

Manufacturers of Fresh Botanical Extracts IECE

ECEIVE Jul 29 2002

Division of Compliance and Enforcement/ONPLDS Center for Food Safety and Applied Nutrition Food and Drug Administration HFS-810 5100 Paint Branch Parkway College Park, Maryland 20740

July 19, 2002

Dear Sir:

This letter is to provide notification, within the prescribed 30 days of marketing, of three new products and three existing products with name changes that contain structure function claims. These products are Liquid Phyto-Caps that are herbal dietary supplements.

The name and structure function claims are as follows:

New products:

Name: Astragalus Supreme

Structure Function: Ultimate Support for Healthy Immune Function

Name: Black Elderberry

Structure Function: Ultimate Support for Healthy Immune Function

Name: Maitake Gold

Structure Function: Helps Support Cellular Defenses

Name Changes:

Name: Cell Wise to Cell Well

Structure Function: For Optimum Intra-Cellular Communication

Name: Daily Detox to Cleanse Maintenance

Structure Function: For Ultimate Support of Internal Cleansing

Name: Siberian Ginseng to Eleuthero Root

Structure Function: Ultimate Support to Enhance Energy and Stamina

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We have selected these names and structure function claims to not make or imply disease claims and meet the requirements of 21 U.S.C. 343(r)(6). Please call at 828-883-5938 if you need addition information or if you have any questions.

Sincerely,

James A. Grant

Regulatory Compliance Officer

Cc: Ric, Etson, Kate, Kent