

May 1, 2003

2729 '03 MAY 27 P3:14

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	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Vitamin E-400	Vitamin E	Vitamin E functions primarily as an antioxidant.* Yet studies also suggest it supports heart health because it's easily incorporated into the LDL-cholesterol molecule and prevents free-radical damage.*

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

Ву: ____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Datar

5/1/03

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

Sincerely,

Vitamin E-400 1p

Michael P. Devereux

Chief Financial Officer

97S 0162

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