

**Botanical**  
**LABORATORIES**  
Consumer Products Division

MAR 11 2005

March 3, 2005

Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740-3825

Dear Sir or Madam,

This notification is on behalf of ZAND<sup>®</sup> and SYMTEC<sup>®</sup> and parent company Botanical Laboratories, Inc., 1441 West Smith Road, Ferndale, WA 98248.

We intend to include the following statements of nutritional support based on substantiated data for the use of Echinacea on the following product.

Ingredient: Lutein

Product: SYMTEC<sup>®</sup> MultiVitamin  
ZAND<sup>®</sup> Zanergy

Statements: Promotes eye health

Please be advised that the information contained herein is accurate to the best of our knowledge and information. Our firm has information substantiating that the above statements are truthful and not misleading.

Sincerely yours,



Kevin H. Cobb  
Director of Marketing  
ZAND<sup>®</sup> Herbal Formulas  
Botanical Laboratories, Inc.

975 0162 LET 15810

**ZAND**

**HERBS<sup>for</sup>KIDS**

**NatraBio**

91074  
**bioAllers**