Rexall Sundown

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:

Grape Seed XTRA: [For] superior antioxidant protection. Our bodies need a variety of antioxidants to protect against different types of free radicals. Free radicals are byproducts of metabolism that can damage cells and DNA, leading to premature aging. Sundown's formula features Grape Seed Extract containing polyphenols that help protect your body from the negative effects of oxidation. Sundown's XTRA Premium Blend® of ingredients provides complementary antioxidant protection.

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

Deborah Shur Trinker, Esquire
Senior Vice President
Regulatory Affairs

Enclosure

975-0162 LET 8789

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