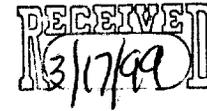




6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
(561) 241-9400
Fax (561) 995-5188

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March 15, 1999



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 21 CFR § 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:

Echinacea: For healthy immune function. Echinacea helps support healthy immune function and promote general well-being. Echinacea helps maintain well-being especially during the winter months. Many people who use a natural ingredient to maintain their well-being rely on Echinacea especially during the winter months. Echinacea naturally helps your body by gently enhancing immune function to help you stay healthy. To further support the immune system and promote well-being during the winter season, take Sundown Echinacea with Sundown Vitamin C and Sundown Goldenseal root. Vitamin C is an important antioxidant that helps promote healthy immune function. Goldenseal is reported to help maintain healthy respiratory function.

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.

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