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November 10, 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: **NRG Instant Tea Mix™ Dietary Supplement (N276-01)**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has modified the labeling for NRG Instant Tea Mix™ Dietary Supplement. Labeling bears the following structure/function claim:

For an Energy Lift*

The NRG Blend of Guarana, Orange Pekoe and Lemon Extract is a delicious pick-me up anytime of the day. Guarana seeds contain guaranine, which has been shown to help sustain energy levels.* Try a warm cup of N-R-G Tea to begin your morning, or a tall glass of iced N-R-G midafternoon to refresh your body and mind.*

NRG Instant Tea Mix™ 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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HERBALIFE.



THERMOJETICS®
NATURE'S RAW GUARANA
 Instant Tea Mix
 For An Energy Lift*
 Dietary Supplement

n-r-g

NET WT 2.12 oz / 60 g

6.25" x 2.25"

Pharmachem

*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.

The N-R-G blend of Guarana, Orange Pekoe and Lemon Extract is a delicious pick-me up any time of the day. Guarana seeds contain guaranine, which has been shown to help sustain energy levels*. Try a warm cup of N-R-G tea to begin your morning, or a tall glass of iced N-R-G mid-afternoon to refresh your body and mind. *

Directions: Mix ½ teaspoon with 6 fl. oz. of hot or cold water.

Instrucciones: Mezcle ½ cucharadita con 6 oz. fl. de agua fría o caliente.

Please note this product contains caffeine.

30-day money-back guarantee.

This exclusively formulated product is available only through Herbalife Independent Distributors.

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Supplement Facts

Serving Size: ½ tsp. (1 g)
 Servings Per Container: 60

	Amount Per Serving	% Daily Values**
Orange Pekoe Extract (Leaf)	250 mg	†
Guarana Seed Extract (Seed)	120 mg	†
Lemon Peel Extract (Peel)	105 mg	†
Caffeine † from Guarana Seed, Natural Caffeine Powder and Orange Pekoe	40mg	†

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

Other Ingredients: Maltodextrin, Modified Food Starch, Citric Acid and Ascorbic Acid. **CONTAINS SOYBEAN INGREDIENTS**

Formulated exclusively for:
HERBALIFE INTERNATIONAL OF AMERICA, INC.
 LOS ANGELES, CA 90080-0210, U.S.A.
 MADE IN U.S.A.



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