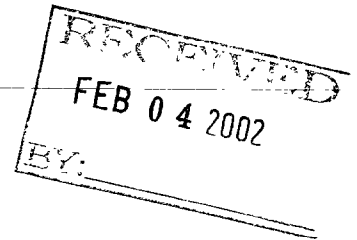


# GAIA HERBS

Manufacturers of Fresh Botanical Extracts



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

79155

December 19, 2001

Dear Sir:

This letter is to provide notification, within the prescribed 30 days of marketing, of three new products that Gaia Herbs is adding to our line that contain structure function claims. These products are Liquid Phyto-Caps that are herbal dietary supplements. I have attached a copy of each label that contains the structure function claim as well as other information.

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

Sincerely,

James A. Grant  
Regulatory Compliance Officer

975 0162

LET 9348

**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 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. If nausea occurs, please discontinue use temporarily.

**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 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.



EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps**

**NICOTINE RELIEF**

Promotes Protection from Environmental Stress\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

**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 CERTIFIED ORGANIC**

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EXTRA STRENGTH

GAIA HERBS  
**Liquid Phyto-Caps**

**HEALTHY SKIN & NAILS**

with Gotu Kola and Silica

Supports Radiant & Vital Skin & Nails\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

**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 BALANCE**

Supports Healthy Cholesterol Metabolism\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 3 Capsules	mg
<b>Calories 21</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Licorice Root ( <i>Glycyrrhiza uralsensis</i> & <i>G. glabra</i> ) ♦	315 mg†
Lobelia Herb & Seed ( <i>Lobelia inflata</i> ) ▲	48 mg†
Wild Oats Milky Seed ( <i>Avena sativa</i> ) ▲	38.4 mg†
St. John's Wort ( <i>Hypericum perforatum</i> ) ●	36 mg†
Calamus Root ( <i>Acorus calamus</i> ) ●	30.3 mg†
Passionflower ( <i>Passiflora incarnata</i> ) ▲	26.4 mg†
†Daily Value not established	

Other ingredients: Vegetable glycerin, vegetable cellulose (capsule)  
● = Ecologically Wildcrafted ♦ = Untreated Chinese Origin  
▲ = Certified Organic or Organically Cultivated

Each 2 capsules contain 5,250 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ U.S. Patent No. 6,238,696 B1

Lot #  
Best by

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
www.gaiaherbs.com

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
<b>Calories 14</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Turmeric Powder Extract (Blend consisting of: <i>Emberlica officinalis</i> , <i>Terminalia bellerica</i> , <i>Terminalia chebula</i> ) ♦	200 mg†
Horsetail aerial parts ( <i>Equisetum arvense</i> ) ▲	150 mg†
Alfalfa aerial parts ( <i>Medicago sativa</i> ) ▲	80 mg†
Gotu Kola Lt & Rt ( <i>Codonopsis asiatica</i> ) ▲	45 mg†
Yellow Dock Root ( <i>Rumex crispus</i> ) ▲	26 mg†
Nettle Leaf ( <i>Acorus calamus</i> ) ▲	22 mg†
Burdock Root ( <i>Arctium lappa</i> ) ▲	17 mg†
Fingwort aerial parts ( <i>Scrophularia nodosa</i> ) ▲	6 mg†
Oregon Grape Root ( <i>Berberis aquifolium</i> ) ●	5 mg†
Astaxanthin	4 mg†
Horsetail, Nettle & Alfalfa Mineral Ash	
<b>STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE</b>	
Bioactivity Per 2 Capsules	mg Activity
Silica from Horsetail	80 mg†
Total Interpenoids from Gotu Kola	3.2 mg†
†Daily Value not established	

Other ingredients: Vegetable glycerin, vegetable cellulose (capsule)  
▲ = Certified Organic or Organically Cultivated ♦ = Untreated Ayurvedic Origin  
● = Ecologically Wildcrafted

Each 2 capsules contain 3,000 mg crude herb equivalent.  
Gaia Herbs Liquid Phyto-Caps™ U.S. Patent No. 6,238,696 B1

Lot #  
Best by

Gaia Herbs, Inc., 108 Island Ford Rd., Brevard, NC 28712  
www.gaiaherbs.com

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
<b>Calories 14</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Parthenone	200 mg†
Artichoke leaf ( <i>Cynara scolymus</i> ) ▲	200 mg†
Coleus root ( <i>Coleus forskohlii</i> ) ●	180 mg†
Guggulu resin ( <i>Commiphora mukul</i> ) ●	150 mg†
Wild Yam rhizome ( <i>Dioscorea villosa</i> ) ●	22 mg†
Policosanol	10 mg†
Maysapple rhizome ( <i>Podophyllum peltatum</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. 6,238,696 B1

Lot #  
Best by

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www.gaiaherbs.com