



2857 '03 JUN -6 P2:22

May 8, 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

MAY 27 2003

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 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. 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.

| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|--|---------------------|--|--|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.) | Iron Complex™ | Vitamin C, Folic Acid, Vitamin B12, Iron, Liquid Liver Fractions, Chlorophyll | Iron Complex™ features liquid liver fractions, a rich source of heme iron. Heme iron is the most easily absorbed form of iron, and doesn't cause side effects such as nausea.* |

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 of Scientific Affairs
Date: 5/8/03

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

975 0162 LET

84560
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 5457