

April 19, 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

APR 25 2002

RE: Label Claims/Disclaimers

Dear Sir/Madam:

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Fatigue Freedom	Vitamin B1, Vitamin B2, Vitamin B6, Vitamin B12, Niacinamide, Folic Acid, Pantothenic Acid, Choline Bitartrate	Targeted Nutritional Support for All Day Energy and Endurance*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-19-02

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

80262

975 0162

LET 9956

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 20, 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 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Fatigue Freedom	Vitamin B1, Vitamin B2, Vitamin B6, Vitamin B12, Niacinamide, Folic Acid, Pantothenic Acid, Choline Bitartrate	Ultimate Strength B Vitamin Formula to Promote All Day Energy*

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 C. Doster
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-20-02

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

825 CHALLENGER DRIVE
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April 21, 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 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Fatigue Freedom	Vitamin B1, Vitamin B2, Vitamin B6, Vitamin B12, Niacinamide, Folic Acid, Pantothenic Acid, Choline Bitartrate	Ultimate Strength B Vitamin Formula for All Day Energy*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-21-02

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

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GREEN BAY, WI 54311-8328
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PhytoPharmica[®]

NATURAL MEDICINES™

April 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

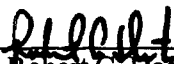
RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Fatigue Freedom	Vitamin A, Biotin, Manganese, Selenium, Vitamin E, Boron, Chromium, Molybdenum, Vitamin C, Vitamin D, Potassium, Magnesium, Zinc, Copper, Iodine, Inositol, Malic Acid, Hesperidin, N-Acetylcysteine, Glycine, L-Serine, Taurine, L-Tyrosine, Fructooligosaccharide, Whey Protein	Targeted Nutritional Support for All Day Energy and Endurance*


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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4.22.02

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
 Fatigue Freedom-Drink 1p

825 CHALLENGER DRIVE
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April 23, 2002

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 Center for Food Safety and Applied Nutrition
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 5100 Paint Branch Parkway
 College Park, MD 20740-3835

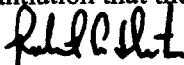
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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Fatigue Freedom	Vitamin A, Biotin, Manganese, Selenium, Vitamin E, Boron, Chromium, Molybdenum, Vitamin C, Vitamin D, Potassium, Magnesium, Zinc, Copper, Iodine, Inositol, Malic Acid, Hesperidin, N-Acetylcysteine, Glycine, L-Serine, Taurine, L-Tyrosine, Fructooligosaccharide, Whey Protein	Ultimate Strength B Vitamin Formula to Promote All Day Energy*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-23-02

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

Fatigue Freedom-Drink 2p

825 CHALLENGER DRIVE
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April 24, 2002

Office of Special Nutritionals (HFS-450)
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 5100 Paint Branch Parkway
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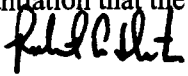
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

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

Date: 4-24-02

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

Fatigue Freedom-Drink 3p

825 CHALLENGER DRIVE
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NATURAL MEDICINES™

April 25, 2002

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 Center for Food Safety and Applied Nutrition
 U. S. Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740-3835

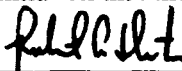
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Fatigue Freedom	Wild Lettuce (Lactuca virosa) Powder, Wild Lettuce (Lactuca virosa) Extract, Hops (Humulus lupulus) Flower Extract, Jamaica Dogwood Extract, Melatonin, Valerian Root Extract, Passionflower Leaf and Flower Extract	Targeted Nutritional Support for all Day Energy and Endurance*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-25-02

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

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April 26, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U. S. Food and Drug Administration
5100 Paint Branch Parkway
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RE: Label Claims/Disclaimers

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Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Fatigue Freedom	Wild Lettuce (Lactuca virosa) Powder, Wild Lettuce (Lactuca virosa) Extract, Hops (Humulus lupulus) Flower Extract, Jamaica Dogwood Extract, Melatonin, Valerian Root Extract, Passionflower Leaf and Flower Extract	Ultimate Strength B Vitamin Formula to Promote All Day Energy*

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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-26-02

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

Fatigue Freedom-Sleep 2p

825 CHALLENGER DRIVE
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April 27, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U. S. Food and Drug Administration
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College Park, MD 20740-3835

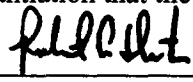
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-27-02

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

Fatigue Freedom-Sleep 3p

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