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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 - **ASHWAGANDHA EXTRACT**
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:
ASHWAGANDHA EXTRACT

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:
"Ashwagandha, also known as Indian ginseng, is considered a
general tonic. The roots and leaves of the Withania
somnifera shrub are reported to promote health, vitality,
stamina, physical performance and mental acuity. General
tonics such as ashwagandha are believed to enhance the
body's ability to cope and adapt to stressful conditions."

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

4) Brand Name: **ASHWAGANDHA EXTRACT**

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

8989 Rio San Diego Dr., Suite 250, San Diego, CA 92108 • Phone 619/297-8100 • Fax 619/209-6236

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Ashwagandha Extract

Description:

Ashwagandha, also known as Indian ginseng, is considered a general tonic. The roots and leaves of the *Withania somnifera* shrub are reported to promote health, vitality, stamina, physical performance and mental acuity. General tonics such as ashwagandha are believed to enhance the body's ability to cope and adapt to stressful conditions.

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.

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

ASHWAGANDHA EXTRACT

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

Ashwagandha extract (<i>Withania somnifera</i> root, std 1.5% withanolides)	450mg	*
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Other Ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide.

*Daily Value not established.

Ashwagandha Extract is free of wheat, corn, soy, dairy, sucrose, starch, salt and yeast.