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February 1, 2002

Office of Nutritional Products, Labeling and Dietary Supplements (ONPLDS)
HFS-810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington, DC 20204

MAR 22 2002

Re: Statements of Nutritional Support Notification

Dear Sir or Madam:

Pursuant to 21 CFR Part 101.93, Viogenix Corporation, 15770 SW Upper Boones Ferry Road, Lake Oswego, Oregon 97035, hereby submits an original and two copies of it's notification within 30 days of first marketing its product with the statements presented below.

Supplement Brand Name: Evolution 2 - Element IV

Supplement Ingredients: N-Acetyl L-Cystein, Ellagic Acid, Calcium D-Glucarate, Acetyl L-Carnitine, Carnosine, Alpha Lipoic Acid, Magnesium Citrate, CoEnzyme Q10, IMMUNOSEB™. IMMUNOSEB is a registered trademark of Specialty Enzymes. Proprietary blend of Bromelain, Peptizime, Lactoperoxidase, Catalase, Lysozyme and Lactoferrin (naturally derived enzymes).

Other Ingredients: Deionized Water, Lecithin Phospholipids, Polysorbate 60, Glycine, Citric Acid, Sodium Citrate, Potassium Sorbate, Sodium Benzoate, Methylparaben, Natural & Artificial Flavors.

Text of Statement of Nutritional Support: Energizes and balances your immune system to function at its best, helps your body keep up with the everyday demands on your immune system, assists cellular membranes in maintaining proper electrical energy and nutrient transfer across cell membrane, assists in cleansing the cells of environmental toxin and supports optimal functioning at the cellular level.

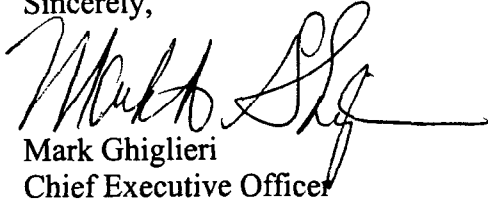
Included with the submission is the entire text of the Evolution 2 labeling for your review.

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Viogenix Corporation certifies that it possesses substantiation for these statements of nutritional support; that the substantiation renders them truthful and non-misleading and thus permissible under the Dietary Supplement Health and Education Act (DSHEA); and that the information contained in this notice is complete and accurate.

Sincerely,



Mark Ghiglieri
Chief Executive Officer

RECOMMENDED

If you want to maximize your body's ability to do what it does naturally, and reduce the level of stress your body is constantly exposed to, the best is to improve the quality of your life through gentle and scientific supplementation.

• Energize and balance your cellular system to function at its best.

• Help your cells keep up with the constant demand on your immune system.

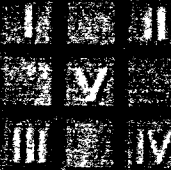
• Activate cellular mechanisms in maintaining healthy electrical energy and functional immune system cell membrane.

• Assist in cleansing the body of excess metabolic wastes.

• Supports natural functioning at the cellular level.

ELEMENT IV

A leader in health corporations, advanced health products, and energy products, we are proud to introduce ELEMENT IV.



Keep bottle tightly closed and store in a cool, dry place. Do not use if seal is broken. No animal products. No animal testing.

IMPORTANT

ELEMENT IV

Cell Health and Immune Booster

DIETARY SUPPLEMENT

LIPOSOME DELIVERY ORAL SPRAY

60 mL / 2 FL OZ

INGREDIENTS

Active Ingredients: N-Acetyl L-Cysteine, Ellagic Acid, Calcium D-Glucarate, Acetyl L-Carnitine, Carnosine, Alpha Lipoic Acid, Magnesium Citrate, CoEnzyme Q10, SAMUNOISED™.

SUPPLEMENT FACTS

Serving Size: 12 Sprays

Active Ingredients	Amount per Spray	%RDI
N-Acetyl L-Cysteine	50 mg	*
Ellagic Acid	50 mg	*
Calcium D-Glucarate	15 mg	*
Acetyl L-Carnitine	10 mg	*
Carnosine	10 mg	*
Alpha Lipoic Acid	5 mg	*
Magnesium Citrate	5 mg	9
CoEnzyme Q10	2 mg	*
SAMUNOISED™	2 mg	*

*%RDI is a registered trademark of Specialty Enzymes. Proprietary blend of Bromelain, Pepsinase, Lactoperoxidase, Catalase, Lysozyme and Lactoferrin (collectively termed enzymes). †Not one of standard.

LIPOSOME DELIVERY: ENHANCED ABSORPTION AND EFFECTIVE CELLULAR DELIVERY. NO ARTIFICIAL FLAVORS OR COLORS. NO SUGAR. NO STARCH. NO SOY. NO GLUTEN. NO YEAST. NO PRESERVATIVES. NO ANIMAL PRODUCTS. NO ANIMAL TESTING.

MADE IN THE USA



12/15/01
7:00pm

www.viogenix.com

RECOMMENDED

To naturally maximize your body's ability to function optimally.

- Helps your body keep up with the everyday demands on your immune system.
- Assists in cleansing the cells of environmental toxins.

IMPORTANT

This is not intended for persons with medical conditions, pregnant or lactating women.

The FDA has not evaluated these statements. This product is not intended to treat, diagnose, cure or prevent disease.

60 ml

EVOLUTIO
2
ELEMENT IV
Cell Health and
Immune Booster

2 fl.oz.

SUGGESTED USE

Shake well, spray 6 full sprays in the mouth in the morning, 6 full sprays in the mouth before bedtime. Mix with saliva for 30 seconds and then swallow. For maximum effectiveness, do not eat or drink anything 30 minutes before or after taking the supplement.

DIETARY
SUPPLEMENT
Liposome
Delivery System



VIOGENIX CORPORATION
LAKE OSWEGO, OR 97035
MADE IN U.S.A.

DIE
(DOESN'T PRINT)
PLEASE REMOVE
BEFORE OUTPUT!

stamp
code
area