



HIGHLAND
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January 12, 2004

Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
FDA
200 C Street, SW
Washington, DC 20204

FEB 2

RE: Notification for Statement on Dietary Supplement

Dear Sir/Madam:

In compliance with the Dietary Supplement Health and Education Act of 1994, **Highland Laboratories, 110 S Garfield, PO Box 199, Mt. Angel, Oregon 97362**, hereby makes its official notification under Section 101.93 that it has included a statement listed in Section 403(r)(6) of the Federal Food, Drug, Cosmetic Act on its label. Accordingly, enclosed please find two (2) copies of this Notification.

Company	Product Name	Dietary Ingredients	Statements
Highland Laboratories	Glucose Response™	Vit. B-6 70 mg. Folic Acid 400 mcg. Vit. B-12 50 mcg. Magnesium 100 mg. Chromium 400 mcg. Fenugreek Seed 200 mg. Bitter Melon 175 mg. DMG 100 mg. Green Tea Ext 100 mg. L-Cystine 50 mg. Banaba Ext 20 mg. Vanadyl Sulfate 12 mg. Gamma Glutamylcysteine 2 mg.	Supports normal range blood sugar level. Supports liver and pancreas. Supports cellular health. <i>Please see attachment 1</i>

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I hereby certify that the information presented and contained in this notice is complete and accurate, and my files contain substantiation that the statements made are truthful and misleading.

Sincerely,

A handwritten signature in black ink that reads "Candis L. Scott". The signature is written in a cursive style with a large initial 'C'.

Candis L. Scott
CEO Highland Laboratories

Attachment 1
Highland Laboratories

Glucose Response™

Glucose is one of the “nectars” of life. But like a lot of good things, too much can be a bad thing.

Glucose comes from the digestion of sugar, whether in raw form or derived from starchy foods. The function of the pancreas is to produce insulin, which then regulates the amount of glucose in the blood and the rate at which glucose is taken in by cells. Optimum health depends on the ability of cells to properly receive and convert glucose into energy.

Glucose Response is designed to help maintain blood sugar and cholesterol levels for those who are within normal limits.

B Vitamins (B6, Folic Acid, B12)

B vitamins are involved in many important body functions and work synergistically, creating red blood cells necessary for life.¹ These vitamins also aid in the synthesis of DNA and overall cellular health.

Minerals (Magnesium, Chromium)

Important in the manufacture of new cells and aiding the secretion and balance of insulin.

Antioxidants (Green Tea Extract, Bilberry Fruit Extract)

L-Cysteine, an amino acid and precursor to glutathione, it is one of the best free radical fighters known.

Fenugreek Seed – traditional source of rich fiber, thought to be important in the amount of cholesterol absorbed² and the maintenance of blood glucose levels already in normal range.

Bitter Melon Juice – this tropical fruit is a traditional medicine used for centuries in Asia, Africa and South America, containing a polypeptide known as p-insulin (the “p” stands for plant).³

Banaba Extract (*Lagerstroemia speciosa*) is another traditional plant used in Southeast Asia and is thought to be a correspondent in a normal uptake process – where cells turn glucose into energy.

DMG (Dimethylglycine) – a derivative of glycine, the simplest of amino acids. Beneficial in maintaining energy levels, as well as being involved in normal blood glucose, cholesterol and triglyceride levels.

Vanadyl Sulfate – an essential nutrient found naturally in black pepper, buckwheat, parsley and shellfish.