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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- **BETA CAROTENE**
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:
BETA CAROTENE

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:
"Beta carotene is a form of Vitamin A that is readily absorbed
and used by the body. The beta carotene molecule, which is found
in certain plants, is changed into Vitamin A as needed by the
body. Vitamin A is important in the body's growth and bone
development, vision, immune system, reproductive system and
healthy skin. Vitamin A acts as an antioxidant to protect tissue
cells from damage caused by toxic chemicals, radiation, and
overexposure to the sun. It is considered important in
maintaining a healthy cardiovascular and immune system."

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

4) Brand Name: **BETA CAROTENE**

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

LET 2531

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

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Beta-carotene

Description:

Beta-carotene is a form of vitamin A that is readily absorbed and used by the body. The beta-carotene molecule, which is found in certain plants, is changed into vitamin A as needed by the body. Vitamin A is important in the body's growth and bone development, vision, immune system, reproductive system and healthy skin. Vitamin A acts as an antioxidant to protect tissue cells from damage caused by toxic chemicals, radiation and overexposure to the sun. It is considered important in maintaining a healthy cardiovascular and immune system.

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

BETA-CAROTENE

DIETARY SUPPLEMENT

100 CAPSULES

Premium Products for Your Health & Wellness™

Supplement Facts

Serving Size: 1 Capsule – Servings Per Container: 100

	Amount Per Serving:	% Daily Value
Vitamin A (as beta-carotene)	25,000 IU	500%

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

Beta-carotene is free of wheat, corn, soy, dairy, sucrose, starch, salt and yeast.