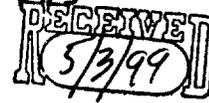




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April 26, 1999

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) Drenamin supports healthy adrenal gland function.\*
- (2) Drenamin helps to maintain cellular health. The antigenic properties of these nucleoprotein-mineral molecules promote healthy cellular division, growth, repair, and function.\*
- (3) Drenamin provides rich sources of vitamins and minerals.\*
- (4) Drenamin enhances circulation.\*
- (5) Drenamin supports metabolic efficiency.\*
- (6) Drenamin supports adrenal gland function.\*
- (7) Protomorphogen™ extracts provide nutritional ingredients and support for the corresponding organs in human.\*

These statements are made for a dietary supplement containing a proprietary blend of defatted wheat (germ), nutritional yeast, bovine liver, bovine adrenal, porcine stomach, bovine adrenal PMG™ extract, choline bitartrate, oat flour, dried buckwheat (leaf) juice, buckwheat (seed), alfalfa flour, magnesium citrate, mushroom, bovine bone, allantoin, bovine brain, carrot (root), soy bean lecithin, veal bone, peanut (bran), and mixed tocopherols. Other ingredients are calcium lactate, cellulose, water, niacinamide,

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potassium para-aminobenzoate, ascorbic acid, calcium stearate, riboflavin, and pyridoxine hydrochloride. The name of the product is Drenamin®.

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.

