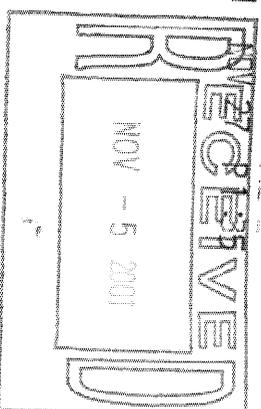




Innovative Nutrition Solutions

4381 01



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:

Perfect Antioxidant®: Antioxidants are vital to your health and well-being. They help protect the body against free radicals that lead to premature aging. The key antioxidants, Vitamins C, E and Beta-Carotene, are associated with cardiovascular health, enhanced immune function and healthy eye function. The added minerals also provide antioxidant support.

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

975-0162 LET 8768

6111 BROKEN SOUND PKWY. NW • BOCA RATON, FLORIDA 33487
561-241-9400 • FAX 561-995-5188