



September 21, 1998 8 '98 RECEIVED  
9/23/98

Via Express Mail

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, D.C. 20204



Re: Statement of Nutritional Support  
Section 403(r)(6) Notification



Ladies and Gentlemen:

In accordance with the requirements of Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Makers of KAL, Inc., having the address of 1500 Kearns Boulevard, Park City, Utah 84060, notifies the FDA that it has commenced the marketing of the following dietary supplement with the following statement of nutritional support:



<u>Product</u>	<u>Relevant Dietary Ingredients</u>	<u>Statement of Nutritional Support</u>
Echinacea Defense	Echinacea	(1) Support your immune system.  (2) Boost your resistance.



I certify that the foregoing is complete and accurate, and that Solaray, Inc. has substantiation that the statements are truthful and not misleading.

Very truly yours,

Makers of KAL, Inc.



By: James B. Selander  
James Selander, President  
Herb Category



Sold Exclusively in Health Food Stores

**NUTRACEUTICAL CORPORATION**

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