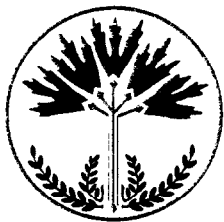


**GAIA**  **HERBS**

*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

January 17, 2002

Dear Sir:

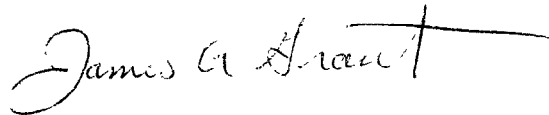
This letter is to provide notification, within the prescribed 30 days of marketing, of three new products that Gaia Herbs is adding to our line that contain structure function claims. These products are Liquid Phyto-Caps that are herbal dietary supplements. I have attached a copy of each label that contains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

These products are:

- Urinary Support
- Fem-Restore
- Aller-Leaf

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

9914

**SUGGESTED USE:**  
 Take 2 capsules with a small amount of warm water every 1-2 hours for 1-2 weeks as needed. *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™**

**URINARY  
 SUPPORT**

*Supports Healthy Functioning of the  
 Urinary System\**

100% VEGETARIAN  
 60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

**Supplement Facts**

Serving Size 1 Capsule	
Servings Per Container 60	
Amount Per 2 Capsules	mg
Calories 20	
ALCOHOL FREE CONCENTRATED EXTRACTS OF:	
Uva Ursi solid extract (Arctostaphylos uva-ursi) ●	370 mg†
Buchu leaf (Barosma betulina) ●	124 mg†
Pipsissewa leaf (Chimaphila umbellata) ●	92 mg†
Coptis rhizome (Coptis chinensis) ●	50 mg†
Echinacea (Echinacea purpurea) flowering top, Echinacea purpurea root, Echinacea angustifolia root	
Echinacea purpurea seed! ▲	30 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 2,740 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 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.*

**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

FEM-RESTORE

Supports Healthy Functioning of the Female Reproductive System\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

**Supplement Facts**

Serving Size 1 Capsule  
Servings Per Container 60

Amount Per 2 Capsules	mg
<b>Calories 20</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Fraxinus bark ( <i>Fraxinus americana</i> ) ●	60 mg†
Red Root ( <i>Ceanothus americanus</i> ) ●	40 mg†
Mayapple rhizome ( <i>Podophyllum peltatum</i> ) ●	30 mg†
Life Root ( <i>Senecio aureus</i> ) ●	20 mg†
Goldenseal rhizome ( <i>Hydrastis canadensis</i> ) ▲	20 mg†
Corydalis root ( <i>Corydalis yanhusuo</i> ) ●	16 mg†
Butterbur root ( <i>Patastis hybridus</i> ) ●	16 mg†
Ginger rhizome ( <i>Zingiber officinale</i> ) ●	14 mg†
Lobelia herb/seed ( <i>Lobelia inflata</i> ) ●	10 mg†

†Daily Value not established.

Other ingredients: Vegetable glycerin, vegetable cellulose (capsule)

▲ = Certified Organic or Organically Cultivated  
● = Ecologically Wildcrafted

Each 2 capsules contain 2,500 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 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.*

**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

ALLER-LEAF

Supports Healthy Functioning of the Upper Respiratory System\*

100% VEGETARIAN  
60 LIQUID-FILLED CAPSULES

A DIETARY SUPPLEMENT

**Supplement Facts**

Serving Size 1 Capsule  
Servings Per Container 60

Amount Per 2 Capsules	mg
<b>Calories 20</b>	
<b>ALCOHOL FREE CONCENTRATED EXTRACTS OF:</b>	
Turmeric root & leaf ( <i>Cucuma longa</i> ) ●	122 mg†
Eyebright herb ( <i>Euphrasia officinalis</i> ) ●	122 mg†
Nettle leaf ( <i>Urtica dioica</i> ) ▲	106 mg†
Bayberry bark ( <i>Myrica carifera</i> ) ●	100 mg†
Chinese Skullcap root ( <i>Scutellaria baicalensis</i> ) ●	36 mg†
Goldenseal rhizome ( <i>Hydrastis canadensis</i> ) ▲	16 mg†
Yarrow flower ( <i>Achillea millefolium</i> ) ▲	14 mg†
Calamus rhizome ( <i>Acorus calamus</i> ) ●	8 mg†

†Daily Value not established.

Other ingredients: Vegetable glycerin, vegetable cellulose (capsule)

▲ = Certified Organic or Organically Cultivated  
● = Ecologically Wildcrafted

Each 12 capsules contain 2,700 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