



**Shaklee Corporation**

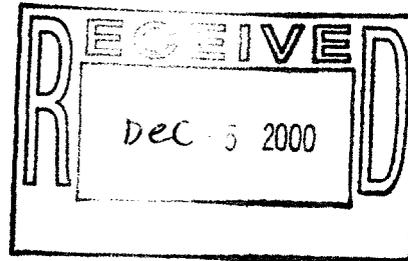
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Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, DC 20204



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 notifies FDA that it has begun using the following statements:

For seasonal immune support

This unique Shaklee combination formula features standardized extracts of Echinacea, Black Elderberry and Larch Tree with immunoactive arabinogalactans to stimulate the body's natural resistance during seasonal changes.

To supercharge the immune system when you start to feel the need

There's got to be a better way to get through each season

Shaklee DR can help you fight back against seasonal challenges by giving your immune system what it needs to stay strong

Complete Echinacea provides natural support for your body's immune system

Recent studies have shown that cichoric acid and alkylamides found in the Echinacea plant have immunoactive properties

Larch Tree enhances Echinacea's benefits with immunoactive arabinogalactans from the heartwood of the Larch Tree. Scientific studies suggest that arabinogalactan – a polysaccharide from plant cell walls – helps support a healthy immune system

Shaklee DR can help your body respond to seasonal challenges by giving your immune system what it needs to stay strong

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Shaklee Corporation

Black Elderberry can help the body maintain a healthy immune response with antioxidant compounds called polyphenols and anthocyanadins

The herbal ingredients in Shaklee DR can help you be prepared for the moment when you first feel the need to bolster your immune system

Defend and resist at the first signs of need

Each of the ingredients in Shaklee DR are believed to promote well-being by supporting and strengthening the immune system

A basis for understanding how Echinacea works comes from laboratory studies showing cichoric acid and alkylamides, compounds found at high concentrations in *Echinacea purpurea*, to have strong immunostimulating activity

There is evidence that compounds found in high concentrations in the heartwood of Larch Tree cells, called arabinogalactans, are even more immunoactive than extracts of Echinacea. Laboratory studies further suggest that Larch arabinogalactans stimulate important markers of immune function. A recent clinical study showed that Larch heartwood extract helped support the immune system's natural ability to achieve a state of immune readiness.

In laboratory tests, Echinacea boosts the production and activity of white blood cells.

Scientific studies show that arabinogalactans, polysaccharides found in Larch cells, boost important indicators of immune system function

which contain the statutory statement, on the following product:

Shaklee DR™ -- Defend and Resist

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,



Christopher Jensen, PhD  
Vice President, Scientific Affairs