



HERBALIFE INTERNATIONAL OF AMERICA, INC.  
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JOHN P. VENARDOS  
Vice President, Regulatory Affairs  
International Product Management

September 8, 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.: **Woman's Advantage with DHEA**

Dear Sir and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has begun commercializing Woman's Advantage with DHEA dietary supplement in the United States.

Woman's Advantage with DHEA will be labeled and promoted with statements provided for in section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act.

1. **LABEL**

Suggested Serving: One tablet daily.

Woman's Advantage with DHEA is a rejuvenating formula containing a select blend of herbs designed specifically for women. It works with natural hormone precursors to increase sensuality, stamina and vitality, and helps create an overall sense of control and well-being. (Note: the DSHEA disclaimer box immediately follows the proceeding statement on the printed label.)

2. **HERBALIFE FACT SHEET**

(Note: the asterisks appearing in the copy shown below relate to the DSHEA disclaimer box which appears on product labeling and in literature.)

Helps improve sensuality, vitality and stamina – changes that can take years off your appearance.

When we are young we take vitality for granted. But as we age, our bodies slow the production of key hormones needed to maintain our essential youthful vitality. Throw stress into the mix and the aging process soon gets an upper hand: our appearance changes, our body shape changes, our sense of well-being decreases – the list goes on. This is nature's plan for us. But what if we have different plans? What if we want to feel young and look young as long as possible? Can we really slow down or reverse the effects of aging? Good nutrition, proper skin care and regular exercise all help us live longer, look better and feel better. But now it's possible to take a giant step forward.

Woman's Advantage with DHEA, with its proprietary blend of select herbs, contains natural hormone precursors that work in harmony with the needs of the female body. The result is a supremely dependable, superior-quality dietary supplement that helps revitalize and rejuvenate.\* Woman's Advantage with DHEA works deep within a woman's system to help elevate sensuality, vitality and stamina as well as to create a sense of well-being.\* You feel "in the groove."

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**Discussion Points**

- Contains the hormone precursor DHEA.\*
- Increases vitality and feelings of youthfulness.\*
- Improves sex drive and feelings of sensuality.\*
- Helps create a positive sense of well-being.\*
- A critical component of every woman's program because it can help boost energy and alertness.\*

**Did You Know?**

Woman's Advantage with DHEA improves sensuality because it contains the herbs Damiana and Tribulus Terrestris and the hormone precursor DHEA, which help to normalize the female hormones that are the basis for feelings of sensuality and sexuality. What's more, Woman's Advantage with DHEA is safe.

**Fast Facts:**

- **DHEA** is a natural hormone precursor that helps normalize the key female hormones necessary for sensuality and youthful vitality.\*
- **Damiana** and **Tribulus Terrestris** are two natural herbs that work to increase the natural sex drive.\*
- **Cocoa Extract**, a form of chocolate, supplies an energy boost and helps provide a sustained sense of well-being.\*
- **Siberian Ginseng** and **L-Arginine** help improve stamina and endurance and maintain a more youthful muscle tone.\*

3. **HERBALIFE TODAY NEWSLETTER**

(Note: the asterisks appearing in the copy shown below relate to the DSHEA disclaimer box which appears on product labeling and in literature.)

*Dietary supplement for women to enhance sensuality and youthful vitality.*

As we age, our bodies slow the production of key hormones needed to maintain our essential youthful vitality. Throw stress into the mix and the aging process soon gets an upper hand: our appearance changes, our body shape changes, and our sense of well-being decreases. This is nature's plan for us. But what if we have different plans? What if we want to feel young and look young as long as possible? Can we really slow down or reverse the effects of aging?

Good nutrition, proper skin care and regular exercise all help us live longer, look better and feel better. But now it's possible to take a giant step forward.

Woman's Advantage with DHEA, with its proprietary blend of select herbs, contains natural hormone precursors that work in harmony with the needs of the female body. Woman's Advantage with DHEA works deep within a woman's system to help elevate feelings of sensuality, vitality and stamina as well as to create a sense of well-being.\*

- DHEA is a natural hormone precursor that helps normalize the key female hormones contributing to feelings of sensuality and youthful vitality.\*
- Damiana and Tribulus Terrestris are two natural herbs that work to help increase the natural sex drive.\*
- Cocoa Extract, a form of chocolate, supplies an energy boost and helps provide a sense of well-being.\*
- Siberian Ginseng and L-Arginine help improve stamina and endurance and maintain a more youthful muscle tone.\*

4. **MINI PRODUCT INSERT**

(Note: the asterisks appearing in the copy shown below relate to the DSHEA disclaimer box which appears on product labeling and in literature.)

Woman's Advantage with DHEA

*Dietary Supplement for Women to Enhance Sensuality and Youthful Vitality*

When we are young we take vitality for granted. But as we age, our bodies slow the production of key hormones needed to maintain our essential youthful vitality. Throw stress into the mix and the aging process soon gets an upper hand: our appearance changes, our body shape changes, our sense of well-being decreases – the list goes on. This is nature's plan for us. But what if we have different plans? What if we want to feel young and look young as long as possible? Can we really slow down or reverse the effects of aging? Good nutrition, proper skin care and regular exercise all help us live longer, look better and feel better. But now it's possible to take a giant step forward.

Woman's Advantage with DHEA, with its proprietary blend of select herbs, contains natural hormone precursors that work in harmony with the needs of the female body. The result is a supremely dependable, superior-quality dietary supplement that helps revitalize and rejuvenate.\* Woman's Advantage with DHEA works deep within a woman's system to help elevate sensuality, vitality and stamina as well as to create a sense of well-being.\* You feel "in the groove."

**Discussion Points**

- DHEA is a natural hormone precursor that helps normalize the key female hormones contributing to feelings of sensuality and youthful vitality.\*
- Damiana and Tribulus Terrestris are two natural herbs that work to help increase the natural sex drive.\*
- Cocoa Extract, a form of chocolate, supplies an energy boost and helps provide a sense of well-being.\*
- Siberian Ginseng and L-Arginine help improve stamina and endurance and maintain a more youthful muscle tone.\*

5. **MINI PRODUCT BROCHURE**

Woman's Advantage with DHEA

Superior dietary supplement for women that enhances feelings of sensuality and youthful vitality. Perfect for creating a sense of well-being.

Product labeling and literature 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: **Woman's Advantage with DHEA**



Proof # 1

90%

#2

## Woman's Advantage with DHEA

### Dietary Supplement for Women to Enhance Sensuality and Youthful Vitality

When we are young we take vitality for granted. But as we age, our bodies slow the production of key hormones needed to maintain our essential youthful vitality. Throw stress into the mix and the aging process soon gets an upper hand: our appearance changes, our body shape changes, our sense of well-being decreases—the list goes on. This is nature's plan for us. But what if we have different plans? What if we want to feel young and look young as long as possible? Can we really slow down or reverse the effects of the aging process?

Good nutrition, proper skin care and regular exercise all help us live longer and look, and feel better. But now it's time to take a giant step forward.

Woman's Advantage with DHEA, with its proprietary blend of select herbs, contains natural hormone precursors that work in harmony with the needs of the female body. The result is a supremely dependable, superior-quality dietary supplement that helps revitalize and rejuvenate.\* Woman's Advantage with DHEA works deep within a woman's system to help elevate sensuality, vitality and stamina as well as to create a sense of well-being.\* You feel "in the groove."

#### Discussion Points

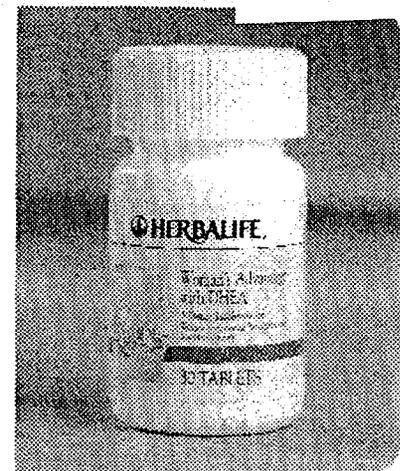
- Contains the hormone precursor DHEA.\*
- Increases vitality and feelings of youthfulness.\*
- Improves sex drive and feelings of sensuality.\*
- Helps create a sustained positive sense of well-being.\*
- A critical component of every woman's anti-aging program because it can help boost energy and alertness.\*

#### Did You Know?

Woman's Advantage with DHEA improves sensuality because it contains the herbs *Damiana* and *Tribulus Terrestris* and the hormone precursor *DHEA*, which help normalize the female hormones that are the basis for feelings of sensuality and sexuality. What's more, Woman's Advantage with DHEA is completely safe.

#### Fast Facts

- DHEA is a natural hormone precursor that helps normalize the key female hormones necessary for sensuality and youthful vitality.\*
- Damiana and Tribulus Terrestris are two natural herbs that work together to increase the natural sex drive.\*
- Cocoa Extract, a form of chocolate, supplies an energy boost and helps provide a sense of well-being.\*
- Siberian Ginseng and L-Arginine help improve stamina and endurance and maintain a more youthful muscle tone.\*



#### SUPPLEMENT FACTS

Serving Size: One tablet daily.  
Servings per container: 30 tablets

|   | Amount Per Serving | % Daily Value** |
|---|--------------------|-----------------|
| Total Carbohydrate                        | <1 g               | <1%             |
| Dried Damiana Extract (leaf)              | 150 mg             | †               |
| Dried Cocoa Extract (seed)                | 150 mg             | †               |
| L-Arginine                                | 150 mg             | †               |
| Dried Siberian Ginseng Extract (root)     | 50 mg              | †               |
| Dried Tribulus Terrestris Extract (fruit) | 50 mg              | †               |
| DHEA (Dehydroepiandrosterone)             | 25 mg              | †               |
| Bio-Absorption Complex-5                  | 23 mg              | †               |

Lecithin, Vitamin C (as ascorbyl palmitate), Plant Cellulose Enzyme, Cinnamon Powder (bark) and Dried Black Pepper Extract (from Bioperine®) (fruit).

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

#### Other Ingredients

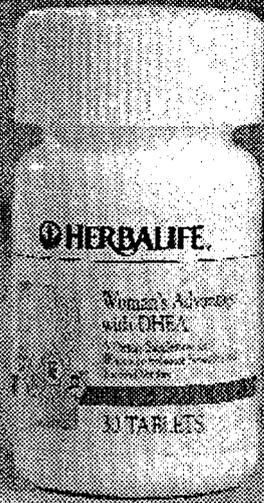
Calcium Carbonate, Stearic Acid, Croscarmellose Sodium, Sodium Starch Glycolate, Magnesium Stearate, Silicon Dioxide, Hydroxypropyl Methylcellulose, Gum Arabic (Acacia senegal) (root), Dextrin, Cellulose, Dextrose, Sodium Carboxymethylcellulose and Sodium Citrate.

#### Suggested Serving

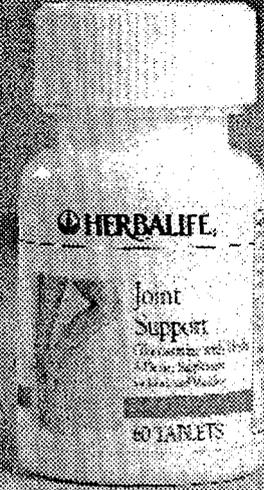
Take one tablet daily.

\*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.

**Ordering Details:**  
30 tablets per bottle  
#3080 (case of 6)  
#0269 (HAP or unit) \$19.95



**"Targeted Line"**  
Expands  
with  
**Two  
Powerful  
New  
Products!**



*Woman's Advantage with DHEA and Joint Support Glucosamine with Herbs strengthen Herbalife's youthful-appearance product line.*

**Woman's Advantage with DHEA**

Dietary supplement for women to enhance sensuality and youthful vitality.

As we age, our bodies slow the production of key hormones needed to maintain our essential youthful vitality. Throw stress into the mix and the aging process soon gets an upper hand: our appearance changes, our body shape changes and our sense of well-being decreases. This is nature's plan for us. But what if we have different plans? What if we want to feel young and look young as long as possible? Can we really help slow down or reverse the effects of aging?

Good nutrition, proper skin care and regular exercise all help us live longer, look better and feel better. But now it's possible to take a giant step forward.

Woman's Advantage with DHEA, with its proprietary blend of select herbs, contains natural hormone precursors that work in harmony with the needs of the female body. Woman's Advantage with DHEA works deep within a woman's system to help elevate sensuality, vitality and stamina as well as to create a sense of well-being.\*

- DHEA is a natural hormone precursor that helps normalize the key female hormones contributing to feelings of sensuality and youthful vitality.\*
- Damiana and Tribulus Terrestris are two natural herbs that work to help increase the natural sex drive.\*
- Cocoa Extract, a form of chocolate, supplies an energy boost and helps provide a sense of well-being.\*
- Siberian Ginseng and L-Arginine help improve stamina and endurance and maintain a more youthful muscle tone.\*

#3080 (case of 6) \$119.70  
#0269 (HAP or unit) \$19.95

\*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.

**Joint Support Glucosamine with Herbs**

Dietary supplement for joints and muscles.

Millions of people find the simple act of lifting an arm, bending a knee or even wiggling a toe may cause agonizing pain. The aches and discomfort may be caused by arthritis, an injury or excessive wear-and-tear, but they can also occur because we are living longer.

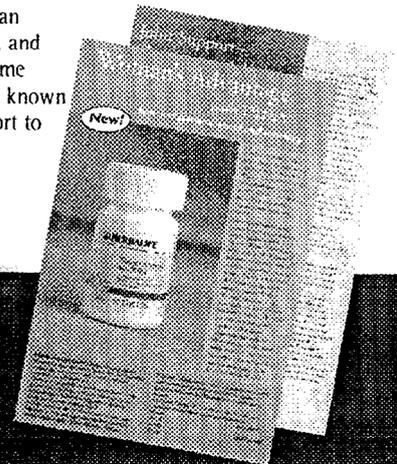
With average life expectancy on the rise, as many as three-fourths of the population over 50 will be affected by symptoms of osteoarthritis, a condition that may be accompanied by a breakdown in the cartilage found between bone joints. Without this protective padding, bones rub together, causing pain, tenderness, swelling, stiffness, and sometimes, deformity.

Herbalife has formulated an herbal-based product, Joint Support-Glucosamine with Herbs, which can help provide support to aching joints that may be subject to excessive wear-and-tear or injury. Taken twice daily, you can experience the benefits of six of the most widely used herbs, enzymes and nutritional factors, all known to benefit aching joints and muscles.\*

- Glucosamine Sulfate, a natural compound produced by the body, that contributes to the natural cushioning effect of cartilage.\*
- MSM (Methylsulfonylmethane), a naturally occurring organic sulfur compound, found in living plant and animal tissues. Known for enhancing flexibility.\*
- Turmeric and Boswellia, frequently used to aid the body in the healing process.\*
- Also contains Bromelain, an enzyme found in pineapple, and Peptizyme®, a purified enzyme complex, each of which are known to provide nutritional support to joints and muscles.\*

■ Easy-to-swallow tablets.

#3070 (case of 6) \$113.70  
#0261 (HAP or unit) \$18.95



A special, full-color *Product Brochure Insert* is available to help you promote these great new products. Order this insert and place copies of it inside the *Product Brochures* you leave with customers and prospects.

#5975 (set of 10) \$1.00

#4

# Woman's Advantage with DHEA

*Dietary Supplement for Women to Enhance  
Sensuality and Youthful Vitality*

**New!**



When we are young we take vitality for granted. But as we age, our bodies slow the production of key hormones needed to maintain our essential youthful vitality. Throw stress into the mix and the aging process soon gets an upper hand: our appearance changes, our body shape changes, our sense of well-being decreases—the list goes on. This is nature's plan for us. But what if we have different plans? What if we want to feel young and look young as long as possible? Can we really slow down or reverse the effects of the aging process? The answer is, Yes! Good nutrition, proper skin care and regular exercise all help us to live longer and look and feel better. But now it's time to take a giant step forward.

Woman's Advantage with DHEA, with its proprietary blend of select herbs, contains natural hormone precursors that work in harmony with the needs of the female body. The result is a supremely dependable, superior-quality dietary supplement that helps revitalize and rejuvenate\*. Woman's Advantage with DHEA works deep within a woman's system to help elevate sensuality, vitality and stamina as well as to create a sustained sense of well-being.\* You feel "in the groove."

\* DHEA is a natural hormone precursor that helps normalize the key female hormones necessary for sensuality and youthful vitality.\*

\* Damiana and Tribulus Terrestris are two natural herbs that work together to increase the natural sex drive.\*

\* Cocoa Extract, a form of chocolate, supplies an energy boost and helps provide a sustained sense of well-being.\*

\* Siberian Ginseng and L-Arginine help improve stamina and endurance and maintain a more youthful muscle tone.\*

#3080 (case of 6)  
#0269 (HAP or unit) \$19.95

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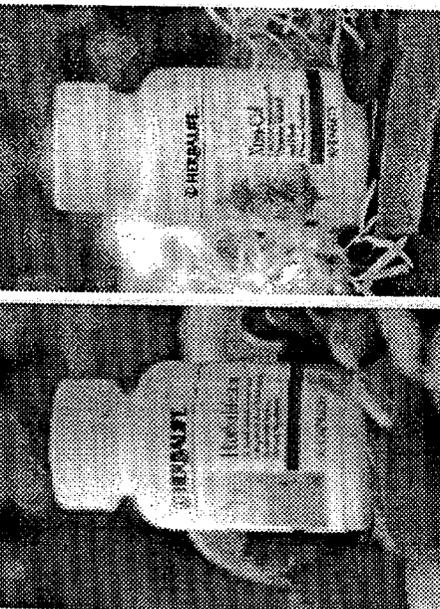
New!

## Supplements for a Healthy Lifestyle

**Joint Support:**  
Glucosamine with Herbs  
Innovative supplement provides support to aching joints, thanks to a unique blend of herbs, enzymes and nutritional factors. \$18.95

New!

## Nutritional Support for Women and Men



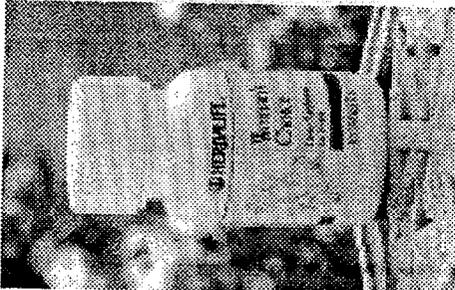
**Ultimate Ginkgo**  
Provides flavonoid glycosides and terpenic lactones which can help support healthy brain function. \$16.95

**Herbalifeine**  
Rich in Omega-3 fatty acids to help protect your heart. \$24.75

**Xtra-Cal**  
Contains the most concentrated form of Calcium available in a tablet. \$10.25

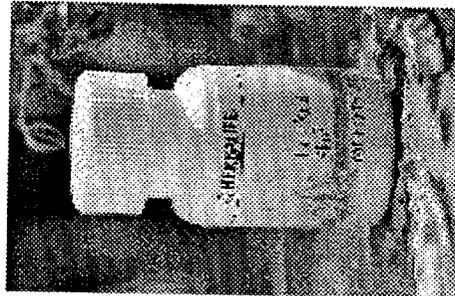
**Ocular Defense Formula**  
This scientifically advanced supplement contains potent antioxidants that are believed to help protect the eyes from the effects of harmful free radicals. \$15.95

**Mega Ginseng Blend**  
Dietary supplement for good health and well-being. Contains an unique mixture of the world's most widely used Ginsengs. \$14.95



**Ultimate Prostate Formula**  
Contains a superior blend of vitamins, minerals and herbs that help support good urinary function. \$17.95

**Male Factor 1000\***  
Helps increase vitality, stamina and endurance in men. \$41.00



**Woman's Advantage with D-HEA**

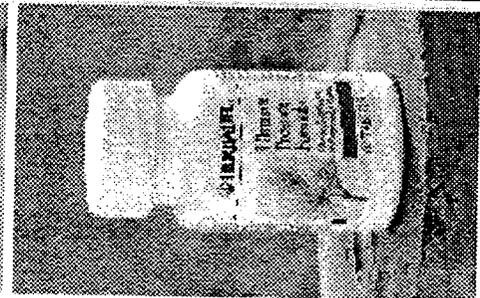
Superior dietary supplement for women that enhances feelings of sensuality and youthful vitality. Perfect for creating a sense of well-being. \$19.95

**Woman's Cheiza**

Contains a special blend of isolavones from Red Clover, Soy and Kudzu, along with antioxidant-rich Black Cohosh, that may promote hormone balance. \$22.95

**Tang Kuei Plus\***

Specially formulated to normalize the challenges associated with a woman's menstrual cycle. \$12.50



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