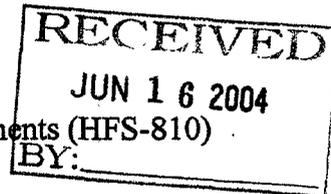




Shaklee Corporation

June 4, 2004



Office of Nutritional Products, Labeling and Dietary Supplements (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:

- Memory Optimizer (product name)
- Brain power supplement for improved memory and learning
- Boost your memory and ability to learn
- Memory Optimizer provides dietary support for improved memory, learning, and overall brain health. Memory Optimizer increases and maintains memory function and improves your ability to learn new information. With regular use Memory Optimizer will help you to stay sharp and be at your best.
- Shaklee's Memory Optimizer Brain Power Supplement can help provide the dietary support to enhance memory and maintain optimal brain function.
- Keep your memory sharp today with Memory Optimizer
- This proprietary formula combines two clinically-proven ingredients that provide dietary support to enhance memory and cognitive function.
- The complementary herbs and naturally-sourced compounds in Memory Optimizer can improve memory function, increase your ability to learn new information and help you to stay sharp.
- Taken every day, Memory Optimizer increases and maintains memory function, improves ability to learn new information, increases blood and oxygen flow to the brain, supports overall brain health

which contain the statutory statement, on the label and labeling for the following product:

Memory Optimizer™ Brain Power Supplement

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Shaklee Corporation

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

Sincerely,

Jack Hegenauer, Ph.D.
Sr. Director, Health Sciences & Innovation

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