



November 17, 2005

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Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

NOV 29 2005

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r(6) and in accordance with the authorized provisions of 21CFR 101.93, AdvoCare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road
Carrollton, TX 75006

Product Name: Macro Mineral Complex

Statement(s)

Basis for Statement

Provides a complete and balanced blend of nutrients for the bones and the body.

Vitamin C (as magnesium ascorbate)
Vitamin D (as cholecalciferol)
Vitamin K (as phytonadione)
Vitamin B-6 (as pyridoxine HCl)
Calcium (as citrate and hydroxyapatite)
Magnesium (as oxide, amino acid chelate and ascorbate)
Zinc (as monomethionine)
Copper (as amino acid chelate)
Manganese (as amino acid chelate)
Potassium (as bicarbonate)
Silicon (as amino acid chelate)
Boron (as amino acid chelate)
Shave grass extract (aerial - *Equisetum arvense*)
Green tea extract (leaf - *Camellia sinensis*)
Ginger extract (root - *Zingiber officinale*)

Supports bone health and supplies the body's needs for minerals.

Zinc (as monomethionine) Copper (as amino acid chelate)
Potassium (as bicarbonate) Silicon (as amino acid chelate)
Manganese (as amino acid chelate) Boron (as amino acid chelate)
Magnesium (as oxide, amino acid chelate and ascorbate)
Calcium (as citrate and hydroxyapatite)

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Helps build strong bones, muscles, cartilage and connective tissue.

Vitamin C (as magnesium ascorbate)
Vitamin D (as cholecalciferol)
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Vitamin B-6 (as pyridoxine HCl)
Calcium (as citrate and hydroxyapatite)
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Shave grass extract (aerial - *Equisetum arvense*)
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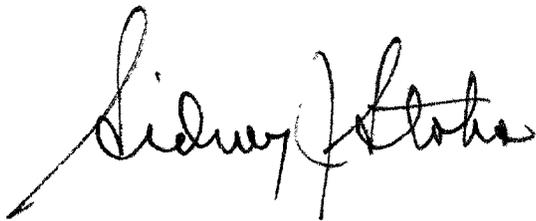
Provides antioxidant activity

Zinc (as monomethionine)
Shave grass extract (aerial - *Equisetum arvense*)
Green tea extract (leaf - *Camellia sinensis*)
Ginger extract (root - *Zingiber officinale*)
Vitamin C (as magnesium ascorbate)
Copper (as amino acid chelate)

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that AdvoCare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,



Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.