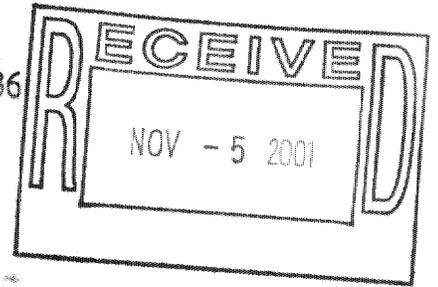




Innovative Nutrition Solutions

4401 '01 NOV 27 P1:36



October 25, 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 and Rexall brand names bearing the following statement(s) on the label and/or in the labeling:

C 500mg (Rexall): [It] promotes healthy immune function.

C 250mg, C 500 mg, C 500mg Plus Natural Rose Hips, Chewable C with Natural Rose Hips and Acerola, C 600mg, C 1000mg with Natural Rose Hips, C 1500mg with Natural Rose Hips (Sundown): [It] promotes healthy immune function and general well-being. [It] acts as an antioxidant to provide protection for healthy cells and body systems. [It] is vital to production of collagen, providing the stability necessary for proper cardiovascular function. [It] helps maintain healthy circulatory 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

Deborah Shur Trinker, Esquire
Senior Vice President
Regulatory Affairs

Enclosure

975-0162 LET8788