



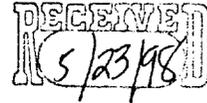
Melaleuca, Inc.

3910 South Yellowstone Hwy
Idaho Falls, Idaho 83402-6003
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2-4264

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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.

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.

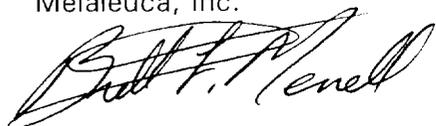
ProVex's proanthocyanadins have been shown to strengthen collagen and connective tissues, enhancing the integrity of capillaries for improved circulation.

These statements contain the statutory disclaimer. The name of the dietary supplements are ProVex™, and the relevant dietary ingredients are grape seed 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.

A handwritten signature in black ink, appearing to read "Brett L. Merrell". The signature is fluid and cursive, with the first name being the most prominent.

Brett L. Merrell
V.P. Product Marketing