Vitogen

July 19, 2005

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Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, Maryland 20740

Re: Statement for Dietary Supplement

Dear Sir or Madam:

This letter is submitted as required by Section 406(r)(6) of the Food, Drug & Cosmetic Act (FDC Act) for the purpose of notifying the Food and Drug Administration (FDA) of certain statements being made in connection with the sale of dietary supplement products marketed by this company.

The product name and the dietary ingredients for which certain statements are being made are as follows:

Desirin
L-Arginine - 160 mg
A proprietary blend of Ginkgo (leaf), Tribulus (root), Desert Broomrape (bark), Cordyceps (mushroom), Maca (root), Fo-ti (root), Astragalus (root), Guava (fruit), Wild Yam (root), Morinda (root), Rehmannia (cooked root), Garana (seed), Panax Ginseng (root), Safflower (flower), Tienchi Ginseng (root), Epimedium (leaf), Ginger (root), Pinellia (root), Indian Woodapple (flower), Reishi (red root), Eucommia (bark), Chinese Dodder (seed), Asiatic Dogwood (seed), Siberian Motherwort (weed) - 690 mg

The text of the statement that is being made for the above product is: "Promotes female sexual function."

As President for Vitogen, Inc., I certify that the information contained in this notification is complete and accurate and that Vitogen has substantiation that the above statement is truthful and not misleading.

Sincerely yours,

Heather Liao, Ph.D.
President
Vitogen, Inc.

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05-4857

VITOGEN, INC. 999 COMMERCIAL STREET, SUITE 101, PALO ALTO, CA 94303
PHONE: 650-424-1163 FAX: 650-424-1182

***Desirin*™** contains a scientifically formulated, proprietary, breakthrough botanical complex that helps to enhance sexual function and performance in women.* It combines recent discoveries in eastern and western medicines with advanced pharmaceutical technologies. ***Desirin*™** is manufactured using proprietary methodologies in United States in compliance with dietary supplement **Good Manufacturing Practices (GMP)** guidelines.

*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.

Directions

For as needed use, take 1-2 capsules each time depending on your conditions. Take several hours before sexual activity. For continuous use to maintain high performance, take 2 capsules several hours before sexual activity during the first two days, and then take 1 capsule every 48 hours continuously.

Cautions

*Do not take more than 3 capsules per day.
*Do not take this product if you are pregnant or nursing.
*Do not take this product within 3 hours of taking any other medications.
*Consult your physician before taking this product if you are under medical care, or if you are taking prescription medications.

KEEP OUT OF REACH OF CHILDREN

One Month Money Back Guarantee.

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Exp: EXP JAN 2008

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SUPPLEMENT FACTS

Serving Size: 1 capsule — Servings per Container: 15

	Amount per Serving	%DV
L-Arginine	160 mg	*
A proprietary blend of Ginkgo (leaf), Tribulus (root), Desert Broomrape (bark), Cordyceps (mushroom), Maca (root),Fo-ti (root), Astragalus (root), Guava (fruit), Wild Yam (root), Morinda (root), Rehmannia (cooked root), Guarana (seed),Panax Ginseng (root), Safflower(flower), Tienchi Ginseng (root), Epimedium (leaf),Ginger (root),Pinellia (root), Indian Woodapple (flower),Reishi (red root), Eucommia (bark), Chinese Dodder (seed), Asiatic Dogwood (seed), Siberian Motherwort (weed)	690 mg	*

*Daily Value (DV) Not Established

Other Ingredients: Maltodextrin, Gelatin, Magnesium stearate and Silicon dioxide

Questions or comments? Call toll-free **1-888-996-5888**

Visit our websute: **www.Vitogen.com**

Manufactured for:
Vitogen

Vitogen, Inc.
Palo Alto, CA 94303
USA

DESIRIN™ 1 Month Money Back Guarantee

Dietary Supplement
15 Capsules

Promotes Female Sexual Function*

DESIRIN™
(Contains AG25 Complex)

Vitogen

DESIRIN™ Phyto-Pharmaceutical Solutions for Female Sexual Function*

DESIRIN™ Promotes Female Sexual Function*

DESIRIN™ Promotes Female Sexual Function*