



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of Advertising Practices

November 16, 2015

Andrea C. Levine, Esq.
Senior Vice President, Director
National Advertising Division
112 Madison Avenue, 3rd Floor
New York, NY 10016

Re: RDK Global's Provailen Dietary Supplement

Dear Ms. Levine:

In June 2015, you referred to the Federal Trade Commission the NAD's investigation of RDK Global's advertising claims for Provailen, a dietary supplement purported to relieve arthritis pain. Your referral letter indicated that the NAD requested substantiation for Provailen claims in response to the Council for Responsible Nutrition's challenge of RDK Global's advertising; however, RDK Global declined to participate in the self-regulatory process.

Upon review of this matter, we have determined not to take additional action at this time. In arriving at this conclusion, we considered a number of factors related to resource allocation and enforcement priorities, as well as the nature of any FTC Act violation and the type and severity of any consumer injury. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

Mary K. Engle
Associate Director for Advertising Practices