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APR 19 2004

April 7, 2004

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: **Herbalifeline® Dietary Supplement**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has begun commercializing a new structure/function claim for Herbalifeline® appearing on a product kit insert: "A valuable source of Omega-3 fatty acids to support healthy weight loss and heart health.\*"

Adjacent to that claim on the label is a ruled DSHEA disclaimer statement as provided for in Section 403 (r) (6) of the Federal Food, Drug and Cosmetic Act.

Please be advised that we have substantiation on file that this claim is truthful and not misleading.

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

Sincerely,

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# Weight-Management Meal Planner

The ShapeWorks weight-loss program has been designed to help you lose weight and get good nutrition without feeling hungry. Individuals may personalize their shakes, snacks and meals, as well as customize their supplement program. For more information about additional products that may help you optimize your success, contact your Herbalife Distributor.

## Breakfast

### IDEAL MEAL

2 scoops of Formula 1 Nutritional Shake Mix + 8 oz glass of nonfat milk or soy milk + 2 tbsp of Formula 3 Personalized Protein Powder + 1 cup of fresh or frozen fruit = Blend well = A delicious and nutritious shake!

Enjoy a cup of energizing Herbal Concentrate

**Don't forget:**  
• Formula 2 Multivitamin Complex (one tablet)

= approximately 29 grams of protein

Add more Formula 3 Personalized Protein Powder to your shake based on your needs.

## Lunch

### IDEAL MEAL

2 scoops of Formula 1 Nutritional Shake Mix + 8 oz glass of nonfat milk or soy milk + 2 tbsp of Formula 3 Personalized Protein Powder + 1 cup of fresh or frozen fruit = Blend well = A healthy shake that tastes great and is good for you!

**Don't forget:**  
• Formula 2 Multivitamin Complex (one tablet)

= approximately 29 grams of protein

Add more Formula 3 Personalized Protein Powder to your shake based on your need.

## Snack

1 cup of cut, raw vegetables + Great-tasting HPLC Cream of Chicken Soup OR Delicious HPLC Roasted Soy Nuts with Cardia Salt OR Satisfying HPLC Bar in four flavors OR Refreshing HPLC Drink in Wild Berry or Peach Mango flavors

= approximately 12 grams of protein

Men may have two snacks a day.

## Dinner

4+ cups of salad + 1 tbsp rice or wine vinegar or nonfat salad dressing + 3 to 6 oz of fish, skinless chicken, lean red meat or soy-meat substitute + 2+ cups of mixed vegetables + For dessert, 1 cup of fresh or frozen fruit

**Don't forget:**  
• Formula 2 Multivitamin Complex (one tablet)

= approximately 30 to 40 grams of protein

### HELPFUL TIPS

- Individuals weighing over 220 pounds or those with 50 pounds or more to lose may add one extra tablespoon of Formula 3 to their shakes. In addition, depending on hunger and weight-loss goals, men may have two snacks a day.
- Shake up your Formula 1 choices and try all five flavors.
- Drinking water is important.
- Exercise several times a week.
- Watch out for stress eating. If you feel emotional, try writing instead.
- Keep high-protein snacks at work and in the car to fight between meal cravings.
- Find ways to reward yourself besides food—set aside time for yourself.

### WEIGHT-LOSS ENHANCERS

- Total Control™**—energy enhancement and appetite control\*
- Snack Defense™**—combat between-meal snacking\*
- Cell-U-Loss®**—helps reduce fluid retention\*
- Thermo-Bond®**—helps create a feeling of fullness to support weight-loss efforts\*
- Active Fiber™**—supports digestive and intestinal health\*
- Arrinogen™**—improves the digestion and absorption of proteins\*
- Herbal Aloe Drink™**—helps soothe the digestive system.
- Cell Activator®**—supports cellular energy production and assimilation of essential nutrients\*

### OPTIMUM NUTRITION

**Garden 7™**—selected concentrated phytonutrients of the seven color groups of fruits and vegetables. **Herbalifeline®**—a valuable source of Omega-3 fatty acids to support healthy weight loss and heart health.\*

\*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.

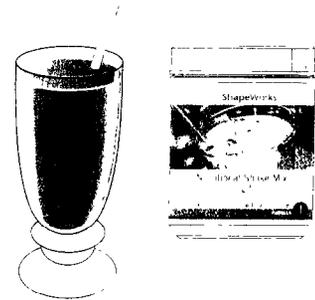
# Weight-Management Eating Guide

## The Ideal Meal

Making your own high-protein shake puts you in control of your meal. Set up your shake area in the kitchen and keep it clean and well-stocked, because you'll be using this area every day. Having a nice clean blender and keeping your spoon and powder handy is as important as having non-fat milk or soy milk and fresh or frozen fruit available. Try different flavors and fruits to give yourself some variety when you need it.

Herbalife's Ideal Meal includes soy protein and essential vitamins and minerals, along with the healthy fruits you've added—all in one delicious meal! The combination of protein and fruit found in ShapeWorks™ shakes make them more filling so you feel satisfied and your cravings are kept at bay. Replacing

two meals with two shakes a day will help you lose weight fast and stay motivated. You can replace just one meal a day if you want to maintain your weight.



## Why Is Protein Important?

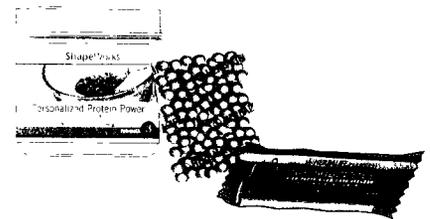
Making sure you get adequate protein intake every day is a simple and safe way to support losing or maintaining your ideal weight. Protein helps you feel fuller during a meal and keeps you satisfied well after you've eaten. Because protein is filling, you won't be as tempted to snack between meals or consume "junk food" that's high in sugar, fat and calories and low in nutritional value.

Protein also helps reduce carbohydrate cravings. Carbohydrates, especially sweets and starches, can trigger the brain to crave more of the same—which leads to a vicious cycle of overeating. Protein foods help block cravings. When you eat protein with healthy carbohydrates, such as fruits, vegetables and whole grains, the protein will keep you satisfied while reducing your cravings for sweets and starches. This makes protein a powerful ally in your quest to lose weight.

In addition, protein helps maintain and build lean body mass, which is important because it determines your metabolic rate. To safely lose weight, you need to maintain a healthy lean body mass. Not only does too little protein leave dieters feeling weak and hungry, but the body may begin burning lean body mass for energy. The protein in

ShapeWorks™ shakes and products is lean, easily digestible and lower-calorie than eating meats.

Women need, on average, 100 grams of protein daily to build and maintain an optimal amount of lean body mass. Men need more—averaging 150 grams of protein daily. The Ideal Meal allows you to meet these protein goals at a very low-calorie cost. These protein guidelines are designed to keep you from feeling hungry, and the calorie-controlled shakes allow you to incorporate plenty of healthy fresh fruits and vegetables into a balanced meal plan. Everyone has different protein needs based upon their size, build and age, so personalize your protein intake according to your needs.



## Identify Trigger Foods

Trigger foods are often used for emotional eating. They can trigger you to eat too much, lose control and not lose weight. These foods are often highly flavorful, but caloric and with little nutritional value. That's why it's important to identify your trigger foods and find healthy substitutes. These simple changes will empower you over the long term.

### Instead of...

Chips, peanuts, crackers, pretzels  
Cheese pizza  
Mayonnaise, margarine, butter  
Regular (high fat) salad dressings  
Red meat and fatty fish  
Colas and juices  
Pastries and ice cream  
Beans, potatoes, pasta

### Try...

Soy nuts and high-protein snacks  
Tomato vegetable soup  
Mustard, ketchup, "no-added sugar" jam, tabasco  
Balsamic, rice or wine vinegar dressing  
Skinless white chicken, turkey, halibut, tuna  
Water, Herbal Aloe Drink  
Fresh fruit  
Steamed vegetables

For more weight loss information, talk to your Herbalife Distributor.

Your Herbalife Independent Distributor is:

