HERBALIST & ALCHEMIST

2049 '03 APR 15 P1:59

March 27, 2003

APR - 4 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington, DC 20204

Dear Food and Drug Administration,

Herbalist & Alchemist, Inc., manufacturer, located at 51 South Wandling Ave., Washington, NJ 07882 is marketing the following product:

Muscle/Joint Tonic containing: bupleurem
sarsaparilla
tumeric
devil's claw
willow bark
ginger

bearing a structure/function claim of: Promotes Healthy Joint Function

We have substantiation to support this claim.

On April 20, 2000, this product was submitted bearing the name: "Smilax/Turmeric". Herbalist & Alchemist has renamed this product, and replaced Ganoderma (reishi) and Chinese Scute Root with Bupleurem and Ginger extract.

Sincerely,

97S 0162 LET 11790

William Hoover

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51 South Wandling Ave. Washington, NJ 07882