



Apex Fitness Group™  
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Camarillo, CA 93012

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July 29, 2005

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

Dear Sirs:

Notice is hereby given pursuant to Section 403 (r)(6)(21 U.S.C. 343(r)(6)) of the Federal Food Drug and Cosmetic Act that Apex Fitness Group, 100 Camino Ruiz, Camarillo, CA 93012 has marketed a dietary supplement under Apex Fitness Group Fit "Chromemate " bearing the following statement(s) on the label and/or in the labeling:

(Statement 1) Chromium for the body's natural insulin process.

(Statement 2) "Chromium is particularly bio-available when bound to niacin. This formula is a complete niacin bound form of biologically active chromium. Chromium is necessary for the function of insulin in the body.

(Statement 3)" Approximately, 90% of the American adult population has a suboptimal level of chromium.

The undersigned certifies that the information contained in this notice is complete and accurate and that Apex Fitness Group has substantiation that the statement(s) is truthful and not misleading. Pursuant to 101.93 (a)(1), two copies of this notification are enclosed.

Jim Starr  
Director Product Development

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