

INTEGRATIVE THERAPEUTICS INC.



NF Formulas



PhytoPharmica



Tyler Encapsulations

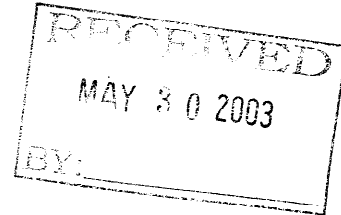


Vitaline Formulas

4018 '03 JUN 24 8:54

May 21, 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 Tyler Encapsulations (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Tyler 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
Lipoic Acid	"[Alpha-lipoic acid acts synergistically with other antioxidants, such as Vitamin E and C, to protect vital cell structures from free radical damage and oxidative stress*.]"  "It also provides support for neurological health, glucose metabolism, and liver function*."	Alpha-Lipoic Acid

I certify that the information contained in this notice is complete and accurate, and that Tyler has substantiation that the statement is truthful and not misleading.

  
 Mario Roxas, N.D. \_\_\_\_\_ Date 5/21/03  
 Director of Technical Services

975 0162 LET 12073 84727

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Product Name	Statement	Ingredient(s) to which claim refers
Lipoic Acid	"Alpha-lipoic acid acts synergistically with other antioxidants, such as Vitamin E and C, to protect vital cell structures from free radical damage and oxidative stress*."	Alpha-Lipoic Acid

I certify that the information contained in this notice is complete and accurate, and that Tyler has substantiation that the statement is truthful and not misleading.

  
\_\_\_\_\_  
Mario Roxas, N.D.  
Director of Technical Services

8/21/03  
\_\_\_\_\_  
Date

84727



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Product Name	Statement	Ingredient(s) to which claim refers
Lipoic Acid	"This highly bioavailable antioxidant provides significant protection in quenching free radicals in both lipid and aqueous domains of the cell*."	Alpha-Lipoic Acid

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Mario Roxas, N.D.  
Director of Technical Services

  
Date