

VIAGENIX*

World Leader in Anti-Aging Solutions

7926 1-1-3 8147

MAR 22 2002

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

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 II

Supplement Ingredients: Calcium (Lactate), Magnesium (Oxide), Zinc (Oxide), Copper (Gluconate), Manganese (Gluconate), Chromium (Amino Nicotinate), Iodine (Potassium Iodine), Selenium (Sodium), Molybdenum (Sodium Molybdate), Vitamin A (Acetate), Vitamin E (d-alpha-Tocopheryl Acetate), Vitamin D3 (Cholecalciferol), Vitamin C (Ascorbic Acid), Vitamin B-1 (Thiamin HCl), Vitamin B-2 (Riboflavin), Vitamin B-3, (Niacin), Vitamin B-3 (Niacinamide), Vitamin B-5 (Calcium Pantothenate), Vitamin B-6 (Pyridoxine HCl), Vitamin B-12 (Cyanocobalamin), Folic Acid, Biotin, PABA (Para amino Benzoic acid), Choline Bitartrate, Inositol, N-Acetyl L-Cysteine, Enzyme Pre-Mix.

Other Ingredients: Fructose, Natural Orange Powder, Potassium Bicarbonate, Citric Acid, Natural Orange Flavor, Digestive Enzymes (blend containing Amylase, Papain, Lipase, Bromelain, Lactase, Cellulase, Maltase, Sucrase), Stevia, Cholecalciferol, Silicon Dioxide.

Text of Statement of Nutritional Support: Provides an array of vitamins, minerals and enzymes for building and nurturing a healthy body, enhances absorption and nutritional value of foods, helps to meet the nutritional and energetic demands of our high-stress society and beneficial for the skin and hair.

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

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,

A handwritten signature in black ink, appearing to read "Mark Ghiglieri". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mark Ghiglieri
Chief Executive Officer

RECOMMENDED

If you want to maximize your body's ability to do what it does naturally, and attain that level when your body is functioning optimally.

Our goal is to improve the quality of your life through gentle and scientific supplementation.

- Provides an array of vitamins, minerals and enzymes for building and nurturing a healthy body.
- Enhances absorption and nutritional value of foods.
- Helps to meet the nutritional and energetic demands of our stress society.
- Essential for skin and hair.

In your fast-paced life it's not easy to get all the recommended nutrients in your diet. We all know that vitamins and minerals are essential for health. They assist in all biochemical processes that occur in your body. They enable your body to utilize the energy that is released from digested food, as well as enhance growth and vitality. Also, due to a diet of cooked and processed foods, most of us are not getting the proper level of enzymes to assist in the digestion and utilization of these nutrients.

Element II provides you with an optimum digestive enzyme complex to unlock the power in the food.

Element II is made to Viogenix

Corporation's guaranteed quality, purity and potency standards using U.S. Pharmacopoeia (USP).

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



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 any disease.

DILIARY
SUPPLEMENT
DRINK MIX
12 oz

ELEMENT II
Vitamin/Mineral/Enzyme Complex

360 g

VIOPENIX

DILIARY
SUPPLEMENT
DRINK MIX
12 oz

ELEMENT II
Vitamin/Mineral/Enzyme Complex

360 g

SUPPLEMENT FACTS

Serving Size: One Level Scoop (12g)
Serving Per Container: 30 Scoops (360g)

	Amount Per Serving	% Daily Value
Vitamin C	1000 mg	2000%
Vitamin E	100 IU	2000%
Vitamin B1	100 mg	2000%
Vitamin B2	100 mg	2000%
Vitamin B3	100 mg	2000%
Vitamin B6	100 mg	2000%
Vitamin B12	1000 mcg	2000%
Vitamin K	100 mcg	2000%
Vitamin D	100 IU	2000%
Vitamin A	10000 IU	2000%
Vitamin H	100 mg	2000%
Vitamin P	100 mg	2000%
Vitamin Q	100 mg	2000%
Vitamin U	100 mg	2000%
Vitamin X	100 mg	2000%
Vitamin Y	100 mg	2000%
Vitamin Z	100 mg	2000%
Vitamin AA	100 mg	2000%
Vitamin BB	100 mg	2000%
Vitamin CC	100 mg	2000%
Vitamin DD	100 mg	2000%
Vitamin EE	100 mg	2000%
Vitamin FF	100 mg	2000%
Vitamin GG	100 mg	2000%
Vitamin HH	100 mg	2000%
Vitamin II	100 mg	2000%
Vitamin JJ	100 mg	2000%
Vitamin KK	100 mg	2000%
Vitamin LL	100 mg	2000%
Vitamin MM	100 mg	2000%
Vitamin NN	100 mg	2000%
Vitamin OO	100 mg	2000%
Vitamin PP	100 mg	2000%
Vitamin QQ	100 mg	2000%
Vitamin RR	100 mg	2000%
Vitamin SS	100 mg	2000%
Vitamin TT	100 mg	2000%
Vitamin UU	100 mg	2000%
Vitamin VV	100 mg	2000%
Vitamin WW	100 mg	2000%
Vitamin XX	100 mg	2000%
Vitamin YY	100 mg	2000%
Vitamin ZZ	100 mg	2000%
Vitamin AA	100 mg	2000%
Vitamin BB	100 mg	2000%
Vitamin CC	100 mg	2000%
Vitamin DD	100 mg	2000%
Vitamin EE	100 mg	2000%
Vitamin FF	100 mg	2000%
Vitamin GG	100 mg	2000%
Vitamin HH	100 mg	2000%
Vitamin II	100 mg	2000%
Vitamin JJ	100 mg	2000%
Vitamin KK	100 mg	2000%
Vitamin LL	100 mg	2000%
Vitamin MM	100 mg	2000%
Vitamin NN	100 mg	2000%
Vitamin OO	100 mg	2000%
Vitamin PP	100 mg	2000%
Vitamin QQ	100 mg	2000%
Vitamin RR	100 mg	2000%
Vitamin SS	100 mg	2000%
Vitamin TT	100 mg	2000%
Vitamin UU	100 mg	2000%
Vitamin VV	100 mg	2000%
Vitamin WW	100 mg	2000%
Vitamin XX	100 mg	2000%
Vitamin YY	100 mg	2000%
Vitamin ZZ	100 mg	2000%

OTHER INGREDIENTS:
FRUCTOSE, NATURAL ORANGE POWDER,
POTASSIUM BICARBONATE, CITRIC ACID,
NATURAL ORANGE FLAVOR, DIGESTIVE
ENZYMES BLEND CONTAINING AMYLASE,
PAPAIN, LIPASE, BROMELAIN, LACTASE,
CELLULASE, MALTASE, SUCRASE, STEVIA,
CHOLECALCIFEROL, SILICON DIOXIDE.

VIOPENIX CORPORATION
LAKE OSWEGO, OR 97035
www.viopenix.com
(866) VIOPENIX
MADE IN U.S.A.

SUGGESTED USE
Mix one level scoop in 8 ounces of
water. Mix well and drink.
• 30 DAYS SUPPLY •