



NF Formulas



PhytoPharmica



Tyler Encapsulations



Vitaline Formulas

June 26, 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



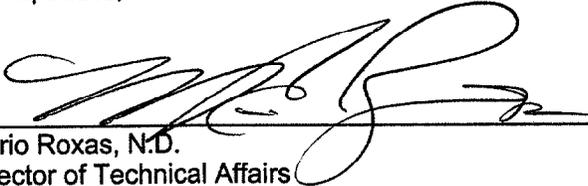
Notification of structure-function claims

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
PureKids®	"PureKids® provides hepatic support from standardized milk thistle (<i>Silybum marianum</i>) seed extract along with select nutritional conjugating agents, such as calcium D-glucarate; antioxidants, such as N-Acetyl-L-Cysteine and selenium; and cofactors, such as alpha-ketoglutarate(AKA), methionine, and choline, which also supports detoxification*."	Milk thistle seed extract (<i>Silybum marianum</i>) N-Acetyl-L-Cysteine (NAC) Calcium D-glucarate Trimethylglycine (betaine, anhydrous) Alpha-Ketoglutaric acid Taurine L-Glutathione, reduced Selenium L-Methionine Choline (bitartrate) Methylsulfonylmethane (MSM)

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 6/26/03
 Director of Technical Affairs

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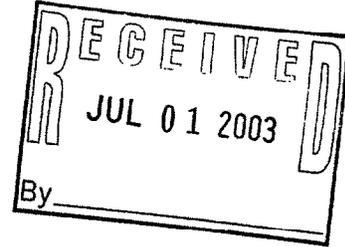
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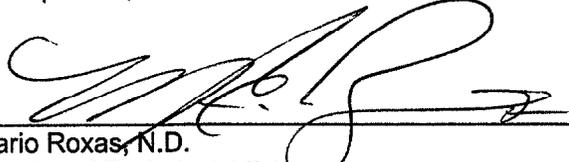
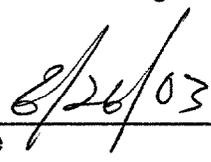
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Product Name	Statement	Ingredient(s) to which claim refers
PureKids®	"PureKids® is a dietary supplement designed to support hepatic detoxification in children*."	Milk thistle seed extract (<i>Silybum marianum</i>) N-Acetyl-L-Cysteine (NAC) Calcium D-glucarate Trimethylglycine (betaine, anhydrous) Alpha-Ketoglutaric acid Taurine L-Glutathione, reduced Selenium L-Methionine Choline (bitartrate) Methylsulfonylmethane (MSM)

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
 Director of Technical Affairs



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Product Name	Statement	Ingredient(s) to which claim refers
PureKids®	"Nature's Support for Natural Detoxification*."	Milk thistle seed extract (<i>Silybum marianum</i>) N-Acetyl-L-Cysteine (NAC) Calcium D-glucarate Trimethylglycine (betaine, anhydrous) Alpha-Ketoglutaric acid Taurine L-Glutathione, reduced Selenium L-Methionine Choline (bitartrate) Methylsulfonylmethane (MSM)

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Mario Roxas, N.D.
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Date 6/26/03