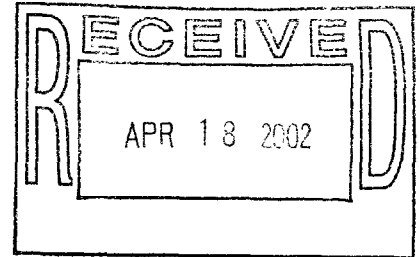


April 2, 2002

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.)	Pantethine Plus Cholestatin	Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Cholestatin works in the intestines to help block the body's ability to absorb cholesterol from foods.*

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: 4/2/02

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

97S 0162

LET 9890

80146

April 3, 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

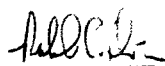
RE: Label Claims/Disclaimers

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.)	Pantethine Plus Cholestatin	Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	It also blocks reabsorption of cholesterol from bile.*

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: 4/3/02

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

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 4, 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

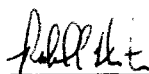
RE: Label Claims/Disclaimers

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.)	Pantethine Plus Cholestatin	Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Pantethine acts at the synthesis stage in the liver to help regulate the body's cholesterol 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 C. Doster  
Title: Senior Vice President of Scientific Affairs  
Date: 4/4/02

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

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 5, 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

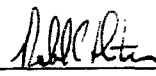
RE: Label Claims/Disclaimers

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.)	Pantethine Plus Cholestatin	Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	So, there are two ways you can retain healthy cholesterol levels that are already within the normal range: change your diet and/or influence your body's healthy cholesterol-making activity.*

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: 4/5/02

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



April 7, 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.)	Pantethine Plus Cholestatin	Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Phytosterols work in the intestines to help block the body's ability to absorb cholesterol from foods.* They also block reabsorption of cholesterol from bile.*

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: 4/7/02

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

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