



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

NOV 29 2005

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 20

Statement(s)

Supports hormone balance throughout the month

Basis for Statement

Wild yam extract (root - *Dioscorea villosa*)
Saw palmetto extract (fruit - *Serenoa repens*)
Ginkgo biloba extract (leaf - *Ginkgo biloba*)
Cranberry extract (fruit - *Vaccinium macrocarpon*)
Raspberry extract (leaf - *Rubus idaeus*)
Resveratrol (from *Polygonum cuspidatum*)

Supports a woman's overall health and well-being

Niacin
Vitamin B-6 (as pyridoxine HCl)
Iron (as ferrous glycinate Ferrochel™)
Glucosamine (as HCl)
Moomiyo
Wild yam extract (root - *Dioscorea villosa*)
Saw palmetto extract (fruit - *Serenoa repens*)
Ginkgo biloba extract (leaf - *Ginkgo biloba*)
Cranberry extract (fruit - *Vaccinium macrocarpon*)
Raspberry extract (leaf - *Rubus idaeus*)
Resveratrol (from *Polygonum cuspidatum*)
Lactobacillus acidophilus

Eases effects of PMS

Niacin
Vitamin B-6 (as pyridoxine HCl)
Iron (as ferrous glycinate Ferrochel™)
Glucosamine (as HCl)
Moomiyo
Wild yam extract (root - *Dioscorea villosa*)
Saw palmetto extract (fruit - *Serenoa repens*)
Ginkgo biloba extract (leaf - *Ginkgo biloba*)
Cranberry extract (fruit - *Vaccinium macrocarpon*)
Raspberry extract (leaf - *Rubus idaeus*)
Resveratrol (from *Polygonum cuspidatum*)
Lactobacillus acidophilus

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LET 17034

Helps maintain a healthy urinary system

Glucosamine (as HCl)
Moomiyo
Wild yam extract (root - *Dioscorea villosa*)
Saw palmetto extract (fruit - *Serenoa repens*)
Ginkgo biloba extract (leaf - *Ginkgo biloba*)
Cranberry extract (fruit - *Vaccinium macrocarpon*)
Raspberry extract (leaf - *Rubus idaeus*)
Resveratrol (from *Polygonum cuspidatum*)
Lactobacillus acidophilus

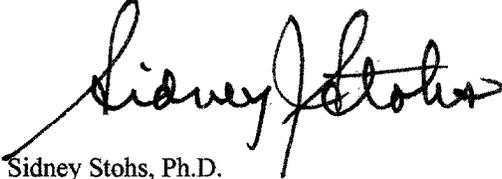
Provides antioxidant activity

Moomiyo
Wild yam extract (root - *Dioscorea villosa*)
Saw palmetto extract (fruit - *Serenoa repens*)
Ginkgo biloba extract (leaf - *Ginkgo biloba*)
Cranberry extract (fruit - *Vaccinium macrocarpon*)
Raspberry extract (leaf - *Rubus idaeus*)
Resveratrol (from *Polygonum cuspidatum*)

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,



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