



PHARMAVITE

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October 18, 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

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):

May have significant beneficial effects on glucose level maintenance.

Chromium is for normal metabolism of carbohydrates, protein and fat by assisting insulin, a key hormone.

Helps regulate glucose metabolism.

Chromium is a trace mineral that is an important component to the glucose tolerance factor that works with insulin to bring blood sugar into the cells of the body. Therefore, chromium helps the body use carbohydrates, protein and fat.

Helps insulin function properly and regulates the absorption of glucose into cells.

(3) Name of the dietary ingredient(s):
Chromium (Chromium Picolinate)

975 0162

LET

16939

05-7724



® PHARMAVITE

- (4) Name of the dietary supplement(s):
High Energy Pack 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