



B I O L A B S , I N C

March 31, 1997

4/16/97

Elizabeth Yetley, Ph.D.  
Office of Special Nutritionals  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 "C" Street, S.W. (HFS-455)  
Washington, D.C. 20204

Dear Dr. Yetley,

0101 '97 SEP 19 P1:38

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, Phoenix BioLogics, Inc. wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing several dietary supplements which bear a statement of nutritional support.

The dietary supplement for which the statements are made is **ARTH PRO™**. The statement of nutritional support reads as follows:

- Promotes optimal joint, ligament and cartilage function\*  
ArthPro™ is formulated with five synergistic components:
- VitaCarte® bovine tracheal cartilage, which has been shown to promote joint flexibility\*
- Both glucosamine sulfate and HCl, essential building blocks of cartilage and connective tissue, which helps maintain strong and flexible joints\*

The dietary supplement for which the statements are made is **OSTEO PRO™**. The statement of nutritional support reads as follows:

- Strengthens bones and skeletal framework\*  
Osteo Pro™ is a complete bone building formula comprised of complimentary nutritional factors:
- Lyophilized Microcrystalline Hydroxyapatite Concentrate (MCHC) a pure and natural calcium phosphorus concentrate that helps build strong bones\*

The dietary supplement for which the statements are made is **CS 500™**. The statement of nutritional support reads as follows:

- Promotes joint flexibility and blood circulation\*  
When taken as a dietary supplement, it stimulates the body's production of additional chondroitin sulfates, which promote joint mobility and blood circulation\*

These statements are accompanied by the required disclaimer which is prominently displayed in bold-faced type. These statements of nutritional support are based on a large body of data which, in our judgment, renders these statements substantiated, truthful and non-misleading.

Sincerely,

William Van Dyke  
Chairman & CEO

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