

August 15, 2001

Jeff and Sabrina Nelson
[address appears in actual letter]

Erik Marcus
[address appears in actual letter]

Mr. John M. Taylor, Director OE, HFC-200
Office of Enforcement, (OE)
1350 Piccard Dr., 4th Floor
Rockville, Md. 20850

Dear Mr. Taylor:

We wish to bring to your attention a situation involving a company called Twinlab Laboratories, Inc, in Ronkonkoma, New York, and their apparent violation of FDA labeling requirements.

It is our understanding that the FDA requires supplement makers to list all ingredients contained in their products. In the case of Twinlab B12 Dots, the company incompletely lists the ingredients of their product, claiming that the ingredients are solely "Vitamin B12 and 100% natural cherry flavor." Enclosed is a photograph showing the Twinlab B12 label.

In response to queries to the company, Twinlab stated that in fact "our B-12 Dots contain gelatin from beef and pork." (Attached please see copies of correspondence with Twinlab.)

Derived from animal bones, skins, and hooves, gelatin is highly objectionable to vegans and vegetarians, who go out of their way to avoid it. As long-term vegans, we have a need to supplement our diets with B12. From reading the Twinlab label, we were falsely led to believe that this is a vegan product. Twinlab goes out of their way to enumerate a list of animal products not contained in the product, creating the strong impression that they are sensitive to the needs of vegetarians, and their products are "appropriate" to the significant portion of the B12 market -- those who avoid animal products. For that reason, and because many apparently confused or misled store employees have told vegetarians customers Twinlab B12 is vegan, we have been using them for an extended period of time -- until learning of the gelatin content in the past week.

Through our ownership of the VegSource.com and Vegan.com websites, over the past few days we have come into contact with scores of vegans and vegetarians who have also been purchasing and consuming this product, due to their impression from the

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misleading label that the product did not contain animal products. Like us, they are very upset about this.

We respectfully request your office to take the following two steps, in accordance with FDA policy on inadequately labeled products. First, we ask that a recall be ordered of all Twinlab B12 Dots, so that the product can be destroyed or re-labeled. Second, we ask that the FDA require Twinlab to accurately label this product for all future shipments.

We also hope that the FDA will review the labeling of all other Twinlab products for similar violations, and take appropriate action if necessary.

We hope you will get back to us at your earliest convenience to inform us of what actions you intend to take. Thank you very much for your time and attention.

Sincerely,

Jeff Nelson

Sabrina Nelson

Erik Marcus