

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

AUG - 1 2005

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:

Staminin

Niacinamide - 10 mg

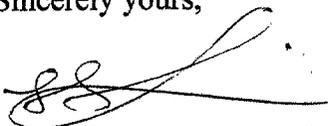
L-Arginine - 250 mg

A proprietary blend of Panax Ginseng (root), Ginkgo (leaf), Eleutherococcus Senticosus (root), Maca (root), Fo-ti (root), Guava (fruit), Tribulus (root), Ginger (root), Reishi (red root), Astragalus (root), Wild Yam (root), Chinese Dodder (seed), Safflower (flower), Cordyceps (mushroom), Panax Notoginseng (root) - 590 mg

The text of the statement that is being made for the above product is: "Increases Energy, Increases Stamina."

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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Staminin™ contains a scientifically formulated, proprietary botanical complex QE44 that helps to increase energy, stamina and performance.* It combines recent discoveries in eastern and western medicines with advanced pharmaceutical technologies. **Staminin™** is manufactured using a proprietary technology 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.

Dosage and Directions
For as needed use, take 2-3 capsules when needed, or 2-3 hours before exercise. For continuous use to maintain high energy and performance, take 1-2 capsules daily.

Cautions

- *Do not take this product if you are pregnant or nursing.
- *Do not take more than 4 capsules per day
- *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.
- *Stop taking this product one week before any surgical procedure.

KEEP OUT OF REACH OF CHILDREN



Exp:

SUPPLEMENT FACTS

Serving Size: 1 capsule Servings per Container: 30

| | Amount per Serving | %DV |
|---|--------------------|-----|
| Niacinamide | 10 mg | 50% |
| L-Arginine | 250 mg | |
| A proprietary blend of Panax Ginseng (root), Ginkgo (leaf), Eleutherococcus Senticosus (root), Maca (root), Fo-ti (root), Guava (fruit), Tribulus (root), Ginger (root), Reishi (red root), Astragalus (root), Wild Yam (root), Chinese Dodder (seed), Safflower (flower), Cordyceps (mushroom), Panax Notoginseng (root) | 590 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 website: www.Vitogen.com

Manufactured for:

Vitogen

Vitogen, Inc.
Falo Alto, CA 94303
U.S.A.

One Month Money Back Guarantee

STAMININ™

30 Capsules

Dietary Supplement

Increases Energy*
Increases Stamina*

(Contains CE 18 Complex)

STAMININ™

Vitogen

Increases Energy*
Increases Stamina*

STAMININ™

STAMININ™ Increases Energy*
Increases Stamina*

Phyto-Pharmaceutical Solutions
to Enhanced Performance

STAMININ™