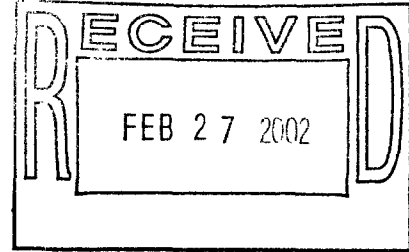




GAIA HERBS

1076 12 11-3 7151 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

February 11, 2002

Dear Sir:

This letter is to provide notification, within the prescribed 30 days of marketing, of a name change that Gaia Herbs is making to one product in our line that contains a structure function claim. This product is a Liquid Phyto-Cap that is an herbal dietary supplement. I have attached a copy of the old and new label that contains the structure function claim as well as other information.

The original name of the product, which was submitted with a group of 34 products in a letter dated February 6, 2001, was as follows:

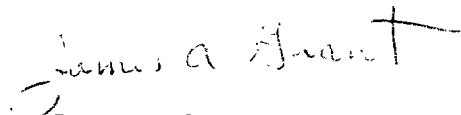
- Ginkgo Gotu Kola (Ultimate Support to Improve Memory)

It is being changed to:

- Mental Alertness (Ultimate Support to Improve Memory)

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

Sincerely,


 James A. Grant
 Regulatory Compliance Officer

97S 0162

LET 9533

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**

*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

**MENTAL
ALERTNESS**

Ultimate Support to
Improve Memory*

100% VEGETARIAN
60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

Supplement Facts

Serving Size 1 Capsule
Servings Per Container 60

Amount Per 2 Capsules	mg
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Calories 20

ALCOHOL FREE CONCENTRATED EXTRACTS OF:

Siberian Ginseng root (<i>Eleutherococcus senticosus</i>) ♦	80 mg†
Ginkgo leaf (<i>Ginkgo biloba</i>) ▲ / ●	40 mg†
Gotu Kola herb (<i>Centella asiatica</i>) ▲	40 mg†
Fo Ti (<i>Polygonum multiflorum</i>) ♦	26 mg†
Wild Oats milky seed (<i>Avena sativa</i>) ▲	22 mg†
Peppermint herb (<i>Mentha piperita</i>) ▲	20 mg†
Vinpocetine (from <i>Voacanga</i> seed)	10 mg†
Rosemary leaf, Supercritical CO ₂ Extract (<i>Rosmarinus off.</i>) ●	8 mg†

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE

Bioactivity Per 2 Capsules	mg Activity
Ginkgo flavonoid glycosides (from Ginkgo)	4.8 mg†
Terpenoids (from Gotu Kola)	1.0 mg†
Eleutherosides B&E (from Siberian Ginseng)	0.64 mg†

†Daily Value not established

Other ingredients: Vegetable glycerin, vegetable cellulose (capsule)

▲ = Certified Organic ● = Ecologically Wildcrafted ♦ = Untreated Chinese Origin

Each 2 capsules contain 5,000 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

SUGGESTED USE:

Take 1 capsule 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' patent pending 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
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EXTRA STRENGTH

GAIA HERBS
Liquid Phyto-Caps

**GINKGO
GOTU KOLA**

Ultimate Support to
Improve Memory*

100% VEGETARIAN
60 LIQUID-FILLED CAPSULES

Supplement Facts

Serving Size 1 Capsule
Servings Per Container 60

Amount Per 2 Capsules	mg
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Calories 14

ALCOHOL FREE CONCENTRATED EXTRACTS OF:

Siberian Ginseng root (<i>Eleutherococcus senticosus</i>) ♦	80 mg†
Ginkgo leaf (<i>Ginkgo biloba</i>) ▲	40 mg†
Gotu Kola herb (<i>Centella asiatica</i>) ▲	40 mg†
Fo Ti (<i>Polygonum multiflorum</i>) ♦	26 mg†
Wild Oats milky seed (<i>Avena sativa</i>) ▲	22 mg†
Peppermint herb (<i>Mentha piperita</i>) ▲	20 mg†
Rosemary leaf, Supercritical CO ₂ Extract (<i>Rosmarinus off.</i>) ●	8 mg†

STANDARDIZED TO FULL SPECTRUM ACTIVITY PROFILE

Bioactivity Per 2 Capsules	mg Activity
12% Ginkgo flavonoid glycosides (from Ginkgo)	4.8 mg†
2.5% Terpenoids (from Gotu Kola)	1.0 mg†
0.8% Eleutherosides B&E (from Siberian Ginseng)	0.64 mg†

†Daily Value not established

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

▲ = Certified Organic ● = Ecologically Wildcrafted ♦ = Untreated Chinese Origin

Each 2 capsules contain 3,600 mg crude herb equivalent.
Gaia Herbs Liquid Phyto-Caps™ Patent pending.

Lot #
Best by

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