



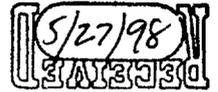
**Melaleuca, Inc.**

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May 19, 1998



Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, DC 20204

**Re: SECTION 403(r)(6) NOTIFICATION**

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Melaleuca, Inc., notifies FDA that it has begun using the following statements:

Proanthocyanadins help maintain the strength and cohesiveness of blood vessels.

Proanthocyanadins (oligomeric proanthocyanadins, specifically) attach to these proteins to help keep them strong and resistant to damage. The result is healthy blood vessels, which help to maintain optimal circulation, visual acuity and cardiovascular health.

Consequently, because of their collagen-strengthening property, proanthocyanadins help maintain the smooth appearance of skin.

Proanthocyanadins help in the formation of these cross-links, keeping the tissues stable and strong and reducing the risk of premature wrinkles.

For example, because vitamin C helps the body absorb iron and maintain an effective immune system--as well as helping to keep bones, gums, and muscles healthy--proanthocyanadins, as well, are important to these functions.

These natural extracts work together to provide extra protection against free radicals, as they are all antioxidants. They also work with grape seed extract to strengthen collagen and to help fortify the walls of blood vessels.

Antioxidants are compounds that can help neutralize free radicals before they are allowed to cause damage inside the body. Vitamin C, vitamin E and beta carotene have all proven through scientific tests to effectively neutralize a variety of free radicals.

Since there are a variety of free radicals out there, an efficient army of antioxidants is necessary to help protect the cells in the body--first, because each antioxidant attacks a variety of different free radicals, and second, because antioxidants work together to help protect each other from the effects of the very free radicals they are set to defeat. Proanthocyanadins add another fully armed ship to our free-radical-fighting

Proanthocyanadins, a unique flavonoid in grape seeds, provide powerful antioxidant protection against free radicals.

Proanthocyanadins bind to connective tissues like collagen and elastin--providing protection against oxidation and inflammatory damage.

Proanthocyanadins also fortify capillary wall structure and function--this can help improve circulation for: healthy tissue and organ functioning, healthier joints, skin elasticity and smoothness, and improved visual acuity.

ProVex's proanthocyanadins have been shown to strengthen collagen and connective tissues, enhancing the integrity of capillaries for improved circulation.

These statements contain the statutory disclaimer. The name of the dietary supplement is ProVex-Plus™, and the relevant dietary ingredients are grape seed extract, grape skin extract, ginkgo biloba extract, and citrus bioflavonoids.

I certify that the foregoing is complete and accurate, and that Melaleuca, Inc., has substantiation that the statements are truthful and not misleading.

Very truly yours,

Melaleuca, Inc.



Brett L. Merrell  
V.P. Product Marketing