



Innovative Nutrition Solutions

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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:

Immune Health with Echinacea and Goldenseal: Echinacea powerfully supports the body's natural defenses by enhancing white blood cell function. Goldenseal supports a healthy respiratory system. Together they offer a natural combination that is especially useful during the harsh winter months. Sundown's Immune Health formula brings together in a precise combination the benefits of Echinacea for immune function support, and Goldenseal for a healthy respiratory system. It's the natural and smart choice for maintaining well-being.

Vitamin C, Selenium, Green Tea [and] Zinc: Keep your immune system strong with 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,

A handwritten signature in cursive script that reads "Deborah Shur Trinker".

Deborah Shur Trinker, Esquire
Senior Vice President
Regulatory Affairs

Enclosure

978-0162

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