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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- WOMEN'S AM FORMULA UNDER 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:
WOMEN'S AM FORMULA UNDER 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: Women's AM Formula Under 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

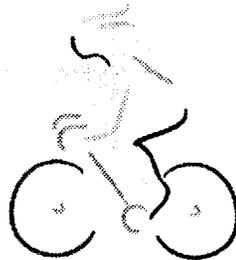
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AM

WOMEN'S AM FORMULA Under 40

**Convenient Morning
Supplement for Women**

Dietary Supplement 180 Tablets (60 Packets)



WOMEN'S AM FORMULA - Under 40 is free of wheat, corn, dairy, sucrose, starch, salt and yeast.

CAUTION/WARNING: This product contains iron and should not be provided to a child under any circumstance without consulting a physician. Accidental overdose of iron-containing products is a leading cause of fatal poisoning in children under 6. Keep this product out of reach of children. In case of accidental overdose, call a doctor or poison control center immediately.

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.

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 breakfast and one packet at lunch, or take two packets at breakfast.

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 palmitate)	2500 IU	50%
Vitamin C (as ascorbic acid 150 mg, calcium ascorbate 150 mg, magnesium 150 mg, palmitate 37.5 mg, potassium 75 mg, sodium 37.5 mg)	600 mg	1000%
Calcium (as amino chelate, 125 mg and calcium Citrimal 125 mg)	250 mg	25%
Iron (as Ferrochel® amino chelate)	9 mg	50%
Vitamin D	400 IU	100%
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, 50 mg)	70 mg	350%
Vitamin B6 (as pyridoxine HCl)	50 mg	2500%
Folate (as folic acid)	400 mcg	100%
Vitamin B12	500 mcg	120%
Biotin	200 mcg	66%
Pantothenic acid	250 mg	2500%
Magnesium (as amino chelate buffered)	25 mg	6%
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	125 mg	*
Bacopa (Bacopa monniera leaves, std 20% bacosides)	25 mg	*
Calcium d-saccharate	50 mg	*
Calcium pyruvate	50 mg	*
Choline bitartrate	100 mg	*
Citrus bioflavonoid complex	125 mg	*
DMAE bitartrate	50 mg	*
Fruit phytonutrient complex (cranberry, grapefruit fiber, apple pectin, psyllium husk, oat bran, quark gum, barley bran, papaya, and pineapple stem)	250 mg	*
Ginger extract (Zingiber officinale root, 4:1)	75 mg	*
Ginkgo extract (Ginkgo biloba leaf, std 24% flavones, 6% terpene lactones)	20 mg	*
Green tea extract (Camellia sinensis leaf, std 90% gynnemic acids)	50 mg	*
Hawthorn berry extract (Crataegus cuneata fruit, 4:1)	25 mg	*
Herbal extracts of Bupleurum (Bupleurum Chinese root), Peppermint (Menthae piperita leaf), Angelica (Angelicae sinensis root), Peony (Paeoniae lactiflora root), Mountain (Paeonia mountain bark), Hoelen (Poria cocos lungus), Atractylodis (Atractylodis ovata rhizome), Licorice (Glycyrrhiza uralensis), Ginger (Zingiberis siccata root) and Gardeniae (Gardenia jasminoides fruit)	1500 mg	*
Inositol	100 mg	*
Ipraflavone	30 mg	*
L-Taurine	125 mg	*
PABA	50 mg	*
Pyridoxal 5-phosphate	2.5 mg	*
Soy isoflavones	25 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® and Ferrochel® 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.

Botanical Sciences' Women's AM 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 Women's AM 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 Women's AM 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 production, 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.