



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20500

Division of Advertising Practices

November 16, 2015

Andre C. Levine, Esq.
Senior Vice President, Director
National Advertising Division
1127 Madison Avenue, 5th Floor
New York, NY 10016

Re: RDK Global's ProVamer

Dear Ms. Levine:

In June 2015, you referred to the Federal Trade Commission the FTD's investigation of RDK Global's advertising claims for ProVamer, a dietary supplement for arthritis pain. In a letter dated August 11, 2015, the National Advertising Division ("NAD") advised you of the Commission's decision in response to the Council for Responsible Nutrition ("CRN")'s challenge to the advertising claims. RDK Global declined to participate in the NAD's voluntary dispute resolution process.

Upon receiving your letter, the Commission considered a number of factors related to resources and enforcement priorities, as well as the nature of any F.T.C. Act violation and the severity of the violation, and the public interest in the matter.

Very truly yours,

Mary K. Engle
Associate Director for Advertising Practices