



NF Formulas



PhytoPharmica



Tyler Encapsulations

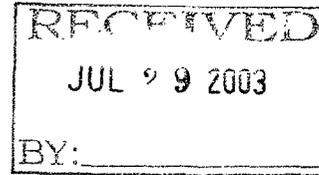


Vitaline Formulas

7766 '03 JUL 31 P2:07

July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
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 Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, 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.

Product Name	Statement	Ingredient(s) to which claim refers
<i>Learner's Edge®</i>	"The Learner's Edge® System...it's what every young body needs, and what every parent should know about."	Vitamin E Dimethylaminoethanol bitartrate (DMAE) L-Theanine Acetyl-L-Carnitine HCl L-Carnosine Coenzyme Q10 Ginkgo extract (<i>Ginkgo biloba</i>) American Ginseng Root extract (<i>Panax quinquefolium</i>)

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.


Mario Roxas, N.D.
Director of Scientific and Technical Affairs

Date 7/24/03

975 0162 LET 12510

85281



NF Formulas



PhytoPharmica



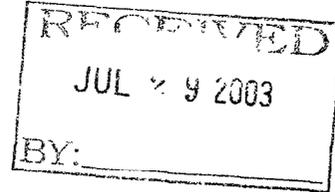
Tyler Encapsulations



Vitaline Formulas

July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
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 Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, 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.

Product Name	Statement	Ingredient(s) to which claim refers
<i>Learner's Edge®</i>	"This natural support system is the result of years of experience and developed by leading children's medical experts at the International Child Development Resource Center (ICDRC) and specialists in naturopathic therapeutics at Integrative Therapeutics, Inc."*	Vitamin E Dimethylaminoethanol bitartrate (DMAE) L-Theanine Acetyl-L-Carnitine HCl L-Carnosine Coenzyme Q10 Ginkgo extract (<i>Ginkgo biloba</i>) American Ginseng Root extract (<i>Panax quinquefolium</i>)

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.

Mario Roxas, N.D.
Director of Scientific and Technical Affairs

Date 7/24/03



NF Formulas



PhytoPharmica



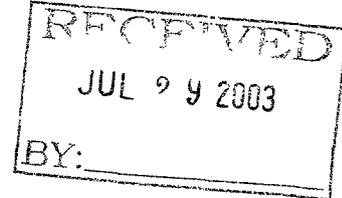
Tyler Encapsulations



Vitaline Formulas

July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
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 Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, 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.

Product Name	Statement	Ingredient(s) to which claim refers
<i>Leamer's Edge</i> ®	"The <i>Leamer's Edge</i> ® System gives kids the edge they need in today's complex and often unhealthy environment, with support for natural ...cognition...."	Vitamin E Dimethylaminoethanol bitartrate (DMAE) L-Theanine Acetyl-L-Carnitine HCl L-Carnosine Coenzyme Q10 Ginkgo extract (<i>Ginkgo biloba</i>) American Ginseng Root extract (<i>Panax quinquefolium</i>)

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.



 Mario Roxas, N.D.
 Director of Scientific and Technical Affairs

Date 7/24/03



NF Formulas



PhytoPharmica



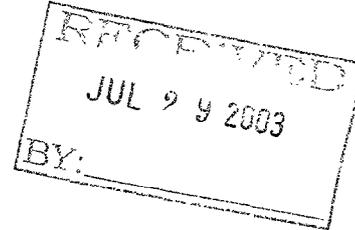
Tyler Encapsulations



Vitaline Formulas

July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
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 Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has a label which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, 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.

Product Name	Statement
Learner's Edge®	"What Every Young Mind Needs"

Ingredient(s) to which claim refers
 Vitamin E
 Dimethylaminoethanol bitartrate (DMAE)
 L-Theanine
 Acetyl-L-Carnitine HCl
 L-Carnosine
 Coenzyme Q10
 Ginkgo extract (*Ginkgo biloba*)
 American Ginseng Root extract (*Panax quinquefolium*)

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.



 Mario Roxas, N.D.
 Director of Scientific and Technical Affairs

Date 

 Date 7/24/03



NF Formulas



PhytoPharmica



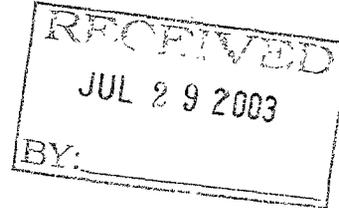
Tyler Encapsulations



Vitaline Formulas

July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



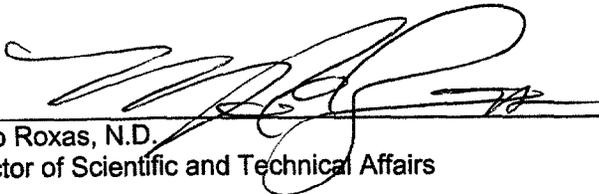
Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by Integrative Therapeutics, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature which contains statements provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Integrative Therapeutics, 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.

Product Name	Statement	Ingredient(s) to which claim refers
Learner's Edge®	"Introducing a natural support system that every young body needs.**"	Vitamin E Dimethylaminoethanol bitartrate (DMAE) L-Theanine Acetyl-L-Carnitine HCl L-Carnosine Coenzyme Q10 Ginkgo extract (<i>Ginkgo biloba</i>) American Ginseng Root extract (<i>Panax quinquefolium</i>)

I certify that the information contained in this notice is complete and accurate, and that Integrative Therapeutics, Inc. has substantiation that the statement is truthful and not misleading.


Mario Roxas, N.D.
Director of Scientific and Technical Affairs

Date 7/29/03