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April 15, 2005

Office of Nutritional Products, Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Pkwy.
College Park, MD 20740

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:

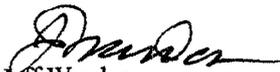
- Probiotic that assists with nutrient uptake and enhances colon health.
- Sometimes you just don't treat your digestive system right. Eating a diet of highly processed foods, taking antibiotics, and experiencing high stress throws the balance of 'good' and 'bad' flora in your digestive system out of whack. The result? Too much 'bad' flora that can reduce nutrient absorption and cause indigestion, constipation, abdominal discomfort, cramping, and other problems. Help get your digestive system back on track with *Florify*.
- In just one *Florify* capsule there are 5 billion colonies of 'good' flora (scientifically known as probiotics) to help rebalance the flora in your intestines. *Florify's* probiotics—*Lactobacillus acidophilus* and *Bifidobacterium lactis*—are strong enough to endure your stomach acid, pass through the digestive process, and enter your intestines where they help boost intestinal flora levels.
- Research-recommended flora for enhanced nutrient absorption and better digestive health.
- The probiotics in *Florify* work by naturally increasing the acidity of your intestine—to promote healthy bacterial growth. *Lactobacillus acidophilus* and *Bifidobacterium lactis* also produce natural substances called bacteriocins, which maintain healthy microflora.
- FOS—fructooligosaccharides—are nondigestible fibers that help keep your stomach and bowels healthy. FOS also nourishes and encourages the growth of *Florify's* probiotics.
- Calcium phosphate is included to help with the absorption of the probiotics. And the powerful antioxidant green tea has long been known to help with stomach health.

These statements contain the statutory disclaimer. The name of the dietary supplement to which these statements apply is *Florify*TM, and the relevant dietary ingredients are *Lactobacillus acidophilus*, *Bifidobacterium lactis*, calcium phosphate, fructooligosaccharides, green tea extract.

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.


Jeff Wasden
V.P. Product Marketing

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