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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- **ANTIOXIDANT FORMULA**
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:
ANTIOXIDANT FORMULA

- 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:
"Antioxidants are a class of vitamins, minerals, and enzymes that
trap and neutralize harmful molecules called free radicals. Free
radicals are formed by exposure to toxic chemicals, pollutants,
radiation, and overexposure to the sun. Antioxidant Formula
contains various antioxidant vitamins and minerals, and the
natural sources of antioxidant s such as grape seed extract and
phytonutrient vegetable extract."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: **ANTIOXIDANT FORMULA**
- 5) Substantiation information on file at the company office. The
corporate officer who can certify same is Dr. Doug Metz, Vice
President.

Yours truly,

Dr. Doug Metz
Vice President

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Antioxidant Formula

Description:

Antioxidants are a class of vitamins, minerals and enzymes which trap and neutralize harmful molecules called free radicals. Free radicals are formed by exposure to toxic chemicals, pollutants, radiation and overexposure to the sun. Antioxidant Formula contains various antioxidant vitamins and minerals, and natural sources of antioxidants such as grape seed extract and phytonutrient vegetable extract.

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.

Other Ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide

*Daily Value not established

Antioxidant Formula is free of wheat, corn, dairy, sucrose, starch, salt and yeast.

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

Directions For Use: Take 1 capsule 2 times per day

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.

Betalene® is a registered trademark of Henkel Corp.

Chelazome® is a registered trademark of Albion Laboratories, Inc.

RoseOx® is a registered trademark of Hauser Chemical Corp.

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

ANTIOXIDANT FORMULA

DIETARY SUPPLEMENT

60 CAPSULES

Premium Products for Your Health & Wellness™

Supplement Facts

Serving Size: 2 Capsules -- Servings Per Container: 30

	Amount Per Serving	% Daily Value
Vitamin C (as ascorbic acid and ascorbyl palmitate)	200mg	334%
Vitamin E (as d-alpha tocopherol succinate)	200 IU	667%
Zinc (as zinc citrate)	5mg	33%
Selenium (as amino complex)	100mcg	143%
Copper Lysine (as amino complex)	500mcg	250%
Manganese (as Chelazome® amino chelate)	2mg	100%
Alpha lipoic acid	200mcg	*
Betalene® (Dunaliella salina whole plant, std 7.5% mixed carotenoids)	10,000 IU	*
Glutathione (reduced)	25mg	*
Grape seed extract (Vitis vinifera seed, std 95% proanthocyanidins)	15mg	*
L-Cysteine	50mg	*
RoseOx® (Rosmarinus officinalis leaf, std 6% carnosic acid)	20mg	*
Vegetable phytonutrient complex (vegetable extract: broccoli, cabbage, carrots, parsley leaf, tomatoes, peppermint, barley grass, beets)	200mg	*