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SEP 18 2006

Ms. Monica Wong
Regulatory Affairs Manager
PuraPharm International (H.K.) Ltd.
c/o Amerisearch, Inc.
1232 Q Street
Sacramento, California 95814

Dear Ms. Wong:

This is in response to your letter of August 29, 2006 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that PuraPharm International is making the following claim for the product Arashi Kuni® Cordyceps:

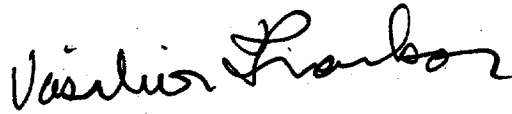
“Arashi Kuni® Cordyceps is Best Used for:...
[P]eople...a higher chance in getting cardiovascular diseases.”Natural Factors.”

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statement that you are making for this product suggests that it is intended to treat, prevent, or mitigate cardiovascular disease. This claim does not meet the requirements of 21 U.S.C. 343(r)(6). This claim suggests that this product is intended for use as a drug within the meaning of 21 U.S.C. 321(g)(1)(B), and that it is subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, Montrose Metro II, 11919 Rockville Pike, Rockville, Maryland 20852.

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Please contact us if we may be of further assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Vasilios Frankos". The signature is written in a cursive style with a large, prominent "V" at the beginning.

Vasilios H. Frankos, Ph.D.
Acting Director
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-310
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200
FDA, San Francisco District Office, Office of Compliance, HFR-PA140



PuraPharm 培力

PuraPharm International (H.K.) Ltd.
培力(香港)健康產品有限公司

Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Nutritional Products, Labeling, and Dietary Supplements
5100 Paint Branch Parkway
College Park, Maryland 20740
FAX: 301-436-2639

29 August 2006

Dear Sir / Madam,

Re: 30-Days Notification Letter of Dietary Supplement's Statement

On behalf of PuraPharm Corporation, with registered company address at AMERISEARCH, INC., 1232 Q Street, Sacramento, CA 95814, notice is hereby given pursuant to the requirements of Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act (21 U.S.C. 343(r)(6)) of the intent of us to market in the U.S. a dietary supplement, brand -named as **Arashi Kuni® Cordyceps**. Accordingly, an original of this notification, the outer box and the package insert layout are submitted for your reference.

I hereby also certify that, to the best of my knowledge, all the information submitted here is true and accurate.

Should you have further inquiries, please do not hesitate to contact the under-signed through phone at (852)2846 6245, fax at (852)2840 0778 or email at mwong@purapharm.com.

Regards,

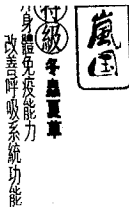


Monica Wong
Regulatory Affairs Manager

06 - 7045

#1775

冬蟲夏草



根據古代醫書《本草綱目》所記載，冬蟲夏草，人參和鹿茸均為中藥三大補藥，是一種名貴的滋補藥材，藥用價值極高，亦是一種理想的養生食品。在日本，大量研究、臨床實驗及書籍均證明冬蟲夏草的療效極佳，而日本人更深信其保健養生的效用，多年來視為生活必須的保健食品。

風國®冬蟲夏草

風國®冬蟲夏草採用最純西藏高原蟲草菌絲體，以先進的極低溫凍結技術培植而成，成分與野生蟲草無異。內含多種珍貴成分，包括蟲草素、昆蟲酸、蟲草多糖、腺苷、蛋白質、氨基酸及多種維生素，能有效改善身體的免疫力。

風國®冬蟲夏草的功效

根據古代醫書如《本草綱目》、《文房秘考》等記載，冬蟲夏草有以下功效：

- 加強身體免疫功能
- 補肺及保持呼吸系統健康
- 益腎
- 有助消炎
- 有助心血管系統健康

哪些人需要預食風國®冬蟲夏草？

根據《現代實用中藥》論說，冬蟲夏草為滋壯劑，不寒不燥，適合任何人士作為補充之用，對下列人士更有明顯作用：

· 呼吸系統虛弱人士

長期服用蟲草可強壯肺臟及保持呼吸系統健康。

· 工作過勞者

由於冬蟲夏草含有能調節人體新陳代謝的微量元素，應能加快新陳代謝，舒緩工作後的種種疲勞。此外，冬蟲夏草所含有的氨基酸是人類無法製造的，能有效改善人體體質，讓工作過勞者迅速回復體力去應付未來的工作，長期服用更可延緩衰老。

· 關注心血管健康人士

對於缺少運動、飲食失節及工作壓力大的人，一般較容易患上心血管病。蟲草功效溫和並沒有副作用，能固本培元，從身體的根本調理，而冬蟲夏草所含有的氨基酸，能有助保持心血管系統健康。

· 男性缺乏精力者

從中醫角度來看，男性缺乏精力主要是與腎氣不足有關。中醫相信腎是先天之本，亦是五臟六腑之首，主管排水、生殖、納氣等。因此，要改善男性缺乏精力問題，就要改善腎功能。冬蟲夏草可以改善腎臟的代謝及運轉功能，加快腎功能的恢復。

· 體虛人士

冬蟲夏草的蟲草多糖被證實能有效增強人體免疫功能，特別適合體虛人士者，而其中的成份——微量元素，更能加速新陳代謝，是體虛人士者不可缺少的營養補充品。

國際認可，安全可靠

風國®冬蟲夏草是按GMP(優良藥品製造規範)生產模式製造，並經具備國際權威之香港通用公證行檢定，保證在重金屬、微生物及毒性測試中符合標準，絕對不含任何防腐劑及有害添加劑，確保產品絕對安全，品質合乎最頂級標準。

成份：

100% 特級純冬蟲夏草

功效：

補肺益腎，提升身體免疫功能，調節呼吸系統功能，保持氣管及肺部健康，平喘去痰，補精益髓，增強體力

服法及用量：

吞服：以溫水吞服，每日一次，每次二至三粒，或遵照醫生指示服用
湯膳：打開膠囊，將粉末混和湯水或飲料飲用，每日一次，每次二至三粒

包裝：

每盒60粒，淨重21克

儲存：

存放於陰涼乾燥處，避免陽光直接照射

Arashi KuniTM Cordyceps



According to ancient medicinal books "The Chinese Herbal of Materia Medica", Cordyceps is cherished as one of the three rare nourishing delicacies along with Radix Ginseng and Cornu Cervi. Previous researches have proven that Cordyceps has strong and reliable medicinal applications, it is therefore an ideal regimen food supplement. In Japan, there have been many scientific researches, clinical studies and documents supporting the efficacy of Cordyceps and hence the Japanese has recognized it as a health supplement for years and treated as a necessity.

Arashi Kuni® Cordyceps

Arashi Kuni® Cordyceps is made from 100% premium-grade cultivated Tibetan Cordyceps using the proprietary Sub-temperature and Hypo-oxygenic Cultivation Technology. Scientifically proven to be equivalent to wild cordyceps in quality, biology and efficacy, Arashi Kuni® Cordyceps contains various active ingredients including cordycepin, cordycepic acid, polysaccharides, adenosine, proteins, amino acid and vitamins which are crucial to the human defense system.

The Efficacy of Arashi Kuni® Cordyceps:

- Improves Immune System
- Strengthens Lungs and Maintains Respiratory Health
- Nourishes Kidneys
- Helps Alleviate Inflammation
- Improves Cardiovascular System

Arashi Kuni® Cordyceps is Best Used for:

- Individuals with Weak Respiratory System
Continuous consumption of Arashi Kuni® Cordyceps can strengthen the lungs and maintain respiratory system in a healthy condition.
- People with Over-exerted Problems
Cordyceps can effectively relieve tiredness and help to regain vitality. The amino acids and trace elements improve metabolism and physical strength, therefore improving the physical conditions for those people with over-exerted problems. Continuous consumption could delay aging as well.
- Individuals Concern Cardiac health
People with less exercise, unbalanced diet and great pressure would have a higher chance in getting cardiovascular diseases. Cordyceps is a mild supplement and good for cardiac health without any known side effect.
- Men Lacking Stamina
In Chinese medicine theory, good stamina is related to the functions of kidneys. The kidney nourishing property of Cordyceps can help men to regain stamina.

· Physically Weak Individuals

Researches indicated that the polysaccharide contained in Cordyceps can effectively improve the immune system. In addition, a variety of trace elements is also capable to enhance metabolism, thereby restoring energy and maintaining good physique for weak individuals.

Quality Assurance

Arashi Kuni® Cordyceps is manufactured under the international GMP (Good Manufacturing Practice) standards to guarantee its safety and reliability. Every batch of Arashi Kuni® Cordyceps obtains safety certificates on heavy metal, microbiology and toxicity tests, issued by worldily-renowned testing laboratory - SGS(IHK). No added preservative and toxic substances.

Ingredients:

100% Premium Grade Cordyceps Sinensis

Functions:

Nourish the lungs and the kidneys, enhance immunity, regulate bodily functions, strengthen respiratory systems and the lungs.

Administration & Dosage:

Swallow with warm water. Once per day, 2-3 capsules each time.
Being an ingredient with soup: Open capsules, add the Cordyceps powder into soup or drink.

Packing:

60 capsules / box, net weight 21g

Storage:

Keep in a cool dry place. Avoid direct sunlight.