

March 26, 2001

John Foret Director, Office of Special Nutritionals 200 C, Street SW Washington DC, 20204

Dear Mr. Foret,

Thank you for your second letter advising us against using the phrase "maintains healthy blood glucose levels" (letter enclosed) in the side panel copy. We would like to re-submit the product with the following changes:

We are offering for sale the following product Pure Gel GlucosolTM, with the following Stucture Function claims: Supports Glucose Metabolism and Assists in Weight Management. The supporting side panel story is: GlucosolTM is a unique soft gel formulation containing the herb Lagestroemia Speciosa L. Clinical data shows GlucosolTM supports glucose metabolism and assists in weight management.

We have deleted the reference to "balancing and maintaining" blood sugar levels.

The FDA disclaimer will also appear on the label.

Sincerely,

Kate /

Katie Ferren Marketing Director SGTI

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