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November 15, 1998

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11/16/98

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

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Vitamin K maintains bone health. It has been discovered that vitamin K is of prime importance in maintaining bone density, especially in postmenopausal women.*
- (2) Chlorophyll in alfalfa may maintain kidney health. Chlorophyll, the substance responsible for photosynthesis and the green color of alfalfa, may be useful in helping to maintain kidney health. Chlorophyll salts do this by dissolving calcium oxalate.*
- (3) Both the fiber and saponins found in alfalfa may help maintain normal cholesterol levels.*
- (4) Saponins found in alfalfa help maintain normal immune response.*
- (5) Alfalfa contains phytoestrogens which are believed to help maintain a normal estrogen level.*

These statements are made for a dietary supplement containing fat soluble extract (from sesame seed, alfalfa, tillandsia, buckwheat, pea vine, and carrot), soy bean lecithin, and mixed tocopherols. The name of the product is Chlorophyll Complex Perles™.

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The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

