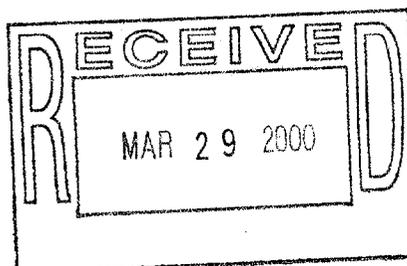




6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
(561) 241-9400
Fax (561) 995-5188

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March 15, 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 pursuant to Section 403(r)(6) (21 U.S.C. § 343(r)(6)) of the Federal Food, Drug, and Cosmetic Act that Rexall Sundown, Inc. ("Sundown") located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Rexall brand name bearing the following statement(s) on the label and/or in the labeling:

Echinacea & Goldenseal Complex with Vitamin C: [It is] for healthy immune function. Echinacea & Goldenseal Complex contains a select combination of ingredients which helps promote healthy immune and respiratory function. Echinacea, or Purple Coneflower, was the most widely used medicinal plant of the Plains Indians in North America. Today, it is an increasingly popular herb used widely in Europe and North America. Echinacea provides superior herbal support for healthy immune function and promotes general well-being. Goldenseal is derived from the root of a small perennial plant native to eastern North America. Goldenseal contains a number of important alkaloids, including hydrastine, berberine and tetrahydroberberine. Goldenseal is reported to help maintain healthy respiratory function. Vitamin C is a powerful antioxidant which provides protection for healthy cells and body systems.

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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