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OF COUNSEL  
MICHELE F. CROWN

July 15, 1996

*Courtesy Copy  
Previously Sent  
By Telecopy*

**BY TELECOPY AND U.S. MAIL**

James T. Tanner, Ph.D.  
Acting Director (HFS-451)  
Division of Programs and Enforcement Policy  
Office of Special Nutritionals  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, D.C. 20204

Re: Liquipharm, Inc. - Cellrenew-C™ (Vitamin C Topical Lotion And Cream)

Dear Dr. Tanner:

This letter is written on behalf of our client Liquipharm, Inc. and responds to your June 25, 1996 letter regarding the labeling of Liquipharm's Cellrenew-C™ (vitamin C topical lotion and cream).

Liquipharm has asked us to assist them in reviewing and revising the labeling of Cellrenew-C™. We are working with Liquipharm to develop revised labeling, such that the product for regulatory purposes will be a cosmetic, and not a dietary supplement or a drug.

Liquipharm is a responsible firm that seeks to operate in full compliance with all FDA requirements and policies. This is demonstrated by, among other things, Liquipharm's willingness to undertake labeling revisions in response to your letter.

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Letter to James T. Tanner, Ph.D  
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On behalf of Liquipharm, we appreciate your time, cooperation, and understanding. We trust that this letter constitutes an adequate response to your June 25 letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Arthur Y. Tsien". The signature is fluid and cursive, with the first name "Arthur" being the most prominent.

Arthur Y. Tsien  
Counsel to Liquipharm, Inc.