

August 21, 2002

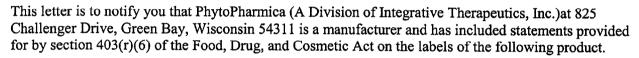
7458 TO TO 17 PROM

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:



COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Concentration™ Formula	DMAE, Phosphatidylserine, N- acetylcysteine (NAC), Taurine, L-Theanine	Children's chewable formula to support healthy focus and attentiveness*

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

Date: 8/21/02

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

975 0162 LET 10962

81623

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



August 22, 2002

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 manufacturer 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.

<u>COMPANY</u>	PRODUCT NAME	DIETARY INGREDIENTS	<u>STATEMENTS</u>
PhytoPharmica	Concentration™	DMAE,	Children's chewable
(A Division of	Formula	Phosphatidylserine, N-	formula to support
Integrative		acetylcysteine (NAC),	healthy focus and
Therapeutics,		Taurine, L-Theanine	attention levels*
Inc.)			

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

Date: 8/22/02

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

Michael P. Devereux

Chief Financial Officer

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