HERBALIFE®

John Venardos
Vice President
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November 3, 2005

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

NOV - 9 2005

Ref: **Improved Herbalifeline® Dietary Supplement (N634-00)**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has revised Herbalifeline® dietary supplement labeling to include a new structure/function claim:

> **Herbalifeline®** The exclusive blend of highly refined marine lipids contains high-quality Omega-3 fatty acids, especially eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA). Omega-3 fatty acids help maintain a healthy cardiovascular system by maintaining cholesterol and triglyceride levels already within a normal range.*

Herbalifeline® dietary supplement 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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N634-00 120cc

HERBALIFE®

Herbalifeline®

New & Improved!

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

Taking Nutrition to Heart™

With Omega-3 Fatty Acids, EPA & DHA

Dietary Supplement

60 SOFTGELS

* This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Herbalifeline® This exclusive blend of highly refined marine lipids contains high quality Omega-3 fatty acids, especially eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA). Omega-3 fatty acids help to maintain a healthy cardiovascular system by maintaining cholesterol and triglyceride levels already within a normal range.*

DIRECTIONS: One softgel, two to three times per day, preferably with a meal.

INSTRUCCIONES: Una cápsula dos a tres veces al día, preferentemente con las comidas.

We offer a *30-day money-back* guarantee to assure your complete satisfaction. This exclusively formulated product is only available through Herbalife Independent Distributors.

NOTICE: This product is not intended for use by children, pregnant or lactating women. Individuals who are using blood thinning medications should consult with their physician about the use of fish oil supplements.

AVISO: Este producto no está destinado a niños, mujeres embarazadas o lactantes. Individuos que consumen medicamentos anticoagulantes deben consultar con su médico acerca del uso de suplementos de aceite de pescado.

Contiene ingredientes de anchoa, caballa, sardinas y soya.

Supplement Facts

Serving Size: 1 Softgel
Servings Per Container: 60

	Amount Per Serving	% DV**
Calories	5	
Calories from Fat	5	
Total Fat	0.5 g	<1%
Vitamin E (as d-alpha tocopherol)	6 IU	27%
Marine Lipid Complex (Fish Oil)	750 mg	†
Omega-3 Fatty Acids from Fish Oil (providing Eicosapentaenoic Acid (EPA) and Docosahexaenoic Acid (DHA))	336 mg	†

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

OTHER INGREDIENTS: Gelatin, Glycerin, Soybean Oil, White Thyme Oil, Clove Oil, Peppermint Oil and Ethyl Vanilla. Contains anchovy, mackerel, sardines and soybean ingredients.

HERBALIFE INTERNATIONAL OF AMERICA, INC., Los Angeles, CA 90080-0210, U.S.A. MADE IN U.S.A. ©2005 HERBALIFE®

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SKU#00615

6" x 2"
Nutricia

M K PANTONE 3145 CV PANTONE 294 CV PANTONE 364 CV Metallic Gold