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October 30, 1998

Office of Special Nutritionals  
HFS-450 Center for Food Safety and Applied Nutrition  
U.S. Food and Drug Administration  
200 C St.SW  
Washington DC 20204

Statement of Nutritional Support- **ECHINACEA COMPLEX**  
Pursuant to 21 CFR Part 101.93, American Specialty Health &  
Wellness (ASHW) files the following Statement of Nutritional  
Support for the Dietary Supplement marketed as:**ECHINACEA COMPLEX**

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr.  
Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made:  
"Preparations made from the juice of the plant have been found to  
strengthen the immune system."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: **ECHINACEA COMPLEX**
- 5) Substantiation information on file at the company office. The  
corporate officer who can certify same is Dr. Doug Metz, Vice  
President.

Yours truly,

  
Dr. Doug Metz  
Vice President

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# Echinacea Complex

## Description:

Echinacea, also known as purple cone flower, is a native North American wildflower. Preparations made from the juice of the plant have been found to strengthen the immune system. Echinacea Complex also contains extracts of Goldenseal (*Hydrastis canadensis* root), Astragalus (*Astragalus membranaceus* root) and L-Lysine.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

**Directions For Use:** Take 1 capsule per day.

**Storage:** Keep tightly closed in a cool, dry place.

**Caution/Warning:** As with any supplement, herb or medication, do not use it while pregnant or lactating, or provide it to a child without consulting a physician. Do not use echinacea for more than a few weeks. This herb is not to be used in systemic diseases such as tuberculosis, multiple sclerosis, immune disorders and other such diseases.

**Note:** This product is regulated by the FDA as a dietary supplement. If you have any questions about how you feel while taking this supplement, contact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

DISTRIBUTED BY AMERICAN SPECIALTY HEALTH & WELLNESS™  
PO BOX 509040, SAN DIEGO, CA 92150-9040

## ECHINACEA COMPLEX DIETARY SUPPLEMENT

60 CAPSULES

*Premium Products for Your Health & Wellness™*

### Supplement Facts

Serving Size: 1 Capsule – Servings Per Container: 60

	Amount Per Serving:	% Daily Value
Echinacea extract ( <i>Echinacea purpurea</i> flowering tops, std 4% phenolics)	100mg	*
Goldenseal extract ( <i>Hydrastis canadensis</i> root, std 5% hydrastines)	25mg	*
Astragalus extract ( <i>Astragalus membranaceus</i> root, std 16% astragalosides)	25mg	*
L-Lysine	100mg	*

**Other Ingredients:** Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide.

\*Daily Value not established.

Echinacea Complex is free of wheat, corn, soy, dairy, sucrose, starch, salt and yeast.