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Office of Nutritional Products
Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

January 4, 2005

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Dear Sir or Madam:

This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our Chewable Esterola-C™ Plus® supplements under the PhysioLogics brand name:

Ingredients: Vitamin C (as Ester-C® Calcium Ascorbate), Malic Acid, Buckwheat, Acerola, Citrus Bioflavonoid, Hesperidin Complex, Rutin

- Immune System and Cardiovascular Support
- This exceptional formula contains a patented form of Vitamin C made from Ester-C®, which provides excellent nutritional support for the immune system, healthy joints, cardiovascular health and good vision.
- The unique structure of Ester-C® promotes absorption while helping to delay excretion of Vitamin C, as measured by serum, white blood cell, and urinary ascorbate levels.
- Ester-C® is also gentle to the stomach.

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

Angelica S. Vrablic, Ph.D.
Manager, Nutrition Research

ASV/mb

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