# INTEGRATIVE THERAPEUTICS INC.









NF Formulas

**PhytoPharmica** 

Tyler Encapsulations

Vitaline Formulas

4016 '03 JM 24 8004

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
Cyto-Redoxin™	"Cyto-Redoxin is a complete antioxidant formula containing redox-coupled antioxidants that can be recycled back to their active reduced state*."	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids)
		Vitamin C (as Ascorbic Acid USP)
		Vitamin E (as d-Alpha-Tocopheryl Succinate)
		Zinc (as L-Opti-Zinc®)
		Selenium (as L-Selenomethionine)
		AnthoRedoxin™ (Min. 10% Anthocyanins)
		Beet Root (Beta vulgaris)
		Black Currant Berry (Ribes nigrum)
		European Elder Berry (Sambucus nigra)
		Bilberry Berry (Vaccinium myrtillus)
	10 07/	NAC (N-Acetyl-L-Cysteine USP)
975 0162	LET 12071	Alpha-Lipoic Acid
	LEI /VI VI	Coenzyme Q10 (Ubiquinone)
		Catechins (from Green Tea Leaf Extract) (Camellia

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** 

Date

sinensis) (Decaffeinated)

84727

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Product Name	Statement	Ingredient(s) to which claim refers
Cyto-Redoxin™	"[Heatlhy levels of antioxidants and the corresponding reduced oxidative stress have been associated with longevity, eye health, joint health, lipid health, and glucose metabolism, among other benefits*.]"	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids)
		Vitamin C (as Ascorbic Acid USP)
		Vitamin E (as d-Alpha-Tocopheryl Succinate)
		Zinc (as L-Opti-Zinc®)
	"Redox cycling maximizes the capacity of antioxidants to protect cells from free radical injury*."	Selenium (as L-Selenomethionine)
		AnthoRedoxin™ (Min. 10% Anthocyanins)
		Beet Root (Beta vulgaris)
		Black Currant Berry (Ribes nigrum)
		European Elder Berry (Sambucus nigra)
		Bilberry Berry (Vaccinium myrtillus)
		NAC (N-Acetyl-L-Cysteine USP)
		Alpha-Lipoic Acid
		Coenzyme Q10 (Ubiquinone)
		Catechins (from Green Tea Leaf Extract) (Camellia sinensis) (Decaffeinated)

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Mario Roxas, N.D.

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Product Name	Statement	Ingredient(s) to which claim refers
Cyto-Redoxin™	"Healthy levels of antioxidants and the corresponding reduced oxidative stress have been associated with longevity, eye health, joint health, lipid health, and glucose metabolism, among other benefits"."	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids)
		Vitamin C (as Ascorbic Acid USP)
		Vitamin E (as d-Alpha-Tocopheryl Succinate)
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