



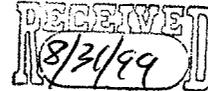
Shaklee Corporation

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August 24, 1999



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

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 notifies FDA that it has begun using the following statements:

- Protective phytonutrients **from** fruits and vegetables.
- CarotoMax contains five key carotenoids and three other phytonutrients that are associated with long-term health of the eyes, prostate, lungs, and heart. Research also suggests that carotenoids work together to support a strong immune system.
- CarotoMax delivers five key carotenoids--lutein, zeaxanthin, lycopene, alpha carotene, beta carotene--pigments found in fruits and vegetables that have potent antioxidant properties.
- CarotoMax combines a variety of the phytonutrients and antioxidants believed to be responsible for some of the health benefits of fruits and vegetables.
- Among the most potent of these phytonutrients are colorful plant pigments, known as carotenoids and flavonoids, that can help protect human cells from free radical damage. New science suggests that each of these pigments helps maintain the health of different parts of the body, including the eyes, heart, lungs, prostate, and cervix.
- Recent studies suggest that lycopene, the red pigment found in tomatoes and watermelons, provides antioxidant protection to the prostate, cervix and heart.
- Research suggests that these two carotenoids [lutein and zeaxanthin] neutralize **free** radicals in the **macula**, a part of the eye that's essential for central vision.

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Shaklee Corporation

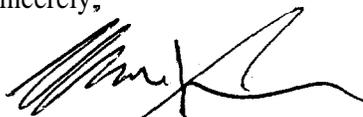
- Carrots, sweet potatoes, broccoli, and pumpkins contain the orange pigments, beta carotene and alpha carotene. Research suggests that these compounds work together with other carotenoids to help maintain proper function of the immune system.
- Recent findings suggest that quercetin has powerful antioxidant properties which help promote lung health.
- Grapeseed extract increases the total antioxidant capacity of the blood and is thought to play a role in promoting cardiovascular health.
- CarotoMax also contains broccoli sprouts extract with naturally occurring sulforaphane, a key compound that has shown to be highly effective at mobilizing detoxification enzymes in the liver.
- One CarotoMax capsule per day is recommended for promoting long-term health of the eyes, prostate, cervix, heart, lung and overall wellness.
- CarotoMax represents a significant evolution in the field of antioxidant nutrition. It is a premium blend of five carotenoids and two flavonoids, all of which have exceptional antioxidant properties.. .

which contain the statutory statement, on labels and in labeling the following product:

CarotoMax™ Dietary Supplement

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

Sincerely,



Christopher Jensen, Ph.D.
Director, Health Sciences