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3/29/05

March 21, 2005

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, ADVOCARE provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

ADVOCARE International, L.P.
2727 Realty Road
Carrollton, TX 75006

Product Name: Joint Promotion

Statement(s)

Basis for Statement

Helps lubricate and protect joints

Glucosamine (as HCl)
Gotu kola extract (leaf/stem/flower - Centella asiatica)
MSM (methylsulfonylmethane)

Supports joint health

Manganese (as manganese sulfate)
Glucosamine (as HCl)
Gotu kola extract (leaf/stem/flower - Centella asiatica)
MSM (methylsulfonylmethane)

Supports mobility and flexibility

Glucosamine (as HCl)
Gotu kola extract (leaf/stem/flower - Centella asiatica)
MSM (methylsulfonylmethane)
White willow extract (bark - Salix alba)

Aids in relieving occasional pain after exercise

Glucosamine (as HCl)
Gotu kola extract (leaf/stem/flower - Centella asiatica)
MSM (methylsulfonylmethane)
White willow extract (bark - Salix alba)

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that ADVOCARE International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
ADVOCARE International, L.P.

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2727 Realty Road, Carrollton, TX 75006