



HERBALIFE

John Venardos Vice President
Worldwide Regulatory & Government Affairs

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April 18, 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

APR 22 2005

Ref: **LIFTOFF™ Effervescent Energy Drink Dietary Supplement (N603-00)**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has begun commercializing **LIFTOFF™ Effervescent Energy Drink Dietary Supplement**.

LIFTOFF™ Effervescent Energy Drink Dietary Supplement is labeled and promoted with statements provided for in Section 403 (r) (6) of the Federal Food, Drug and Cosmetic Act.

Launch your energy into orbit with **LIFTOFF™ Effervescent Energy Drink**. **LIFTOFF™** gives you the explosive boost you need for body and mind, whenever your engine is running on empty.*

LIFTOFF™'s proprietary energy blend fights fatigue and helps you stay alert and focused for improved concentration.*

Also contains 100% RDI of Vitamin C, a powerful antioxidant, and more than 100% RDI of Vitamins B6 and B12, essential nutrients for long-lasting energy production.*

- Enhance mental performance*
- Improve short-term memory*
- Promote fast, accurate thinking*
- Reduce mental fatigue*

A convenient, on-the-go energy drink that won't cause the jitters.*

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."

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LET

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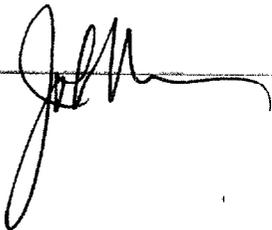
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Office of Nutritional Products
Labeling and Dietary Supplements
FOOD & DRUG ADMINISTRATION
April 18, 2005
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Please be advised that we have substantiation on file that these claims are truthful and not misleading.

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

Sincerely,

A handwritten signature in black ink, appearing to be "J. M.", is written over a horizontal line that spans the width of the page.

OFF
OFF

LIFT OFF™ provides energy, alertness, focus, focus and more. It's also alert and focus for improved concentration. Also contains 100% RDI of Vitamin C, a powerful antioxidant, and more than 100% RDI of Vitamins B5 and B12, essential nutrients for enhanced energy production.

Research indicates that the **LIFT OFF**™ blend of *Panax ginseng* and *Ginkgo biloba*:

- Enhances mental performance*
- Improves short-term memory*
- Promotes faster, accurate thinking*
- Reduces mental fatigue*

You can take **LIFT OFF**™ packets with you so you can **FUEL GOOD!**™ anytime, anywhere. Try both refreshing flavors: **Orion-Me Orange** and **Lemon-Lime Blast**.

* 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.

Supplement Facts

Serving Size: 1 To Met (5 g)
Servings Per Container: 10

	Amount Per Serving	% DV**
Calories	0	
Total Fat	0 g	0%
Total Carbohydrate	1 g	<1%
Vitamin C	60 mg	100%
Thiamin	3 mg	200%
Riboflavin	1.7 mg	100%
Niacin	20 mg	100%
Vitamin B6	6 mg	200%
Vitamin B12	12 mcg	200%
Biotin	300 mcg	100%
Pantothenic Acid	20 mg	200%
Sodium	215 mg	9%
(205 mg from Sodium Bicarbonate)		
Potassium	165 mg	3%
Energy Blast:	353 mg	7
L-Theanine, <i>Panax ginseng</i> (Root), Caffeine, <i>Ginkgo biloba</i> Extract (Leaf), Guarana Extract (Seeds), Inositol		
** PERCENT DAILY VALUE'S (DV) ARE BASED ON A 2,400 CALORIE DIET.		
† DAILY VALUE (DV) NOT ESTABLISHED		
INGREDIENTS: Citric Acid, Sodium Bicarbonate, Gum Syrup Solids, Potassium Bicarbonate, Natural Lemon Lime Flavor, Microcrystalline Cellulose, L-Theanine, <i>Panax ginseng</i> , Polyethylene Glycol, Ascorbic Acid, Caffeine, <i>Ginkgo biloba</i> Extract, Sodium Benzoate, Acesulfame - K, Guarana Extract, Biotin, Inositol, D-Calcium Pantothenate, Nicotinamide, Sucralose, Pyridoxine Hydrochloride, Thiamine Mononitrate, Riboflavin and Cyanocobalamin		

LIFT OFF

FUEL GOOD!

10 TABLETS

LEMON-LIME BLAST™ NATURAL FLAVORED
energizes your energy drink
2.02 (5.6 g) EACH NET WT. (20 g)

HERBALIFE INTERNATIONAL
OF AMERICA, INC.
LOS ANGELES, CALIFORNIA 90048, U.S.A.
MADE IN U.S.A.
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