

1824 South Robertson Blvd.
Los Angeles, CA 90035-4317
310/204-6936 • 800/726-0886
www.Jarrow.com

FAX NUMBERS
Orders 800/890-8955
General 310/204-2520
Administrative 310/204-5132

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RECEIVED
6/12/03

May 28, 2003

Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-810)
5100 Paint Branch Parkway
College Park, Maryland 20740
Reference phone #301-436-2373

Dear CFSAN:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section of 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

(1) Name of Address of distributor:

Jarrow Formulas, 1824 South Robertson Blvd., Los Angeles, CA 90035

(2) Text of the statement(s):

Creatine SURGE contains anticatabolic nutrients such as creatine, glutamine and taurine delivered in a base of 35 grams pure dextrose, which is critical to the replenishment of muscle glycogen. Dextrose stimulates the release of insulin to enhance glycogen production in muscles. The effect of dextrose on insulin is superior to maltodextrin or fructose. Jarrow Formulas' Creatine SURGE is formulated to enhance absorption of nutrients by the muscles, incorporating specific anticatabolic nutrients that aid protein and glycogen synthesis.

- Creatine SURGE contains 6 grams (6,000 mg) of pure Creatine Monohydrate, one of the most potent performance enhancers available.
- Creatine SURGE contains 2 grams (2,000 mg) of free form L-Glutamine, an amino acid that improves glycogen synthesis and intramuscular nitrogen balance and a potent performance enhancer.
- Creatine SURGE contains 25 mg of Alpha Lipoic Acid providing a powerful antioxidant that shuttles carbohydrates into muscle cells, resulting in enhanced glucose metabolism.
- Creatine SURGE contains 1 gram (1,000 mg) of Taurine, an insulin mimetic that allows for better carbohydrate entry into muscles.
- Creatine SURGE contains 500 mg of Vitamin C, a provider of antioxidant protection against exercise-induced free radicals. Vitamin C is essential for connective tissue integrity.

(3) Name of the dietary ingredient(s) if not provided in the text of the statement:

Ingredients: Dextrose (Glucose), Pure Creatine Monohydrate, L-Glutamine, Ribose, Taurine, Ascorbic Acid (Vitamin C), Alpha Lipoic Acid, Xanthan Gum and Natural Flavors, Beet extract (as color).

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(4) Name of the dietary supplement(s)

Creatine Surge with Alpha Lipoic Acid Guava/Mango flavor 908 g • 2 lbs.

(5) The following disclaimer appears on the label in bold:

These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

These claims are limited to, and a result of, what we believe to be a substantial body of scientific evidence supporting the functional role of these nutrients.

Respectfully submitted,



Siddharth Shastri
Vice President, Product Development