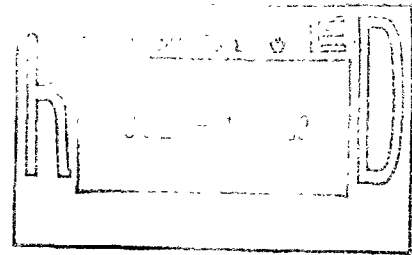




April 26, 2002



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:


- Help stop cell-damaging free radicals in their tracks. This broad-spectrum antioxidant works at the cellular level—targeting specific parts of your cells (as well as different types of cells) with powerful antioxidants like vitamins C and E, beta carotene, and the minerals zinc, selenium, and copper.
- Antioxidants are your cells' best friends. These specialized nutrients neutralize the damaging activity of free radicals by supplying the extra electrons they desperately seek.
- Nourishes respiratory tract; strengthens cell membranes; protects cells against toxins; helps promote message signals between cells; encourages normal cell division; protects cells from free radical damage; nourishes skin, bone, cartilage; enhances antioxidants' effectiveness; stimulates white blood cell activity to protect the body from foreign invaders.

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.


Jeff Wasden
V.P. of Product Marketing

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