

7/14/02
5/26/02

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Marjorie L. Fine
Senior Vice President and
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May 13, 2002

Office of Special Nutritionals (HFS-810)
Center For Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Section 403(r)(6) Notification

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Shaklee Corporation hereby notifies FDA that it has begun using the following statements:

- Glucose Regulation Complex (product name).
- Helps retain normal blood sugar levels.
- Shaklee Glucose Regulation Complex helps to transport glucose into the cells, thus making your system more efficient and effective at glucose metabolism, thereby helping to retain normal blood sugar levels.
- This unique combination of nutrients also contains Alpha Lipoic Acid, a powerful antioxidant.
- Helps regulate normal blood sugar levels.
- Promotes efficient and effective glucose utilization.
- Aids normal glucose transport into cells and normal responsiveness of cells to insulin.
- Helps sustain energy and prevent blood sugar crashes that can lead to carbohydrate cravings.
- Provides powerful antioxidant protection.

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- Glucose Regulation Complex provides a unique blend of specific scientifically supported minerals, a botanical, and antioxidants that can help promote normal blood sugar levels.
- Promotes efficient glucose utilization. Magnesium, chromium, zinc and vanadium support the body's ability to process glucose.
- Aids normal glucose transport into cells and normal responsiveness of cells to insulin. Banaba leaf extract and the minerals magnesium and chromium promote efficient transport of glucose from the blood into cells, promoting normal blood glucose levels.
- The antioxidants alpha lipoic acid, zinc, and taurine help protect the integrity of cells so they can respond normally to insulin.
- Helps sustain energy and prevent blood sugar crashes than can lead to carbohydrate cravings. When taken as part of a healthful, high-fiber diet, chromium and banaba leaf extract can help stave off blood sugar crashes that can lead to feelings of low energy, hunger, carbohydrate craving, and between-meal snacking.
- Provides antioxidant protection and helps to recycle vitamins C and E for additional antioxidant activity. Alpha lipoic acid is a powerful antioxidant in itself, but it also helps recharge the antioxidant protection of vitamins C and E.
- Unique approach to regulating blood sugar levels by making your system more efficient and effective at utilizing blood glucose.
- Unique combination of natural ingredients to help maintain cell responsiveness to insulin.
- Supports efficient insulin function, thereby helping to maintain long-term cardiovascular health and retain normal blood sugar levels.
- A unique approach to blood sugar regulation.

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- The natural way to help the body make efficient use of the insulin it already produces to help transport glucose from your blood into your cells for energy production.

which contain the statutory statement, on the following product:

Glucose Regulation Complex

I certify that the foregoing is complete and accurate, and that Shaklee Corporation has substantiation that the statements are truthful and not misleading.

Very truly yours,



Marjorie L. Fine

/MLF