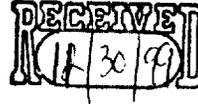




68740

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
200 C Street, SW
Washington, DC 20204



November 19, 1999

Dear Acting Director for Office of Special Nutritionals:

Notice is hereby given pursuant to the requirements of section 403 (r) (6) (21 U.S.C. 343 (r) (6) of the Federal Food, Drug and Cosmetic Act and in accordance with the requirements of 21 CFR 101.93, that VIVA Life Science, Inc., previously known as VIVA America Marketing Corp., at 1239 Victoria St., Costa Mesa, CA 92627, within the past 30 days commenced marketing dietary supplements for which the following structure/function statements are made.

DailyGuard

DailyGuard is your premium supplemental source of multi-vitamins, minerals, phytonutrients and antioxidants, formulated in a base of more than 30 fruit and vegetable concentrates.

- ◆ Clinically studied to help promote healthy cholesterol levels.
- ◆ Helps maintain healthy cardiac risk ratios.

Following are a few of the references for substantiation on file.

Medical Science Research, February 1999, Vol. 27, No. 2, pages 121-125
Progress in Cardiovascular Nursing 1997, 12(3): 3-23

LipoGuard

- ◆ LipoGuard softgels contain concentrated Omega-3 fatty acids, garlic and other nutrients in a proprietary formulation that helps maintain your healthy cholesterol and triglyceride levels.
- ◆ Clinically studied to help maintain healthy cholesterol and triglyceride levels.

Following are a few of the references for substantiation on file.

National Medical Association, October 1997, Vol 89, No. 10, pages 673-678
International Journal of Clinical Pharmacology, Therapy and Toxicology 1991, Vol. 29, No. 4, pages 151-155

The undersigned certifies that the information contained in this notice is complete and accurate and that VIVA Life Science, Inc., previously known as VIVA America Marketing Corp., has substantiation that the statements are truthful and not misleading.

Sincerely,

Dr. Simon Hsia, Ph.D.
Vice President of Technology and Marketing Support
97S-0162

Also see docket 97S-0163
LET 4678

VIVA Life Science, Inc.