

Food and Drug Administration Washington, DC 20204

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FEB 22 2001

Mr. James A. Grant Regulatory Compliance Officer Gaia Herbs 108 Island Ford Road Brevard, North Carolina 28712

Dear Mr. Grant:

This is in response to your letter of February 6, 2001 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Gaia Herbs is making the following claims, among others, for the following products:

## Infla-Profen

"For Ultimate Relief of Back Pain & Inflammation"

## Migra-Profen

"For Ultimate Relief of Headache Pain & Cramps"

## **Nettle Leaf**

"For Ultimate Relief of Allergy Symptoms."

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products, including the name of the product "Migra-Profen," suggests that they are intended to treat, prevent, cure or mitigate diseases, namely inflammatory back conditions, migraines, and allergies. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

## Page 2 - Mr. James A. Grant

Please contact us if we may be of further assistance.

Sincerely,

John B. Foret
Director
Division of Compliance and Enforcement
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

## Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300 FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of Enforcement, HFC-200 FDA, Atlanta District Office, Office of Compliance, HFR-SE140

## cc:

HFA-224 (w/incoming) HFA-305 (docket 97S-0163)

HFS-22 (CCO)

HFS-800 (r/f, file)

HFS-810

HFS-811 (file)

HFD-310

HFD-314 (Aronson)

HFS-605

HFV-228 (Benz)

GCF-1 (Nickerson)

f/t:HFS-811:rjm:2/16/01:docname:74477.adv:disc54



Manufacturers of Fresh Botanical Extracts

FEB 1 3 2001

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

February 6, 2001

Dear Sir:

This letter is to provide notification, within the prescribed 30 days of marketing, of a new product line that contains structure function claims. The line is composed of 34 Liquid Phyto-Caps that are herbal dietary supplements. I have attached a list of these products to include a group of trial size versions of these products. I have also attached a copy of each label that contains the structure function claim as pointed out in the "label example".

Please call at 828-883-5938 if you need addition information or if you have any questions.

Sincerely,

James A. Grant

Regulatory Compliance Officer

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#### SUGGESTED USE:

Take I capsule with a small amount of warm water 2 times daily between meals. Not to be used during pregnancy or lactation. Keep away from children. Use only as directed Neep away from children, use only as unrecieu on label. Safety seaied for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.

LIQUID PHYTO-CAPS" — Gaia Herbs patent pending technology delivers a concentrated full spectrum alconol-free figurid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption the superior bioavailability and tast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

"THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION, THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.

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Deep Liver Support\*



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THE PARTY NAME AND ADDRESS.

100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



### Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

Amount Per 2 Caosules

Calories 14

ALCOHOL FREE CONCENTRATED EXTRACTS DE-

Astragalus root (Astragalus membranaceous) 
Chinese Skuilcap root (Scutellaria baicalensis) 200 mgt 100 mot Chinese Bupleurum root (Bupleurum falcatum) •
Reishi mushroom (Ganoderma lucidum) •
Maitake mushroom (Grifola frondosa) • 60 mgt 30 mgt 20 mat Licorice root (Glycyrrhiza glabra) .

†Daily Value not established.

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule) ◆= Untreated Chinese Origin Each 2 capsules contain 3,000 mg crude herb equive Gaia Herba Liquid Phyto-Ceps " Patent pending.

<u>1</u> Herbs,

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Brevard,

Island Ford Rd.,

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NC 28712

Brevard,

108 Island Ford Rd., www.gaiaherbs.com

28712

Brevard, NC

108 Island Ford Rd., www.gaiahorbs.com

#### SUGGESTED USE

Take 2 capsules with a small amount of warm water 2-3 times daily between meals. Warm water 2-3 miles daily detween meas. Mot to be used during pregnancy or lectation. Keep away from children. Use only as directed on label. Safery seeled for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.

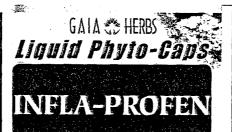
This does not affect product quality.

LIQUID PHYTO-CAPS'"— Gais Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from cartified organic and ecologically wildcrafted herbs, in a convenient capsule.

ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC

THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION, THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.





For Ultimate Relief of Back Pain & Inflammation\*



100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



### Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

Amount Per 7 Cassules

ALCOHOL FREE CONCENTRATED EXTRACTS OF ALCOHOL FREE CONCENTRATED EXTRACTS OF:
Devil's Claw root (Hanpagohyum procumbers). ■ 300
Fevertiew tops (Chryscarthemum parthenium) ▲ 20
Turmaric hissome (Curcuma longs) ● 100
Yucca root (Yucca sp.) ● 40
Burdock root is seed (Arctium lappa) ▲ 25
Celery seed (Aprium graveolans) ▲ 15
Jamaican Doewood bark (Piscidia erythrina) ● 1
Jamaican Doewood bark (Piscidia erythrina) ● 10
Ginger ritizome;
Supercritical CO<sub>2</sub> Extract (Zingüber off.) ● 8
STANDARDIZED TO FILLI SPECTRUM ACTIVITY PROFILE
Bloostivity Par Cansules.

Bloactivity Per 2 Capsules 95% Curcumin (from Turmenc) 0.5% Parthenolide (from Feverte †Daily Value not established.

Lot # Best by: Other ingredients: Vegetable glycerin, lecithin, vegetable gelai A = Certified Organic = Ecologically Wildcrafted Each 2 capsules contain 3,800 mg crude herb equivalent.

Gaia Herbs Liquid Phyto-Caps™ Patent pending

## SUGGESTED USE:

Take 1 capsule with a small amount of warm water 3 times daily between meals. Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety seeled for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.

This does not affect product quality.

IQUID PHYTO-CAPS"— Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetatian capsule. Now you can have the supenor bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a sowyenient capsule.

a convenient capsule.
ECOLOGICALLY WILDCRAFTED (Boroku variety from Vanuatu)

\*THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOI AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE. TREAT, CURE OR PREVENT ANY DISEASE.





Ultimate Support for Relaxation \*



100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



#### Supplement Facts

mount Per 2 Capsules

ALCOHOL FREE CONCENTRATED EXTRACT OF

Kava Kava rhizome (Piper methysticum) ●408 mg†

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE Bioactivity Per 3 Capsules mg Ac 55% Total Kavalactones (from Kava Kava)

†Daily Value not established.

Other ingredients: Lecithin, vegetable glycerin, vegetable gelatin (capsule). gelatin (capsule).

== Ecologically Wildcrafted

Each 3 capsules contain 3,750 mg crude herb equiv Gaia Herbs Liquid Phyto-Caps™ Patent pending.

8 mgt

<u>2</u> Herbs,

## SUGGESTED USE:

Take 1 capsule with a small amount of warm water 2 times daily between meals. warm water 2 times cally Derween meals. Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sailed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This stoes not affect product quality.

IGUID PHYTO-CAPS" — Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsula. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient cansula.

Organic and ecologicary Wildcartzed nerds, in a convenient capsule. ECOLOGICALLY WILDCRAFTED CERTIFED ORGANIC

-THIS STATEMENT HAS NOT BEEN FLAULATED BY THE FOOD AND DIAL ADMINISTRATION. THIS PRODUCT IS NOT MYEINDED TO DIAGNOSE. THACK ORE OR PREVIOURLY AND DESIGN.



GAIA ## HERBS Liquid Phyto-Caps

For Ultimate Support of Healthy Liver Function\*



300

100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



## Supplement Facts

Amount Per Z Capsules

ALCOHOL FREE CONCENTRATED EXTRACTS OF

ALCONDE RECONDENTRATED EXTRACTS OF MINIT TISSES Seed (Silybum marianum) ▲ Turmeric rhizome (Curcuma longa) ◆ Schizandra chinensis) ◆ MSM (Methylsulfonylmethane) Ch. Skullcap root (Scutellaria baicalensis) Licorice root (Glycyrrhiza glabra) ◆ 100 mg† 100 mg† 100 mg† 100 mgt 20 mgt

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE
Bloactivity Per 2 Capsules mg Activity 80% Silymarins (from Milk Thistle) 80 mgt 95% Curcumin (from Turmeric)

†Daily Value not established

Other ingredients: Vegetable glycerin, lecithin, vegetable gleatin (capsule).

A = Cartified Tragnic = Ecologically Wilderafted

- Untreated Chinese Origin

Eanh 2 capsules contain 5.000 mg crude herb equiva

Gaia Herbs Liquid Phyto-Caps \*\* Patent pending.

38 Island Ford Rd., Brevard, NC 2871 88

Ę, Herbs,

Take 1 capsule with a small amount of warm water 2 times daily between meals. Warm Water Z times Gaily between meals. Not to be used during prepanery or lectation. Keep owey from children. Use only as directed on label. Safety sealed for your protection, Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality. UMJO PHYTO-CAPS"— Gaia Herbs' patent pending technology delivers a concentrated full spectrum acottol-free liquid extract in a 100% vegetrain acoust. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule. ECOLOGICALLY WILDCRAFTED

CERTIFIED ORGANIC \*THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND GRUG ADMINISTRATION, THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OF PREVENT ANY DISEASE.

00000 00000



Ultimate Support for Healthy Upper Respiratory Function\*



100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

mount Per 2 Capsules Calories 14

Calories 14

ALCOHOL FREE CONCENTRATED EXTRACTS OF:
Garric bulb (Allium sativum) A
Osha root (Ligusticum porterii) 
Comatum root (Ligusticum porterii) 
Grindelia floral bul (Ginnielia robusta) 
Grindelia floral bul (Ginnielia robusta) 
Hyssop flowers (Hyssopus off) |
Barberry root (Pervairs vulgars) 
Oregon Grape root (Pervairs vulgars) 
Oregon Grape root (Pervairs vulgars) 
Goldenseal root (Hydrastic canadensis) |
Mullein leaf (Verbassum olympicum) 
Cubella herb & seed (Lobela infaltat) 
St. John's Wort flower buld (Hypencum perforatum) 
Echinacea purpurea root 
Echinacea purpurea flowering top 
Echinacea pungustellia root 
Echinacea Echinacea 
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Echinacea purpurea seeu

Toairy Value nor established.

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule).

= Certified Organic 
= Echologically wildcrafted
Each 2 capaties controls 1,200 mg crude herb equivalent.
Each 2 capaties controls 1,200 mg crude herb equivalent.
Gata Herbs Liquid Phyto-Caps "Patent pending.

Brevard, 1 Island Ford Rd., E ww.gai.doctos.com . 108 ISI. www.o Inc., tot# Best by: Herbs, I Gaia

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8 mgt 8 mgt 8 mgt 8 mgt 6 mgt 4 mgt 4 mgt 3 mgt 9.7 mgt

120 mg†

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SUGGESTED USE:

SUGGESTED USE:

Take 1 capsule with a small amount of Take I capsule with a small amount of warm water 3 times daily between meals. Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.

I This does not affect product quality.

LIQUID PHYTO-CAPS" — Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a fiquid delivery system, from certified organic and acologically wildcrafted herbs, in a convenient capsule.

ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC

ITEMENT HAS NOT BEEN EVALUATED BY THE FOOD A ADMINISTRATION. THIS PRODUCT IS NOT INTENDED USE, TREAT, CURE OR PREVENT ANY DISEASE.





For Ultimate Enhancement of

# Male Stamina & Performance\*



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SEMBERIC

100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

Amount Per 3 Capsules

Calories 21

ALCOHOL FREE CONCENTRATED EXTRACTS OF:

Maca tuber (Lepidium meyenii) Horny Goat Weed (Epimedium grandiflorum) @ 54 mgt Saw Palmetto,

Supercritical CO<sub>2</sub> Extract (Serenoa repens) 
Tribulus bark (Tribulus terrestris) 45 mgt Yohimbe bark (Corynanthe yohimbe) 
Sarsaparilla root (Smilax off. v. ornata)

30 mgt 24 mat Muira puama root (Ptychopetalum olacoides) • 15 mgt Fo Ti root (Polygonum multiflorum) + 15 mat Wild Oats milky seed (Avena sativa) 15 mgt

†Daily Value not established.

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule).

Each 3 capsules contain 2,700 mg crude herb equivalent.
Gaia Herbs Liquid Phyto-Caps " Patent pending.

SUGGESTED USE:

SUGGESTED USE:
Take 2 capsules with a small amount of warm water at the noise of pain and repeat 2-3 times at 15 minute intervals.
Its minute intervals, which is a single programmer of lactation. Keep wavey from children. Use only as directed on label. Safety saeled for your protection, Keep bottle capsed at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.

Influences not anext product quanty.

Idulio PHY-CAPS" - Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

a convenient capsule.
ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC

THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND CHUG ADMINISTRATION, THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OF PREVENT ANY DISEASE,



靈 GATA CHERBS Liquid Phyto-Caps

MIGRAEPROFEN

with Phospholipase A2 and COX-2 Inhibitors

For Ultimate Relief of Headache Pain & Cramps



100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

Amount Por 2 Capsules

Calories 14

Calories 14

ALCOHOL FREE CONCENTRATED EXTRACTS OFFeverfew leaf (Tanacetum parthenium) ▲ 240

Eh. Skulicap roct (Scuellaria balcalensis) ● 110

Avaur Kava (Piper methysticum) ● 70

Valerian root (Valeriana officinalis) ▲ 20

Jamaican Doywood bark (Fiscifia enythrina) ● 20

Rosemary leaf, Supercritical Fxtr. (Flosmarinus off.) ● 8

Ginger hizome,
Supercritical CO<sub>2</sub> Extract (Zingiber off.) ● 8

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE
Biosactivity Per 2 Capsules mg Acti

240 mgt 110 mgt 70 mgt 30 mgt 20 mgt 8 mgt 8 mgt

Bioactivity Per 2 Capsules 55% Kavalactones (from Kava Káva) 0.5% Parthenolide (from Feverfew) Activity mg Activity 38.5 mgt 1.2 mgt

Other ingredients: Vegetable glycerin, vegetable geletin (capsule).

\$\( \) = Carnified Organic \( \) = Ecologically Wilderafted

\$\( \) = Untreasted Chinese Origin

Each 2 capsules contain 5,000 mg crude herb equivalent.

Gaia Herbs Uquid Physo-Caps " Patent pending.

Herbs, Gaia

SUGGESTED USE:

Take I capsule with a small amount of warm water 2 times daily between meals. Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry piace. Natural separation may occur. This does not affect product quality.

LIQUID PHYTO-CAPS" — Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetraina capsule. Now you can have the superior bioavoilability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in

a convenient capsule.
ECOLOGICALLY WILDCRAFTED

CERTIFIED ORGANIC

THIS STATEMENT HAS 1010 FEED EVALUATED BY THE FOOD
AND DRIG ADMINISTRATION, THIS PRODUCT IS NOT INTENDED
TO DIAGNOSE, TREAT CURE OR PREVENT ANY DISEASE.

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GAIA # HERBS Liquid Phyto-Caps

SHAD

Ultimate Support for Healthy Liver Function\*



100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

Amount Per 2 Capsules

Calories 4

ALCOHOL FREE CONCENTRATED EXTRACT OF:

Milk Thistle seed (Silybum marianum) ●/▲ 300 mg†

STANDARIZED TO FULL SPECTRUM ACTIVITY PROFILE Bioactivity Per 2 Capsules mg / 80% Silvmarins (from Milk Thistle) 240 mat

†Daily Value not established.

Other ingredients: Lecithin, vegetable glycerin, vegetable gelatin (capsule). A=Certified Organic ==Ecologically Wildcrafted

Each 2 capsules contain 9,000 mg crude herb equivale Gaia Herbs Liquid Phyto-Caps " Patent pending.

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Brevard, 08 Island Ford Rd., www.gaiallerbs.com 80

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5 Herbs, SUGGESTED USE:

Take 1 capsule with a small amount of warm water 2 times daily between meals... Not to be used during pregnancy or lactation. Keep away from children. Use only as directed ABEP away trom children. Use only as directed on label. Safety sealed for your protection. Keep tottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.

LIQUID PHYTO-CAPS\*\* – Gais Herbs' patent

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LIQUID PHYTO-CAPS"—Gian Herrs patent pending technology delivers a concentrated full spectrum elechol-free figuid oxfraer in a 100% vegetarna cansule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient casses.

a convenient capsule.
CERTIFIED ORGANIC

"THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION, THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, THEAT, CURE OR PREVENT ANY DISEASE.



For Ultimate Relief of Allergy Symptoms\*

> 100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

rving Size 1 Capsule rvings Per Container 60

mount Per 2 Capsules

ALCOHOL FREE CONCENTRATED EXTRACT OF

Nettle leaf (Urtica dioica) A

100 mg†

STANDARDIZED TO FULL SPECTHUM ACTIVITY PROFILE
Bioactivity Per 2 Capsules mg Act 1% Caffeic acid derivatives (from Nettle) 1.0 mgt

1Daily Value not established.

Other ingredients: Vegetable glycerin, vegetable gelatin (capsule)

A = Certified Organic

Each 2 capsules contain 4,000 mg crude herb equivalent. Gaia Herbs Liquid Phyto-Caps " Patent pending.

Lot # Best by:

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Brevard,

Island Ford Rd.

108

Gaia Herbs, Inc.,

28712

Brevard, NC

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SUGGESTED USE: Take 1 capsule with a small amount of warm water 2 times daily between meals. Not to be used during pregnancy or lectation. Keep away from children. Use only as directed on label. Safety sealed to your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This does not affect product quality.

LIQUID PHYTO-CAPS\*\* — Gaia Horta' patent panding technology delivers.

pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetrain censule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient cannot be

a convenient capsule.

ECOLOGICALLY WILDCRAFTED

"THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE. TREAT, CURE OR PREVENT ANY DISEASE.

GAIA THERBY Liquid Phyto-Caps

Supercritical CO2

**Extract of Oregano** 



100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

unt Per 2 Capsules

ALCOHOL FREE CONCENTRATED EXTRACT OF Oregano leaf.

rcritical CO<sub>2</sub> Extract (Origanum vulgare) • 400 mg1

†Daily Value not established.

Other ingredients: Lecithin, vegetable gelatin (capsule).

Each 2 capsules contain 4,000 mg crude herb equiva Gaia Herbs Liquid Phyto-Caps " Patent pending.

Lot # Best by:

108 Island Ford R www.galaherbs.c . Inc., Herbs,

Gaia

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SUGGESTED USE:

Take 1 capsule with a small amount of warm water 2 times daily between meals. Not to be used during prepanery or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection. Keep bottle capped at all times and store in a cool dry place. Natural separation may occur. This loos not affect product quality.

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LIQUID PITYO-CAPS"— Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetarian capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system, from certified organic and ecologically wildcrafted herbs, in a convenient capsule.

a convenient capsule.
ECOLOGICALLY WILDCRAFTED

"THIS STATEMENT HAS NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THIS PRODUCT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.

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KARTEN LED SE GAIA 35 HERBS Liquid Phyto-Caps

Support for Healthy Immune Function\*



100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

Serving Size 1 Capsule Servings Per Container 60

Amount Per 2 Capsules

Calories 14

ALCOHOL FREE CONCENTRATED EXTRACT OF

Olive leaf (Olea europaea)

500 mgt

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE
Bicactivity Per 2 Capsules mg Ac 10% Oleuropeins

50 mg†

†Daily Value not established.

Other ingredients: Vegetable glycerin, lecithin, vegetable gelatin (cansule) gically Wildcrafted

Each 2 capsules contain 3,200 mg crude herb equive Gaia Herbs Liquid Phyto-Caps \*\* Patent pending.

Lot # Best by:

108 Island Ford Rd., Brevard, www.gaiaherbs.com 'nc.,

Herbs, Gaia

NC 28712

Brevard,

300 mgt 30 mgt 27 mgt 21 mgt 21 mgt

18 mgt 12 mgt m ▲ 12 mgt 12 mgt

SUGGESTED USE:

Take 1 capsule with a small amount of warm water 3 times daily between meals. Warm Water 3 times daily detweet media. Not to be used during pregnancy or lactation. Keep away from children. Use only as directed on label. Safety sealed for your protection, Keep bottle capped at diffiens and store in a cool dry place. Natural separation may occur. This does not affect product quality.

This does not affect product quality.

LIQUID PHYTO-CAPS™ — Gaia Herbs' patent pending technology delivers a concentrated full spectrum alcohol-free liquid extract in a 100% vegetraina capsule. Now you can have the superior bioavailability and fast absorption of a liquid delivery system. Irom certifled organic and ecologically wildcrafted herbs, in a convenient capsule.

ECOLOGICALLY WILDCRAFTED CERTIFIED ORGANIC

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STREET BY DELEGAN GAIA # HERBS Liquid Phyto-Gans

Support for the Peri-Menopause and Menopausal Years\*

100% VEGETARIAN 60 LIQUID-FILLED CAPSULES



Supplement Facts

ng Size 1 Capsule ngs Per Container 60

ALCOHOL FREE CONCENTRATED EXTRACTS OF

Alfalfa leaf (Medicago sativa) 
Vitex berry (Vitex agrus-castus) 
Black Cohosh rhizome (Cimicifuga racemosa)

black Conesh mazone (Camicitya racemos).

Red Clover blossoms (Trifolium pratense).

Wild Oats milky seed (Avena sativa) ▲

Blue Vervain herb (Verhena hastata).

Blue Vervain herb (Verhena hastata).

St. John's Wort flower bud (Hypericum perfon).

Sage leaf (Salvia off.).

†Daily Value not established

Other ingredients: Vegetable giycerin, lecithin, vegetable gelatin (capsule).

A = Cerdied (riganic = Ecologically Wildcrafted Each 3 capsules contain 3,000 mg crude herb equivalent.

Gaia Herbs Liquid Phyto-Caps.\*\* Patent pending.

lot # Best b

38 Island Ford Rd., www.gaiaharbs.com 80 nc. Herbs,