



March 8, 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

RECEIVED  
MAR 13 2002  
BY: \_\_\_\_\_

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.)	Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract	Dietary Supplement for mild memory problems associated with aging.*

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: 3/8/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  
Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer  
Mental Sharpness Formula 1p

975 0162 LET 9637

79745  
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



March 9, 2002

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RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract	Mental Sharpness Formula supplies a unique blend of vitamins and herbs that deliver nutritional support for mild memory problems associated with aging, as well as enhanced focus and concentration*

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: 3/9/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  
Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer  
Mental Sharpness Formula 2p

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March 10, 2002

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RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract	The key ingredients-Bacopa monnieri extract and alpha lipoic acid-have each been clinically studied to support brain function*

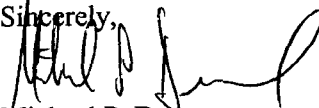
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/10/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  
  
Michael P. Devereux  
Chief Financial Officer

Mental Sharpness Formula 3p

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March 11, 2002

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RE: Label Claims/Disclaimers

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract	These ingredients reduce homocysteine levels*

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: 3/11/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  
  
Michael P. Devèreux  
Chief Financial Officer



March 12, 2002

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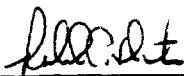
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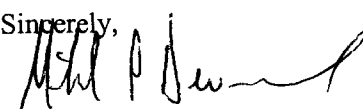
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/14/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  
  
Michael P. Devereux  
Chief Financial Officer

Mental Sharpness Formula 5p

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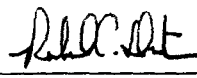
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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract	Low homocysteine levels have been associated with healthy brain function*


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: 3/13/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  
  
Michael P. Devereux  
Chief Financial Officer

Mental Sharpness Formula 6p

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