

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



Tyler Encapsulations

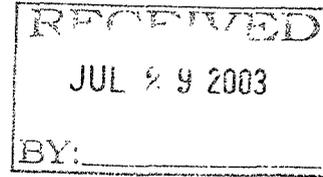


Vitaline Formulas

7765 '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.

Table with 3 columns: Product Name (Child Essence®), Statement ("The Learner's Edge® System gives kids the edge they need in today's complex and often unhealthy environment, with support for natural ...growth.**"), and Ingredient(s) to which claim refers (Vitamin A, Vitamin C, Vitamin D3, Vitamin E, Thiamin, Riboflavin-5'-phosphate, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic acid, Calcium, Iron, Iodine, Magnesium, Zinc, Selenium, Chromium, Molybdenum, Bioflavonoids (citrus) complex).

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.

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

Date 7/24/03

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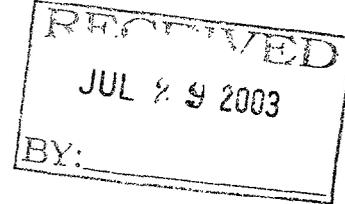
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Notification of structure-function claims

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	Ingredient(s) to which claim refers
<i>Child Essence</i> ®	"Vitamins and minerals every child needs"	Vitamin A Vitamin A (natural beta carotene) Vitamin C Vitamin D3 Vitamin E Thiamin Riboflavin-5'-phosphate Niacin Vitamin B6 Folic Acid Vitamin B12 Biotin Pantothenic acid Calcium (citrate/malate/glycinate) Iron Iodine Magnesium (citrate/malate/glycinate) Zinc Selenium Chromium Molybdenum Bioflavonoids (citrus) complex

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

Date 7/24/03



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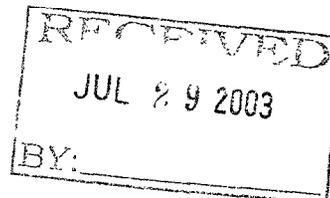
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Product Name	Statement	Ingredient(s) to which claim refers
<i>Child Essence®</i>	"Introducing a natural support system that every young body needs."*	Vitamin A Vitamin A (natural beta carotene) Vitamin C Vitamin D3 Vitamin E Thiamin Riboflavin-5'-phosphate Niacin Vitamin B6 Folic Acid Vitamin B12 Biotin Pantothenic acid Calcium (citrate/malate/glycinate) Iron Iodine Magnesium (citrate/malate/glycinate) Zinc Selenium Chromium Molybdenum Bioflavonoids (citrus) complex

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Director of Scientific and Technical Affairs

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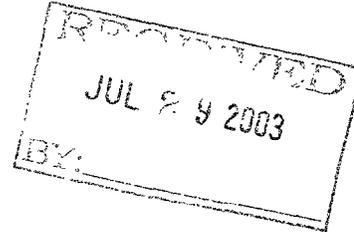
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Product Name	Statement	Ingredient(s) to which claim refers
<i>Child Essence</i> ®	"This natural support system is the result of years of experience and developed by leading children's medical experts at the International Child Development Resource Center (ICDRC) and specialists in naturopathic therapeutics at Integrative Therapeutics, Inc."*	Vitamin A Vitamin C Vitamin D3 Vitamin E Thiamin Riboflavin-5'-phosphate Niacin Vitamin B6 Folic Acid Vitamin B12 Biotin Pantothenic acid Calcium Iron Iodine Magnesium Zinc Selenium Chromium Molybdenum Bioflavonoids (citrus) complex

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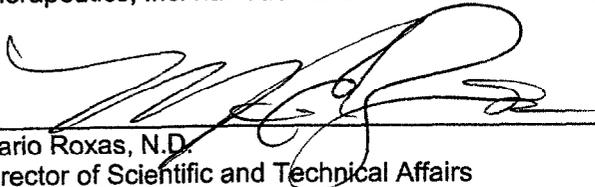
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Product Name	Statement	Ingredient(s) to which claim refers
<i>Child Essence®</i>	"The Learner's Edge® System...it's what every young body needs, and what every parent should know about.**"	Vitamin A Vitamin C Vitamin D3 Vitamin E Thiamin Riboflavin-5'-phosphate Niacin Vitamin B6 Folic Acid Vitamin B12 Biotin Pantothenic acid Calcium Iron Iodine Magnesium Zinc Selenium Chromium Molybdenum Bioflavonoids (citrus) complex

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