



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.

Table with 3 columns: Product Name (Child Essence®), Statement (Included are zinc and vitamin C, essential for cognitive function and neurotransmitter production; the important minerals calcium, needed for nerve transmission, and iron; and the trace elements iodine, selenium, and chromium*), and Ingredient(s) to which claim refers (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).

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. and date 6/26/03. Below the signature line is the name Mario Roxas, N.D. Director of Technical Affairs and the word Date.

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Handwritten number 84929



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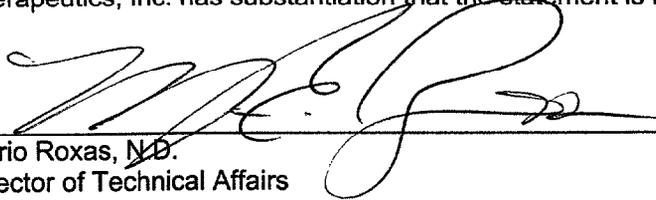
Notification of structure-function claims

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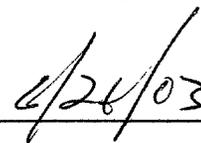
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Product Name	Statement	Ingredient(s) to which claim refers
<i>Child Essence®</i>	"Among its ingredients are moderate and well tolerated amounts of chelated magnesium plus activated co-enzyme forms of the B vitamins, including B6*."	Vitamin A Vitamin 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

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 Technical Affairs

Date





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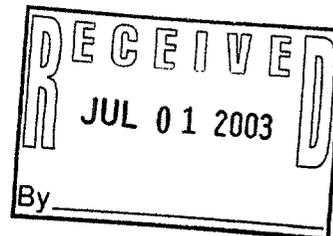
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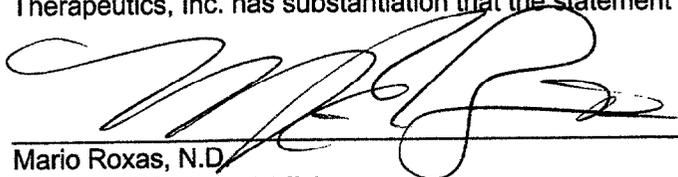
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Product Name
Child Essence®

Statement
"Child Essence® is a comprehensive vitamin and mineral supplement formulated by leading physicians in child neurological development to provide nutritional support in children*."

Ingredient(s) to which claim refers
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, N.D.
Director of Technical Affairs


Date