

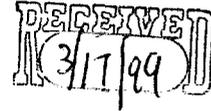


6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
(561) 241-9400
Fax (561) 995-5188

March 15, 1999

1 2 7 2 '99 MAR 23 P 2 :14

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 pursuant to the requirements of Section 403(r)(6) (21 U.S.C. § 343(r)(6)) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21CFR § 101.93, that Rexall Sundown, Inc. located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement within the last thirty days under the Sundown Herbals brand name bearing the following statement(s) on the label and/or in the labeling:

Gotu Kola: For healthy skin and connective tissue. Gotu Kola contains glycosides, which aid in cell repair, and are known to promote healthy skin and connective tissue. To further support healthy skin and connective tissue, take this product with Sundown Vitamin C and Sundown Vitamin E. These important antioxidants help protect against oxidative damage. Vitamin C is vital to the production of collagen, a protein in connective tissue. Vitamin E is essential for the use of oxygen by muscles, and enhances other antioxidants. The perennial, faintly aromatic Gotu Kola has been a popular rejuvenating herb in India and Pakistan for thousands of years.

The undersigned certifies that the information contained in this notice is complete and accurate and that Rexall Sundown, Inc. 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
Vice President of Regulatory Affairs
and Assistant General Counsel

Enclosure