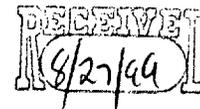




6111 Broken Sound Parkway NW
Boca Raton, FL 33487-3693
(561) 241-9400
Fax (561) 995-5188

August 18, 1999

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 Sundown brand name bearing the following statement(s) on the label and/or in the labeling:

C500mg XTRA: For healthy immune function. Vitamin C is an essential nutrient that helps promote healthy immune function. Vitamin C is water soluble and must be replenished in the body regularly. Vitamin C-500 XTRA goes one step further to provide a select combination of ingredients that work in harmony to neutralize free radicals. Free radicals are unstable substances that can cause oxidative stress and damage to cells. The ingredients in Sundown C-500 XTRA help to promote a healthy immune system and cellular health. This Advanced Formula features Vitamin C-500 blended with bioflavonoids, including hesperidin and rutin, as well as minerals Selenium and Zinc. These ingredients work in harmony to help promote healthy immune function, capillary strength and provide antioxidant protection for healthy cells, tissues and overall well-being.

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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