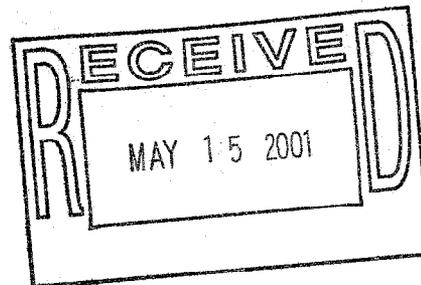




Office of Nutritional Products, Labeling and Dietary Supplements
 HFS 810
 Center for Food Safety and Applied Nutrition
 Food and Drug Administration
 200 C Street SW
 Washington, DC 20204

8007 '01 JUN 11 P2:11



RE: NOTIFICATION OF A DIETARY SUPPLEMENT STRUCTURE / FUNCTION CLAIM

Dear Sir/Madam:

Watkins Incorporated, in accordance with 21 USC § 343(r) and 21 CFR § 101.93, submits an original and two copies of its notification of its product marketing with the statements presented below.

Distributor:

Watkins Incorporated
 150 Liberty Street
 Winona, MN 55987
 Phone: (507)-457-3300
 FAX: (507)-452-6723

Supplement Brand Name:	Rezist Plus
Supplemental Ingredient that is the subject of the statement:	Larch arabinogalactan
The Text of Statement of Nutritional Support:	"More effective than echinacea at boosting the immune system"
Supplemental Ingredients that are the subject of the statement:	Lactobacillus sporogenes Larch arabinogalactan
The Text of Statement of Nutritional Support:	"Supports healthy digestive function"

In accordance with 21 USC § 343(r)(6) and 21 CFR § 101.93(c), each of the above statements will be followed by an asterisk that will be cross-referenced to another asterisk on the very same panel or page next to which the following statement will appear in a box in bold face type. "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease."

Certification of Accuracy:

In compliance with 21 CFR § 101.93 (a)(3), I certify that the information presented and contained in the notice herein is complete and accurate. Watkins Incorporated has substantiation that the statement contained in this notice is truthful and not misleading.

Brenda Koth

Brenda Koth, MS, RD
 Health & Nutrition Advisor
 Watkins Incorporated

975 0162 LET 8031

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