

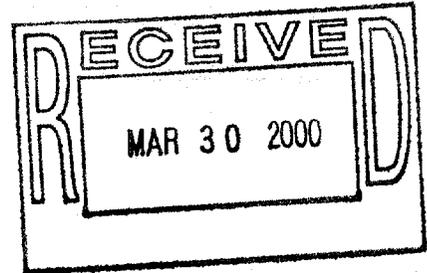


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March 16, 2000

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:

Cat's Claw: [It] promotes healthy immune function. [It] is the inner bark from a vine that grows in the Amazon rain forest. Also known as Una de Gato for its claw-like thorns, Cat's Claw is treasured by South American native peoples. Scientists and herbalists alike laud its unique restorative qualities. [It] has been used traditionally to support healthy immune function and overall well-being.

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
Vice President of Regulatory Affairs
and Assistant General Counsel

Enclosure