



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

June 15, 1998

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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.: **Ultimate Ginkgo Dietary Supplement**

Dear Sir and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has begun commercializing Ultimate Ginkgo dietary supplement in the United States.

Ultimate Ginkgo 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 or two tablets per day.

Ultimate Ginkgo provides flavonoid glycosides and terpene lactones which can support healthy brain function. This product includes DHA, an essential fatty acid present in the brain, and Phosphatidylserine, an important component of neurons.

PRODUCT LITERATURE

Studies have shown that Ginkgo Biloba may help improve blood flow to the brain, stimulate neural activity and help maintain blood vessel tone. Herbalife has captured the botanical treasure of this ancient tree and formulated its goodness into Ultimate Ginkgo.

- Provides flavonoid glycosides and terpene lactones which can support healthy brain function.
- Contains DHA, an essential fatty acid present in the brain.
- Includes phosphatidylserine, which is an important component of brain neurons.

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."

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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,

A handwritten signature in black ink, appearing to read "John W. ...". The signature is written in a cursive style with a large initial "J".

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Herbalife products are available only through Herbalife Independent Distributors.

3008-US-00
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**Ultimate
Ginkgo**
Dietary Supplement
for the Brain

30 TABLETS

EACH TABLET PROVIDES:

GINKGO BILOBA LEAF POWDER.....	50 MG
DHA (DOCOSAHEXAENOIC ACID).....	10 MG
PHOSPHATIDYLSERINE POWDER.....	10 MG
GINKGO BILOBA EXTRACT (27/10).....	40 MG
BIO-ABSORPTION COMPLEX-S.....	23 MG
LECTITHIN, ASCORBYL PALMITATE, PLANT CELLULOSE ENZYME, CINNAMON POWDER AND BIPERINE® (BLACK PEPPER EXTRACT).	

30-day money back guarantee.

FORMULATED EXCLUSIVELY FOR:
HERBALIFE INTERNATIONAL OF AMERICA, INC.
LOS ANGELES, CA 90080-0210, U.S.A.

MADE IN U.S.A.