



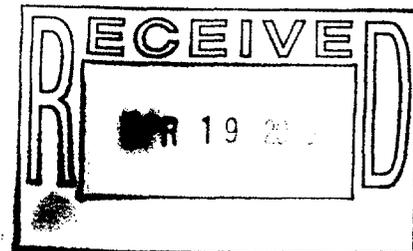
HERBALIFE INTERNATIONAL of AMERICA, INC.  
9800 La Cienega Blvd. • Inglewood, CA 90301  
(310) 258-7146 • FAX (310) 258-7124

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

April 7, 2000

Office of Nutritional Products  
Labeling and Dietary Supplements  
**FOOD & DRUG ADMINISTRATION**  
200 C Street, S.W.  
Washington, D.C. 20204

75308



Ref.: Triple Berry Complex

Dear Sir and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has begun commercializing Triple Berry Complex in the United States.

Triple Berry Complex is labeled and promoted with statements provided for in section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act.

1. LABEL

(Note: On the label, immediately below the following copy, appears a ruled DSHEA disclaimer box.)

Suggested Serving: Take one or two capsules a day.

Triple Berry Complex contains an exclusive blend of whole cranberries, blueberries and the herb, Bilberry, to help promote urinary tract health.

2. HERBALIFE FACT SHEET

(Note: The asterisks appearing in the copy shown below relate to the ruled DSHEA disclaimer box which is located and asterisked on the same page of the product literature.)

Triple Berry Complex

Introducing Triple Berry Complex, an exciting product that combines the goodness of whole cranberries with nutrient-rich blueberries and the herb, bilberry, to help support urinary health.\* This time-released supplement delivers benefits over a 24-hour period, so you take just one capsule a day.\* If you've been drinking cranberry juice or cranberry-juice cocktail to help promote urinary health, Triple Berry Complex is an ideal alternative that's natural, calorie free and convenient to use.

Discussion Points

- **Good news for the "blues":** Blueberries are the second most popular berries in the United States...and with good reason. They not only taste great, but they are rich in antioxidant properties that can help fight the damaging effects of free radicals.\*
- **Combine with other products:** Triple Berry Complex can be used in conjunction with the Thermojetics® Weight-Management Program and Herbalife's entire line of nutritional products.

Fast Facts

- Formulated from whole cranberries, which are high in Vitamin C, dietary fiber and other health-promoting nutrients.\*
- Includes blueberries, which are loaded with folic acid, Vitamins A and C, and dietary fiber.\*
- Contains bilberry, an herb that has many health benefits, especially for the eyes.\*
- Unique time-released formula allows for once-daily usage.
- 100% natural. No artificial preservatives, flavorings or colorings.

97S - 0162

LET 5269

3. **HERBALIFE TODAY NEWSLETTER**

(Note: The asterisks appearing in the copy shown below relate to the ruled DSHEA disclaimer box which appears on product literature.)

Triple Berry Complex combines the benefits of whole cranberries with nutrient-rich blueberries and bilberry to help support urinary health.\* Cranberry juice has long been known to promote a healthy urinary tract. Now get all the benefits of cranberry, bilberry and blueberry without the added sugar, preservatives and calories.

- Formulated from whole cranberries, which are rich in Vitamin C, dietary fiber and other health-enhancing nutrients.\*
- Includes blueberries and folic acid, dietary fiber and free-radical-fighting antioxidants. (Blueberries have the highest antioxidant effect of any food.)\*
- Contains bilberry, another antioxidant-rich herb, which offers many health benefits, especially for the eyes.\*
- Unique time-released formula allows for once-daily usage.
- 100% natural. No artificial preservatives, flavorings or colorings.

4. **PRODUCT FOCUS**

(Note: The asterisks appearing in the copy shown below relates to the ruled DSHEA disclaimer boxes which are located on the same pages of the product literature.)

One of Herbalife's newest introductions to its line of women's nutritional products is Triple Berry Complex, a dietary supplement that combines the goodness of these three beneficial berries. It helps support urinary health and provides essential nutrients without the added calories of cranberry juice.\*

- Formulated from whole cranberries, which are high in Vitamin C, dietary fiber and other health-promoting nutrients.\*
- Includes blueberries, which are loaded with folic acid, Vitamin A and C, dietary fiber and free-radical-fighting antioxidants. Blueberries have one of the highest antioxidant effects of any food.\*
- Contains bilberry, another antioxidant-rich herb that offers many health benefits, especially for the eyes.\*
- Convenient, once-daily capsule.
- 100% natural. No artificial preservatives, flavorings or colorings.

Product labeling and literature 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: Triple Berry Complex



## Triple Berry Complex

Cranberry • Blueberry • Bilberry  
Advanced Dietary Supplement for  
Urinary Tract Health

30 CAPSULES

**Suggested Serving:** Take one or two capsules a day.

Triple Berry Complex contains an exclusive blend of whole Cranberries, Blueberries and the fruit, Bilberry, to help promote urinary tract health.\*

\*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 products are available only through Herbalife Independent Distributors.

30-day money back guarantee.

Recycle this bottle.

306845-00 © 2000 HERBALIFE INTERNATIONAL, INC., U.S.A.

### Supplement Facts

Serving Size: 1 Capsule

Servings Per Container: 30

	Amount Per Serving
Cranberry Powder (fruit)	500 mg†
Dried Bilberry Extract 4:1 (fruit)	50 mg†
Blueberry Powder (fruit)	50 mg†

† Daily Value not established.

Other Ingredients: Calcium Carbonate, Silicon Dioxide and Magnesium Stearate.

Formulated exclusively for:

HERBALIFE INTERNATIONAL OF AMERICA, INC.

LOS ANGELES, CA 90080-0210, U.S.A.

MADE IN U.S.A.