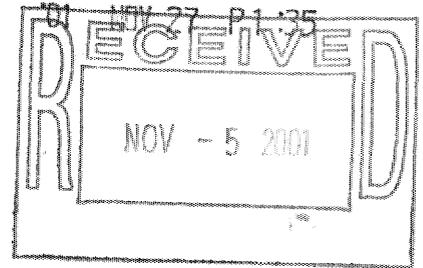




Innovative Nutrition Solutions

4380



October 24, 2001

Food and Drug Administration
Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street, SW
Washington, DC 20204

Dear Sirs:

Notice is hereby given that Rexall Sundown, Inc. ("Sundown") located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown brand name bearing the following statement(s) on the label and/or in the labeling:

Ze117™: Advanced mood enhancement. Sundown's Ze117 is an advanced St. John's Wort Extract that can enhance mood in a convenient one-caplet-per-day dosage.

Ginseng XTRA, B-Complex [and] Kava Kava: To further protect yourself during high-stress times...

The undersigned certifies that the information contained in this notice is complete and accurate and that Sundown has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

A handwritten signature in cursive script that reads "Deborah Shur Trinker".

Deborah Shur Trinker, Esquire
Senior Vice President
Regulatory Affairs

Enclosure

97S 0162 LET 8767

6111 BROKEN SOUND PKWY. NW • BOCA RATON, FLORIDA 33487
561-241-9400 • FAX 561-995-5188