

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

JAN 27 2005

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 CLA (Conjugated Linoleic Acid)**.

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

Statement 1: "Transitions CLA (conjugated linoleic acid) is ideal for those who are physically active, in need of moderate weight loss, and are interested in reduction of body fat while maintaining lean muscle mass."—Brochure

Statement 2: "Transitions CLA contains natural ingredients that can reduce fat cells in your body while reducing overall fat mass in existing cells and muscle tissue." —Brochure

Statement 3: "Transitions CLA also contains guarana, which provides a natural slow-release form of caffeine that gently promotes an increase in metabolism." —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 CLA is composed of the following ingredients: chromium (from Chromax® chromium picolinate), Tonalin® CLA (100% pure safflower oil), caffeine (from Guarana seed extract); other ingredients include: gelatin, glycerin, soybean oil, soy lecithin, beeswax, carmine color, and natural lemon flavor.

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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: January 6, 2005

By: James L. Wilmer

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