



8905 '98 NOV 24 P2:37
NOV 16 1998

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- MEN'S AM FORMULA OVER 40
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:
MEN'S AM FORMULA OVER 40

- 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:
"Men's and women's AM-PM formulas contain a blend of vitamins,
minerals, and herbs specifically formulated to work with your
body's natural daily rhythms, so that nutrients are available when
the body needs them most."
- 3) Name of dietary ingredient: See Attached Product Label
- 4) Brand Name: Men's AM Formula Over 40
- 5) Substantiation information on file at the company office. The
corporate officer who can certify same is Dr. Doug Metz, Vice
President.

Yours truly,

A handwritten signature in cursive script, appearing to read "Doug Metz".

Dr. Doug Metz
Vice President

97S-0162

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SUPPLEMENT FACTS

Botanical Sciences™ Men's AM Formulas

Serving size: 2 packets (six tablets) Servings per package: 30

Six Tablets Provide:	Amt/Serving	% Daily Value
Vitamin A (as palmitate)	5000 IU	100%
Vitamin C (as ascorbic acid 100 mg, calcium ascorbate 100 mg, magnesium 100 mg, palmitate 25 mg, potassium 50 mg, sodium 25 mg)	400 mg	667%
Vitamin D	200 IU	50%
Vitamin E (as d-alpha tocopherol succinate)	200 IU	667%
Thiamin (as cocarboxylase, 2.5 mg and mononitrate, 100 mg)	102.5 mg	6833%
Riboflavin (as riboflavin, 50 mg and riboflavin 5-phosphate, 2.5 mg)	52.5 mg	3088%
Niacin (as niacin, 20 mg and niacinamide, 125 mg)	145 mg	725%
Vitamin B6 (as pyridoxine HCl)	50 mg	2500%
Folate (as folic acid)	200 mcg	50%
Vitamin B12	500 mcg	8333%
Biotin	200 mcg	666%
Pantothenic acid	250 mg	2500%
Magnesium (as amino chelate buffered)	100 mg	25%
Manganese (as manganese Chelazome® amino chelate)	1 mg	50%
Chromium (as chromium Chelavite® amino chelate)	100 mcg	83%
Molybdenum (as amino chelate)	75 mcg	100%
Alpha-ketoglutaric acid	62.5 mg	*
Bacopa (Bacopa monniera leaf, std 20% bacosides)	50 mg	*
Calcium d-saccharate	25 mg	*
Calcium pyruvate	50 mg	*
Choline bitartrate	100 mg	*
Citrus bioflavonoid complex	125 mg	*
Coenzyme Q10	20 mg	*
DHEA	20 mg	*
DMAE bitartrate	75 mg	*
Fruit phytonutrient complex (cranberry, grapefruit fiber, apple pectin, psyllium husk, oat bran, guar gum, barley bran, papaya, pineapple stem)	250 mg	*
Ginkgo extract (Ginkgo biloba leaf, std 24% flavones, 6% terpene lactones)	40 mg	*
Green tea extract (Camellia sinensis leaf, std 90% gynnemic acids)	50 mg	*
Hawthorn berry extract (Crataegus cuneata fruit leaf, 4:1)	35 mg	*
Herbal extracts of Ginkgo (Ginkgo biloba leaf), Ginseng (Panix ginseng root), Cnidium (Cnidium officinale rhizome), Epimedium (Epimedium sagittatum aerial parts) and Tribulus (Tribulus terrestris fruit)	2400 mg	*
Inositol	100 mg	*
L-Carnitine, Base	50 mg	*
L-Taurine	250 mg	*
Lutein extract	50 mg	*
Lycopene	50 mg	*
PABA	50 mg	*
Pyridoxal 5-phosphate	2.5 mg	*
Stinging nettles extract (Urtica dioica leaf, 4:1)	75 mg	*

* Daily Value not established

Other ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide. Albion Laboratories, U.S. Patents 4,599,152 & 5,292,729, patents pending. Chelazome® & Chelavite® are registered trademarks of Albion Laboratories, Inc. Botanical Sciences™, the human figure symbols, & American Specialty Health & Wellness™ are licensed trademarks of American Specialty Health & Wellness.



AM-PM Formulas

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