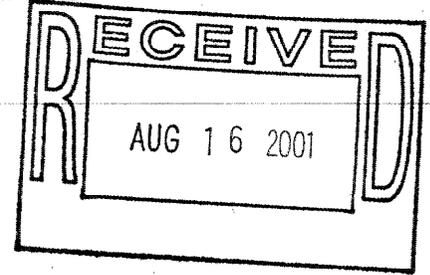


August 8, 2001

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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. The herbs found in Withania Complex Phytosynergist provide strong, consistent support to the body as it addresses everyday physical and emotional stress.
2. These herbs collectively support the nervous and immune systems, help to maintain mental and physical performance, promote overall well-being, and enhance vitality and stamina.
3. Withania Complex Phytosynergist is a multi-purpose tonic formulated to help the body and mind meet the challenges of daily living.

These statements are made for a dietary supplement containing a blend of Ashwaganda, Licorice, Skullcap, Korean Ginseng, steroidal compounds (including the complex mixture of steroidal saponins called ginsenosides), alkaloids, triterpenoid saponins (especially glycyrrhizin), and many flavonoids. Other ingredients include purified water and 41% alcohol. The name of the product is Withania Complex Phytosynergist™.

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.

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