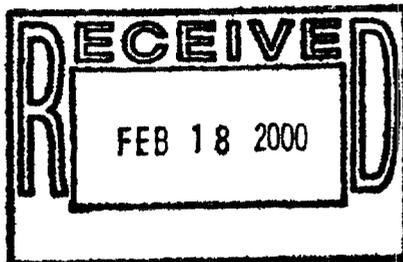


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January 31, 2000



Lynn A. Larsen, Ph.D.
Director
Division of Programs and Enforcement Policy
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
Washington, D.C. 20204

Dear Dr. Larsen:

This letter is in response to your communication dated November 12, 1999 regarding a previously submitted statement of nutritional support relative to Herbalogix's Enzyme Time™ product. Herbalogix agrees to revise its "...regulate the presence of unwanted bacteria." statement to "...regulate normal intestinal bacterial flora."

Please contact me should you have any questions or concerns regarding the above.

Best of Health,

Joel E. Rath
Managing Director

/jp

cc: Office of Special Nutritionals (HFS-450)

97S - 0162

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