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October 12, 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) Orchic PMG contains Protomorphogen™ extracts which are uniquely derived nucleoprotein-mineral extracts that support cellular health.*
- (2) Bovine orchic PMG™ extract helps maintain the orchic glands in a good state of repair to support healthy orchic gland function.*

These statements are made for a dietary supplement containing a proprietary blend of bovine orchic PMG™ extract, and magnesium citrate. Other ingredients include calcium lactate, cellulose, calcium stearate. And the name of the product is Orchic PMG®.

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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