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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- MEN'S PM FORMULA SENIORS
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 PM FORMULA SENIORS

- 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 PM FORMULA SENIORS
- 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

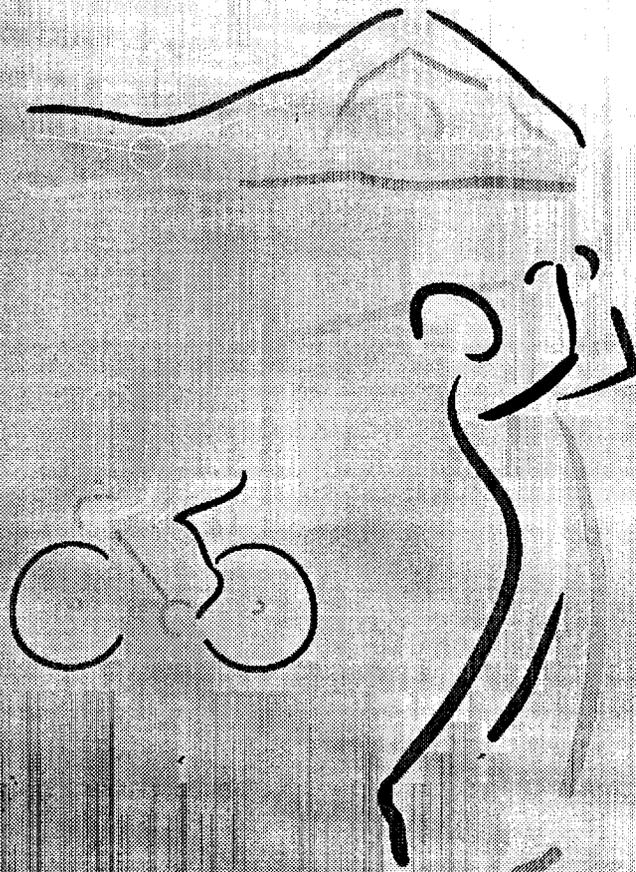
LET 2501

PM

MEN'S PM FORMULA Seniors

**Convenient Evening
Supplement for Men**

Dietary Supplement | 80 Tablets (60 Packets)



MEN'S PM FORMULA - Seniors is free of wheat, corn, dairy, sucrose, starch, salt and yeast.

CAUTION/WARNING: Keep out of reach of children. As with any supplement, herb or medication, do not provide it to a child without consulting a physician. Not for use by pregnant or lactating women unless directed by a physician.

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.

STORAGE: Keep tightly closed in a cool, dry place.

DIRECTIONS FOR USE: As a dietary supplement, take one packet (3 tablets) with dinner and one packet at bedtime, or take two packets at dinner.

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

S U P P L E M E N T F A C T S

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

Six Tablets Provide:	Amt/Serving	% Daily Value
Vitamin A (as beta carotene)	5000 IU	100%
Vitamin C (as ascorbic acid 100 mg, calcium ascorbate 100 mg, magnesium 100mg, palmitate 25 mg, potassium 50 mg, sodium 25 mg)	400 mg	667%
Calcium (as amino chelate 125 mg and calcium Citrimal 125 mg)	250 mg	25%
Niacin (as niacinamide)	125 mg	625%
Folate (as folic acid)	200 mcg	50%
Biotin	200 mcg	67%
Iodine (from Atlantic kelp)	150 mcg	100%
Magnesium (as amino chelate buffered)	100 mg	25%
Zinc (as zinc Chelazome® amino chelate)	20 mg	133%
Selenium (as L-selenomethionine)	100 mcg	143%
Copper (as copper Chelazome® amino chelate)	2 mg	100%
Manganese (as manganese Chelazome® amino chelate)	1 mg	50%
Chromium (as chromium Chelavite® amino chelate)	100 mcg	83%
Alpha-lipoic acid	500 mcg	*
Apple pectin	250 mg	*
Bacopa extract (Bacopa monniera leaf, std 20% bacosides)	100 mg	*
Betadene® mixed carotenoids (Dunaliella salina plant, std 7.5% mixed carotenoids)	6,300 mcg	*
Bilberry extract (Vaccinium myrtillus fruit, 4:1)	30 mg	*
Calcium D-saccharate	25 mg	*
Calcium pyruvate	25 mg	*
Cal's claw extract (Uncaria tomentosa bark, 4:1)	100 mg	*
Citrus bioflavonoid complex	125 mg	*
Damiana extract (Turnera diffusa leaf, 4:1)	25 mg	*
Dibenzozide	250 mg	*
Fructo-oligosaccharides	300 mg	*
Ginger extract (Zingiber officinale root, 4:1)	200 mg	*
Grape seed extract (Vitis vinifera seed, std 95% proanthocyanidins)	25 mg	*
Grape skin extract (Vitis vinifera skin, 4:1)	25 mg	*
Hawthorn berry extract (Crataegus cuneata fruit, 4:1)	40 mg	*
L-Lysine	250 mg	*
L-Taurine	250 mg	*
Lutein extract	50 mg	*
Lycopene	50 mg	*
Milk thistle extract (Silybum marianum seed, std 80% silymarin)	50 mg	*
N-Acetyl cyteine	300 mg	*
PABA	50 mg	*
Pinebark extract (Pinus strobus bark, std 95%)	15 mg	*
Pygeum extract (Pygium africanum plant, 4:1)	40 mg	*
Red wine extract (Vitis vinifera fruit, std 15%)	25 mg	*
RoseOx® rosemary extract (Rosmarinus officinalis leaf, std 6% carnosic acid)	25 mg	*
Saw palmetto extract (Seronia repens fruit, std 25% liposterolics)	160 mg	*
Turmeric extract (Curcuma longa root, std 95% curcuminoids)	100 mg	*
Valerian extract (Valerian officinalis root, std 0.8% valerianic acid)	50 mg	*
Vegetable phytonutrient complex (vegetable extract: broccoli, cabbage, carrots, parsley leaf, tomatoes, peppermint, barley grass, beets)	250 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 and 5,292,729 and patents pending. Chelazome® and Chelavite® are registered trademarks of Albion Laboratories, Inc. Betadene® is a registered trademark of Henkel Corp. RoseOx® is a registered trademark of Hauser Chemical Corp. Botanical Sciences™, the human figure symbol, and American Specialty Health & Wellness™ are licensed trademarks of American Specialty Health & Wellness.

Botanical Sciences' Men's PM Formulas were specifically developed to work with your body's natural daily rhythms, maximizing the efficiency of your body's metabolism and meeting the needs of your body at the end of the day. The Men's PM Formulas include a unique combination of vitamins, minerals, antioxidants, phytonutrients, botanical extracts and amino acids to support energy production, immune system protection, and enzyme function. All ingredients in the Men's PM Formulas have been carefully selected for their purity, potency and effective interaction with other nutrients.

The Botanical Sciences name is your assurance of the finest in dietary supplements. Botanical Sciences is committed to upholding the highest standards in premium dietary supplements and providing you with a quality, safe and effective product. Through continuous quality control, Botanical Sciences products are carefully monitored at every stage of productions, bringing you the highest quality nutritional supplements.

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.



AM-PM Formulas

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.