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2/24/99

February 20, 1999

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) Calcium is also essential for various other body functions, including blood coagulation, muscle contraction, nerve conduction, maintenance and function of cell membranes and membrane permeability, and the proper functioning of many enzymes. The magnesium in this product aids in the uptake of calcium lactate by the body.*

These statements are made for a dietary supplement containing calcium lactate, magnesium citrate, calcium stearate, and arabic and cellulose gum. The name of the product is Calcium Lactate™.

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

Sincerely yours,

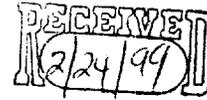
Ann Holden
Standard Process Inc.

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February 20, 1999



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) Others guard our health -- zinc and selenium are anti-oxidant minerals that protect the body against the damage of reactive and poisonous oxygen molecules called "free radicals".*
- (2) Vitamin B₆ is essential for immune system function.*
- (3) Vitamin B₆ is important for maintaining immune function in older people.*
- (4) Vitamin C maintains normal immune function in the face of physical and environmental stress. It protects leukocytes against their own poisons they emit in their immune functioning.*

These statements are made for a dietary supplement containing bovine liver PMG™ extract, zinc-iron-copper liver chelate, bovine liver powder, veal bone PMG™ extract, ascorbic acid, nutritional yeast, bovine spleen PMG™ extract, high selenium yeast, vacuum dried bovine and ovine spleen, bovine thymus PMG™ extract, bovine thymus Cytosol™ extract, mixed tocopherols, high chromium yeast, pyridoxal 5-phosphate, vitamin A esters, calcium lactate, folic acid, and cyanocobalamin. The name of the product is Immuplex®.

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**Standard
Process®**

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.

