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November 08, 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

NOV 15 2005

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:** V16 Effervescent

**Statement(s)**

**Basis for Statement**

Helps the body adapt to stress

Golden Root extract (root - *Rhodiola rosea*)  
Leuzea extract (root - *Rhaponticum carthamoides*)  
Schisandra extract (fruit - *Schisandra chinensis*)

Supports increased availability of oxygen to cellular processes

Golden Root extract (root - *Rhodiola rosea*)  
Niacin (as niacinamide)  
Vitamin B-6 (as pyridoxine HCl)  
Folic acid  
Vitamin B-12 (as cyanocobalamin)

Supports sustained energy levels

Golden Root extract (root - *Rhodiola rosea*)  
Leuzea extract (root - *Rhaponticum carthamoides*)  
Schisandra extract (fruit - *Schisandra chinensis*)  
Niacin (as niacinamide)  
Vitamin B-6 (as pyridoxine HCl)  
Folic acid  
Vitamin B-12 (as cyanocobalamin)

Provides antioxidant activity

Vitamin A (as beta-carotene)  
Vitamin C (as ascorbic acid)  
Vitamin E (as acetate)  
Golden Root extract (root - *Rhodiola rosea*)  
Schisandra extract (fruit - *Schisandra chinensis*)

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Supports metabolic processes

Vitamin A (as beta-carotene)  
Vitamin C (as ascorbic acid)  
Vitamin D (as cholecalciferol)  
Vitamin E (as acetate)  
Vitamin K (as phylloquinone)  
Thiamine (as hydrochloride)  
Riboflavin  
Niacin (as niacinamide)  
Vitamin B-6 (as pyridoxine HCl)  
Folic acid  
Vitamin B-12 (as cyanocobalamin)  
Biotin  
Pantothenic acid (as calcium pantothenate)  
Calcium (as bicarbonate)  
Potassium (as bicarbonate)  
Sodium (as bicarbonate)

**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,

A handwritten signature in cursive script that reads "Sidney Stohs". The signature is written in black ink and is positioned above the typed name and title.

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