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March 31, 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

APR 22 2005

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<sup>®</sup>, 100 mg VCaps, a dietary supplement. Please note that this claim supercedes our claim filed December 16, 2002.

Statements being made in the labeling of 7-Keto<sup>®</sup>, 100 mg VCaps:

- (1) 7-Keto<sup>®</sup> is a naturally occurring metabolite of DHEA, providing the same benefits DHEA without its associated side effects. Because the body's production of DHEA declines with age, so does the production of 7-Keto. Weight gain is a common sign of aging that often accompanies the decreased production of DHEA and its metabolites. 7-Keto<sup>®</sup> has been patented for its ability to safely promote thermogenesis as well as for the maintenance of healthy body weight.

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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 Bloomingdale, IL 60108

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*Michael Lelah*

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