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April 3, 1996

BY FEDERAL EXPRESS

Dr. Elizabeth A. Yetley
Acting Director
Office of Special Nutritionals
U.S. Food and Drug Administration (HFS-450)
FB8, Room 2804C
200 C Street, S.W.
Washington, D.C. 20204

Re: Statements of Nutritional Support

Dear Dr. Yetley:

We have been requested by Banner Pharmacaps Inc. ("Banner"), located at 20730 Dearborn Street, Chatsworth, California 91311, to notify the Food and Drug Administration (FDA), as required by Section 403(r)(6)(C) of the Food, Drug, and Cosmetic Act, that Banner intends to market dietary supplement products with the following labeling statements of nutritional support:

- 1 Softgel capsule containing Echinacea with the following labeling statement:

Scientific studies indicate that Echinacea may provide immune support.

2. Softgel capsule containing Lycopene with the following labeling statements:

One of the major benefits reported was a significant contribution towards prostate health. As an anti-oxidant, Lycopene was also reported to help protect against cell damage.

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W. PATRICK NOONAN, P.C.

If you should have any questions concerning the above statements of nutritional support Banner intends to use for the marketing of its dietary supplement products, please contact me.

Sincerely,



W. Patrick Noonan

WPN/jfk

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