

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



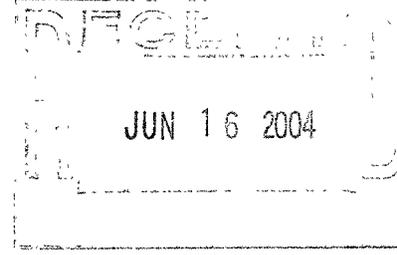
Tyler Encapsulations



Vitaline Formulas

June 8, 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 Integrative Therapeutics 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. 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. 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
Mega MultiVitamin Drink Mix	Flavoring from natural fruit extracts also provide support for healthy immune, eye and urinary function, and maintaining blood sugar levels that are already within normal range. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)
		Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevia rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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. \_\_\_\_\_ Date 6/8/04  
 Director of Scientific and Technical Affairs  
 975 0162 LET 14141



NF Formulas



PhytoPharmica



Tyler Encapsulations



Vitaline Formulas

June 8, 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 Integrative Therapeutics 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. 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. 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
Mega MultiVitamin Drink Mix	To provide protection from oxidative stress, <i>Mega MultiVitamin Drink Mix</i> formula contains the anti-oxidants Vitamins E, A and C, along with the phyto-components, lutein, zeaxanthin, hesperidin and fruit extracts. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)
		Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevia rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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.


Date 6/8/04

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



NF Formulas



PhytoPharmica



Tyler Encapsulations



Vitaline Formulas

June 7, 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 Integrative Therapeutics 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. 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. 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
Mega MultiVitamin Drink Mix	A busy lifestyle can deplete the body of vitamins and minerals needed for optimal energy production and healthy stress management. †	Vitamin A (50% as beta carotene and as retinyl acetate) Vitamin C (as ascorbic acid) Vitamin D (as cholecalciferol) Vitamin E (as d-alpha tocopheryl acetate) Thiamin (as thiamine HCl) (Vitamin B1) Riboflavin (vitamin B2) Niacin (as niacinamide) Vitamin B6 (as pyridoxine HCl) Folic Acid Vitamin B12 (as cyanocobalamin) Biotin Pantothenic Acid (as calcium D-pantothenate) Calcium (as calcium lactate) Iodine (as potassium iodide) Magnesium (as magnesium glycinate) Zinc (as zinc sulfate) Selenium (as L-selenomethionine) Copper (as copper gluconate) Manganese (as manganese citrate) Chromium (as chromium picolinate) Molybdenum (as sodium molybdate) Sodium Potassium (from whey protein, guar gum, potassium citrate and potassium iodide)
		Malic Acid Betaine Inositol Inulin (from chicory root) Hesperidin 50% (from citrus fruits) Taurine Glycine L-Tyrosine N-Acetylcysteine (NAC) L-Serine Stevia (Stevia rebaudiana) Leaf Extract Sour Cherry (Prunus cerasus) Fruit Extract Cranberry (Vaccinium macrocarpon) Fruit Extract Bilberry (Vaccinium myrtillus) Fruit Extract Boron (as sodium borate) Lutein (from Calendula officinalis) Zeaxanthin (from Calendula officinalis) Whey Protein Concentrate

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

6/7/04