

Notification Letter

November 15, 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 Pkwy.  
 College Park, MD 20740

NOV 30 2004

Re: Notification Letter for Atkins Dia-Life Dietary Supplement

To Whom It May Concern:

This letter notifies the Food and Drug Administration that within the past 30 days our company has begun to market Dia-Life Dietary Supplement, with the following structure/function claims included on the label and in labeling for the product:

Claims:

1. Helps maintain blood sugar levels already within the normal range
2. Supports overall circulatory health and immune system function
3. The essential nutrient biotin, helps metabolize carbohydrates, fats and proteins
4. The essential minerals chromium and magnesium help to maintain blood sugar levels already within the normal range.
5. Biotin, a beneficial nutrient, works with your controlled-carb lifestyle for energy metabolism by helping enzymes break down carbohydrates, fats and proteins.
6. Combined with a powerful antioxidant and centuries-old herbal remedies, Dia-Life is a superior product that works to maintain blood sugar levels already in the normal range and provides the added benefits of supporting overall circulatory health and immune system function.

The dietary ingredients of the product that are the subject of the above statements are:

- Statement 1 applies to the ingredients gymnema sylvestre leaf standardized extract, alpha-Lipoic acid and banaba leaf standardized extract.
- Statement 2 applies to the ingredient zinc (as zinc citrate) supporting immune system function.
- Statement 3 and 5 apply to the ingredient biotin.
- Statement 4 applies to the ingredient chromium (as chromium dinicotinate glycinate) and magnesium (as magnesium oxide).
- Statement 6 applies to the antioxidant alpha-lipoic acid to maintain blood sugar levels already in the normal range and herbs, gymnema sylvestre leaf standardized extract and banaba leaf standardized extract (*Lagstroemia speciosa*).

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The brand name of the product is Dia-Life Dietary Supplement.

It is hereby certified that the information in this notification is complete and accurate, and that our company has substantiation that the above statement is truthful and not misleading.

Very truly yours,  
Atkins Nutritionals, Inc.



Paul Bruns, Ph.D.  
Scientific Affairs Manager