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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 PM FORMULA OVER 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 PM FORMULA OVER 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 PM Formula Over 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 black ink, appearing to read "Doug Metz", written in a cursive style.

Dr. Doug Metz
Vice President

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WOMEN'S PM FORMULA - Over 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 dinner and one packet at bedtime, or take two packets at dinner.

DISTRIBUTED BY:

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

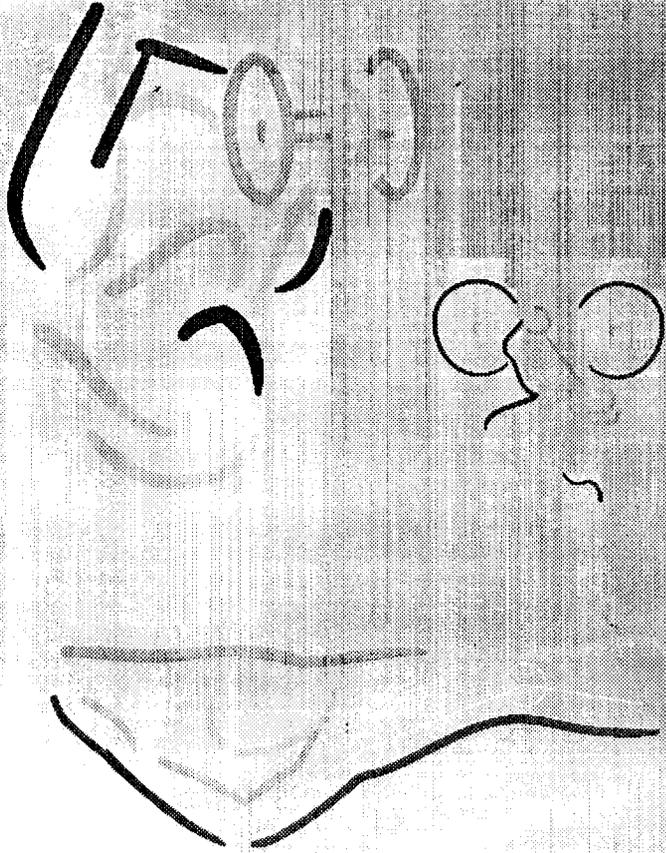
PM

WOMEN'S PM FORMULA Over 40

**Convenient Evening
Supplement for Women**

Dietary Supplement 180 Tablets (60 Packets)

**BOTANICAL
SCIENCES**



SUPPLEMENT FACTS

Serving size: 2 packets (six tablets) Servings per container: 30

Six Tablets Provide:	Amt/Serving	% Daily Value
Vitamin A (as beta carotene)	5000 IU	100%
Vitamin C (as ascorbic acid 100 mg, calcium ascorbate 100 mg, magnesium 100 mg, palmitate 25 mg, potassium 50 mg, sodium 25 mg)	400 mg	667%
Calcium (as amino chelate 100 mg and calcium Citrimal 100 mg)	200 mg	20%
Iron (as Ferrochel® amino chelate)	4.5 mg	25%
Niacin (as niacinamide)	125 mg	525%
Folate (as folic acid)	400 mcg	100%
Biotin	200 mcg	67%
Iodine (from Atlantic kelp)	150 mcg	100%
Magnesium (as amino chelate buffered)	50 mg	13%
Zinc (as zinc Chelazome® amino chelate)	15 mg	100%
Selenium (as L-selenomethionine)	100 mcg	143%
Copper (as copper Chelazome® amino chelate)	2 mg	100%
Manganese (as manganese Chelazome® amino chelate)	1 mg	50%
Chromium (as chromium Chelavite® amino chelate)	100 mcg	83%
Alpha-ketoglutaric acid	62.5 mg	*
Alpha-lipoic acid	500 mcg	*
Apple pectin	100 mg	*
Betaten®-mixed carotenoids (Dunaliella salina plant, std 7.5% mixed carotenoids)	6,300 mcg	*
Bilberry extract (Baccinium myrtillus fruit, 4:1)	15 mg	*
Black cohosh extract (Cimifuga racemosa root, std 2.5% triterpene glycosides)	250 mg	*
Calcium D-saccharate	75 mg	*
Calcium pyruvate	50 mg	*
Cat's claw extract (Uncaria tomentosa bark, 4:1)	100 mg	*
Citrus bioflavonoid complex	125 mg	*
Damiana extract (Turnera diffusa leaf, 4:1)	75 mg	*
Fructo-oligosaccharides	200 mg	*
Grape seed extract (Vitis vinifera seed, std 95% proanthocyanidins)	25 mg	*
Grape skin extract (Vitis vinifera skin, 4:1 proanthocyanidins)	25 mg	*
Hawthorn berry extract (Crataegus cuneata fruit, 4:1)	35 mg	*
Horsechestnut extract (Aesculus hippocastanum seed, std 20%)	200 mg	*
Ipraflavone	30 mg	*
L-Lysine	250 mg	*
L-Taurine	250 mg	*
Lutein extract	50 mg	*
Lycopene	50 mg	*
Milk thistle extract (Silybum carduus marianus seed, std 80% silymarin)	50 mg	*
N-Acetyl cysteine	300 mg	*
PABA	150 mg	*
Pinebark extract (Pinus strobus bark, std 95%)	15 mg	*
Red wine extract (Vitis vinifera fruit, std 15%)	25 mg	*
RoseOx® rosemary extract (Rosmarinus officinalis leaf, std 6% carnosic acid)	25 mg	*
Soy isoflavones	50 mg	*
Turmeric extract (Curcuma longa root, std 95% curcuminoids)	100 mg	*
Valerian extract (Valerian officinalis root, std 0.8% valerianic acid)	50 mg	*
Vegetable phytonutrient complex (vegetable extract: broccoli, carrots, parsley leaf, tomatoes, peppermint, barley grass, beets)	250 mg	*
Chasteberry extract (Vitex agnus castus berry, 4:1)	100 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 and 5,292,729 and patents pending. Chelazome®, Chelavite® and Ferrochel® are registered trademarks of Albion Laboratories, Inc. Betaten® is a registered trademark of Henkel Corp. RoseOx® is a registered trademark of Hauser Chemical Corp. Botanical Sciences™, the human figure symbols, and American Specialty Health & Wellness™ are licensed trademarks of American Specialty Health & Wellness.

Botanical Sciences™ Women's PM 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 PM 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 PM 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.