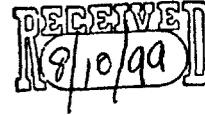


PREMIER DIRECT_{INC.}

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(561) 278-6080 TEL • (561) 278-1139 FAX

July 27, 1999

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



RE: 21 U.S.C. Section 343(r)(6) Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of SUG-Arrest, a dietary supplement. Premier Direct, Inc. is a manufacturer of SUG-Arrest.

Statements Being Made in the Labeling of SUG-Arrest

- (1) For Blood Sugar Balance
- (2) Vanadium helps to promote normal blood glucose levels and activates the synthesis of enzymes for carbohydrate metabolism.
- (3) Chromium Polynicotinate offers support to move glucose across cell membranes ... keep insulin levels down ... keep sugar from being stored as fat ... and promote sugar's use for energy.
- (4) L-Taurine / L-Lysine - These amino acids are important essentials for building protein and preventing sugar from being stored as fat.
- (5) Alpha-Lipoic Acid helps to aid in the proper functioning of two key enzymes that convert food to energy in your body.
- (6) help support healthy blood sugar balance!
- (7) the unique all-natural formula whose ingredients have been shown to be beneficial for helping to promote normal blood sugar balance

To the best of my knowledge, and based upon information and belief present at the time of executing this notice, I certify that this information is accurate and complete and Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

A handwritten signature in black ink, appearing to read "John L. ...", written over a horizontal line.

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