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Manufacturer of Premium Botanical Extracts and Liquid Phyto-Caps™

OCT 18 2004

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

September 16, 2004

Dear Sir:

This letter is to provide notification, within the prescribed 30 days of marketing, of 7 new product names. These products are herbal dietary supplements in either liquid or liquid phyto-cap form. The following is a list of the names and structure function claims.

Joint Health: Supports Healthy Joint Function and Promotes COX2 Inhibition

Holy Basil: Maintains Healthy Cortisol Levels and Promotes Feeling of Emotional Well Being

Para-Stop: Supports Healthy Intestinal Environment

Tumeric Root: Promotes COX2 Inhibition

Ginger Root: Promotes Healthy Digestive Function and Promotes COX2 Inhibition

The following two products have been submitted before but the structure function claims have been modified.

Adrenal Health: Supports Healthy Adrenal Function and Maintains Healthy Cortisol Levels

Glycemic Health Supports Healthy Blood Sugar Metabolism

We have selected the names and structure function claims to not make or imply a disease claim and meet the requirements of 21 U.S.C. 343(r)(6)

Please call at 828-883-5938 if you need additional information or if you have any questions.

Sincerely,

James A. Grant
Regulatory Compliance Officer

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