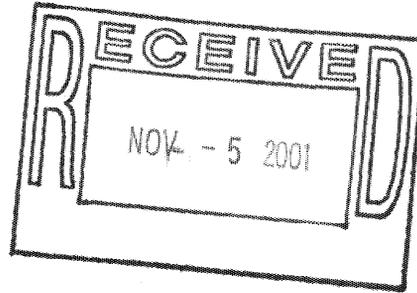




Innovative Nutrition Solutions

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October 25, 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:

Licorice Root: [For] healthy digestion... licorice root has been used by the Chinese for centuries to promote healthy digestion. Licorice is also used to protect and soothe the intestinal tract, and maintain healthy stomach function. [It] provides relief from occasional upset stomach and supports a healthy digestive tract.

Ginger, Papaya Enzyme [and] Vitamin B Complex: To further support healthy stomach function, try these Sundown products.

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,

Deborah Shur Trinker, Esquire
Senior Vice President
Regulatory Affairs

Enclosure

975-0162

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