

# GRONEK & ARMSTRONG

ATTORNEYS AT LAW

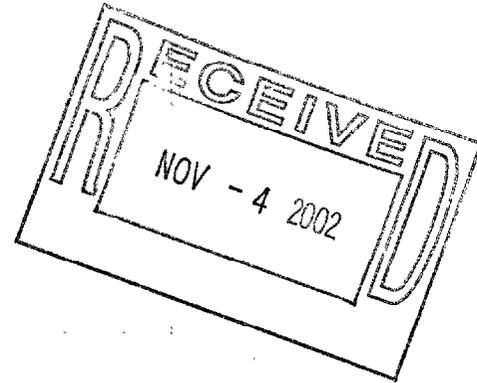
98TH FLOOR - SEARS TOWER  
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November 1, 2002

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



Re: Notification for Statement on Dietary Supplement Labels

Dear Sir/Madam:

This firm represents Innovative Botanical Solutions, Inc., Provo, Utah, a distributor of dietary supplement products. Innovative Botanical Solutions has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement product labels.

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 21 CFR §101.93(a), your Agency is hereby notified that Innovative Botanical Solutions has made statements of "nutritional support", as described in 21 U.S.C. §343(r)(6)(A), for its dietary supplements as follows:

<u>Product Name</u>	<u>Label Statement(s)</u>
Calcium Magnesium & Vitamin D, 180 Capsules	Bone building formula, essential nutrition. In scientific studies calcium with magnesium and Vitamin C has been shown to help support the structural system.
Calcium Magnesium & Vitamin D, 90 Capsules	Bone building formula, essential nutrition. In scientific studies calcium with magnesium and Vitamin C has been shown to help support the structural system.

97S 0162

LET 11211

St. John's Wort, 60 Capsules

Supports essential nutrition. In scientific studies Vitamin C has been shown to help support the body's vital systems.

Vitamin C with Citrus Bioflavonoids, 90 Tablets

Nervous system support. In scientific studies St. John's Wort has been shown to help support the nervous system. Also helps support a person's emotional state and manage the stresses of everyday life.

Vitamin E, 90 Softgels

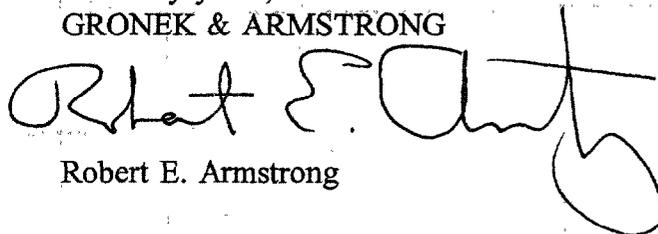
Essential nutrition. Supports heart and vascular health. Powerful antioxidant. Vitamin E is obtained from natural vegetable sources and is the most biologically active form of Vitamin E available.

Vitamin E, 60 Softgels

Essential nutrition. Supports heart and vascular health. Powerful antioxidant. Vitamin E is obtained from natural vegetable sources and is the most biologically active form of Vitamin E available.

The undersigned hereby certifies on behalf of Innovative Botanical Solutions, Inc. that the information contained in this correspondence is complete and accurate.

Sincerely yours,  
GRONEK & ARMSTRONG



Robert E. Armstrong

PJW:REA:  
pr

CC: Innovative Botanical Solutions, Inc.