

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

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

MAR 11 2005

Dear Sir or Madam,

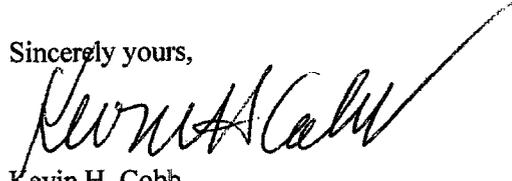
This notification is on behalf of SYMTEC® and ZAND® and parent company Botanical Laboratories, Inc., 1441 West Smith Road, Ferndale, WA 98248.

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

- Products: ZAND® Glucosamine Plus Liquid Caps  
SYMTEC Joint Movement Glucosamine Plus Liquid Caps
- Ingredients: Glucosamine, MSM (methylsulfonylmethane), Omega 3 & 6 Fatty Acids
- Statements: Current studies support the use of Glucosamine to maintain healthy joint function, cartilage, and flexibility.
- Supplementation with Omega 3 & 6 fatty acids has been shown to have a beneficial effect on repairing and maintaining cartilage and bone joints.
- Studies support the use of supplements containing Omega 3 fatty acids and MSM for joint health, increased flexibility and ease of movement.
- Daily joint support.
- Maintain healthy joint function
- Increase flexibility
- Increase ease of movement

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  
Botanical Laboratories, Inc.

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**ZAND**

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

**NatraBio**

**bioAllers**

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