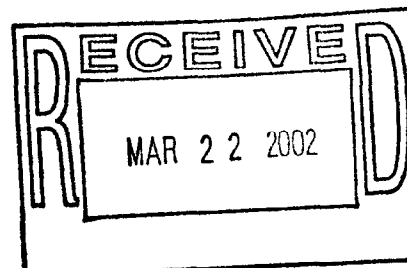


VIOGENIX[®]

World Leader in Anti-Aging Solutions

975 0162 LET 9483



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 its notification within 30 days of first marketing its product with the statements presented below.

Supplement Brand Name: Evolution 2 - Element III

Supplement Ingredients: Phosphatidyl Serine, Vinpocetine, Carnitine Fumerate, Gingko Biloba, L-Theanine, 5-HTP, Choline Bitartrate.

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

Text of Statement of Nutritional Support: Phosphatidyl Serine – protects brain cells from free-radical damage and enhances brain function, Vinpocetine – increases oxygen absorption and enhances focus, Carnitine Fumerate – nourishes your body's "power cells" and improves brain's metabolic rate, Gingko Biloba – maintains healthy blood circulation and cognitive functioning, L-Theanine – enhances memory and mood, 5-HTP - Enhances HGH secretion, healthy sleep patterns and feelings of well-being, Choline Bitartrate – power component for the brain.

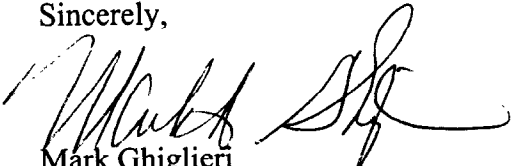
Included with the submission is the entire text of the Evolution 2 labeling for your review.

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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,

A handwritten signature in black ink, appearing to read 'Mark Ghiglieri', written in a cursive style.

Mark Ghiglieri
Chief Executive Officer

RECOMMENDED

If you have a headache, your back aches, or you are stressed, this spray may help you relax your body and mind. Our goal is to improve the quality of your life through natural and scientific supplements.

Phosphatidyl Serine - A natural brain cell membrane lipid that improves memory performance in the brain.

Vinpocetine - A natural alkaloid that improves focus.

Carnitine - A natural amino acid that improves energy and metabolism.

Ginger - A natural root that improves circulation and respiratory functioning.

L-Threonine - A natural amino acid that improves memory and mood.

S-HTP - A natural amino acid that improves mood and energy.

Choline Bitartrate - A natural nutrient that improves brain function.

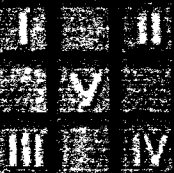
ELEMENT III

Made in the USA. Contains natural ingredients and is free from any synthetic chemicals.



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



EVOLUTION 21

By VIOGENIX

ELEMENT III

Brain-Nutrient Complex

DIETARY SUPPLEMENT
LIPOSOME DELIVERY
ORAL SPRAY

60 ml / 2 fl. oz.



RECOMMENDED USE

Shake well. Spray 8-12 sprays in the mouth in the morning, afternoon, and evening. For best results, use after meals. Do not use if you are pregnant or nursing. Consult your physician if you are on medication.

SUPPLEMENT FACTS

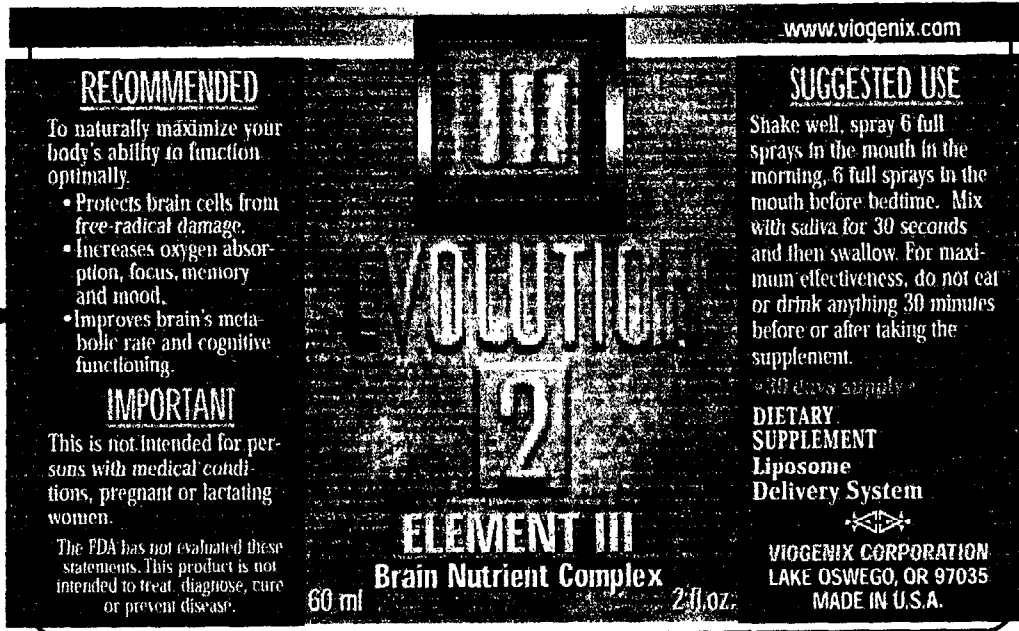
Serving Size: 12 Sprays

Active Ingredients	Amount per Spray	%RDI
Phosphatidyl Serine	75 mg	*
Vinpocetine	5 mg	*
Carnitine Tartrate	100 mg	*
Ginger	5 mg	*
L-Threonine	2 mg	*
S-HTP	1 mg	*
Choline Bitartrate	5 mg	*

*Percent Daily Values are based on a diet of other people's secrets.

VIOGENIX CORPORATION
LAKE TOSCANO, DE SOTO
www.vioenix.com
VIOENIX
MADE IN USA

12/15/01
5:00pm



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

(ALL SKUS)
 COLOR SPEC
 4/c process + PMS 343
 high gloss coating
 (UV recommended)

stamp
 code
 area

Client authorized
 signature on file
2/19/02

Label die
 2/19/02
 4 X 2.5
 .125 radius