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June 30, 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

JUL 18

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 Carnitine Creatinate, a dietary supplement.

Statements being made in the labeling of Carnitine Creatinate:

- (1) Carnitine Creatinate Monohydrate is a specialized form of Creatine bonded to L-Carnitine. Creatine is a compound natural to the human body that aids in the regeneration of ATP, the chemical energy used by muscle tissue. During exercise, however, large quantities of creatine are irreversibly consumed. Clinical studies have shown that oral supplementation with Creatine can increase the amount of creatine available in muscle for ATP production. L-Carnitine is an amino acid that is necessary for the transfer of fatty acids into the fat-burning parts of the cell, facilitating energy production from fat. The combination of these two compounds, therefore can produce a synergistic effect, making NOW<sup>®</sup> Carnitine Creatinate an ideal energy supplement.

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

A handwritten signature in black ink that reads "Michael Lelah".

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