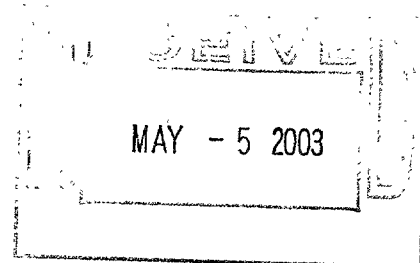


April 21, 2003

2690 '03 MAY 27 13:12

 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 at 825 Challenger Drive, (a Division of Integrative Therapeutics, Inc.), 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.)	Yeast Formula™	Oregano Aerial Part Oil Extract, Thyme Leaf and Stem Oil Extract, Peppermint Leaf Oil Extract, Godlenseal Root and Rhizome Extract	Scientists recognize that the volatile oils of oregano and thyme play a role in digestion and other body functions.* Peppermint oil is widely used in Europe to support colon function.* And goldenseal contains alkaloid compounds that show great promise for human 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
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

 Date: 4/21/03

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 GREEN BAY, WI 54311-8328
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 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,


Michael P. Devereux
Chief Financial Officer