

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



Tyler Encapsulations

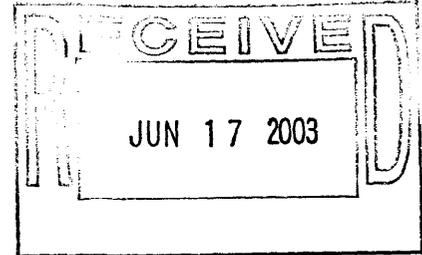


Vitaline Formulas

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June 9, 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 Tyler Encapsulations (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Tyler 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
Myco Complex	"This formulation also includes thymus fractions for added glandular support and select forms of selenium and zinc with proven bioavailability*."	Zinc (as L-OptiZinc®) Selenium (as SelenoExcell™ selenium yeast) Turkey Tails Fruiting Body Extract (<i>Trametes versicolor</i>) (25% Polysaccharides) Astragalus Root Extract (<i>Astragalus membranaceus</i>) (16% Polysaccharides) Thymus Polypeptide Fractions (Bovine Source) Cordyceps Mycelia Extract (<i>Cordyceps sinensis</i>) (16% Polysaccharides) Schisandra Fruit Extract (<i>Schisandra chinensis</i>) (9% Schizandrins) Milletia Root (<i>Milletia reticulata</i>) (12:1 Conc.) Lycium Fruit Extract (<i>Lycium barbarum</i>) (10% Polysaccharides) Bai-Zhu Atractylodes Rhizome Extract (<i>Atractylodes macrocephala</i>) (1% Atractylone) Tangerine Peel Extract (<i>Citrus reticulata</i>) (5% Bioflavonoids)

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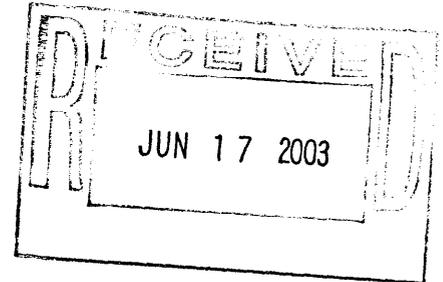
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Product Name	Statement	Ingredient(s) to which claim refers
Myco Complex	"This formula incorporates the wisdom of Chinese medicine with the science of functional medicine to create a valuable component to any immune support regimen*."	Zinc (as L-OptiZinc®) Selenium (as SelenoExcel™ selenium yeast) Turkey Tails Fruiting Body Extract (<i>Trametes versicolor</i>) (25% Polysaccharides) Astragalus Root Extract (<i>Astragalus membranaceus</i>) (16% Polysaccharides) Thymus Polypeptide Fractions (Bovine Source) Cordyceps Mycelia Extract (<i>Cordyceps sinensis</i>) (16% Polysaccharides) Schisandra Fruit Extract (<i>Schisandra chinensis</i>) (9% Schizandrins) Milletia Root (<i>Milletia reticulata</i>) (12:1 Conc.) Lycium Fruit Extract (<i>Lycium barbarum</i>) (10% Polysaccharides) Bai-Zhu Atractylodes Rhizome Extract (<i>Atractylodes macrocephala</i>) (1% Atractylone) Tangerine Peel Extract (<i>Citrus reticulata</i>) (5% Bioflavonoids)

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Product Name	Statement	Ingredient(s) to which claim refers (cont'd)
		Proprietary Mushroom Blend Maitake Mycelia (<i>Grifola frondosa</i>) (80% Polysaccharides) Cordyceps Mycelia (<i>Cordyceps sinensis</i>) (80% Polysaccharides) Maitake Gold 404™ (<i>Grifola frondosa</i>) Eleuthero Root Extract (<i>Eleutherococcus senticosus</i>) (1.2% Eleutherosides) Ginger Root Extract (<i>Zingiber officinale</i>) (5% Gingerols)

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



Mario Roxas, N.D.
 Director of Technical Services

6/9/03

Date



NF Formulas



PhytoPharmica



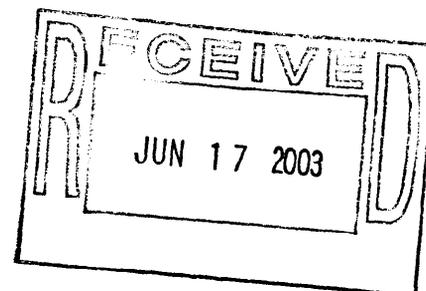
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Product Name	Statement	Ingredient(s) to which claim refers
Myco Complex	"Myco Complex was developed specifically for individuals who need supplemental immune tonification and support*."	Zinc (as L-OptiZinc®) Selenium (as SelenoExcell™ selenium yeast) Turkey Tails Fruiting Body Extract (<i>Trametes versicolor</i>) (25% Polysaccharides) Astragalus Root Extract (<i>Astragalus membranaceus</i>) (16% Polysaccharides) Thymus Polypeptide Fractions (Bovine Source) Cordyceps Mycelia Extract (<i>Cordyceps sinensis</i>) (16% Polysaccharides) Schisandra Fruit Extract (<i>Schisandra chinensis</i>) (9% Schizandrins) Milletia Root (<i>Milletia reticulata</i>) (12:1 Conc.) Lycium Fruit Extract (<i>Lycium barbarum</i>) (10% Polysaccharides) Bai-Zhu Atractylodes Rhizome Extract (<i>Atractylodes macrocephala</i>) (1% Atractylone) Tangerine Peel Extract (<i>Citrus reticulata</i>) (5% Bioflavonoids)

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Mario Roxas, N.D. Date 6/2/03
 Director of Technical Services