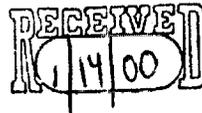


american nutraceutical

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January 10, 2000



Dr. Elizabeth Yetley
Office of Special Nutritionals
Food and Drug Administration
200 C Street SW
Washington D.C. 20204

Dear Dr. Yetley:

We are offering for sale the following product Pure Gels Echinacea & Goldenseal Extract, with the following Structure/Function claim: Temporarily Assists the Body's Natural Defenses.

The former side panel story that did not meet your requirements was: This synergistic combination supports the body's immune function in times of stress. Helpful during Cold and Flu season, both herbs help maintain the body's natural immune arsenal.

We have removed the former supporting side panel story and replaced it with: This herbal combination helps maintain the body's immune system in times of stress. Both herbs work in synergy to support the natural immune arsenal by promoting the health of white blood cell components.

The FDA disclaimer will also appear on the label. We hope the rewording of our side panel story complies with 21 U.S.C. 343 (r) (6).

Sincerely,

Katie Ferren
Marketing Director
979-0162

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