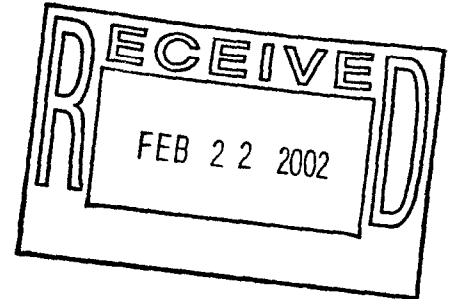


January 23, 2002

1739 02 FEB -7 P2:14

 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


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 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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Robert's Formula™	Niacin (as niacinamide), Cranesbill (Geranium maculatum) Root, Cabbage (Brassica oleracea) Leaf Extract, Marshmallow (Althaea officinalis) Root Extract, Okra (Abelmoschus esculentus) Fruit, Slippery Elm (Ulmus fulva) Bark, Duodenal Substance, Echinacea Angustifolia Root Extract, Goldenseal (Hydrastis canadensis) Root and Rhizome Extract, Pancreatic Enzymes	Dietary supplement to support digestion, absorption, and transport of foods in the small intestine*

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 Scientific Affairs

 Date: 2/23/02

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with the first name being the most prominent.

Michael P. Devereux
Chief Financial Officer