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William J. Thomas, Jr.
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File No. 82249.00001

November 30, 2006

VIA ELECTRONIC MAIL & U.S. MAIL

James J. Glessner, President
GSI Horticultural
141 NW Greenwood #200
Bend, OR 97701

RE: GSI HORTICULTURAL'S MOISTURIN LABEL

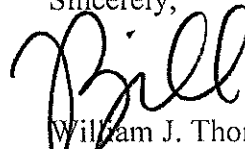
Dear Mr. Glessner:

As you know we resubmitted the Moisturin label to the California Department of Pesticide Regulation, with the claims of "accelerates bud break" eliminated. After review, Barry Cortez, Chief of the Pesticide Registration Branch, indicated GSI Horticultural's label, as amended, is not subject to pesticide registration. (A copy of Mr. Cortez's letter is attached.)

Based thereon, it appears the issues relating to pesticide registration of the Moisturin label have been resolved. Should you have any questions, or need additional assistance, please let me know.

Happy Holidays!

Sincerely,



William J. Thomas, Jr.
Of Counsel
for BEST BEST & KRIEGER LLP

WJT:ad



Department of Pesticide Regulation



Mary-Ann Warmerdam
Director

Arnold Schwarzenegger
Governor

October 19, 2006

Mr. William J. Thomas
Best Best & Krieger
400 Capitol Mall, Suite 1650
Sacramento, California 95814

Dear Mr. Thomas:

In response to your letter dated September 7, 2006, DPR Registration Branch determined the submitted label for the subject product Moisturin, contained the claim "accelerates bud break" and would be subject to pesticide registration.

We have reviewed your resubmitted label with the printer's proof dated October 16, 2006. Since the claim has been deleted from the amended label, it is no longer considered a plant growth regulator. This label is acceptable and is not subject to pesticide registration.

If you have any questions, please contact Andy Yokoyama by e-mail at ayokoyama@cdpr.ca.gov or by telephone at (916) 324-3914.

Sincerely,

Barry Cortez, Chief
Pesticide Registration Branch
(916) 445-4377

cc. Mr. Andy Yokoyama

