

**PROVENANCE™**  
Your path to health and well-being

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10/29/99

Dr. Robert Moore  
Office of Special Nutritionals (HFS-450)  
Center for Food and Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street SW  
Washington, DC 20204

RECEIVED

VIA U.S. POSTAL MAIL

RE: STATEMENTS OF NUTRITIONAL SUPPORT

Dear Dr. Moore:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, *Herbalogix, Inc. 987 North Enterprise Street, Orange, CA 92867*, wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing a line of dietary supplements, which bears statements of nutritional support.

The following list notes the structure function claims for each dietary supplement product. These statements are accompanied by the required disclaimer that is prominently displayed in bold-faced type.

These statements of nutritional support are based on a large body of data, which, in our judgment renders these statements, truthful and non-misleading.

Sincerely,

*Donald Lewis*

Donald Lewis  
975 - 0162

DL:ln

LET 4558

Enclosures  
987 N. Enterprise Street  
Orange California 92867-5472  
phone 714 765 8355  
fax 714 769 1181

# PROVENANCE™

CLAIM	Product Name
Balanced Vitamin B also contains an exclusive balancing blend of calming adaptogens known to support the body's stress response system.*	Basics Balanced Vitamin B
Provenance Basics™ Balanced Vitamin B is a unique formulation of B vitamins that supports many metabolic processes, including energy production, nerve function and enzyme synthesis.*	Basics Balanced Vitamin B
Bioflavonoids function as antioxidants and help maintain the strength and integrity of blood vessels.*	Basics Balanced Vitamin C
Vitamin C is essential for collagen production and is well known for its antioxidant and immune function roles.*	Basics Balanced Vitamin C
Vitamin D assists in the absorption and metabolism of calcium and phosphorus, essential minerals for strong bones and teeth.*	Basics Balanced Vitamin D
Balanced Vitamin E Nature's "cell protector"	Basics Balanced Vitamin E
Vitamin E is especially known for its role in supporting cardiovascular system function.*	Basics Balanced Vitamin E
Vitamin E is nature's premier fat-soluble antioxidant cell protector and is involved in the proper functioning of all major organ systems in the body.*	Basics Balanced Vitamin E
Enhanced Ginkgo Biloba™ for supporting memory function and circulation*	Basics Enhanced Ginkgo Biloba™
Enhanced Ginkgo Biloba™ offers you a standardized extract of Ginkgo Biloba leaf with other supportive herbs, including Gotu Kola, Ginger, and Bilberry to improve circulation to the brain as well as to the extremities.*	Basics Enhanced Ginkgo Biloba™
Ginger is well known throughout the world as a stimulant to the circulatory system.*	Basics Enhanced Ginkgo Biloba™
Gotu Kola enhances well being, and Bilberry fruit extract provides microcirculation support.*	Basics Enhanced Ginkgo Biloba™
It has been shown to provide specific antioxidant support for the brain, retina and cardiovascular system.*	Basics Enhanced Ginkgo Biloba™
It is renowned for enhancing mental activity and alertness.*	Basics Enhanced Ginkgo Biloba™
Evening Primrose oil and Borage oil are a rich source of Gamma Linolenic Acid (GLA). These essential fatty acids are needed to form prostaglandins that maintain and regulate vital body functions.*	Basics Essential Oils
Omega-3 fatty acids support healthy triglyceride and cholesterol levels.*	Basics Essential Oils
Additionally, it supports healthy glucose (sugar) metabolism and may help to maintain cardiovascular health.*	Basics Five Source Chromium™
Chromium is an important component of Glucose Tolerance Factor (GTF), and assists insulin in the regulation of protein, carbohydrate and fat metabolism.*	Basics Five Source Chromium™
Parsley herb, Olive leaf and Citrus Bioflavonoids enhance the antioxidant and immune support.*	Basics Protective Garlic™
Scientific research shows that Garlic helps to maintain healthy blood lipid levels, thereby supporting a healthy cardiovascular system.*	Basics Protective Garlic™
Traditionally, Garlic has been used to enhance general immunity.*	Basics Protective Garlic™
Concentrated natural source of beta carotene and mixed carotenoids offer powerful health enhancing nutrients that contribute to eye health, protect cellular integrity, and enhance the immune system.*	Basics Resourceful Carotenes™
Concentrated vegetable blend designed to give a broad spectrum of nutritional factors and essential nutrients that support the body while boosting energy.*	Basics Resourceful Carotenes™

# PROVENANCE™

CLAIM	Product Name
Potent antioxidant lycopene protects the body's cellular structure.*	Basics Resourceful Carotenes™
Resourceful Carotenes™ is a superior blend of natural source carotenes and nutrient-dense green foods specifically formulated for antioxidant support.*	Basics Resourceful Carotenes™
Ginseng has a worldwide reputation for enhancing superior health, longevity, and well-being.*	Basics Revitalizing Ginseng™
American Ginseng is also renowned as an adaptogen.*	Basics Revitalizing Ginseng™
Clinical research suggests that Ginseng promotes adaptogenic function and the body's ability to handle stress.*	Basics Revitalizing Ginseng™
In traditional Chinese medicine, American Ginseng is more sedative and relaxing; it also increases the body's yin, or feminine, energy.*	Basics Revitalizing Ginseng™
In traditional Chinese medicine, Panax ginseng has a primary stimulating effect and increases the yang energy in the body.*	Basics Revitalizing Ginseng™
Panax Ginseng root extract is an adaptogen, which helps the body adapt to stress.*	Basics Revitalizing Ginseng™
Revitalizing Ginseng™ for enhancing physical and mental vitality*	Basics Revitalizing Ginseng™
Siberian Ginseng has been renowned since ancient times for enhancing physical endurance, immune function, and helping the body adapt to stress.*	Basics Revitalizing Ginseng™
The treasured Russian herb, Rhodiola Rosea root extract, possesses adaptogenic properties for increased strength and energy.*	Basics Revitalizing Ginseng™
Soothing St. John's Wort™ Supports the feeling of positive well-being*	Basics Soothing St. John's Wort™
Soothing St. John's Wort™ is a natural formula that lightens your mood and promotes an overall sense of well-being.*	Basics Soothing St. John's Wort™
Traditional Chinese herb, Codonopsis root, for energy and nerve support*	Basics Soothing St. John's Wort™
A daily supply of Vitamin C, an essential, water-soluble nutrient for immune function.*	Basics Strengthening Echinacea™
Astragalus Root, Elderberry Flowers, and Olive Leaf are classic immune strengthening herbs that complete this comprehensive blend.*	Basics Strengthening Echinacea™
Standardized extracts of Echinacea Purpurea and Echinacea Augustifolia for overall immune system strengthening.*	Basics Strengthening Echinacea™
Strengthening Echinacea™ Enhances the body's defense system*	Basics Strengthening Echinacea™
Strengthening Echinacea™ is specifically targeted to help enhance your immune system.*	Basics Strengthening Echinacea™
Strengthening Echinacea™ provides all the benefits of a full spectrum Echinacea. The most effective types of Echinacea are combined with antioxidant-rich vitamin C and other supporting herbs to boost your immune system.*	Basics Strengthening Echinacea™
Strengthening Echinacea™ to boost immune support*	Basics Strengthening Echinacea™