

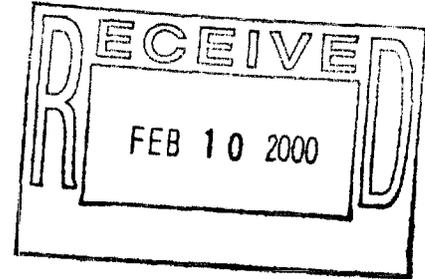


E a r t h r i s e F a r m s

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Date: January 25, 2000

Dr. Elizabeth Yetley, Ph.D.
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW.
Washington, DC 20204



Dear Dr. Yetley,

We started distributing Wellness Care™, a dietary supplements with structure/function claims, on Tuesday January 18, 2000. We are hereby sending you a copy of the label.

Product Name Wellness Care™ Capsules, size 120

Ingredients : Earthrise® Spirulina, Natural Beta Carotene, Zinc Citrate, Vitamin C, Garlic Bulb Extract (Allicin 10,000 ppm), Echinacea Purpurea Root Extract (4%), Bitter Orange Bioflavonoids, Vitamin A Palmitate, Natural Vitamin E Succinate, Gelatin, Cellulose, Silica (Silicon Dioxide), and Magnesium Stearate.

Structure Function Claims:

- Wellness Care™ provides timely nutritional and herbal support to boost your immune system defense*
- Promotes a healthy immune system*
- Earthrise® Spirulina supports a healthy immune system*
- Echinacea Extract is a traditional herb known for its ability to support the immune functions*
- Garlic has been used for centuries to enhance wellness*
- Vitamin A, C & E with natural Beta Carotene are vitamins plus complete antioxidants that boost the immune system.*
- Bitter Orange Bioflavonoids provide wellness boosting phytonutrients*
- Zinc is essential for cellular health*.

***THESE STATEMENTS HAVE NOT BEEN EVALUATED BY THE FDA. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE, OR PREVENT ANY DISEASE.**

Please note: Not all of the above structure/function claims appear on the label. Please inform us if other information or materials are needed. Thank you.

Sincerely,

Robert A. Martin
 Robert A. Martin
 President

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Suggested Use: Take 3 capsules, once or twice a day with food. For maximum effectiveness, after taking for eight weeks, a two week break is recommended before restarting use.

- * Earthrise® Spirulina supports immune system health.*
- * Echinacea Extract is a traditional herb known for its ability to support the immune functions.*
- * Garlic has been used for centuries to enhance wellness.*
- * Vitamin A, C & E with natural Beta Carotene are vitamins plus complete antioxidants that boost the immune system.*
- * Bitter Orange Bioflavonoids provides wellness boosting phytonutrients.*
- * Zinc is essential for cellular health.*

WARNING: KEEP OUT OF REACH OF CHILDREN. If you are pregnant or nursing, or taking a prescription drug, consult your health care professional. Do not use if you are allergic to any of the ingredients.

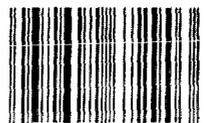
EARTHRISE®

Wellness Care™

Dietary Supplement*



Echinacea, Garlic, Vitamin C & Zinc



0 32602 67290 3

Supplement Facts

Serving Size 3 capsules

Amount Per Serving	% Daily Value*
Vitamin A 5,000 IU	100%
50% natural Beta Carotene / 50% Vitamin A Palmitate	
Vitamin C (Ascorbic Acid) 450 mg	750%
Vitamin E (d-alpha-tocopherol succinate) 30 IU	100%
Zinc (citrate) 6 mg	40%

Proprietary Blend 792 mg †

Earthrise® Spirulina, Echinacea Purpurea Root Extract (4% Extract), Garlic Bulb Extract (Allicin 10,000 ppm), Bitter Orange Bioflavonoids.