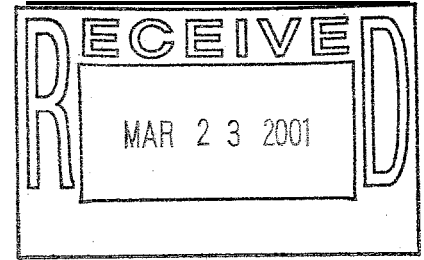




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By Federal Express

March 21, 2001

Office of Special Nutritional Products Labeling and Dietary Supplements
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration HFS 8 11
200 c St. SW
Washington, DC 20204

RE: Notification for Certain types of Statements on Dietary Supplements

Dear Sir or Madam:

As required by Section 403(r)(6)(c) of the Food, Drug and Cosmetic Act, Pharmanex, LLC, 75 West Center, Provo, Utah 84601, intends to market a dietary supplement product with the following label and marketing statements of nutritional support:

Product identified as Immune Formula with the following label statements:

- Boosts immune function for the cold weather season
- Supports the body's natural immune function
- Provides a blend of immune-enhancing ingredients
- Immune Formula's powerful immune-bolstering properties help assure you are prepared for whatever comes your way.
- Arabinogalactan AG was shown to be two times as effective as Echinacea in boosting immune function.
- Proprietary Immune formula is a blend of vitamin C, herbs and other immune system enhancing ingredients for the wet weather season.
- Immune Formula rapidly stimulates the body's own natural immune defense system when needed.
- A dietary supplement for individuals who want to promote the body's natural immune defense system

I certify that the information contained in this notice is complete and accurate and that Pharmanex, LLC has substantiation that these statements are truthful and not misleading.

Sincerely,

Win Duersch
Sr. Director of Global Technical Services

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