DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
College Park, MD 20740

FEB 16 2006 FEB 16 P2:33

President
Beulah Land Corporation
715 Lake Street, Suite 706
Oak Park, IL 60301

Dear Sir:

This is in response to your letters received by the Food and Drug Administration (FDA) on February 1, 2006. These letters were submitted to FDA pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)).

21 CFR 101.93(a)(3) requires that the notice submitted pursuant to 21 U.S.C. 343®)(6) and this section be signed by a responsible individual who can certify the accuracy of the information presented and contained in the notice, and that the individual certify that the information contained in the notice is complete and accurate, and that the notifying firm has substantiation that the statement is truthful and not misleading. Your submissions do not meet this requirement in that the notices do not contain the name and signature of a responsible individual; as such, each notice does not certify that the firm is in compliance with the requirements of the Act and the regulation. Therefore, your firm has not complied with the notification requirement in 21 U.S.C. 343®)(6) and must submit notifications in accordance with the requirements in 21 CFR 101.93(a). The failure to submit a valid notice as required by the Act and the agency's regulation may subject the products that are the subject of the notification to regulation under the drug provisions of the Act.

Please contact us if we may be of further assistance.

Sincerely yours,

Susan J. Walker, M.D.
Director
Division of Dietary Supplement Programs
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

97S 0162 LET 861

Copies:
FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-310
FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of Enforcement, HFC-200
FDA, Chicago District Office, Office of Compliance, HFR-CE640

Office of Special Nutritional (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

2006- undated/Unnumbered

FEB 1 2005

Dear Sir/Madam:

This letter will serve as notification, pursuant to 21 USC 343(r)(6) (section 403(r)(6)) of the Federal, Food, Drug, and Cosmetic Act and 21 CFR 101.93, that I am using the following claim on my label (see attached label).

Name of Distributor:
Beulah Land Corporation
715 Lake Street, Suite 706
Oak Park, IL 60301

Name of Manufacturer:
Ortho Molecular Products, Inc.
3017 Business Park Drive
P.O. Box 1060
Stevens Point, WI 54481

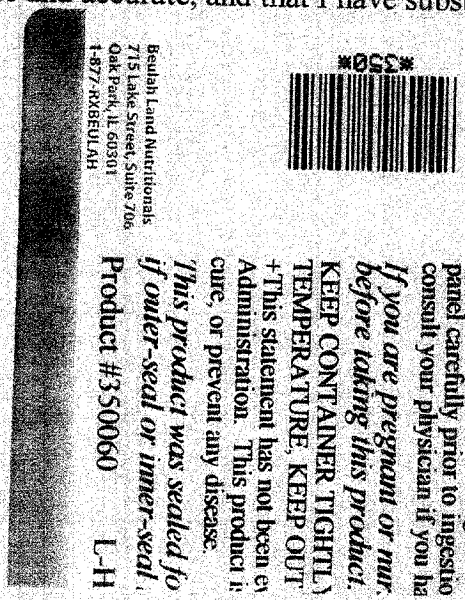
Statement Text:
Natural Medicine Use: Beulah's Bone Plus Pack may help promote bone health.

Dietary Ingredients:
2 packets contain: Vitamin D3 1000IU, Vitamin K 1mg, Folic Acid 800mcg, Calcium 1000mg, Phosphorus 400mg, Magnesium 400mg, Selenium 200mcg, Copper 1mg, Manganese 10mg, Molybdenum 150mcg, Ipraflavone 600mg, Strontium Citrate 1000mg, Montmorillonite 150mg, Boron 5mg

Dietary Supplement Name:
Beulah's Bone Plus Pack

As required, enclosed are two photocopies of this notification. I certify that the information presented and contained in this notice is complete and accurate, and that I have substantiation that the statement is truthful and not misleading.

Sincerely,
Beulah Land Corporation



#1575

plement, 2 packets per day
AM and one Clear/Clear packet
er day alternating 1 Clear/White
packet on even days or as
fessional.

individuals may not tolerate or
d. Please read the ingredient
se taking this product and
gative reactions upon ingestion.

consult your physician

OSED, STORE AT ROOM
EACH OF CHILDREN.
ed by the Food and Drug
ntended to diagnose, treat,

r protection. Do not use
ssing or damaged.

42-350060-B

Beulah's Bone Plus Pack +

DIETARY SUPPLEMENT
60 PACKETS

Supplement Facts		
Serving Size: 2 Packets		
Servings Per Container: 30		
2 packets contain	Amount Per Serving	% Daily Value
Vitamin D3 (as Cholecalciferol)	1000 IU	250%
Vitamin K (as Phytonadione)	1 mg	1250%
Folic Acid	800 mcg	200%
Calcium (as Hydroxyapatite, Citrimal®)	1000 mg**	100%
Phosphorus (as Calcium Hydroxyapatite, Chelate)	400 mg	40%
Magnesium (as Buffered Amino Acid Chelate, Citrate, Aspartate)	400 mg	40%
Selenium (as Amino Acid Complex)	200 mcg	286%
Copper (as Lysinate)	1 mg	50%
Manganese (as Chelazome®)	10 mg	500%
Molybdenum (as Amino Acid Chelate)	150 mcg	200%
Ipriflavone	600 mg	*
Strontium Citrate	1000 mg***	*
Montmorillonite	150 mg	*
Boron (as Proteinate)	5 mg	*

* % Daily Value not established
** The clear/white packet contains 900 mg Calcium.
*** The clear/clear packet contains 900 mg Strontium.

Other Ingredients: Natural vegetable capsules, Cranberry Juice Concentrate and Turmeric Root Extract. This product may contain one or more of the following: Ascorbyl palmitate, magnesium stearate, microcrystalline cellulose, and silicon dioxide.

Formulated to be free of allergens derived from: Gluten, corn, egg, dairy, peanuts, artificial colors and flavors.

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