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January 6, 2005

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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 Phase 2[®], 500 mg Caps, a dietary supplement. This claim supercedes our claim filed March 8, 2004.

Statements being made in the labeling of Phase 2[®], 500 mg Caps:

(1) NOW[®] PHASE 2[®] helps you achieve dietary management objectives without the use of stimulants or laxatives. Phase 2[®] is an all-natural bean extract that has been shown in non-clinical studies to help reduce the breakdown and absorption of complex carbohydrates, by limiting the action of alpha-amylase, a digestive enzyme. Alpha-amylase helps break down dietary starches into glucose so that they can be absorbed by the digestive tract. With less alpha-amylase activity, there may be less excess glucose available to convert into fat and store as adipose tissue.

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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Michael Lelah

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