

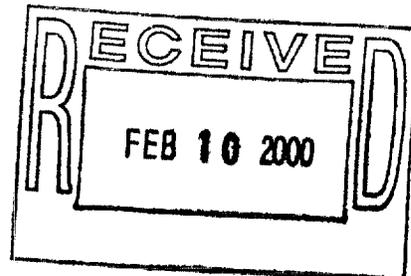


Earthrise Farms

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

Product Name: Joint Assist™ Capsules, size 120

Ingredients : Earthrise® Spirulina, Beta Carotene, Omega-3 DHA/EPA fatty acid, Vitamin C (Ascorbic Acid), Vitamin E Succinate (d-alpha-tocopherol succinate), Boswellia Extract (Boswellin®), Grape Seed Extract (95% OPC), Glucosamine Sulfate (KCl salt), Vitamin A Palmitate, Gelatin, Cellulose, Silica (Silicon Dioxide), and Magnesium Stearate.

Structure Function Claims:

- Joint Assist™ helps maintain joint mobility for an active lifestyle*
- Supports healthy joints*
- Earthrise® Spirulina supports a healthy immune system*
- Glucosamine promotes healthy joints & connective tissue*
- Boswellin® is a traditional Ayurvedic herb*
- Boswellia is a traditional Ayurvedic herb that supports healthy joints*
- Natural Beta Carotene, Grape Seed Extract, and Vitamins A, C & E provide complete antioxidants*
- Vitamin C helps build healthy cartilage*
- Vitamin C helps build strong cartilage*
- Omega-3 promotes healthy cells*

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

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

Suggested Use: For best results take 1/2 hour before or with meals. Adults take daily amount indicated below according to body weight. Capsules can be taken in divided doses.

under 120 lbs. 4 capsules **120 lbs. – 200 lbs.** 6 capsules **over 200 lbs.** 8 capsules

Results are expected within 8 weeks whereby the dosage may be lowered to a level that maintains the desired results. For children, please consult with your healthcare professional.

- Earthrise® Spirulina supports a healthy immune system.*
- Glucosamine promotes healthy joints & connective tissue.*
- Boswellin® is a traditional Ayurvedic herb.*
- Natural Beta Carotene, Grape Seed Extract, Vitamins A, C & E provide complete antioxidants.*
- Vitamin C helps build healthy cartilage.*
- Omega-3 promotes healthy heart.*

EARTHRISE

Joint AssistTM

Dietary Supplement*



Glucosamine & Boswellin®

Supplement Facts

Serving Size 4 capsules

Amount Per Serving	% Daily Value*
Vitamin A 5,000 IU	100%
50% natural Beta Carotene/50% Vitamin A palmitate	
Vitamin C (Ascorbic Acid) 60 mg	100%
Vitamin E (d-alpha tocopherol succinate) 30 IU	100%
Proprietary Blend 762 mg	
Earthrise® Spirulina, Boswellin® (Boswellia serrata Extract), Omega-3 DHA/EPA fatty acid, Grape Seed Extract (95% OPC), Glucosamine Sulfate (Potassium Salt) 1000mg	

*Percent Daily Values are based on a diet of other people's secrets.

