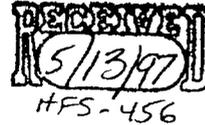


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May 8, 1997

Department of Health & Human Services
James T. Tanner, Ph.D., Acting Director
Food and Drug Administration
200 C Street, S. W. HFS-456
Washington, DC 20204

re: Your letter of March 21, 1997

Dear Mr. Tanner:

I have reworked the text for our Product Guide regarding the RESIST and PRE COLD PLUS products. May I submit the following for your review:

RESIST

Applications:

1. To supplement the diet when following programs designed to strengthen and support the body's own defense
2. mechanisms. *[See inside cover] ¹
3. In TCM Fu Zhen therapy is the traditional approach to healing that assists the body in rebuilding its vital forces
4. in order to prevent disease. RESIST-1 is a very neutral tonic, meaning it can be used by a wide variety of
5. individuals in different states of health. Many professionals supplement the diet with RESIST-1 when using
6. programs designed to strengthen patients with reduced or compromised biological defense system. *[See inside
7. cover] People on chemotherapy, AZT/ddi, or similarly damaging treatments are considered to have
8. compromised biological defense function. RESIST-1 was used in controlled clinical studies for five years and
9. is described in books² and journal articles written on various regimes, including diet for the management of
10. HIV. RESIST-1 is best used in conjunction with RESIST 2 in daily rotation.

¹ Refers to a section on the inside cover:

A WORD ABOUT LABELS:

Manufactures of dietary or herbal supplements are not allowed to include "drug claims" on product labels. Examples of such claims are "cures colds" or "cures arthritis". Drug claims of this type on nutritional dietary or herbal supplement labels should serve as a warning to you that the manufacturer is not abiding by the labeling regulations. If however, the manufacturer does make a product claim, the law requires that the claim be supported by clinical studies and/or scientific proof.

Government labeling legislation requires us to print the following on dietary supplement labels: "The statements presented here have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease". This required statement refers to the section on a product label that tells how a dietary supplement affects a particular function in those people who use the supplement. You will see this statement referenced throughout this catalog.

² Jon Kaiser, M.D.; In 'Immune Power: A Comprehensive Treatment Program For HIV' St. Martin's Press ISBN 0-312-11831-7

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RESIST continued:

11. We recommend a regiment of taking RESIST for three months and skipping one to two weeks.

PRE COLD PLUS

Applications:

12. To supplement the diet when following a program designed to strengthen the body's own defenses against the
13. common cold and flu infections. *[See inside cover] (see footnote 1)

14. From the perspective of Chinese Medicine developing cold or flu symptoms are the result of a number of
15. factors. PRE COLD *Plus* is primarily a tonic, but also contains certain clearing agents, and is designed to
16. support the body's own defense mechanisms. *[See inside cover]. It is based upon an ancient Chinese formula
17. called Power of Jade Screen which has been modernized to enhance its ability to fight off modern viral
18. infections.

Suggested Use:

19. 2-4 capsules, 3-4 times per day as soon as possible at the very first signs you recognize which could develop
20. into a cold or flu. Continue to take until the symptoms are gone 24+ hours. If the symptoms begin to get
21. stronger, discontinue use and begin taking COLD FREE 1 or COLD FREE 1 *Plus*. *[See inside cover] (see
22. footnote 1)

I know the guidelines are spelled out in section 403(r)(6) and I do believe I have carefully written the text accordingly. If you determine that a line or lines are in violation of this section, could you please specify which one(s) it is? If you wish, you may call or fax me to expedite resolution to my dilemma. Thank you again for your help.

All the best,



Curtis Jacquot
Pacific BioLogic