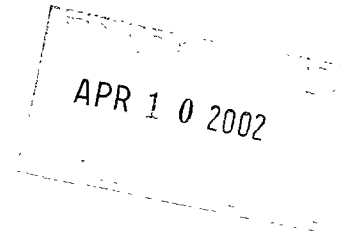


GAIA HERBS

Manufacturers of Fresh Botanical Extracts

John B. Foret
Director
Division of Compliance and Enforcement/ONPLDS
Center for Food Safety and Applied Nutrition
Food and Drug Administration HFS-810
5100 Paint Branch Parkway
College Park, Maryland 20740



April 3, 2002

Dear Sir:

This letter is in response to your letter of March 26, 2002 in regard to our name and structure function claim as follows:

Cholesterol Vital Balance
Supports Healthy Cholesterol Metabolism

You stated this name and claim might imply a disease claim and therefore did not meet the requirements of 21 U.S.C. 343(r)(6). For this reason we are changing the name and structure function claim. We used as guidance the section which you referenced in the preamble to the January 6, 2000 final rule on structure function claims which discusses cholesterol (65 FR 1000 at 1018). We used the suggestions contained in this section to avoid any implication of a disease claim. The name and structure function claim are as follows:

Cholesterol Vital Maintenance
Helps maintain cholesterol levels already in a normal range.

We feel that this does meet the requirements of 21 U.S.C. 343(r)(6) as required for dietary supplements. 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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108 Island Ford Road • Brevard, NC 28712
(828) 884-4242 tel • (828) 883-5999 fax • (800) 831-7780 orders

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SUGGESTED USE:

Take 2 capsules 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 place. Natural separation may occur. This does not affect product quality.

LIQUID PHYTO-CAPS™ – Gaia Herbs' patented 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.

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.



EXTRA STRENGTH

GAIA HERBS

Liquid Phyto-Caps

CHOLESTEROL VITAL MAINTENANCE

Helps Maintain Cholesterol Levels Already in a Normal Range*

100% VEGETARIAN
60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

Supplement Facts

Serving Size 1 Capsule
Servings Per Container 60

Amount Per 2 Capsules mg

Calories 20

ALCOHOL FREE CONCENTRATED EXTRACTS OF:

Parthenoc	200 mg†
Artichoke leaf (<i>Cynara scolymus</i>) ▲	200 mg†
Coleus root (<i>Coleus forskohlii</i>) ●	160 mg†
Guggulu resin (<i>Commiphora mukul</i>) ●	150 mg†
Wild Yam rhizome (<i>Dioscorea villosa</i>) ●	22 mg†
Policosanol	8 mg†
Greater Celandine tops & roots (<i>Chelidonium majus</i>) ●	8 mg†

†Daily Value not established.

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

▲ – Certified Organic or Organically Cultivated

● – Ecologically Wildcrafted

Each 2 capsules contain 3,600 mg crude herb equivalent.
Gaia Herbs Liquid Phyto-Caps™ U.S. Patent No. 6,238,586 B1

Lot #
Best by
Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712
www.gaiaherbs.com