

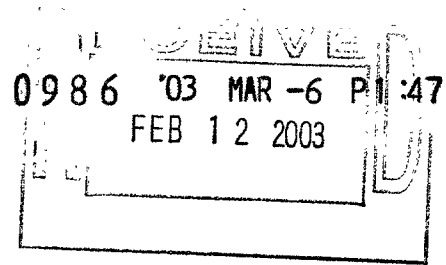


# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES<sup>™</sup>

January 22, 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



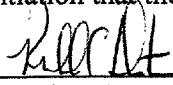
RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica 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.)	Cellular Forte <sup>®</sup> Max <sup>3</sup>	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	Support healthy activity of NK cells.* IP6 provides healthy support of immunoregulation and overall immune system surveillance.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

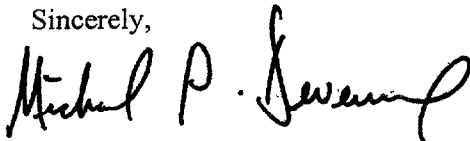
By:   
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/22/03

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

3469

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

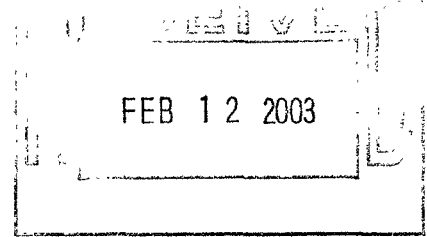
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January 23, 2003

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 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.)	Cellular Forte® Max <sup>3</sup>	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	IP6, Grifola frondosa, and Uncaria tomentosa support the healthy secretion of macrophage-induced biochemical secretions and/or healthy macrophage production in the presence of antigens.*


I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By:   
 Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/23/03

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

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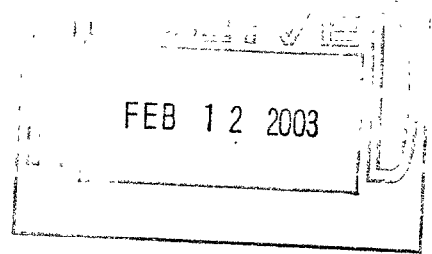


# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES<sup>™</sup>

January 24, 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

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Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte <sup>®</sup> Max <sup>3</sup>	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	B cells exposed to POA Cat's Claw demonstrated increased healthy cell activity, which resulted in healthy antibody production.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

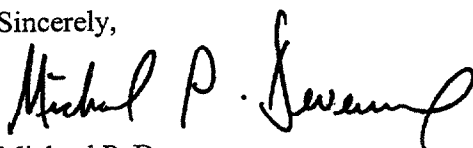
By:   
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/24/03

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

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GREEN BAY, WI 54311-8328  
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WWW.PHYTOPHARMICA.COM

January 25, 2003

FEB 12 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

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max <sup>3</sup>	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	POA Cat's Claw support healthy proliferation of helper T cells and improves healthy communication of the immune system as a whole.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

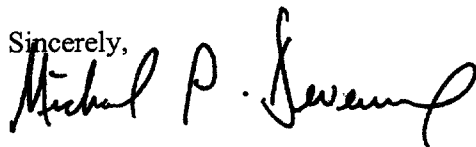
By:   
 Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/25/03

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

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# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES<sup>™</sup>

January 26, 2003

FEB 12 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:

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte <sup>®</sup> Max <sup>3</sup>	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	POA Cat's Claw supports the healthy proliferation of effective, mature T cells; supports healthy immune resistance response to antigens.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert Doster  
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/26/03

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

Sincerely,

*Michael P. Devereux*

Michael P. Devereux  
Chief Financial Officer

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January 27, 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

FEB 12 2003

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica 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.)	Cellular Forte® Max <sup>3</sup>	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	Uncaria tomentosa (POA Cat's Claw) supports the healthy proliferation of mature suppressor T cells and supports healthy balance to the immune response.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert Doster  
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/27/03

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

Sincerely,  
Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer

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FEB 12 2003

January 28, 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

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max <sup>3</sup>	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	POA Cat's Claw supports the healthy production of neutrophils and supports the rate of healthy phagocytosis in the presence of antigens.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert Doster  
Robert Doster  
Title: Senior Vice President of Scientific Affairs

Date: 1/28/03

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

Sincerely,  
Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer

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