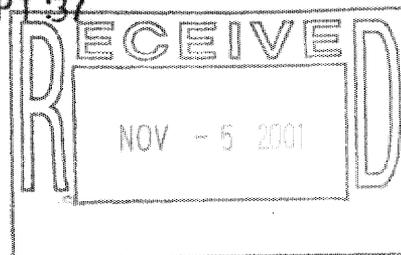




Innovative Nutrition Solutions⁰¹ NOV 27 P1:37



October 24, 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:

Healthy Liver with Milk Thistle: Milk Thistle helps to protect the liver and maintain healthy liver function. It contains silymarin, a flavonoid with antioxidant activity that may also have a cell membrane-stabilizing effect. Research shows that milk thistle helps protect liver cells. Anyone who drinks alcohol, smokes or comes into contact with any pollutants will benefit from daily use of Sundown's Healthy Liver Formula.

Vitamin B-Complex, Garlic, Lecithin [and] Co Q-10: To further aid [the liver's] cleansing function, try these Sundown products.

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, Esquire
Senior Vice President
Regulatory Affairs

Enclosure

975-0162 LET 8798

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