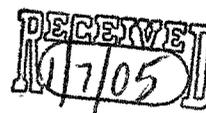


NOTIFICATION PURSUANT TO
SECTION 6 OF DSHEA
AND RULE 21 CFR §101.93



This notification is being filed on behalf of **Market America, Inc.** which is the **distributor** of the product bearing the statements identified in this notification. Its business address is **1302 Pleasant Ridge Road, Greensboro, NC 27409**. This notification is being made pursuant to Section 6 of DSHEA and Rule 21 CFR §101.93. The dietary supplement product on whose label or labeling the statements appear is **Transitions Fat Conversion Inhibitor**.

The text of each structure-function statement for which notification is now being given is:

Statement 1: "Transitions Fat Conversion Inhibitor (FCI) helps reduce the number of calories being converted to fat."—Brochure

Statement 2: "Transitions FCI also contains other natural ingredients that effectively promote weight loss." —Brochure

Statement 3: "Transitions FCI is an excellent base product for weight management which can produce significant weight loss in as little as 8 weeks. In fact, a recent study demonstrated that the combination of ingredients in FCI (in conjunction with a healthy diet and exercise) induced 7.8% reduction in body weight (about 10 ½ lbs) and a 7.9% reduction in BMI over an eight-week period" —Brochure

Statement 4: "Weight Management System"—Brochure

The following summary identifies the dietary ingredients or supplements for which a statement has been made:

Statement Number(s)	Identity of Dietary Ingredient or Supplement That Is the Subject of the Statement
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1.-4.	Transitions Fat Conversion Inhibitor is composed of the following ingredients: chromium, <i>Gymnema sylvestre</i> leaf extract (25% gymnemic acids), <i>Garcinia cambogia</i> (60% hydroxycitric acid), Bioperine black pepper extract; other ingredients include: dicalcium phosphate,
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- microcrystalline cellulose, sodium starch glycolate, stearic acid, magnesium stearate, silica, and pharmaceutical glaze.

The following identifies the brand name of each supplement for which a statement is made:

<u>Statement Number(s)</u>	<u>Brand Name</u>	<u>Label or Labeling</u>
1-3.	Transitions Fat Conversion Inhibitor	Brochure
4.	Transitions Fat Conversion Inhibitor	Bottle label

I, James L. Wilmer, am authorized to certify this Notification on behalf of Market America, Inc. I certify that the information presented and contained in this Notification is complete and accurate, and that Market America, Inc. has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: December 13, 2004

By: James L. Wilmer
 James L. Wilmer, Ph. D.
 Director, Scientific Affairs
 Market America, Inc.