

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



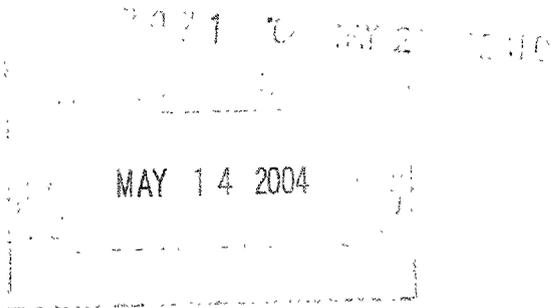
PhytoPharmica



Tyler Encapsulations



Vitaline Formulas



May 5, 2004

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

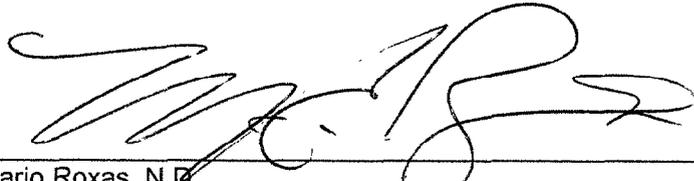
**Notification of structure-function claims**

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Naturopathic Formulations, Inc. (9755 SW Commerce Circle, Suite B2, Wilsonville, OR 97070) has a label that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Naturopathic Formulations, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

Product Name	Statement	Ingredient(s) to which claim refers																														
PhytoPro®	Also supports detoxification. †	<table border="0"> <tr> <td>Vitamin C</td> <td>Eleuthero root</td> </tr> <tr> <td>Magnesium</td> <td>Grape seed</td> </tr> <tr> <td>Chromium</td> <td>Licorice root</td> </tr> <tr> <td>Rice protein blend</td> <td>Cat's Claw root</td> </tr> <tr> <td>Soy lecithin</td> <td>Green Tea leaf</td> </tr> <tr> <td>Flax seed</td> <td>Spectra Probiotic proprietary blend</td> </tr> <tr> <td>Pectin</td> <td></td> </tr> <tr> <td>Spirulina</td> <td>Stevia leaf</td> </tr> <tr> <td>Barley grass</td> <td>Dandelion leaf and root</td> </tr> <tr> <td>Chlorella vulgaris</td> <td>Herbal blend:</td> </tr> <tr> <td>Glycine</td> <td>    Pau D'Arco bark</td> </tr> <tr> <td>Oat grass</td> <td>    Thyme aerial parts oil</td> </tr> <tr> <td>Wheat grass</td> <td>    Rosemary aerial parts oil</td> </tr> <tr> <td>Beet juice powder</td> <td></td> </tr> <tr> <td>Astragalus root</td> <td></td> </tr> </table>	Vitamin C	Eleuthero root	Magnesium	Grape seed	Chromium	Licorice root	Rice protein blend	Cat's Claw root	Soy lecithin	Green Tea leaf	Flax seed	Spectra Probiotic proprietary blend	Pectin		Spirulina	Stevia leaf	Barley grass	Dandelion leaf and root	Chlorella vulgaris	Herbal blend:	Glycine	Pau D'Arco bark	Oat grass	Thyme aerial parts oil	Wheat grass	Rosemary aerial parts oil	Beet juice powder		Astragalus root	
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I certify that the information contained in this notice is complete and accurate, and that Naturopathic Formulations, Inc. has substantiation that the statement is truthful and not misleading.

  
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 Mario Roxas, N.D. Date 5/5/04

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