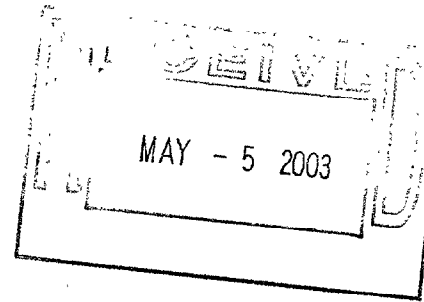




April 19, 2003

2685 '03 MAY 27 P3:12



Mr. Robert Moore
 Office of Nutritional Products, Labeling &
 Dietary Supplements, HFS 811
 Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor 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. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	If you experience lack of energy, restless sleep and brain fog End Fatigue™ gives you the power to rise above it!*

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 C. Doster*

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/19/03

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
 Chief Financial Officer

975 0162

LET

11927

84351

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 20, 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

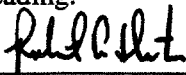
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Developed by energy expert Jacob Teitelbaum, M.D. End Fatigue™ delivers the key vitamins, minerals and nutrients that create a solid foundation of vitality and exceptional health.*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/20/03

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

End Fatigue Daily Energy B Complex 18p

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 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

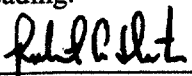
RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Take End Fatigue™ in the morning and take charge of your energy all day.*

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.

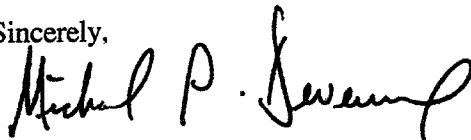
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/21/03

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

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 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

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor 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. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	End Fatigue™ Daily Energy B Complex is designed to be taken with Daily Energy Enfusion™ for optimum results.*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/21/03

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



April 27, 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

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor 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. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Dietary Supplement – Comprehensive nutritional system that supplies the key vitamins, minerals and nutrients that provide exceptional energy to get you through the day.*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/27/03

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

End Fatigue Daily Energy B Complex 21p

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 28, 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

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor 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. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Dr. Teitelbaums clinical experience shows most people will feel a difference within two to three weeks of starting.*

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: 

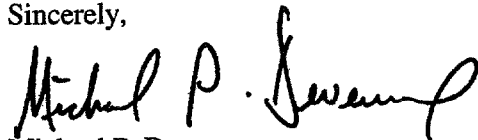
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/28/03

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



April 29, 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


RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor 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. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	This ultimate-strength formula contains choline to help maintain mental alertness when feeling fatigue, as well as the vitamin B complex necessary for healthy function of blood, brain and nerve cells which are vital for sustained energy.*

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 C. Doster

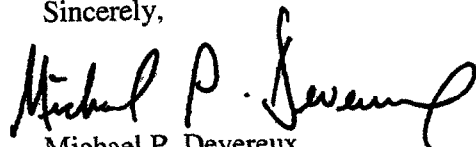
Title: Senior Vice President of Scientific Affairs

Date: 4/29/03

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



PhytoPharmica[®]

NATURAL MEDICINES™

April 30, 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

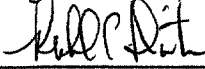
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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Features essential B vitamins and Choline to support endurance and energy, and help maintain mental alertness when experiencing fatigue.*

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: 

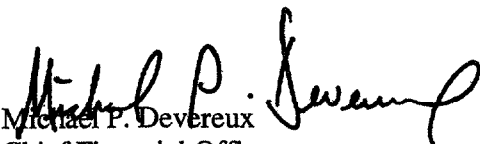
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/30/03

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
 End Fatigue Daily Energy B Complex 24p

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



May 1, 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

RECEIVED
MAY 05 2003
BY:

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor 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. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	As a foundation to support energy levels, End Fatigue™ Energy Revitalization System™ delivers over 40 vitamins, minerals and other nutrients for exceptional health and sustained energy.*

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.

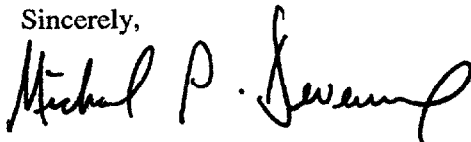
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/1/03

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

End Fatigue Daily Energy B Complex 25p

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



May 1, 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

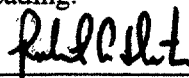
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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Unleash Your Energy with End Fatigue™ Energy Revitalization System.*

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: 

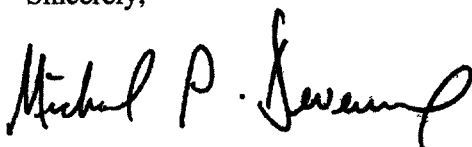
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/1/03

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

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