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January 31, 2001

Office of Special Nutritionals (HF-450) Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C Street SW Washington, DC 20204 FEB 13 2001

Re: 21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Winter WellnessTM, an herbal dietary supplement.

Statements being made in the labeling of Winter WellnessTM

(1) Winter Wellness[™] is an advanced nutritional product formulated by certified nutritionists in conjunction with Dr. James Balch, Jr. It is a comprehensive phytofood supplement fortified with standardized herbal extracts that have guaranteed potencies. It is the perfect supplement for building the body's natural defenses.

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. Now Foods possesses substantiation that the statements are truthful and not misleading.

Jim Roza
Director, Quality Assurance
NOW Foods
395 S. Glen Ellyn Rd.
Bloomingdale, IL 60108

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