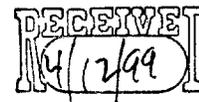




The Vitamin Marketing Experts

8000 '99 APR 20 P2:04

April 1, 1999



Dr. Elizabeth Yetley  
Director of the Office of Special Nutritionals  
Division of Programs and Enforcement Policy  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street  
HFS-455  
Washington, D.C. 20204

Dear Dr. Yetley:

Notice is hereby given pursuant to the requirements of Section 403(r)(6)(21 U.S.C. 343(r)(6) of the Federal Food, Drug and Cosmetic Act of statements of nutritional support which have been made on the label and/or in the labeling in connection with the marketing of the dietary supplement PRO HERBS IMMUNE DEFENSE. PRO HERBS IMMUNE DEFENSE was first marketed with these statements of nutritional support on Monday, March 29, 1999. The statements of nutritional support are as follows:

“Helps increase body’s natural defenses”

“Fortify your body’s natural defenses everyday with a complete formula that combines clinically tested ingredients such as the well known antioxidants **ActiVin™ (Grape Seed Extract), Alpha Lipoic Acid and Vitamins C and E**. These ingredients have been combined in this powerful formula for their ability to protect cells from free radical damage. Also featuring ActiVin™ brand red grape extract, a premium quality standardized herb. Studies show that ActiVin™ inhibits free radical – induced lipid peroxidation and DNA damage in cells. These are combined with **Echinacea** standardized extract, providing the perfect combination of nutrients to support optimum immune system function. Include Immune Defense in your daily nutrition for a healthier you.”

Very truly yours,

MASON VITAMINS, INC.

Sonia C. Rodriguez  
VP Marketing & Regulatory Affairs

975 - 0162

64627

LET 3451