

# INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



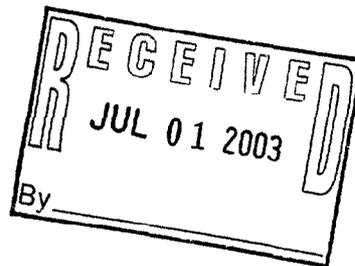
Tyler Encapsulations



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



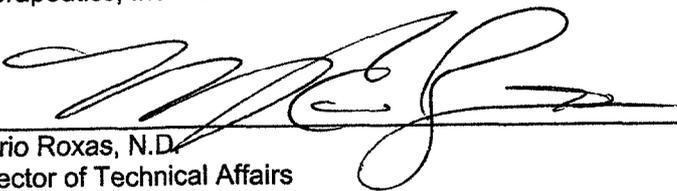
## Notification of structure-function claims

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
DigestRight®	Enhanced digestion supports optimal nutrient uptake and intestinal health by reducing exposure to potentially antigenic foods, promoting healthy intestinal permeability, and reducing the impact of the incomplete digestion of dairy (casein) foods and wheat (gluten) products*."	Protease Validase Maltase Amylase Lipase Lactase Cellulase Sucrase (Invertase) Phytase

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

6/26/03

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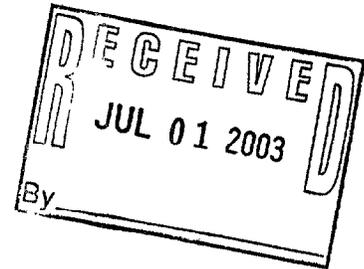
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**Notification of structure-function claims**

Dear Sir:

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Product Name	Statement	Ingredient(s) to which claim refers
DigestRight®	"Nature's Support for Natural Digestion"	Protease Validase Maltase Amylase Lipase Lactase Cellulase Sucrase (Invertase) Phytase

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.


6/26/03  


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Mario Roxas, N.D. Date  
Director of Technical Affairs

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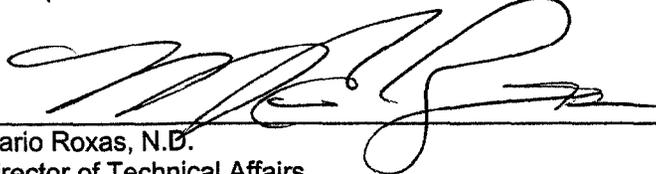
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Product Name	Statement	Ingredient(s) to which claim refers
DigestRight®	"DigestRight®'s broad-spectrum enzyme supplementation includes a full range of protease-, peptidase-, and DPP-IV-containing enzymes for optimal digestive health*."	Protease Validase Maltase Amylase Lipase Lactase Cellulase Sucrase (Invertase) Phytase

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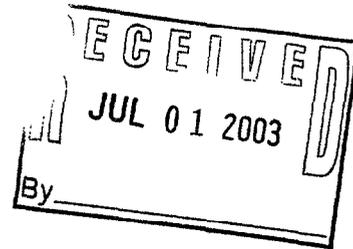
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Product Name	Statement	Ingredient(s) to which claim refers
DigestRight®	"The plant-based and microbial enzymes in DigestRight® are acid-stable and therefore survive exposure to stomach acidity without the need for enteric coatings; they have been shown to have aggregate activity in a pH range of 2-12*."	Protease Validase Maltase Amylase Lipase Lactase Cellulase Sucrase (Invertase) Phytase

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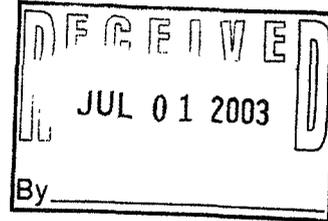
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Product Name  
DigestRight®

Statement  
"DigestRight® is a comprehensive enzyme supplement formulated for children by leading physicians in child neurological development to promote optimal digestion of the fullest range of foods\*."

Ingredient(s) to which claim refers  
Protease  
Validase  
Maltase  
Amylase  
Lipase  
Lactase  
Cellulase  
Sucrase (Invertase)  
Phytase

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