

W H O L E W O R L D B O T A N I C A L S[®]

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VIA UPS NEXT DAY AIR

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

July 9, 2004

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Re: Fulfillment of Reporting Obligation Under 21 U.S.C. § 343 (r) and 21 C.F.R. § 101.93

Dear Dr. Moore:

Whole World Botanicals, Inc.,¹ by counsel and in accordance with 21 U.S.C. § 343(r) and 21 C.F.R. § 101.93, hereby submits an original and two copies of its notification within thirty days of first marketing its products with the statements presented below. Whole World Botanicals retains scientific documentation supporting the statements.

1. Supplement Brand Name

Royal Desmodium

Ingredients

Desmodium adscendens (whole leaf and stem extract), gelatin, purified water.

Text of Statements of Nutritional Support

Promotes liver and respiratory health.

Scientific research documents the positive effects of Desmodium adscendens on respiratory function.

Research has demonstrated that the alkaloids in Desmodium adscendens relaxes the bronchial tubes. Desmodium adscendens promotes free and easy breathing.

Recent scientific research suggests that Desmodium adscendens helps maintain healthy liver enzyme levels.

Called "Strong Back Herb" in Central America, it is famous for its effectiveness in relieving back, neck and knee pain due to exercise and its relaxation of muscles and spasm.

A powerful and safe lung and liver support.

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In accordance with 21 U.S.C. § 343(r)(6) and 21 C.F.R. § 101.93 (c), each of the above statements will be followed by an asterisk that will be cross-referenced to another asterisk on the very same panel or page next to which the following statement will appear in a box in bold face type: **“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.”**

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Viana Muller".

Viana Muller, PhD.
President