



We Make Quality Affordable

December 16, 2004

*Richard*  
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Food and Drug Administration  
Center for Food Safety and Applied Nutrition  
Office of Nutritional Products, Labeling, and Dietary Supplements  
Division of Nutritional Programs and Labeling  
200 C Street SW  
Washington, DC 20204

Re: 21 U.S.C. Section 343(r)(6), Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of NOW® Chitosan 500 mg + Chromium 100 mcg Caps, a dietary supplement.

Statements being made in the labeling of Chitosan 500 mg + Chromium 100 mcg Caps:

(1) Chitosan is a dietary fiber derived from the shells of crustaceans that has been shown in non-clinical studies to bind to fat and cholesterol in the digestive tract. NOW® Chitosan contains LipoSan Ultra™, a patented high-density form of Chitosan that binds up to five times more fat than conventional Chitosan according to laboratory testing. A published clinical study has demonstrated that LipoSan Ultra™, taken as directed, may aid in the support of healthy body weight and serum cholesterol levels already within the normal range. NOW has also included Chromium in this formula. Chromium is an essential trace mineral that works with insulin to support healthy blood glucose levels and plays an important role in the proper utilization of protein, fat, and carbohydrates.

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. NOW Foods possesses substantiation that the statements are truthful and not misleading.

Michael Lelah, Ph.D.  
Technical Director  
NOW Foods  
395 S. Glen Ellyn Rd.  
Bloomington, IL 60108

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*Michael Lelah*