

May 2, 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 DIETARY STATEMENTS NAME INGREDIENTS			
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Revitalizing Sleep Formula	Valerian Root Extract, Passionflower Leaf and Flower Extract, L- Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf	Dietary supplement to improve quality of restful sleep*

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

5/2/03 Date:

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

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Sincerely,

97S **Chief Financial Officer**

End Fatigue Revitalizing Sleep Formula 21p

2738

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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

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April 18, 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	<u>STATEMENTS</u>
Phyto-	End Fatigue™	Valerian Root Extract,	If you experience lack of
Pharmica	Revitalizing	Passionflower Leaf and	energy, restless sleep and
(a Division	Sleep Formula	Flower Extract, L-	brain fog End Fatigue™
of Integrative		Theanine, Hops Flower	gives you the power to rise
Therapeutics		Extract, Wild Lettuce	above it!*
Inc.)		Leaf Extract, Jamaica	
mo.)		Dogwood Root Extract,	
		Wild Lettuce Leaf	

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.

Bv:

Robert C. Doster Title: Senior Vice President of Scientific Affairs

Date: _4/18/03

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 Revitalizing Sleep Formula 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 19, 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		<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Revitalizing Sleep Formula	Valerian Root Extract, Passionflower Leaf and Flower Extract, L- Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf	Developed by energy expert Jacob Teitelbaum, M.D. End Fatigue™ delivers the key vitamins, minerals and nutrients that create a solid foundation for 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

4/19/03 Date:

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 Revitalizing Sleep Formula 19p 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 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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Revitalizing Sleep Formula	Valerian Root Extract, Passionflower Leaf and Flower Extract, L- Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf	Revitalizing Sleep Formula helps you get to sleep faster, so you have increased energy and feel less fatigued in the morning.*

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. \cap

By:

Robert C. Doster Title: Senior Vice President of Scientific Affairs

4/24/03 Date:

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

Sincerely,

Michael P. Deve

Chief Financial Officer End Fatigue Revitalizing Sleep Formula 20p 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

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.

	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Revitalizing Sleep Formula	Valerian Root Extract, Passionflower Leaf and Flower Extract, L- Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf	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

1103 Date:

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 Revitalizing Sleep Formula 17p

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