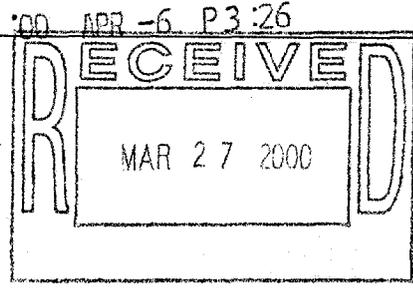




6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
(561) 241-9400
Fax (561) 995-5188

0848



March 21, 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, Rexall and Thompson brand names bearing the following statement(s) on the label and/or in the labeling:

Ginkgo Biloba XTRA (Sundown): [For] mental alertness. [It] helps support healthy brain function, memory and mental alertness by increasing circulation to the brain.

Ginkgo Biloba, Ginkgo Biloba Complex (Sundown): Promotes mental alertness. [It] helps support healthy brain function, memory and mental alertness by increasing circulation to the brain. It also provides antioxidant protection against cellular damage caused by free radicals. Now with Sundown's Ginkgo you can help maintain adequate blood flow to the memory centers of the brain. Now with Sundown's Standardized Ginkgo Biloba you can help maintain your memory function.

Ginkgo Biloba, Ginkgo Biloba Complex (Rexall): For mental alertness. [It] promotes healthy brain function, memory and mental alertness by increasing blood circulation to the brain.

Advanced Formula Ginkgo Biloba (Thompson): Thompson Ginkgo Biloba Advanced Formula features five herbs generally recognized for their abilities to promote healthy brain function and mental alertness.

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