

CELL TECH
 1300 Main Street, Klamath Falls, Oregon 97601
 Phone: 541.882.5406 Fax: 541.884.1869

September 11, 2000

**CERTIFIED MAIL, RETURN
RECEIPT REQUESTED**

Dr. Elizabeth Yetley
 Office of Special Nutritionals (HFS-450)
 Food and Drug Administration
 200 C Street, S.W.
 Washington, D.C. 20204

Re: Notification of Product claims

Dear Dr. Yetley,

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. 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,
 Vice President, Cell Tech

Encl.

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ATTACHMENT "A"

1. **Product: Alpha Sun®**

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

Statements of Nutritional Support:

- **ENERGY FOR LIFE® PHYSICAL SUPPORT***
- **Alpha Sun®** is the whole, complete algae intended for the natural promotion of physical health and immune system support.*

2. **Product: Omega Sun®**

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

Statements of Nutritional Support:

- **ENERGY FOR LIFE® MENTAL SUPPORT***

3. **Product: Acidophilus**

A dietary supplement containing *Lactobacillus acidophilus* and blue-green algae (*Aphanizomenon flos-aquae*).

Statements of Nutritional Support:

- **SUPER BLUE GREEN® ACIDOPHILUS FOR INTESTINAL HEALTH***

4. **Product: Bifidus**

A dietary supplement containing *Bifidobacterium bifidum* and blue-green algae (*Aphanizomenon flos-aquae*).

Statements of Nutritional Support:

- **SUPER BLUE GREEN® BIFIDUS FOR INTESTINAL HEALTH***

5. **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:

- **SUPER BLUE GREEN® SPECTRABIOTIC FOR INTESTINAL HEALTH***

6. **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:

- **ENERGY FOR LIFE® ANTIOXIDANT SUPPORT***
- This special blend of wheat sprouts, Alpha Sun® Algae, and Super Red Beta algae promotes antioxidant enzyme production within the body and provides natural carotenoids for antioxidant support.*

7. **Product: Original Enzymes**

A dietary supplement containing a proprietary blend of amylase, protease, lipase, lactase, cellulase, and blue-green algae (*Aphanizomenon flos-aquae*).

Statements of Nutritional Support:

- **SUPER BLUEGREEN® ENZYMES FOR DIGESTIVE SUPPORT***

8. **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:

- **SUPPER BLUE GREEN® ENZYMES FOR DIGESTIVE HEALTH***

9. **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:

- **COENZYME Q10 CARDIOVASCULAR SUPPORT***
- The addition of organic essential oils, Super Blue Green® Algae, and natural mixed carotenoids completes this formula, making it the superior product for support to the cardiovascular system at the cellular level.*

10. **Product: SBGAnytime Chewables**

A dietary supplement containing blue-green algae (*Aphanizomenon flos-Aquae*), orange juice, honey, soy lecithin, and natural vanilla flavoring in a chewable form.

Statements of Nutritional Support:

- SBGAnytime supplies Alpha Sun® and Omega Sun® in a convenient chewable form, providing nature's extraordinary superfood to support your body and mind anytime you need a boost for an active lifestyle.*

11. **Product: Cell Tech Essentials**

A dietary supplement containing blue-green algae (*Aphanizomenon flos-aquae*), plant based enzymes, acidophilus, and bifidus.

Statements of Nutritional Support:

- This array of products delivers the highest quality nutritional support for your immune system and brain function, probiotic support for your small and large intestine, and active enzymes to help your body break down food and absorb more nutrients.*
- You will function in better balance and health as a result of this broad spectrum support for the complex systems of your body.*

VITABRANDS

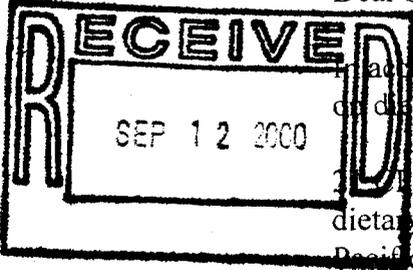
Barry Sugarman, B.S. ENGR.
Principal

9/3/2000

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To: Division of Compliance and Enforcement/ONPLDS, Center for Food Safety and Applied Nutrition, Food and Drug Administration, HFS-810 200 C Street, SW, Washington, DC 20204, Phone 202-205-5229

Dear Sir or Ma'am,



In accordance with 21 CFR 101.93, Notification procedures for certain types of statements of dietary supplements, our firm is notifying you of the following statement:

21 CFR 101.93(a)(2)(i): Name and address of the manufacturer, packer, or distributor of the dietary supplement that bears the statement: Vitabrand, 15515 Sunset Blvd., Suite 115, Pacific Palisades, CA 90272-3530, USA

21 CFR 101.93(a)(2)(ii): The text of the statement that is being made: Supports a healthy heart.

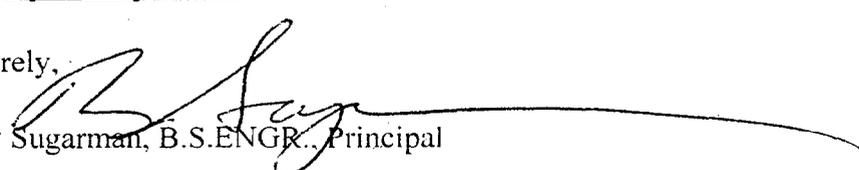
21 CFR 101.93(a)(2)(iii): The name of the dietary ingredient or supplement that is the subject of the statement, if not provided in the text of the statement: Partially defatted and milled flaxseed, Soy protein, and Co-Enzyme Q-10.

21 CFR 101.93(a)(2)(iv): The name of the dietary supplement (including brand name), if not provided in response to paragraph (a)(2)(iii) on whose label, or in whose labeling, the statement appears: Cardioflax chocolate bar, and Cardioflax lemon crunch bar.

21 CFR 101.93(a)(3): The notice shall be signed by a responsible individual or the person who can certify the accuracy of the information presented and contained in the notice. The individual shall certify that the information contained in the notice is complete and accurate, and the notifying firm has the substantiation that the statement is truthful and not misleading: I certify that I am the responsible individual or the person who can certify the accuracy of the information presented and contained in this notice, and that the information contained in this notice is complete and accurate, and the notifying firm has the substantiation that the statement is truthful and not misleading

Thank you very much.

Sincerely,


Barry Sugarman, B.S. ENGR., Principal

15515 Sunset Blvd.
Suite 115
Pacific Palisades, CA 90272
Phone (310)355-6046
FAX (310)454-9592