

# GRONEK & ARMSTRONG

ATTORNEYS AT LAW

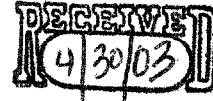
98TH FLOOR - SEARS TOWER  
233 SOUTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606

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April 15, 2003



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

Re: Notification for Statement on Dietary Supplement Labels

Dear Sir/Madam:

This firm represents Innovative Botanical Solutions, Inc., Provo, Utah, a distributor of dietary supplement products. Innovative Botanical Solutions has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement product labels.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the authorized provisions of 21 CFR §101.93(a), your Agency is hereby notified that Innovative Botanical Solutions has made statements of "nutritional support", as described in 21 U.S.C. §343(r)(6)(A), for its dietary supplements as follows:

| <u>Product Name</u> | <u>Label Statement(s)</u>  |
|---------------------|--|
| IMMUNO-FY           | Stimulates immune system. Immuno-Fy utilizes herbs that contain polysaccharides. Polysaccharides, harmless in nature, are recognized by the immune system and trigger a significant response of key immune system factors. |

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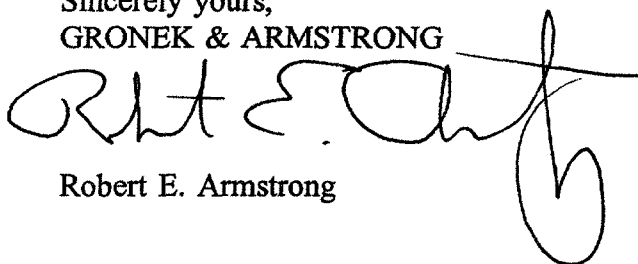
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MEMORY W/HUPERZINE A  
AND BACOPA

Supports memory and increases alertness.  
Supports nerve function. Promotes circulation.  
Memory is formulated to benefit brain function  
including both short and long term memory.  
Ginkgo supports overall blood circulation.

The undersigned hereby certifies on behalf of Innovative Botanical Solutions, Inc. that  
the information contained in this correspondence is complete and accurate.

Sincerely yours,  
GRONEK & ARMSTRONG

A handwritten signature in black ink, appearing to read "Robert E. Armstrong", with a large, stylized flourish at the end.

Robert E. Armstrong

PJW:REA:  
pr

CC: Innovative Botanical Solutions, Inc.