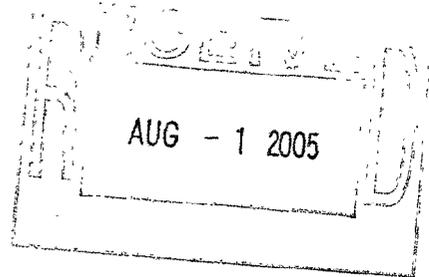


Vitogen

July 19, 2005

Office of Nutritional Products 293 5 AUG 18 P2:23
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:

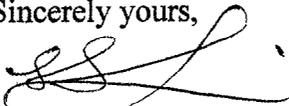
Follicor

A proprietary blend of Polygonatum (root), Chicory (root), Reishi (red root), Chebulic Myrobalan (fruit), Dandelion (flower), Dong Quai (root), Ligustrum (fruit), Black Soybean, Sichuan Lovage (root), Chinese Agarwood (trunk), Safflower (flower), Chinese Dodder (seed), Indian Woodapple (flower), Guava (fruit), Poria (root), Rehmannia (cooked root), Black Sesame (seed), Polyporus Mylittae (root), Kudzu (root), Codonopsis (root), Wild Yam (root), Licorice (root), Walnut, Fo-ti (root), Bai-zhu Atractylodes (root), Persica (seed), Tangerine (peel), Eclipta (whole herb), Grapefruit juice (extract)
- 800 mg

The text of the statement that is being made for the above product is: "Promotes healthy hair."

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

05-4857

Follicor™ (TS 98) contains a scientifically developed, proprietary botanical complex that helps to promote healthy hair growth.* Developed by biomedical scientists, the botanical complex in Follicor™ is purified with an advanced proprietary technology. Follicor™ is manufactured in the U. S. in compliance with dietary supplement **Good Manufacturing Practices (GMP)** in a certified GMP facility. It is tested with advanced biochemical technologies for quality control and standardization to ensure the highest product quality and consistency.

*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:

Take two capsules two times a day after meals. For best result, take this product continuously for 12-24 months.

Cautions:

Do not take this product if you are allergic to sesame, if you are pregnant or nursing. Consult your physician if you are under medical care, or if you are taking prescription medications contraindicated with grapefruit juice. Stop taking this product at least two weeks before any surgical procedures.

KEEP THIS PRODUCT OUT OF REACH OF CHILDREN

Lot Number:
Exp.

Manuf. Date:

FOLLICOR™

(Contains TS98 Complex)

Promotes Healthy Hair*

120 Capsules

Dietary Supplement
Natural Source

SUPPLEMENT FACTS

Serving Size: 1 capsule

Servings per Container: 120

	Amount per Serving	%DV
TS98 (a proprietary blend of Polygonatum sibiricum (root), Chickory (root), Reishi (root), Chebulic Myrobalan (fruit), Dandelion (flower), Dong Quai (root), Ligustrum (fruit), Black Soybean, Sichuan Lovage (root), Chinese Agarwood (trunk), Safflower (flower), Chinese Dodder (seed), Indian Woodapple (flower), Gueva (fruit), Poria (root), Rehmannia (cooked root), Black Sesame (seed), Polyporus Mylittae (root), Kudzu (root), Codonopsis (root), Wild Yam (root), Licorice (root), Walnut, Fo-ti (root), Bai-zhu Atractylodes (root), Persica (seed), Tangérene (peel), Eclipta prostrata (weed), Grapefruit juice (extract))	800 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

One Month Money Back Guarantee.



Manufactured for:
Vitogen, Inc.
Palo Alto, CA 94303
USA

Vitogen