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March 31, 2005

APR 22

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 7-Keto[®], 25 mg Capsules, a dietary supplement. Please note that this claim supercedes our claim filed December 16, 2002.

Statements being made in the labeling of 7-Keto[®], 25 mg Capsules:

- (1) 7-Keto[®] is a naturally occurring metabolite of DHEA, providing similar benefits to DHEA without its associated side effects. Because the body's production of DHEA declines with age, so does the production of 7-Keto-DHEA. Because 7-Keto[®] will not convert into estrogen and testosterone, it can provide support for age-related complaints, such as mild memory problems and loss of stamina without safety concerns. For weight management benefits, try NOW[®] High Potency 7-Keto[®], 100 mg Capsules.

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
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