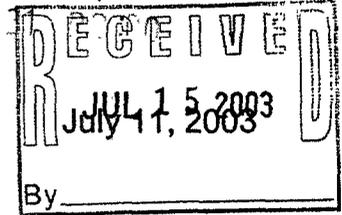


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Dr. Robert Moore  
Division of Compliance and Enforcement/ONPLDS  
Center for Food and Safety and Applied Nutrition  
U.S. Food and Drug Administration  
HFS – 810  
5100 Paint Branch Parkway  
College Park, MD 20740

Dear Dr. Moore:

Inverness Medical Nutritionals Group hereby notifies the Food and Drug Administration, that it has started marketing the dietary supplement *Starch Catcher™* (or *Carb Catcher™*). This supplement, which consists of the following active ingredients: Chromium 50 mcg, and Phase2™ Kidney Bean Extract (Phaseolus vulgaris) 500 mg bears the following structure/function statements on the label(s).

Display Panel (Bottle Label)

Clinically Studied – Reduces Starch Absorption  
Supports Your Low-Carb Diet \*

Side Panel (Bottle Label)

*Starch Catcher™* (or *Carb Catcher™*) is a natural weight loss aid developed from the latest clinical diet research on carbohydrate blocking activity. Featuring Phase2™, a natural bean extract ingredient, the *Starch Catcher™* (or *Carb Catcher™*) formula may help prevent fat from forming by inhibiting the metabolism of dietary carbohydrates. *Starch Catcher™* (or *Carb Catcher™*) is an ideal supplement for those on low-fat or low-carbohydrate diets. \*

\* These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

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Tray Label

Clinically Studied – Reduces Starch Absorption  
Supports Your Low-Carb Diet \*

\*This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

We certify that the information contained in this notice is complete and accurate, and we have substantiation that the above structure/function statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink that reads "William J. Neumann". The signature is written in a cursive style with a large, sweeping initial "W".

William J. Neumann  
Vice President  
Quality and Regulatory Affairs