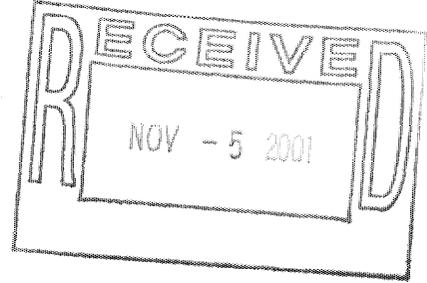




Innovative Nutrition Solutions

4424 '01 NOV 27 P1:37



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:

Mental Clarity: Ginkgo biloba helps support healthy brain function, memory and mental alertness by increasing circulation to the brain. It also provides antioxidant protection against cellular damage caused by free radicals. Now with Sundown's Mental Clarity you can help maintain normal blood flow to the memory centers of the brain.

Kava Kava, Ginseng [and] Vitamin B Complex: Get relief with these Sundown anti-stress supplements.

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, Esquire
Senior Vice President
Regulatory Affairs

Enclosure

975-0162 LGT 8811

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561-241-9400 • FAX 561-995-5188