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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

February 22, 2005

MAR 1 2005

Dear Sir or Madam:

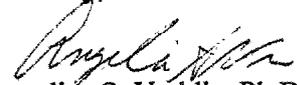
This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our Focus Complex supplements under one or more of the following brand names: American Health, Bioenergy Nutrients, Body Fortress, CVS, Dollar General, Duane Reade, Giant Eagle, Good 'N Natural, Health's Finest, Heartland, HealthSmart Vitamins, HealthWatchers, Kaiser Permanente, Life's Finest, Major, Met-Rx, Natural Wealth, Naturalist, Nature's Bounty, Nutrition Headquarters, Nutrition Warehouse, PhysioLogics, Precision Engineered, Puritan's Pride, Radiance, Rexall, Sam's Club, Shoprite, Sundown, Target, US Nutrition, Vibrant Health, Vitamin World, Walgreens, Walmart and WorldWide Sports:

Ingredients: Vitamin C, Vitamin E, Vitamin B-6, Folic Acid, Vitamin B-12, Biotin, Soy Lecithin, Fish Oil (EPA and DHA), Ginkgo Biloba Extract, Alpha Lipoic Acid, Acetyl L-Carnitine, Gotu Kola Extract, Huperzine A, Vinpocetine, Phosphatidyl Serine, DMAE, L-Glutamic Acid, Choline Bitartrate, Inositol, Bilberry 4:1 Extract, Grape Seed Extract, Boron Citrate, Vanadyl Sulfate, Spinach Leaf, and Blueberry Leaf Extract.

- Promotes Mental Focus
- For Occasional Mild Memory Problems
- Focus Complex is a first-rate supplement scientifically designed to support memory and healthy brain function.
- When taken everyday as directed, Focus Complex is ideal for occasional mild memory problems associated with aging.
- Focus Complex also supports healthy circulation to the brain.
- The choice is clear – focus your brain health and memory on Focus Complex.

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

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ASV/mb