HERBALIFE.

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Dr. Robert J. Moore
Branch Chief, Compliance & Enforcement Branch
Office of Nutrition Products, Labeling & Dietary Supplements
FOOD & DRUG ADMISTRATION (HFS-800)
5100 Paint Brush Parkway
College Park, Maryland 20740

Ref: **Garden 7™ Dietary Supplement**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has begun commercializing Garden 7™.

1) **LABEL**
On the supplement carton appears the following structure/function claim, "Taken daily, the tablets in each packette boost many of the benefits from the seven key color groups of fruits and vegetables, making it easier to get phytonutrients into your diet to help achieve optimal health.*"

2) **CARTON INSERT**
On the enclosed carton insert appears the following structure/function claims,

"Phytonutrient Benefits:

Orange-Yellow, Antioxidant for cellular health and protection.*

Orange, Good Source of dietary vitamin A. Complete with carrot concentrate for your health.*

Red-Purple, Antioxidant benefits of this unique group of phytonutrients.*

Red, Helps support a healthy heart.* Contains tomato extracts with olive oil for better absorption.*

Yellow-Green, Helps maintain healthy vision.* Lutein is concentrated by your body in the back of the eye (macula), where it provides UV protection.*

Green, beneficial phytonutrients support healthy liver function, your body's filter.*

White-Green, Supports healthy circulation.*"

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Garden 7™ Directions

Take one packette a day to help ensure you get the phytonutrients of 7 servings of fruits and vegetables every day.

The product label prominently bears the required ruled DSHEA disclaimer statement: "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease."

Garden 7™ is labeled and promoted with statements provided for in Section 403 (r) (6) of the Federal Food, Drug and Cosmetic Act."

Please be advised that we have substantiation on file that these claims are truthful and not misleading.

If you have any questions please do not hesitate to ask.

Sincerely,

Color Your Diet Healthy with Garden 7

Eating the recommended 5 to 9 servings of fruits and vegetables each day is important to good health. Research also shows that making sure you eat them from a wide variety of types and colors is important, too. This is because fruits and vegetables are good sources of antioxidants and vitamins, and contain special plant ingredients called phytonutrients. These phytonutrients provide benefits beyond those from essential vitamins and minerals and each color group contains different phytonutrients. Research has found that phytonutrients can help provide protection against a variety of conditions. However, the phytonutrients derived from fruits and vegetables can vary from plant-to-plant, crop-to-crop and season-to-season. And, even eating popular fruits and vegetables like bananas, potatoes and iceberg lettuce may not provide the phytonutrition you need.

Daily Benefits from Garden 7™

Now with Garden 7™, it's easier than ever to get many of the benefits from phytonutrients found in fruits and vegetables. Each Garden 7™ packette collectively corresponds to the 7 key color categories. The following table describes each of the 7 color categories and their benefits.

Fruit & Vegetable Color Group	Examples of Fruits & Vegetables in Color Group	Selected beneficial Phytonutrients in tablet	Example of Fruits & Vegetables that could provide the Phytonutrient benefits of tablet	Phytonutrient Benefits
Orange-Yellow	Oranges, tangerines, pomelos, papayas, nectarines	Combinations of bioflavonoids	1 large orange	Antioxidants for [illegible] and protection
Orange	Carrots, mangos, apricots, acorn squash, cantaloupes, pumpkin, winter squash, sweet potatoes	Alpha and Beta carotene	1 carrot	Good source of dietary vitamin A. Complete with carrot concentrate for your health *
Red-Purple	Red grapes, fresh or dried plums, cranberries, raspberries, blackberries, blueberries, strawberries.	Anthocyanins	1 oz. cranberry cocktail and 1 cup of red grapes	Antioxidant benefits of this unique group of phytonutrients *
[redacted]				
Yellow-Green	Spinach, avocado, honeydew melon, collard greens, mustard greens, yellow corn, green peas	Lutein (5 mg) compare to leading vitamins at 300 mcg. We have 17x as much!	½c. cooked spinach or 1½ raw spinach	Helps maintain healthy vision * Lutein is concentrated by your body in the back of the eye (macula) where it provides UV protection *
[redacted]				
White-Green	Garlic, chives, onions, celery, leek, asparagus	Combination of Allysulfides from garlic	1 clove garlic	Supports healthy circulation *

A Colorful Diet for Good Health

Based on National Cancer Institute recommendations [illegible] servings, women and teenagers [illegible] eat 5 servings of fruits and vegetables a day [illegible] Yet serving amounts are only one part of the [illegible] There are actually 7 different categories of fruits and vegetables [illegible] the 7 key colors, each with their own unique contribution [illegible] health. To achieve optimal health, your daily servings of fruits should ideally be spread across these 7 different categories [illegible] take in some of each beneficial phytonutrient group [illegible]

Garden 7™ Directions

Take one packette a day to help ensure you get the [illegible] 7 servings of fruits and vegetables every day.

For optimal nutrition, also eat one to two servings of fruits with your meals for fiber, low-density energy and [illegible]

*These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, [illegible]

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[illegible] una Dieta Colorida y saludable con Garden 7

[illegible] consumo diario de entre 5 y 9 porciones de frutas y [illegible] siendo esto muy importante para mantener una buena salud [illegible] las investigaciones demuestran que tambien es importante [illegible] en una amplia variedad de tipos y colores. Esto se [illegible] frutas y verduras son buenas fuentes de antioxidantes y [illegible] contienen ingredientes vegetales especiales llamados [illegible] Estos fitonutrientes proporcionan beneficios que van mas alla [illegible] y minerales esenciales. Cada grupo de color contiene [illegible] fitonutrientes. Las investigaciones han descubierto que los [illegible] pueden ayudar a proteger contra diversas condiciones. Sin [illegible] de frutas y vegetales pueden variar de planta a [illegible] cultivo y de temporada a temporada. Incluso el consumo [illegible] populares como bananas, papas y lechuga tipo iceberg [illegible] brindandole la fitonutricion que usted necesita.

Los beneficios diarios de Garden 7

[illegible] Garden 7, es mas facil que nunca obtener muchos de los [illegible] de los fitonutrientes que se encuentran en frutas y vegetales. Cada [illegible] de Garden 7 corresponde colectivamente a las 7 categorias de [illegible] En la siguiente tabla se describe cada una de las 7 categorias [illegible] beneficios.

Grupo de color de Frutas y Vegetales	Ejemplos de Frutas y Vegetales en este Grupo de Color	Selectos Fitonutrientes beneficiosos en Tabletas	Ejemplos de Frutas y Vegetales que podrian proporcionar los beneficios Fitonutrientes de las tabletas	Beneficiosos Fitonutrientes
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Naranja	Zanahorias, mangos, albaricoques, calabaza de Castilla, calabaza amarilla, melones, camotes	alfa y betacaroterio	1 zanahoria	Buena fuente dietética de la vitamina A. Completa con concentrado de zanahoria para su salud *
Rojo-morado	Uva roja, ciruela fresca o ciruela pasa, arándano, zarzamoras, arándano y fresa	Antocianinas	1 oz. cóctel de arándano y 1 taza de uva roja	Los beneficiosos antioxidantes de este grupo de fitonutrientes unico*
[redacted]				
Amarillo-verde	Espinaca, aguacate, melón dulce, tallos de col rizada, tallos de mostaza, elote amarillo, chicharos	Luteína (5 mg) compárese con las vitaminas principales a 300 mcg ¡Tenemos 17 veces más!	½ taza espinaca cocida ó 1½ espinaca cruda	Ayuda a mantener una visión sana * Su organismo concentra la luteína en la parte posterior de ojo (mácula) proporcionando protección contra los rayos ultravioletas(UV)*
[redacted]				
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Una dieta colorida para la buena salud

Con base en las recomendaciones del Instituto Nacional d[illegible] hombres deben consumir 9 porciones, las mujeres y los adole[illegible] comer 7 porciones, y los ninos deben de ingerir 5 porcion[illegible] verduras al dia para tener una dieta bien balanceada. Sin embar[illegible] de porciones constituye solo una parte de la ecuacion frutas [illegible] en realidad 7 categorias distintas de frutas y vegetales que con[illegible] colores clave, cada una con su propia contribucion unica [illegible] individuo. Para lograr una salud optima, sus porciones dia[illegible] verdura idealmente abarcaran estas 7 categorias distintas. [illegible] usted consume cada dia algo beneficioso de cada grupo fitone[illegible]

Garden 7™ Instrucciones

Tome un paquete al dia para ayudar a asegurar un consumo d[illegible] equivalente al de 7 porciones de frutas y verduras.

Para una nutricion optima, consuma tambien una o dos porci[illegible] y verduras con sus comidas para recibir fibra, energia de baja [illegible] goelementos.

*Estas afirmaciones no han sido evaluadas por la [illegible] *Drug Administration*. Este producto no tiene el proposito de diagnosticar, tratar, curar ni prevenir enfermedad alguna.

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