INTEGRATIVE THERAPEUTICS INC.









NF Formulas

PhytoPharmica

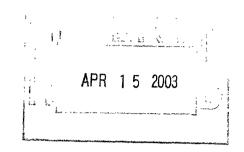
Tyler Encapsulations

Vitaline Formulas

2436 03 MAY -5 P15

April 7, 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, Inc. (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has a label that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Tyler Encapsulations 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.

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Pro	duct	Name

Statement

Ingredient(s) to which claim refers

Para-Gard®*

Para-Gard®*

Berberine Sulfate
Citricidal™ Extract
Genetian Root (Genitiana lutea)
Goldenseal Root Extract (Hydrastis Canadensis)
Sweet Wormwood Aerial Parts (Artemisia annua)
Jamaica Quassia Bark (Picrasma excelsa)
Black Walnut Green Outer Hull (Juglans nigra)
Garlic Bulb Extract (Allium sativum)

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

Mario Roxas, N.D.

Director of Technical Services

Date

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