



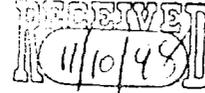
HERBALIFE INTERNATIONAL OF AMERICA, INC
9800 La Cienega Blvd., Inglewood, CA 90301
Mailing Address: P.O. Box 80210, Los Angeles, CA 90080-0210
(310) 410-9600 • FAX: (310) 258-7124

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JOHN P. VENARDOS
Vice President, Regulatory Affairs
International Product Management

November 4, 1998

Office of Special Nutritionals (HFS-450)
Center For Food Safety and Applied Nutrition
FOOD & DRUG ADMINISTRATION
200 C Street, S.W.
Washington, D.C. 20204



Ref.: **Super Echinacea+ Dietary Supplement**

Dear Sir and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has begun commercializing Super Echinacea+ dietary supplement in the United States.

Super Echinacea+ is labeled and promoted with statements provided for in section 403(r)(5) of the Federal Food, Drug, and Cosmetic Act.

LABEL

Advanced Immune Support Formula Dietary Supplement.

Super Echinacea+ contains an extract of Echinacea, an herb used by Native Americans to promote health, and other carefully selected herbs that may help your seasonal well-being.

MINI PRODUCT BROCHURE LITERATURE

Advanced immune-support formula.

Echinacea, one of the world's favorite herbs, has been prized for its immune-supporting properties. Now you can experience the many benefits of this natural wonder with Herbalife's Super Echinacea+, formulated with 125mg of premier Echinacea. Super Echinacea+ also includes naturally healthy Elderberry extract and Cat's Claw, an herb from South America.

- Contains carefully selected herbs that promote good health.
- Includes Echinacea Extract, a North American herb used by Native Americans to promote well-being.
- Easy-to-swallow tablets.

FACT SHEET

Description:

Advanced Immune Support Formula Dietary Supplement.

Features

Echinacea

Elderberry Extract

Cat's Claw

Benefits:

An herb known for its immune-supporting actions. Used by Native Americans to promote seasonal well-being.

A well-known herb traditionally used to promote respiratory health.

An herb from South America that can help support the body's defenses.

97S - 0162

See docket 97S-0163

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HERBALIFE TODAY NEWSLETTER

Immune-support formula.

- Contains carefully selected herbs that may help you feel better and may help support your immune system.
- Includes Echinacea Extract, a North American herb used by Native Americans to promote well-being.

Product labeling prominently bears the required boxed 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."

Herbalife International of America, Inc. certifies that the information contained in this notice is complete and accurate, and that the Company has substantiation that the foregoing statements are truthful and not misleading.

Please do not hesitate to advise should you have any questions.

Sincerely,



File: **Super Echinacea+ Dietary Supplement**



The image shows the product label for Super Echinacea+ Dietary Supplement. The label features the Herbalife logo at the top center, which consists of a stylized leaf symbol followed by the word "HERBALIFE" in a bold, sans-serif font. Below the logo, the product name "Super Echinacea+" is written in a large, serif font, followed by "Advanced Immune Support Formula" and "Dietary Supplement" in smaller fonts. A central illustration depicts a person standing in a field with trees. At the bottom of the label, it says "60 TABLETS". On the left side, there is a box containing text about suggested serving, ingredients, and a 30-day money back guarantee. On the right side, there is a box listing the ingredients and their amounts per six tablets, along with the manufacturer's name and "MADE IN U.S.A."

HERBALIFE

Super Echinacea+
Advanced Immune Support Formula
Dietary Supplement

60 TABLETS

Suggested Serving: Take one tablet four-to-six times per day to provide nutritional support for the immune system.

Super Echinacea+ contains an extract of Echinacea, an herb used by Native Americans to promote health, and other carefully selected herbs that may help your seasonal well-being.

Herbalife products are available only through Herbalife Independent Distributors.

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.

30 day money back guarantee

15234500
© 1998 HERBALIFE INTERNATIONAL, INC., U.S.A.

SIX TABLETS PROVIDE:

ECHINACEA EXTRACT	750 MG
ELDERBERRY EXTRACT	300 MG
JUNIPER BERRIES POWDER	30 MG
LEMON BALM POWDER	30 MG
CATS CLAW POWDER	30 MG
BIO-ABSORPTION COMPLEX	128 MG
LECTHIN, ASCORBYL PALMITATE, PLANT CELLULOSE ENZYME, CINNAMON POWDER AND BIOPERINE® (BLACK PEPPER EXTRACT)	

Formulated Exclusively for:
HERBALIFE INTERNATIONAL OF AMERICA, INC.
Los Angeles, CA 90080-0210 U.S.A.
MADE IN U.S.A.

SUPER ECHINACEA +

Advanced immune-support formula.

Echinacea extract

Elderberry extract



Cat's Claw

Echinacea, one the world's favorite herbs, has been prized for its immune-supporting properties. Now you can experience the many benefits of this natural wonder with Herbalife's Super Echinacea +, formulated with 125 mg of premier Echinacea. Super Echinacea + also includes naturally healthy Elderberry extract and Cat's Claw, an herb from South America.

- Contains carefully selected herbs that promote good health.
- Includes Echinacea Extract, a North American herb used by Native Americans to promote well-being.
- Easy-to-swallow tablets.

\$16.95

#1523 (case of 6)

#0207 (HAP or unit)

HERBALIFE[®] Fact Sheet

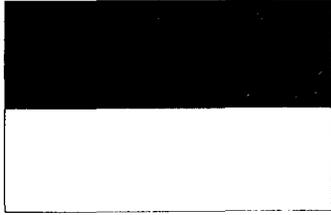


PRODUCT NAME:	Super Echinacea+
SKU #:	1523 (case) 0207 (HAP or unit)
RETAIL PRICE:	U.S. \$16.95 (each)
VOLUME POINTS:	13.50
SIZE:	60 tablets per bottle
PACKAGING:	6 bottles per case
DESCRIPTION:	Advanced immune-support formula dietary supplement.
FEATURES:	BENEFITS:
Echinacea	An herb known for its immune-supporting actions. Used by Native Americans to promote seasonal well-being.
Elderberry Extract	A well-known herb traditionally used to promote respiratory health.
Cat's Claw	An herb from South America that can help support the body's defenses.
USER:	Adults
USAGE:	Take one tablet four to six times per day to provide nutritional support for the immune system.
CROSS-SELL:	Super Echinacea+ can be used in conjunction with the Thermojetics [®] Weight-Management Program and Herbalife's entire line of nutritional products.
COLLATERAL MATERIAL:	<i>New Products Brochure</i>

NEW PRODUCT

US Edition No. 049

HERBALIFE.



TODAY

NEWS FOR BUSINESS BUILDING

■
*"I don't encounter 'obstacles'
in life. I prefer to think of
them as challenges!"*

—Mark Hughes
■

Five New Herbal-Based Products

continued from page 1

throats, cold and flu symptoms. And we've made it easy for customers to triple their health protection with our Immune-Support Kit, which combines Zinc & Echinacea Lozenges, Super Echinacea + and Herbal Throat Spray in one convenient package.

Get familiar with these products so you can share them with customers and prospects. Winter is quickly approaching, which makes this the ideal time to let everyone know about our new seasonal product line. So get the word out—and you'll see a healthy return on your efforts!

Zinc & Echinacea Throat Lozenges

Dietary supplement for a healthy throat.



- Includes Echinacea, an herb known for its immune-supporting actions.
- Contains Zinc, an essential mineral that helps keep the body's enzyme systems healthy.
- Great tasting honey-lemon flavor.
#1135 (case of 6) \$5.95
#0208 (HAP or unit)

Super Echinacea + *Immune-support formula.*

- Contains carefully selected herbs that may help you feel better and may help support your immune system.
- Includes Echinacea Extract, a North American herb used by Native



Americans to promote well-being.
#1523 (case of 6) \$16.95
#0207 (HAP or unit)

Herbalife continues to provide products that help fight common health concerns and also improve the lives of customers, and move your business forward.

Herbal Throat Spray

Homeopathic Throat Medication.

- This therapeutic product is formulated with ingredients that are listed in the homeopathic pharmacopoeia.
- Includes a powerful blend of Echinacea, Kava Kava, Thyme and Club Moss.



- Temporarily eases sore-throat pain, discomfort or hoarseness.
- Cool peppermint flavor.
- Convenient spray applicator.
#3048 (case of 6) \$6.95
#0211 (HAP or unit)

Immune-Support Kit

Triple protection against seasonal discomforts.

- Includes Zinc & Echinacea Throat Lozenges, Super Echinacea + and Herbal Throat Spray in a convenient kit.
- Contains a powerful blend of carefully selected herbal ingredients that may help you feel better.
- Temporarily eases sore throat pain, discomfort or hoarseness.
#2009 (case of 6) \$29.85
#0239 (HAP or unit)

Complementing our seasonal line, we've formulated additional products that are inspired by Mother Nature and include ingredients that are renowned for their health benefits.

Mega Garlic Plus

A dietary supplement.



- Derived from the world's best garlic.
- Includes a synergistic selection of herbs that complement garlic's healthy actions.
- Has no aftertaste.
#3050 (case of 6) \$18.95
#0212 (HAP or unit)



K8

Nature's relaxation formula.

- A combination of natural herbs, including Kava Kava and Ashwagandha, an Ayurvedic herb designed to help relax the body and increase your feelings of well-being.
- Each serving contains 150 mg of Calcium to help build strong bones.
- Includes Bio-Absorption Complex-5, which helps the body absorb the beneficial properties of the herbs.
#3051 (case of 6) \$13.95
#0213 (HAP or unit)