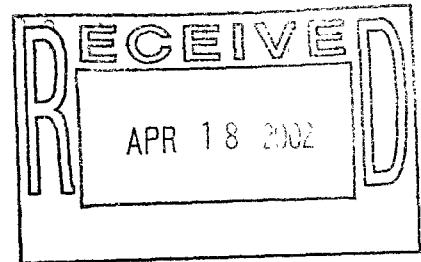


April 5, 2002

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
U. S. Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740-3835



RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	FlexAgility	Proprietary Herbal Extract Blend ginger (Zingiber officinale) rhizome extract and greater galangal (Alpinia galanga) rhizome extract	With FlexAgility™, PhytoPharmica now offers you more options for your patients to reach optimal support for joints and cartilage.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By:   
Robert Doster

Title: Senior Vice President Scientific Affairs

Date: 4/5/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

Michael P. Devereux  
Chief Financial Officer

FlexAgility 5p

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825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
920-469-9099  
TOLL FREE 800-553-2370  
FAX 920-469-4418  
FAX TOLL FREE 888-311-5657  
WWW.PHYTOPHARMICA.COM

April 7, 2002

Office of Special Nutritionals (HFS-450)  
 Center for Food Safety and Applied Nutrition  
 U. S. Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740-3835

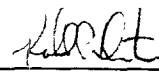
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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	FlexAgility	Proprietary Herbal Extract Blend ginger (Zingiber officinale) rhizome extract and greater galangal (Alpinia galanga) rhizome extract	Clinical studies have shown significant effects after two weeks of using this formula, and even more significant results after six weeks of use.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.


By:   
 Robert Doster

Title: Senior Vice President Scientific Affairs

Date: 4/7/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

  
 Michael P. Devereux  
 Chief Financial Officer  
 FlexAgility 7p

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