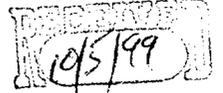




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October 1, 1999



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 statement:

- (1) Cholaplex is a special combination product that helps to support the healthy metabolism of blood fats, including cholesterol.*

This statement is made for a dietary supplement containing a proprietary blend of collinsonia (root), choline bitartrate, defatted wheat (germ), bovine liver, calcium lactate, dried buckwheat (leaf) juice, buckwheat (seed), porcine stomach, *Tillandsia usneoides*, purified bovine bile salts, bovine orchic Cytosol™ extract, soy (bean), inositol, soy bean lecithin, bovine spleen, ovine spleen, betaine hydrochloride, carrot (root), manganese glycerophosphate, bovine prostate, bovine brain, allantoin, bovine adrenal Cytosol™ extract, bovine orchic extract, oat flour, and ascorbic acid. Other ingredients include gelatin, niacinamide, water, potassium bicarbonate, pyridoxal 5-phosphate, potassium para-aminobenzoate, natural colors, prolamine iodine (zein), and riboflavine 5-phosphate. And the name of the product is Cholaplex®.

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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