



November 18, 2005

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Office of Nutritional Products  
Labeling and Dietary Supplements (HFS-810)  
Center for Food Safety and Applied Nutrition  
U.S. Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, AdvoCare provides notification for statements on dietary supplement labels as follows:

**The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:**

AdvoCare International, L.P.  
2727 Realty Road  
Carrollton, TX 75006

**Product Name:** Fem 40+

**Statement(s)**

**Basis for Statement**

Balances menopausal swings

Vitamin E (as d-alpha tocopheryl succinate)  
Vitamin B-6 (as pyridoxine HCl)  
Red clover extract (flower - *Trifolium pratense*)  
Black cohosh extract (root - *Cimicifuga racemosa*)  
Dong quai extract (root - *Angelica polymorpha*)  
Chaste tree extract (berry - *Vitex agnus-castus*)

Supports mid-life changes

Vitamin E (as d-alpha tocopheryl succinate)  
Vitamin B-6 (as pyridoxine HCl)  
Pantothenic acid (as calcium pantothenate)  
Red clover extract (flower - *Trifolium pratense*)  
Black cohosh extract (root - *Cimicifuga racemosa*)  
Dong quai extract (root - *Angelica polymorpha*)  
Chaste tree extract (berry - *Vitex agnus-castus*)

Provides antioxidant activity

Vitamin E (as d-alpha tocopheryl succinate)  
Vitamin B-6 (as pyridoxine HCl)  
Red clover extract (flower - *Trifolium pratense*)  
Black cohosh extract (root - *Cimicifuga racemosa*)  
Dong quai extract (root - *Angelica polymorpha*)  
Chaste tree extract (berry - *Vitex agnus-castus*)

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**Certification**

The undersigned certifies that the information contained in this notice is complete and accurate and that AdvoCare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Sidney Stohs". The signature is written in a cursive style with a large, prominent initial "S".

Sidney Stohs, Ph.D.  
Senior Vice President, Research and Development  
AdvoCare International, L.P.