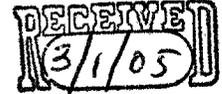




John Venardos Vice President  
Worldwide Regulatory & Government Affairs

Herbalife International of America INC  
1800 Century Park East Century City CA 90067  
T 310.410.9600 F 310 557.3916  
e-mail: [johnv@herbalife.com](mailto:johnv@herbalife.com)

February 22, 2005



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

Ref: **Mega Garlic Plus (N623-01)**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has revised Mega Garlic Plus labeling to include a new structure/function claim.

Mega Garlic Plus helps support healthy circulation and a healthy heart.\*

Equivalent to 1 clove of garlic, this product also helps provide the antioxidant protection your body needs\*.

Mega Garlic Plus is labeled and promoted with statements provided for in Section 403 (r) (6) of the Federal Food, Drug and Cosmetic Act.

~~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."

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,

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N623-01 50cc

4.5 x 1.5"

30 TABLETS

Mega Garlic Plus

*John P. Ignarro*  
 Endorsed by Dr. Lou Ignarro,  
 1998 Nobel Laureate in Medicine



**NEW & IMPROVED!**

**HERBALIFE®**

Dietary Supplement

Mega Garlic Plus helps support healthy circulation and a healthy heart.\* Equivalent to 1 clove of garlic, this product also helps provide the antioxidant protection your body needs.\*  
**Suggested Serving:** Take one tablet per day with a meal.

\*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.

Herballe products are available only through Herbalife Independent Distributors.

30-day money-back guarantee.  
 Recycle this bottle.  
 ©2005 HERBALIFE®

**Supplement Facts**

| Amount Per Serving                                  | % DV**                              |
|---|-------------------------------------|
| Serving Size: 1 Tablet<br>Serving Per Container: 30 |                                     |
| Total Carbohydrates                                 | 1 g >1%                             |
| Vitamin C (as ascorbic acid)                        | 70 mg 116%                          |
| Calcium   | (from dicalcium phosphate) 35 mg 3% |
| Phosphorus  | (from dicalcium phosphate) 34 mg 3% |
| Garlic Powder (clove)                               | .612 mg †                           |

\*\*Percent Daily Values (DV) are based on a diet of 2,000 calories.  
 † Daily Value (DV) not established.

**Other Ingredients:** Microcrystalline Cellulose, Methacrylic Acid Copolymer, Croscarmellose Sodium, Hypromellose, Stearic Acid, Talc, Titanium Dioxide, Methyl Methacrylate, Magnesium Stearate, Cellulose, Vegetable Stearate, >1%  
 Vitamin C (as ascorbic acid) 70 mg 116%  
 Acetoglycandes, Silicon Dioxide, Polyethylene Glycol, Polysorbate 80, Methyl Paraben, Propyl Paraben, FD&C Blue #1 and FD&C Yellow #5. Formulated exclusively for: HERBALIFE INTERNATIONAL OF AMERICA, INC. Los Angeles, CA 90080-0210 U.S.A. MADE IN U.S.A.



4.5 x 1.5"

**Mega Garlic Plus**  
Dietary Supplement  
30 TABLETS



*John A. Kryvoroz*  
Endorsed by Dr. Lou Ignarro,  
1998 Nobel Laureate in Medicine



**HERBALIFE®**

Mega Garlic Plus helps support healthy circulation and a healthy heart.\* Equivalent to 1 clove of garlic, this product also helps provide the antioxidant protection your body needs.\*  
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30-day money-back guarantee.

Recycle this bottle.

©2005 HERBALIFE®

**Supplement Facts**

Serving Size: 1 Tablet  
Serving Per Container: 30

| Amount Per Serving   | DV** |
|--|------|
| Iron, Titanium Dioxide, Hypromellose, Stearic Acid, Croscarmellose Sodium, Methacrylic Acid Copolymer, Microcrystalline Cellulose, |      |

Total Carbohydrates 1g >1%

Vitamin C (as ascorbic acid) 70 mg 116%

Calcium (from dicalcium phosphate) 35 mg 3%

Phosphorus (from dicalcium phosphate) 34 mg 3%

Garlic Powder (dove) 612 mg †

\*\* Percent Daily Values (DV) are based on a diet of 2,000 calories.

† Daily Value (DV) not established.

Other ingredients: Microcrystalline Cellulose, Methacrylic Acid Copolymer, Croscarmellose Sodium, Hypromellose, Stearic Acid, Talc, Titanium Dioxide, Methyl Cellulose, Magnesium Stearate, Cellulose, Vegetable Stearate, Cellulose, Silicon Dioxide, Polyethylene Glycol, Polysorbate 80, Methyl Cellulose, Polyethylene Glycol, FD&C Blue #1 and FD&C Yellow #5.

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SKU: #0032

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