

Vitogen

July 19, 2005

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

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AUG -J

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:

Bonafil

Glucosamine sulfate (from shellfish) - 1500 mg

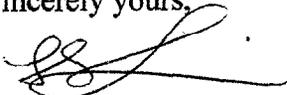
Chondroitin sulfate - 800 mg

A proprietary blend of Soy (bean), Wild Yam (root), Chicory (root), Reishi (red root), Ligustrum (fruit), Astragalus (root), Chinese Dodder (seed), Dong Quai (root), Pinellia ternata (root), Gastrodia (root), Poria (root), Guava (fruit), Drynaria (root), Lycium (fruit), Indian Frankincense (resin), Devil's Claw (root), Corydalis Yanhusuo (root), Lycopodium (weed), Loranthus (vine), Eleuthero (root), Sichuan Teasel (root), Arrow-Leaf Sida (root), Ginger (root), Notopterygium (root), Pubescent Angelica (root), Licorice (root), Turmeric (root), Cassia (bark), Gastrodia (root), Tienchi Ginseng (root), Scythian Lamb (root) - 780 mg

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

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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LET

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

WIMS
2005-4857

USP* amino acid ingredient in this product is made to U.S. Pharmacopeia (USP) quality, purity and potency standards

SUPPLEMENT FACTS		
Serving Size: 4 capsules	Servings per Container: 30	
	Amount per Serving	%DV
Glucosamine Sulfate (from Shellfish)	1500 mg	*
Chondroitin Sulfate*	800 mg	*
Vitamin D3	600 IU	150%
A proprietary blend of Angelica Sinensis (root), Soy (bean), Wild Yam (root), Ligustrum (fruit), Astragalus (root), Cuscuta (seed), Cyathula (root), Cibotium (root), Poria (root), Psoralea (fruit), Drynaria (root), Lycium (fruit), Boswellia Serrata (resin), Devil's Claw (root), Corydalis (root), Lyco podium (weed), Loranthus (vine), Siberian Ginseng (root), Dipsacus (root), Siler (root), Ginger (root), Notopterygium (root), Tu Huo Angelica (root), Licorice (root), Curcuma Longa (root), Myrrh, Cinnamon (bark), Gastrodia (root), Notoginseng (root), Ganoderma (red root), Cornus (fruit)	1285 mg	*

*Daily Value Not Established

Other ingredients: Maltodextrin, Gelatin, Magnesium stearate and Silicon dioxide.

*Guarantee: Chondroitin Sulfate is manufactured from U.S. resource.



Exp:

(Contains Glucosamine, Chondroitin and Drynol Cibotin™)

Promotes Healthy Joints
Promotes Healthy Bones

120 Capsules

Natural Source
Dietary Supplement

Bonafil™ is a proprietary natural complex developed by biomedical scientists. It contains Glucosamine Sulfate, Chondroitin Sulfate and a botanical complex, Drynol Cibotin™. Glucosamine Sulfate and Chondroitin Sulfate are important components in cartilage and connective tissues. They have been shown by clinical research to help to repair and rebuild cartilage for healthy joints. Drynol Cibotin™ was discovered by a Columbia University and Stanford University-trained biomedical PhD scientist. It was studied in a biomedical laboratory in Sweden and was implicated in promoting human bone cell growth, reducing bone cell death, enhancing calcium uptake and promoting collagen production. The synergistic effect of these components may help to build and maintain healthy joints and bones and promotes joint and bone functions. **Bonafil™** is manufactured in the U. S. in compliance with FDA **Good Manufacturing Practices (GMP)** in a registered pharmaceutical facility.

Directions

Take 2 capsules two times a day, preferably before meals.

Cautions

*Do not take this product if you are allergic to shellfish, soybean, or if you are pregnant or nursing. *Do not take this product if you are taking medications contraindicated with Vitamin D, Glucosamine Sulfate and Chondroitin Sulfate. *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

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

Manufactured for:

Vitogen

Vitogen, Inc.
Palo Alto, CA 94303
Made in USA