

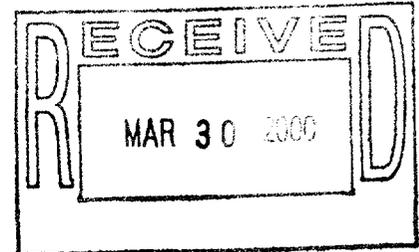


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March 21, 2000

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

Natural Grape Seed Extract 30mg (Thompson): Grape Seed is one of nature's richest sources of oligomeric proanthocyanidins (OPCs) and other phenolic compounds.

Grape Seed Extract 30mg (Rexall): For superior antioxidant protection. Grape Seed is one of nature's richest sources of oligomeric proanthocyanidins (OPCs) and other phenolic compounds.

SDV Grape Seed Preferred™ (SDV): [It] is an advanced formula containing a select combination of ActiVin Grape Seed Extract, Green Tea, Bilberry and Selenium which helps promote natural antioxidant protection against free radicals.

Grape Seed XTRA (Sundown): For superior antioxidant protection. Free radicals are by-products of energy metabolism that damage cells and DNA. Antioxidants protect our cells from the damaging effects of free radicals. The combination of ingredients in Sundown Grape Seed XTRA helps provide natural antioxidant protection. This advanced formula features ActiVin Grape Seed Extract blended with the XTRA Premium Blend of Green Tea, Bilberry and Selenium that work in harmony to provide natural antioxidant protection. ActiVin grape seed extract contains oligomeric proanthocyanidins (OPCs) and phenolic compounds, providing superior antioxidant protection.

Grape Seed Extract (Sundown): For superior antioxidant protection. Free radicals are by-products of energy metabolism that damage cells and DNA. Antioxidants protect our cells from the damaging effects of free radicals. Grape seed is one of nature's richest sources of flavonoids which have potent free radical scavenging activity.

The undersigned certifies that the information contained in this notice is complete and

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Food and Drug Administration

March 21, 2000

Page 2

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