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March 15, 2005

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 Low Carb Diet Defender™, a dietary supplement. Please note that this claim supercedes our claim filed May 17, 2004.

Statements being made in the labeling of Low Carb Diet Defender™:

- (1) NOW® Phase 2® is an all-natural bean extract that has been shown to limit the action of alpha-amylase in non-clinical studies and thus may help to reduce the breakdown and absorption of complex carbohydrates. Alpha-amylase is a digestive enzyme that breaks down dietary starches into glucose so that they can be absorbed by the digestive tract. Although glucose is used by all cells of the body to fuel metabolism, excess glucose is often converted into fat and stored in adipose tissue. NOW® Low Carb Diet Defender™ has the added benefit of lipase to aid in the digestion of fats, as well as protease to support protein digestion.

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
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Michael Lelah

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