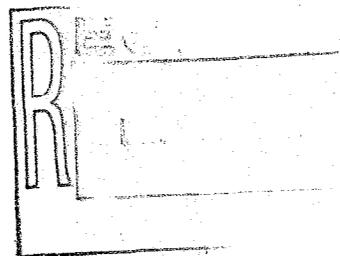




Office of Nutritional Products, Labeling and Dietary Supplements
 HFS 810
 Center for Food Safety and Applied Nutrition
 Food and Drug Administration
 200 C Street SW
 Washington, DC 20204

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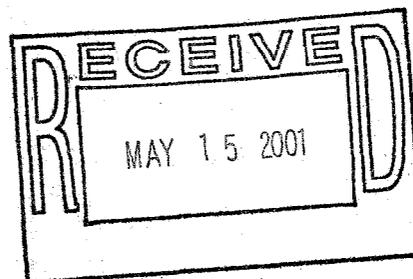
RE: NOTIFICATION OF A DIETARY SUPPLEMENT STRUCTURE / FUNCTION CLAIM

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:

Brain Plus

Supplemental Ingredient
 that is the subject of the statement:

Ginkgo Biloba

The Text of Statements of Nutritional Support:

“Supports brain function
 Aids in memory and concentration
 Enhances mental alertness”

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, MS, RD
 Health & Nutrition Advisor
 Watkins Incorporated

97S 0162 LET 8034

Since 1868 committed to enhancing lives one person at a time