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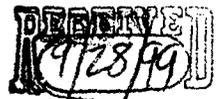
Bristol-Myers Squibb Company

Worldwide Consumer Medicines

1350 Liberty Avenue Hillside, New Jersey 07207 908 851-6119

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Steven J. Knapp, R.Ph.
Senior Director
Global Regulatory Affairs



September 23, 1999

Elizabeth Yetley, Ph.D., R.D.,
Director, Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204

Dear Dr. Yetley:

Pursuant to section 403(r)(6) of the Federal Food, Drug and Cosmetic Act (21 U.S.C. section 343(r)(6)), notification is hereby submitted of a statement made on the label of a dietary supplement that has been placed on the market within the past 30 days.

Company name: Bristol-Myers Products
Bristol-Myers Squibb Company
345 Park Avenue
New York, New York 10154

Product name: Theragran Heart Right Multivitamin/Multimineral Supplement

Statement: "Theragran Heart Right is a new generation of complete multivitamins developed with leading cardiologists to provide a full spectrum of your daily essential vitamins and key minerals. At the same time, it is specially formulated to help support a healthy heart.*"

As required by 21CFR101.93 the disclaimer appears below the statement, and it is printed in bold letters and enclosed in a box.

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Ingredients: The ingredients and levels printed in bold support the statement.

Amount per two caplets:

Vitamin A	5000IU	(8% as beta carotene and 2% as alpha carotene from proprietary blend)
Vitamin C	120mg	
Vitamin D	400IU	
Vitamin E	400IU	
Vitamin K	14mcg	
Thiamin	3mg	
(Vitamin B1)		
Riboflavin	3.4mg	
(Vitamin B2)		
Niacin	20mg	
Vitamin B6	16mg	
Folate	600mcg	
Vitamin B12	30mcg	
Biotin	30mcg	
Pantothenic Acid	10mg	
Calcium	55mg	
Iron	4mg	
Iodine	150mcg	
Magnesium	150mg	
Zinc	15mg	
Selenium	70mcg	
Copper	1.5mg	
Manganese	2mg	
Chromium	50mcg	
Molybdenum	75mcg	
Proprietary Blend	10mg	
Beta carotene	+	
Alpha carotene	+	
Lutein	+	
Lycopene	+	
Zeaxanthin	+	
Cryptoxanthin	+	

+daily value not established

The information herein is complete and accurate, to the best of our knowledge and belief. Bristol-Myers Squibb Company maintains on file substantiation that the statement is truthful and not misleading.

Sincerely,



Steven J Knapp
Senior Director,
Global Regulatory Affairs