

1824 South Robertson Blvd.
Los Angeles, CA 90035-4317
310/204-6936 • 800/726-0886
www.Jarrow.com

FAX NUMBERS

Orders 800/890-8955
General 310/204-2520
Administrative 310/204-5132

Food and Drug Administration
Center for Food Safety and Applied Nutrition
Office of Nutritional Products, Labeling, and Dietary Supplements (HFS-810)
5100 Paint Branch Parkway
College Park, Maryland 20740
Reference phone #301-436-2373

July 2, 2004

AUG 12 2004

Dear CFSAN:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

(1) Name and Address of distributor:

Jarrow Formulas, 1824 South Robertson Blvd., Los Angeles, CA 90035

(2) Statements:

Warning: Do not use if allergic to bees or bee products. Do not use if pregnant or lactating. People on anticoagulants/blood thinners should consult their health care practitioner before using this product

Wellness Optimizer™ combines a comprehensive blend of nature's most potent herbs, bee propolis, mushrooms and chlorella extract to support the body's natural defense system. LymphaSelect™ (sweet yellow clover extract) promotes lymphatic circulation, which assists immune system functions. Respondin™ (Chlorella extract) has been shown to enhance natural killer cell activity and boost immune function. Wellness Optimizer™ promotes well being by optimizing the body's immune and physiological functions, which are challenged by mental or physical stress. Keep out of the reach of children

(3) Name of the dietary ingredient(s) if not provided in the text of the statement:

Vitamin C (from Ascorbic Acid), LymphaSelect™ (*Melilotus officinalis*, sweet yellow clover extract), Eleuthero Root Extract (*Eleutherococcus senticosus*), Respondin™ (Chlorella Extract, *Chlorella pyrenoidisa*), Garlic Clove Extract (*Allium sativum*), Propolis, Schisandra (*Schisandra chinensis*), Rhodiola Extract (*Rhodiola rosea*), Isatis Leaf (*Isatis tinctoria*, Da Qin Ye), Marshmallow (*Althaeae officinalis*), Pau d' Arco Root Extract (*Tabebuia impetiginosa*), Mushroom Blend, [*Cordyceps sinensis* (Cordyceps), *Tremella fuciformis* (White Wood Ear), *Coriolus versicolor* (Turkey Tail), *Ganoderma lucidum* (Reishi), *Grifola frondosa* (Maitake), *Lentinula edodes* (Shitake), *Agaricus blazei*], Mullein Leaf (*Verbascum densiflorum*), Elderberry Fruit (*Sambucus nigra*), Astragalus Extract (*Astragalus membranaceus*), Bioflavonoids Complex, Oregon Grape Root, (*Mahonia aquifolium*)

(4) Name of the dietary supplement(s):

Wellness Optimizer

(5) The following disclaimer appears on the label in bold:

These statements have not been evaluated by the Food and Drug Administration.
This product is not intended to diagnose, treat, cure or prevent any disease.

These claims are limited to, and a result of, what we believe to be a substantial body of scientific evidence supporting the functional role of the nutrients.

Respectfully submitted,

975 0162

LET

144/22


Peilin Guo, MS, RD

Vice President of Functional Foods and Clinical Research

89280