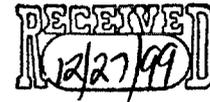




1675 TO JUN-4 P2:07

December 15, 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) Choline is necessary for the body to transport different fats in the bloodstream. It is especially known for its ability to help keep the liver free from fatty buildup. Choline is also a key component of two important elements of the nervous system – acetylcholine and sphingomyelin, both necessary for the normal functioning of the nervous system.
- (2) Honey is packed with carbohydrates, protein, amino acids, some minerals, B-complex vitamins, and vitamins C, D, and E – all healthy ingredients to promote energy in a natural form.
- (3) Supports healthy nervous system function.
- (4) Choline and calcium are needed to transmit nerve impulses from the brain throughout the central nervous system. Choline enhances brain function and memory.
- (5) Keeps your heart and liver healthy.
- (6) The primary function of choline is to metabolize fats throughout the body.
- (7) Boosts your energy level.
- (8) Maintains cellular health. Choline furnishes an essential structural component of many biological membranes. Choline donates necessary methyl groups that are needed to synthesize other important compounds needed for various physiological processes.

975 - 0162

LET 4752 68581





These statements are made for a dietary supplement containing the ingredients of choline bitartrate, honey, and calcium stearate. The name of the product is Choline.

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.

