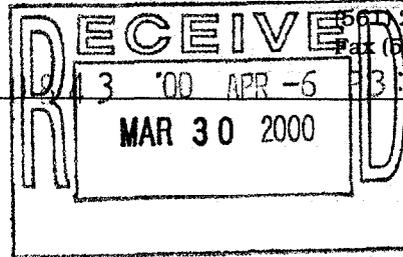




6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
Tel (561) 241-9400
Fax (561) 995-5188



March 20, 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 Thompson and Sundown brand names bearing the following statement(s) on the label and/or in the labeling:

Pycnogenol® (Sundown), Pycnogenol® 50mg (Thompson): Pycnogenol helps maintain normal healthy cell function by protecting against free radical activity. Pycnogenol also helps maintain healthy circulation by strengthening capillary walls.

Fortified Pycnogenol® (Sundown): [It] helps protect cells from free radical damage. [It] provides antioxidant protection that helps maintain normal healthy cell function by protecting against free radical activity. Helps maintain healthy circulation by strengthening capillary walls. [It] is combined with Beta-Carotene, Coenzyme Q-10, Grape Seed Extract (a highly concentrated source of proanthocyanidins), and Selenium to provide a powerful combination of antioxidant protection against free radicals that can cause oxidative stress and damage to cells and tissues including joints.

Fortified Pycnogenol® Complex (Sundown): [For] antioxidant protection. Sundown's Pycnogenol Complex complements the effectiveness of Vitamins C and E, and offers powerful antioxidant protection, helping to maintain normal healthy cell function.

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

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