



2726 5 JUN 25 2:17
CELL TECH INTERNATIONAL INCORPORATED

565 Century Court, Klamath Falls, Oregon 97601

Phone 541 882 5406 Fax 541 884 1869 www.celltech.com

JUN 23 2

June 16, 2005

CERTIFIED MAIL, RETURN
RECEIPT REQUESTED

Office of Nutritional Product, Labeling and
Dietary Supplement (HFS 810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Re: Notification of Product claims

Dear Sir or Madam:

This letter serves as notification of the nutritional support label statements being made by Cell Tech located at 565 Century Court, Klamath Falls, OR 97601, in connection with products being marketed by Cell Tech International Incorporated. A list of the products and their respective nutritional support statements are listed in the enclosed Attachment "A".

The company hereby certifies that the information contained in this notice is complete and accurate, and that the company can substantiate the statements of nutritional support that are the subject of this notification letter.

If you have any questions, please feel free to contact the undersigned.

Sincerely,


Justin Straus
Chief Operating Officer
Cell Tech International Incorporated

Encl.

2005-3808
(A.ms)

975 0162

LET

16423

ATTACHMENT "A"

General Product Statement:

- In this issue, we feature Cell Tech's targeted nutritional supplements to help you gain an extra edge for optimal health. While the core products improve general wellness by supporting all cells and organs of the body, Cell Tech offers additional natural supplements that focus specifically on healthy weight management, strong bones, optimal vision, and immune system support.*
- Cell Tech's core products are designed to address these common challenges through three interrelated functions:
TO SUPPORT the organs of digestion and elimination (Original Formula Enzymes, E-12 Super Enzymes, Contain™, Acidophilus, Bifidus, Spectrabiotic®, and New Seasons™ Cleansing System)*
TO REPAIR the cells and tissues with plant-based antioxidants (Super Sprouts & Algae, Super Q10, and Grape Synergy™)*

1. **Product: Super Q10**

A dietary supplement containing a proprietary blend of coenzyme Q10, Betatene® (carotenoid extract), essential oils (fennel, ginger, and cinnamon), and blue-green algae (*Aphanizomenon flos-aquae*).

Statements of Nutritional Support:

- Science has shown the effectiveness of coenzyme Q10 and a nutrient-dense diet in supporting a healthy cardiovascular system.*

2. **Product: Super Sprouts & Algae**

A dietary supplement containing a proprietary blend of wheat sprouts, Betatene® (carotenoid extracts), and blue-green algae (*Aphanizomenon flos-aquae*).

Statements of Nutritional Support:

- In Super Sprouts & Algae, red beta algae (*Dunaliella salina*) is combined with Super Blue Green Algae and wheat sprouts to nourish our cells, support joint health, and help to repair cellular free radical damage.*

3. **Product: Alpha Sun®**

A dietary supplement containing freeze-dried blue-green algae (*Aphanizomenon flos-aquae*).

Statements of Nutritional Support:

- Alpha Sun® and Omega Sun® contain a vast array of micronutrients that your body utilizes to enhance immune system function.*

4. **Product: Omega Sun®**

A dietary supplement containing freeze-dried blue-green algae (*Aphanizomenon flos-aquae*).

Statements of Nutritional Support:

- Alpha Sun® and Omega Sun® contain a vast array of micronutrients that your body utilizes to enhance immune system function.*

5. **Product: E-12 Super Enzymes**

A dietary supplement containing a proprietary blend of amylase, glucoamylase, invertase, lactase, pectinase (w/phytase), cellulase, lipase, protease, bromelain, papain, blue-green algae (*Aphanizomenon flos-aquae*), fennel, ginger, and cayenne.

Statements of Nutritional Support:

- E-12 Super Enzymes are a good option if extra digestive support is desired.*
- Supplementation of food enzyme can positively affect the entire digestive process and, in turn, promote overall health.*

6. **Product: Resistance™**

A liquid dietary supplement containing water, vegetable glycerin, Omega Sun Super Blue-Green Algae, WGP™ beta-glucan, and natural cinnamon flavoring.

Statements of Nutritional Support:

- Containing a liquid concentrate of omega Sun® algae bolstered with 125 mg of WGP™ Beta Glucan per serving, Resistance provides natural support for your immune system.*
- Resistance a refreshing way to enhance your body's natural defenses.*
- Resistance will help boost your mind and guard your body.*
- The result is a stronger immune system.*

7. **Product: New Seasons™**

A dietary supplement system consisting of two formulas as listed below.

Herbal Formula

A dietary supplement containing rice bran, Jerusalem artichoke tubers, milk thistle seed, pumpkin seed, turmeric root, wheat grass, aloe vera gel, amylase, burdock root, dandelion root, *Echinacea purpurea* root, fennel seed, plantain leaf, cabbage juice powder, cinnamon bark, clove flowerbuds, garlic bulb, ginger rhizome, thyme leaves, blue-green algae (*Aphanizomenon flos-aquae*), cayenne pepper, protease, black walnut leaf, cat's claw bark, cellulase, centaury herb, elecampane root, fenugreek seed, gentian root, grapefruit seed extract, licorice root, yellow dock root, and lipase.

Fiber Formula

A dietary supplement containing oat fiber, apple fiber, beet root fiber, pea Fiber acacia gum, aloe vera gel, apple pectin, barberry root bark, cascara

sagrade bark, turmeric root, Irish moss algae, konjac root glucomannan, slippery elm bark, wheat grass, cabbage juice powder, protease, blue-green algae (*Aphanizomenon flos-aquae*), amylase, cellulase, and lipase.

Statements of Nutritional Support:

- The New Seasons™ Cleansing System, formulated with herbs, fiber, enzymes, and superfoods, is a two-part program that helps keep the cells and organs clean and efficient.*
- The Herbal Formula gently assists your body's own efforts to purge pollutants from tissues, clean the lymph and the liver, and discharge bile into the digestive system for safe elimination.*
- The Fiber Formula assists the body in removing contaminants from the digestive system, promotes the growth of beneficial bacteria, and protects and supports the intestinal wall while helping to maintain proper bowel function.*
- Provides herbs that promote removal of toxins through the lymphatic system.*
- Contains a blend of herbs, fiber, and other natural ingredients to enhance the body's natural cleansing processes.*
- Contains natural sources of fiber that sweep, clean, and tone the bowels.*
- Helps re-establish healthy digestive system function.*
- The Herbal Formula contains a selection of herbs, enzymes, and other natural ingredients that help cells and tissues release toxins and support the lymph, liver, and digestive tissue.*
- The Fiber Formula contains dietary fiber and a selection of herbs, enzymes, and other natural ingredients that capture toxins in the digestive system, promote beneficial intestinal bacteria, protect the intestinal wall, release intestinal plaque, and support bowel function.*

8. Product: Contain™

A dietary supplement containing a proprietary blend of: alginate, sodium bicarbonate, calcium carbonate, enzyme blend (protease, protease BC, Lipase, and amylase) and freeze-dried blue-green algae (*Aphanizomenon flos aquae*).

Statements of Nutritional Support:

- For relief of occasional acid indigestion and upset stomach, Cell Tech's **Contain**™, with aginate and enzymes, is a unique and natural choice.
- And remember, the natural ingredients in Contain are also excellent for soothing an unsettled stomach.*

9. Product: OsteoSun™

A dietary supplement containing freeze-dried blue-green algae (*Aphanizomenon flos-aquae*) and red yeast rice (*Monascus purpureus* Went).

Statements of Nutritional Support:

- OsteoSun™ for maintaining bone strength*

10. Product: **ImmuSun®**

A dietary supplement containing WGP™ beta 1,3 / 1,6 glucan.

Statements of Nutritional Support:

- While Alpha Sun® and Omega Sun® contain a vast array of micronutrients that your body utilizes to enhance immune system function, Cell Tech also offers ImmuSun® that contains the active ingredient WGP™ beta glucan.*
- ImmuSun® is an all-natural dietary supplement in convenient capsule form, with the patented active ingredient WGP™ beta glucan, that fortifies the body's own immune system to help keep you feeling well.*
- ImmuSun®, with WGP™ beta glucan, for enhanced immune system support*
- The active ingredient in ImmuSun® is WGP™ beta glucan, a patented form of the complex carbohydrate beta glucan. WGP beta glucan supports the production and activity of beneficial white blood cells and helps to maintain overall health.*
- The first of our products to contain WGP™ beta glucan, Immu Sun® is an all natural dietary supplement designed to help fortify the body's immune system.*
- Taken daily as part of an overall healthful regimen, ImmuSun® can help the immune system maintain peak performance.*
- Containing the active ingredient WGP™ beta glucan, a patented form of the complex carbohydrate beta 1,3/1,6 glucan, ImmuSun® is an all natural dietary supplement that fortifies the body's own immune system.*
- Since then, it has been shown to produce multiple broad-scale effects that have the potential to strengthen the vitality of the immune system.*

11. Product: **Weight Management Essentials**

A three-capsule dietary supplement containing one capsule of blue-green algae (*Aphanizomenon flos-aquae*), one capsule of a proprietary blend of blue-green algae (*Aphanizomenon flos-aquae*) and digestive enzymes (amylase, lipase, protease, lactase, cellulase) and one capsule of a proprietary blend of garcinia extract, kola nut extract, eleuthero, blue-green algae (*Aphanizomenon flos-aquae*), gotu kola, fo-ti, St Johnswort, gymnema extract, hawthorne extract, guarana extract, maca, green tea extract, bladderwrack algae, lecithin, ginkgo extract, cascara sagrada, kelp extract, ginger, white willow, cayenne, chromium polynicotinate and digestive enzymes (lipase, amylase, protease, pectinase, CereCalase).

Statements of Nutritional Support:

- Weight Management Essentials™ provides optimal nutrition, helps reduce cravings, increases energy, improves mental clarity and attitude, and improves fat-burning and weight loss, while maintaining lean muscle mass.*
- The superior nutrition of Omega Sun®, the digestion enhancement of Original Formula Enzymes, and the proven effectiveness of NaturaLight create a winning trifecta in the battle to maintain a healthy weight.*

12. Product: Spectrabiotic®

A dietary supplement containing a proprietary blend of Lactobacillus Acidophilus, Bifidobacterium bifidus, Streptococcus faecium, Lactobacillus bulgaricus, Lactobacillus casei, Lactobacillus plantarum, Lactobacillus salivarius, Streptococcus thermophilus, lipase, amylase, protease, cellulase, blue-green algae (*Aphanizomenon flos-aquae*), Jerusalem artichoke, acerola, and rosehips.

Statements of Nutritional Support:

- Once you have experimented with strains of friendly bacteria (plus rose hips, acerola, and Jerusalem artichoke) that provide the entire digestive tract with superb nutritional and probiotic support.*

13. Product: Vision Essentials

A four-capsule dietary supplement containing one capsule of blue-green algae (*Aphanizomenon flos-aquae*), one capsule of a proprietary blend of blue-green algae (*Aphanizomenon flos-aquae*) and digestive enzymes (amylase, lipase, protease, lactase, cellulase) and two capsules of a proprietary blend of lutein and zeaxanthin.

Statements of Nutritional Support:

- FloraGLO softgels provide lutein and zeaxanthin, two of the most effective nutrients for maintaining healthy vision.*
- Both of these nutrients have been shown to play an essential role in protecting the retina of the eye from the damaging effects of light.*
- With the addition of Omega Sun® and Original Enzymes, Vision Essentials offer a powerful combination of vitamins, minerals, and phytonutrients to help support both your vision and your overall health.*
- Vision Essentials, with FloraGLO® lutein and zeaxanthin, for supporting the macula of the eye.*

14. Product: Immune System Essentials™

A dietary supplement consisting of three-capsule dietary supplement containing one capsule of blue-green algae (*Aphanizomenon flos-aquae*), one capsule of a proprietary blend of blue-green algae (*Aphanizomenon flos-aquae*) and digestive enzymes (amylase, lipase, protease, lactase, cellulase) and one capsule of WGP™ beta 1,3 / 1,6 glucan.

Statements of Nutritional Support:

- Adding Omega Sun® (for full-spectrum nutrition) and Original Formula Enzymes (to help digest and assimilate nutrients) makes Immune System Essentials a convenient and ideal product to enhance your immune system.*

15. Product: Heart Essentials™

A dietary supplement consisting of four-capsule dietary supplement containing one capsule of blue-green algae (*Aphanizomenon flos-aquae*),

one capsule of a proprietary blend of blue-green algae (*Aphanizomenon flos-aquae*) and digestive enzymes (amylase, lipase, protease, lactase, cellulase) and two capsules of a proprietary blend of coenzyme Q10, flaxseed oil, blue-green algae (*Aphanizomenon flos-aquae*), red beta algae (*Dunaliella salina*), lycopene, and essential oils (fennel, rosemary, cinnamon, ginger).

Statements of Nutritional Support:

- This powerful combination of ingredients delivers premium antioxidants to help boost cellular energy, counter free radical damage, support the cardiovascular and immune systems.*
- The addition of Omega Sun® and Original Formula Enzymes to Heart Essentials further boosts this product by providing full-spectrum nutrition and the means to help digest and assimilate nutrients.*