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March 8, 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 name bearing the following statement(s) on the label and/or in the labeling:

Alpha Lipoic Acid 50mg (Thompson) (Rexall): [It] promotes healthy cell function PLUS/and enhances energy production. [It] provides superior antioxidant protection because it helps protect cells from oxidative stress and glycation, a process where body sugars interfere with normal protein function. [It] provides antioxidant protection from free radicals that may cause premature aging. It helps the body metabolize sugar, primarily in muscle cells, where it is used for energy....it can provide antioxidant protection for the entire cell. Alpha Lipoic Acid also enhances the potency of other antioxidants in the body, including Vitamin C and E.

Alpha Lipoic Acid 50mg (Sundown): [It] promotes healthy cell function and enhances energy production. [It] provides antioxidant protection from free radicals that may cause premature aging. It helps the body metabolize sugar, primarily in muscle cells, where it is used for energy.

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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