

1824 South Robertson Blvd.
Los Angeles, CA 90035-4317
310/204-6936 • 800/726-0886
www.Jarrow.com

FAX NUMBERS

Orders 800/890-8955

General 310/204-2520

Administrative 310/204-5132

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August 11, 2005

Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-810)
5100 Paint Branch Parkway
College Park, Maryland 20740
Reference phone #301-436-2373

AUG 24 2005

Dear CFSAN:

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

(1) **Name of Address of distributor:**

Jarrow Formulas, 1824 South Robertson Blvd., Los Angeles, CA 90035

(2) **Text of the statement(s):**

CarnitALL™ is a full spectrum carnitine combination comprised of L-Carnitine Fumarate, Ester Carnitine™ (GPLC: Glycine Propionyl-L-Carnitine), ALCA™ (Acetyl-L-Carnitine Arginate) and Acetyl-L-Carnitine Taurinate, to impact various body tissues with the benefits of carnitine.

Ester Carnitine™ is a muscle-specific carnitine that enhances endothelial function and promotes maximum muscular energetics.

ALCA and Acetyl-L-Carnitine Taurinate are novel molecular combination of the amino acids Acetyl-L-Carnitine with L-Arginine and Taurine, respectively. Acetyl-L-Carnitine is found in high concentrations in human brain, nerve, heart, liver and sperm cells, where it participates in metabolizing fatty acids into energy by the mitochondria.

(3) **Name of the dietary ingredient(s) if not provided in the text of the statement:**

- L-Carnitine Fumarate (L-Carnitine: 350 mg; Fumaric Acid: 250 mg)
- Acetyl-L-Carnitine Arginate dihydrochloride (Acetyl-L-Carnitine: 90 mg; Arginine: 80 mg)
- Ester Carnitine™ (Propionyl-L-Carnitine: 132 mg; Glycine: 46 mg; Chloride: 22 mg)
- Acetyl-L-Carnitine Taurinate hydrochloride (Acetyl-L-Carnitine: 111 mg; Taurine: 69 mg; Hydrochloride: 20 mg)

(4) **Name of the dietary supplement(s)**

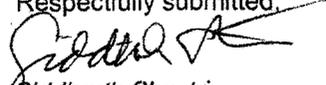
CarnitALL™ 90 capsules

(5) **The following disclaimer appears on the label in bold:**

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

These claims are limited to, and a result of, what we believe to be a substantial body of scientific evidence supporting the functional role of these nutrients.

Respectfully submitted,


Siddharth Shastri
Vice President, Product Development

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