



April 21, 2003

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MAY - 5 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:

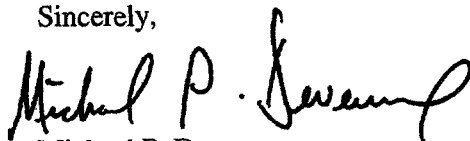
This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. 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.)	B ₁₂ -Active™	Vitamin B12	Methylcobalamin is the active form of vitamin B12, which means it works immediately in the body when absorbed. This form of the nutrient is delivered efficiently to nerve tissues.*

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: 4/21/03

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
 B12-Active 3p

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