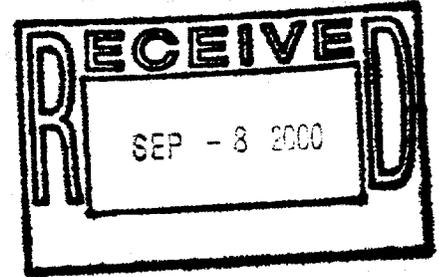




6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
(561) 241-9400
Fax (561) 995-5188

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September 5, 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 Sundown and Rexall brand names bearing the following statement(s) on the label and/or in the labeling:

Ginseng XTRA (Sundown): Many active people find that Sundown's ginseng helps them make the most of their natural energy. Ginseng has the unique ability to vitalize, strengthen and rejuvenate the entire body.

Ginseng Complex (Sundown): [For] energy and endurance. [It] is one of the world's best "anti-stress" tonics. Its unique adaptive action promotes equilibrium of the nervous system, calming or stimulating the body as required.

Korean Ginseng (Sundown): [For] energy and endurance. Sundown's Korean Ginseng has the unique ability to vitalize, strengthen and rejuvenate the entire body. It improves stamina and increases resistance to environmental stress.

Siberian Ginseng (Sundown): Energize naturally. Siberian Ginseng helps the body adapt to environmental stress and minimize fatigue. Research shows that it improves both physical and mental energy and endurance. [It] has a unique adaptive action that has been shown to calm or stimulate the body as required. [It] is one of nature's most powerful stress tonics.

Korean and Siberian Ginseng Complex (Rexall): [It] promotes energy and endurance. Siberian Ginseng is a tall, wild shrub whose roots have been used for 2,000 years in China. Siberian Ginseng is reported to positively affect fatigue and lessen daily environmental stress. Korean Ginseng, or Panax ginseng, is a perennial shrub native to Asia and Korea. The root of the plant contains ginsenosides which help the body to respond to stress. It is also noted for its endurance-enhancing effects.

Multi-Source Ginseng Complex (Rexall): [It] promotes energy and endurance. As adaptogens, Siberian and Korean Ginseng naturally help your whole body to adjust to stressful physical and mental demands and help to promote endurance. Ginseng helps the body to utilize oxygen, which enhances recovery and maintains endurance. Vitamin B-12 helps maintain iron-healthy blood and metabolize carbohydrates and fat. Rexall Herbal Complex formulas are carefully selected herbal combinations that naturally promote well-being. Ginseng has been prized in the Orient for centuries to promote strength, energy and endurance.

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Food and Drug Administration

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Korean Ginseng (Rexall): For energy and endurance.

Siberian Ginseng (Rexall): Energize naturally. Siberian Ginseng root is also known as Eleuthero. It is harvested from the shrub that grows in China and eastern Europe where it is used as an energy tonic. Siberian Ginseng helps promote energy and endurance. People with active lifestyles choose it to help support normal body functions under environmental and physical stress. Siberian Ginseng helps promote energy and endurance. It also supports normal body functions under environmental and physical stress.

Siberian Ginseng Root 1000mg (Rexall): Energize naturally. Siberian Ginseng is a tall, deciduous shrub native to north-eastern Asia and southeastern Russia. One of nature's most popular herbs, it is well-known for its energy-enhancing qualities and its ability to lessen the effects of daily environmental stress. Siberian Ginseng supports healthy adaptogenic function, physical performance and increases the body's resistance to stress.

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