

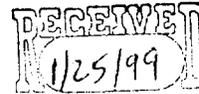


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HERBALIFE INTERNATIONAL OF AMERICA, INC.
9800 La Cienega Blvd., Inglewood, CA 90301
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(310) 410-9600 • FAX: (310) 258-7124

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



January 18, 1999

Office of Special Nutritionals (HFS-450)
Center For Food Safety and Applied Nutrition
FOOD & DRUG ADMINISTRATION
200 C Street, S.W.
Washington, D.C. 20204

Ref.: **Advanced St. John's Wort with Uplifting Herbs**

Dear Sir and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has begun commercializing Advanced St. John's Wort with Uplifting Herbs dietary supplement in the United States.

Advanced St. John's Wort with Uplifting Herbs is labeled and promoted with statements provided for in section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act.

LABEL

Suggested Serving: One tablet twice per day.

Herbalife's Advanced St. John's Wort contains a blend of high-quality herbs including St. John's Wort, Gotu Kola, Suma and Maca to help enhance your mental well-being.

Notice: Not intended for use by pregnant or lactating women, children or by individuals taking prescription anti-depression medication. Use of this product may increase one's sensitivity to sunlight. This product is not intended for weight control.

HERBALIFE FACT SHEET

Advanced St. John's Wort with Uplifting Herbs
An all-natural complex to support your well-being.

FEATURES:

St. John's Wort

Gotu Kola

Suma

979-0162 Maca

Coleus

BENEFITS:

An herb used for thousands of years as a natural mood enhancer. Standardized to 0.3% hypericin.

An Indian herb that can help support the central nervous system and enhance vitality.

An herb known as Brazilian Ginseng, used to increase energy and boost mood levels.

An herb known as Peruvian Ginseng, used as an energy and mental enhancer.

A mood-enhancing herb effective in promoting well-being.

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PRODUCT FLYER

Advanced St. John's Wort with Uplifting Herbs

- Formulated with high-quality St. John's Wort.
- Includes Gotu Kola, an Indian herb, that can help support the central nervous system and enhance vitality.
- Features Suma, an herb known as Brazilian Ginseng, used to increase energy and boost mood levels.
- Contains Maca, an herb known as Peruvian Ginseng, used as an energy and mental enhancer.

PRODUCT BROCHURE INSERT

An all-natural complex to support your well-being.

St. John's Wort is one of the most sought-after herbs on the market – and with good reason. It's been used for thousands of years and has recently become popular as a natural mood enhancer. Herbalife has captured the beneficial properties of this time-honored herb in its exclusive new product, Advanced St. John's Wort with Uplifting Herbs.

- Formulated with high-quality St. John's Wort.
- Includes Gotu Kola, an Indian herb, that can help support the central nervous system and enhance vitality.
- Features Suma, an herb known as Brazilian Ginseng, used to increase energy and boost mood levels.
- Contains Maca, an herb known as Peruvian Ginseng, used as an energy and mental enhancer.
- Includes Coleus, a mood-enhancing herb effective in promoting well-being.

Product labeling 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: Advanced St. John's Wort with Uplifting Herbs Dietary Supplement

HERBALIFE® Fact Sheet



PRODUCT NAME:	Advanced St. John's Wort with Uplifting Herbs
SKU#:	3010 (case of 6) 0162 (HAP or unit)
RETAIL PRICE:	\$19.95 (each)
VOLUME POINTS:	19.95
SIZE:	60 tablets per bottle
PACKAGING:	6 bottles per case
DESCRIPTION:	An all-natural complex to support your well-being.
FEATURES:	BENEFITS:
St. John's Wort	An herb used for thousands of years as a natural mood enhancer. Standardized to 0.3% hypericin.
Gotu Kola	An Indian herb that can help support the central nervous system and enhance vitality.
Suma	An herb known as Brazilian Ginseng used to increase energy and boost mood levels.
Maca	An herb known as Peruvian Ginseng used as an energy and mental enhancer.
Coleus	A mood-enhancing herb effective in promoting well-being.
USER:	Adults
USAGE:	One tablet, twice a day as needed.
CROSS-SELL:	Advanced St. John's Wort with Uplifting Herbs can be used in conjunction with the Thermojetics® Weight-Management Program and Herbalife's entire line of nutritional products.
COLLATERAL MATERIAL:	Product Brochure Insert

NEW PRODUCT

Introducing Two New Products for Natural Health!



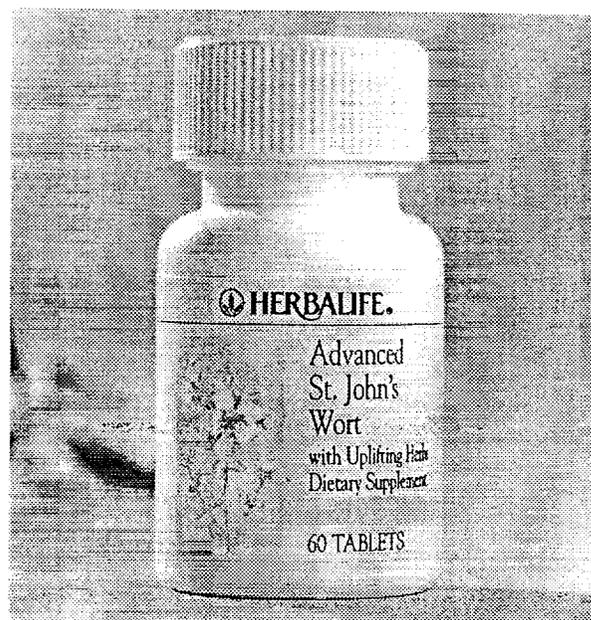
You're going to love Herbalife's newest natural health products. Looking for an advanced antioxidant for good health? Check out Cardio ToconOx™. Want to support your well-being? Advanced St. John's Wort with Uplifting Herbs can help enhance your mood and promote good feelings. Order today.



Cardio ToconOx™

- Includes tocotrienols, which can help protect the body from the harmful effects of free radicals.
- Can help support a healthy cardiovascular system and help maintain healthy cholesterol.
- Contains Coenzyme Q10, a nutrient used in the production of energy and found in every cell of your body.
- Provides the antioxidant benefits of olive and rice bran oils.

#3060 (case of 6)
#0241 (HAP or unit) \$22.95



Advanced St. John's Wort with Uplifting Herbs

- Formulated with high-quality St. John's Wort.
- Includes Gotu Kola, an Indian herb, that can help support the central nervous system and enhance vitality.
- Features Suma, an herb known as Brazilian Ginseng, used to increase energy and boost mood levels.
- Contains Maca, an herb known as Peruvian Ginseng, used as an energy and mental enhancer.

#3010 (case of 6)
#0162 (HAP or unit) \$19.95

Call Today! (310) 216-7770

 **HERBALIFE.**

Advanced St. John's Wort with Uplifting Herbs

An all-natural complex to support your well-being.

New!



St. John's Wort is one of the most sought-after herbs on the market—and with good reason. It's been used for thousands of years and has recently become popular as a natural mood enhancer. Herbalife has captured the beneficial properties of this time-honored herb in its exclusive new product, Advanced St. John's Wort with Uplifting Herbs.

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- Includes Coleus, a mood-enhancing herb effective in promoting well-being.

#3010 (case of 6)

#0162 (HAP or unit) \$19.95