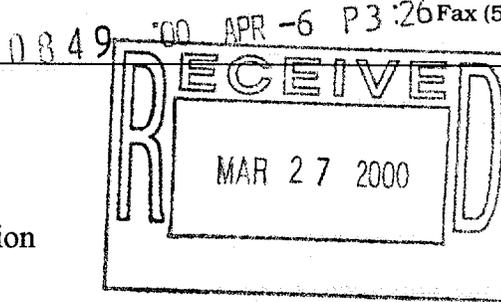




6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
(561) 241-9400
Fax (561) 995-5188



March 21, 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 Rexall, Thompson and Sundown brand names bearing the following statement(s) on the label and/or in the labeling:

Garlic Oil (Sundown): [It] promotes healthy cardiovascular and circulatory function.

Garlic 1500 (Sundown): [It] promotes healthy cardiovascular function and general well-being.

Odorless Garlic (Sundown): [It] promotes healthy cardiovascular function and general well-being. It helps maintain normal cholesterol levels and aids in healthy circulation and digestion.

Garlic XTRA (Sundown): [It] promotes healthy heart function and cholesterol levels. It has been shown to help promote healthy cholesterol levels, cardiovascular health and circulatory function. The ingredients in Sundown Garlic XTRA help maintain healthy cholesterol levels. Sundown Garlic XTRA features standardized Garlic concentrate (standardized to yield 1% allicin, 2.4mg per tablet) blended with Hawthorn, Korean Ginseng, Vitamin C and Chromium Picolinate, which work in harmony to help promote healthy heart function and cholesterol levels.

Odor-Free Garlic (Sundown): [It] naturally promotes healthy heart function and cholesterol levels. Garlic is a member of the lily family and has been used as a health aid since the dawn of civilization. Garlic helps maintain normal cholesterol levels and healthy cardiovascular and circulatory function. Garlic's extensive health-enhancing properties also include immune system benefits.

Garlic (Rexall): [It] naturally promotes healthy heart function and cholesterol levels. Garlic is a member of the lily family and has been used as a health aid since the dawn of civilization. Garlic helps maintain normal cholesterol levels and healthy cardiovascular and circulatory function. Garlic's extensive health-enhancing properties also include immune system benefits.

Garlic Oil, Garlic Oil 1500 (Rexall): Garlic helps maintain healthy serum cholesterol levels. Garlic promotes healthy circulatory, cardiovascular and digestive health.

975-0162

Also see docket 975-0163

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Advanced Formula Garlic Odor-Controlled with Hawthorn, Korean Ginseng, Vitamin C and Chromium Picolinate (Thompson): [It] promotes healthy heart and cholesterol levels.

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