



HERBALIFE INTERNATIONAL OF AMERICA, INC.
9800 La Brea Ave., Inglewood, CA 90304
Mailing Address: P.O. Box 30210, Los Angeles, CA 90030
TEL: 410 9600 • FAX: 410 243 7111

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



November 4, 1998

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.: **Mega Garlic Plus Dietary Supplement**

Dear Sir: and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has began commercializing Mega Garlic Plus dietary supplement in the United States.

Mega Garlic Plus dietary supplement is labeled and promoted with statements provided for in section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act.

LABEL

Dietary Supplement.

Derived from the world's best garlic, Mega Garlic Plus Tablets include a synergistic selection of herbs that complement garlic's healthy actions.

MINI PRODUCT BROCHURE LITERATURE

Natural support for good health.

By combining the highest-quality garlic with synergistic and compatible herbs, we've created Mega Garlic Plus, an exclusive product that increases the overall benefit of garlic's healthy actions. And you can enjoy the wholesome goodness of garlic without the aftertaste associated with many garlic tablets.

- Derived from the world's best garlic.
- Includes a synergistic selection of herbs that complement garlic's healthy actions.
- Has no aftertaste.

FACT SHEET

Description:

Dietary Supplement.

Features

Garlic
Synergistic blend of herbs
No aftertaste

Benefits:

Valued for its natural goodness and many health properties.
Complements the overall benefit of garlic's actions.
Allows you to enjoy the wholesome goodness of garlic.

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MEGA GARLIC PLUS

Natural support for good health.

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\$18.95

#3050 (case of 6)

#0212 (HAP or unit)



*Increases the
overall benefit of
garlic's healthy actions.*

HERBALIFE[®] Fact Sheet



PRODUCT NAME: Mega Garlic Plus
SKU #: 3050 (case)
 0212 (HAP or unit)

RETAIL PRICE: U.S. \$18.95 (each)

VOLUME POINTS: 18.95

SIZE: 60 tablets per bottle

PACKAGING: 6 bottles per case

DESCRIPTION: Dietary Supplement.

FEATURES:

Garlic

Synergistic blend of herbs

No aftertaste

USER:

Adults

USAGE:

Take one tablet two times a day with meals.

CROSS-SELL:

Mega Garlic Plus can be used in conjunction with the Thermojetics[®] Weight-Management Program and Herbalife's entire line of nutritional products.

COLLATERAL MATERIAL:

New Products Brochure

NEW PRODUCT

US Edition No. 049

HERBALIFE.



TODAY

NEWS FOR BUSINESS BUILDING

■
*"I don't encounter 'obstacles'
in life. I prefer to think of
them as challenges!"*

—Mark Hughes
■

Five New Herbal-Based Products

continued from page 1

throats, cold and flu symptoms. And we've made it easy for customers to triple their health protection with our Immune-Support Kit, which combines Zinc & Echinacea Lozenges, Super Echinacea + and Herbal Throat Spray in one convenient package.

Get familiar with these products so you can share them with customers and prospects. Winter is quickly approaching, which makes this the ideal time to let everyone know about our new seasonal product line. So get the word out—and you'll see a healthy return on your efforts!

Zinc & Echinacea Throat Lozenges

Dietary supplement for a healthy throat.



- Includes Echinacea, an herb known for its immune-supporting actions.
- Contains Zinc, an essential mineral that helps keep the body's enzyme systems healthy.
- Great tasting honey-lemon flavor.
#1135 (case of 6) \$5.95
#0208 (HAP or unit)

Super Echinacea + *Immune-support formula.*

- Contains carefully selected herbs that may help you feel better and may help support your immune system.
- Includes Echinacea Extract, a North American herb used by Native



Americans to promote well-being.
#1523 (case of 6) \$16.95
#0207 (HAP or unit)

Herbalife continues to provide products that help fight common health concerns and also improve the lives of customers, and move your business forward.

Herbal Throat Spray

Homeopathic Throat Medication.

- This therapeutic product is formulated with ingredients that are listed in the homeopathic pharmacopoeia.
- Includes a powerful blend of Echinacea, Kava Kava, Thyme and Club Moss.



- Temporarily eases sore-throat pain, discomfort or hoarseness.
- Cool peppermint flavor.
- Convenient spray applicator.
#3048 (case of 6) \$6.95
#0211 (HAP or unit)

Immune-Support Kit

Triple protection against seasonal discomforts.

- Includes Zinc & Echinacea Throat Lozenges, Super Echinacea + and Herbal Throat Spray in a convenient kit.
- Contains a powerful blend of carefully selected herbal ingredients that may help you feel better.
- Temporarily eases sore throat pain, discomfort or hoarseness.
#2009 (case of 6) \$29.85
#0239 (HAP or unit)

Complementing our seasonal line, we've formulated additional products that are inspired by Mother Nature and include ingredients that are renowned for their health benefits.

Mega Garlic Plus

A dietary supplement.



- Derived from the world's best garlic.
- Includes a synergistic selection of herbs that complement garlic's healthy actions.
- Has no aftertaste.
#3050 (case of 6) \$18.95
#0212 (HAP or unit)



K8

Nature's relaxation formula.

- A combination of natural herbs, including Kava Kava and Ashwagandha, an Ayurvedic herb designed to help relax the body and increase your feelings of well-being.
- Each serving contains 150 mg of Calcium to help build strong bones.
- Includes Bio-Absorption Complex-5, which helps the body absorb the beneficial properties of the herbs.
#3051 (case of 6) \$13.95
#0213 (HAP or unit)