



December 10, 1998

Office of Special Nutritional
HFS-450 Center for Food Safety and Applied Nutrition
Us. Food and Drug Administration
200 c St. Sw
Washington DC 20204

2333 "99 MN-5 P2:13

Statement of Nutritional Support - VITAMIN C ESTER C
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:
VITAMIN C ESTER C

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:

" Vitamin C, also known as ascorbic acid, is an antioxidant
that is required for proper tissue growth and maintenance
and adrenal gland function. Ester C has naturally bonded
minerals which help the body absorb the Vitamin C more
quickly. Vitamin C supports a health immune system and
blood and tissue functions in the body."

3) Name of dietary ingredient(s): See Attached Product Label

4) Brand Name: VITAMIN C ESTER C

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 that reads "Doug Metz".

Dr. Doug Metz
Vice President

070 - 0162

62873
LET 2866

Ester Vitamin C

(Ascorbic Acid, Polyascorbate)

Description:

Vitamin C, also known as ascorbic acid, is an antioxidant that is required for proper tissue growth and maintenance and adrenal gland function. Ester C has naturally bonded minerals which help the body absorb the Vitamin C more quickly. Vitamin C supports a health immune system and blood and tissue **functions** in the body.

VITAMIN C
ESTER-C®
 DIETARY SUPPLEMENT

Supplement Facts

Serving Size: 1 Tablet - Servings Per Container: 100

	Amount Per Serving	% Daily Value
Vitamin C (as Ester-C® calcium)	500mg	833%
Citrus bioflavonoids (Citrus rind, std 35% bioflavonoids)	200mg	
Other Ingredients: Wm, cellulose, calcium phosphate hydrous, stearic acid, <input type="checkbox"/> acnes'm stearated silicon dioxide		

*Daily Value not established

Vitamin C Ester-C is free of wheat, corn, dairy, sucrose, starch, salt and yeast.

® and Ester-C™ are licensed trademarks of Inter-Cal Cap. Manufactured under U.S. Patent No. 4,522,816. Other foreign patents pending.

Directions For Use: Take 1 tablet 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 provide it to a child without consulting a physician. Mega-doses can cause diarrhea and skin rashes, and* term mega-doses can cause oxalate and uric acid stone formation.

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 505040, SAN DIEGO, CA 92150-5040

100 TABLETS

Premium Products for Your Health & Wellness™