



Melaleuca, Inc.

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September 27, 1999

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:

- Cell-Wise contains scientifically recommended doses of vitamins C, E, and beta carotene, as well as zinc, selenium, copper and manganese--all classified as powerful antioxidants.
- In today's world of rising pollution, stress and radiation--all factors that can increase free radicals--Cell-Wise is a welcome relief in the fight to maintain good health, way down to your cells.
- Proven in scientific studies to neutralize free radicals, these nutrients safeguard your entire system and serve as a complement to The Vitality Pak.

These statements contain the statutory disclaimer. The names of the dietary supplements to which these statements apply are Cell-Wise® and Cell-Wise® Synthetic E, and the relevant dietary ingredients are the vitamins C, E, and beta carotene and the minerals zinc, selenium, copper, and manganese.

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.

McKay F. Christensen
Chief Operating Officer

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