



PHARMAVITE

July 11, 2005

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C St. SW  
Washington, DC 20204

Pharmavite Reference: 644134 AA

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- (1) Name and address of manufacturer:  
Pharmavite LLC, PO Box 9606, Mission Hills, CA 91346
- (2) Text of the statement(s):  
For immune system strength

Taking TriMune is one positive thing that you can do to help maintain your immune system. This cold weather formula is a potent combination of Andrographis paniculata, Echinacea and Nature Made Vitamin C and Zinc. Each of these proven ingredients has long been shown to help boost immune system strength. As a single formula in TriMune, these ingredients work together to support, stimulate and defend the immune system.

Andrographis has long been used in traditional Indian and Chinese herbal medicine to support immune system strength. Andrographis is superior to placebo in promoting upper respiratory health.

TriMune's special combination of multi-nutrients helps you stay healthy by providing your body with the nutrition it needs and helps to activate your immune system.

TriMune helps you stay healthy during the cold weather season by strengthening your immune system.

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Re: 644134 AA  
July 6, 2005  
Page 2

TriMune will help boost your body's natural defenses, by its potent combination of nutrients and herbs, which includes Andrographis.

- (3) Name of the dietary ingredient(s):  
Vitamin C  
Zinc  
Echinacea  
Andrographis
- (4) Name of the dietary supplement(s):  
TriMune or products containing the above ingredients as a single ingredient or in combination with other ingredients.

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, Kirkland Signature, Nature Made, Nature's Resource, Nutri Plus, Olay, Spring Valley, Target, TruNature, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

  
\_\_\_\_\_  
David Kropp  
Director, Regulatory Affairs

cc. P. Bolar