



June 1, 2003

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Mr. Robert Moore
 Office of Nutritional Products, Labeling &
 Dietary Supplements, HFS 811
 Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740

RECEIVED
 JUN 17 2003
 BY:

RE: Label Claims/Disclaimers

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 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Starch Away™	Sugar, Corn Syrup, White Kidney Bean Extract (Phase 2 Starch Neutralizer), Partially Hydrogenated Coconut Oil, Xylitol, Corn Starch, Glycerin, Natural Flavor, Citric Acid, Soy Lecithin, Carrageenan, Malic Acid and Yellow 6 Lake	Blocks Calories from Bread, Pasta, Potatoes & other Starchy Foods*

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: 6/1/03

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

Starch Away 1p

975 0162 LET

12093

84712

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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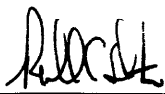
RE: Label Claims/Disclaimers

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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

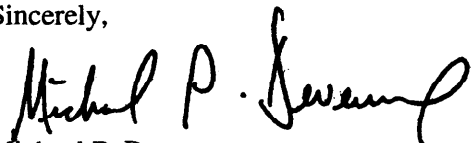
Title: Senior Vice President of Scientific Affairs

Date: 6/1/03

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Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer

June 1, 2003

Mr. Robert Moore
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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: 6/1/03

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Sincerely,


Michael P. Devereux
 Chief Financial Officer

Starch Away 3p

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June 2, 2003

Mr. Robert Moore
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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.

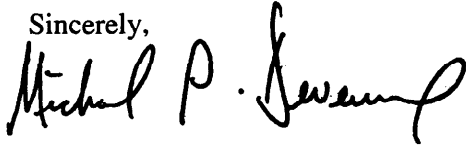
By: Robert C. Doster
 Robert C. Doster
 Title: Senior Vice President of Scientific Affairs

Date: 6/2/03

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Michael P. Devereux
Chief Financial Officer



June 2, 2003

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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

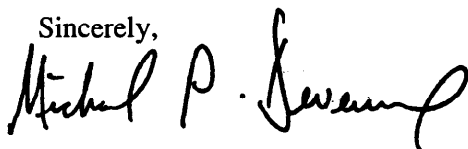
Title: Senior Vice President of Scientific Affairs

Date: 6/2/03

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Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer



June 3, 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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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: 6/3/03

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

Starch Away 6p

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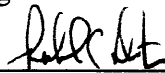
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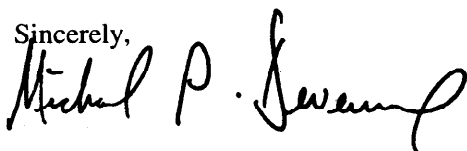
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/3/03

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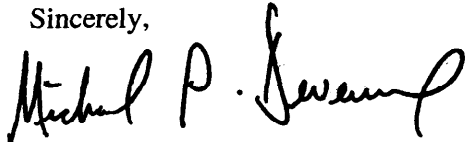
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By: Robert C. Doster
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 Title: Senior Vice President of Scientific Affairs

Date: 6/3/03

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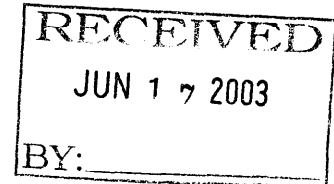
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Michael P. Devereux
Chief Financial Officer



June 3, 2003

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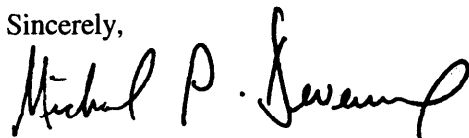
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/3/03

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Michael P. Devereux
Chief Financial Officer

Starch Away 9p

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June 4, 2003

Mr. Robert Moore
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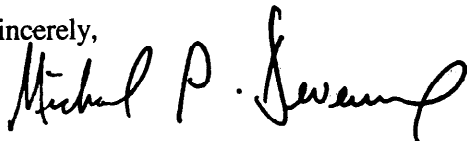
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/4/03

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Sincerely,



Michael P. Devereux
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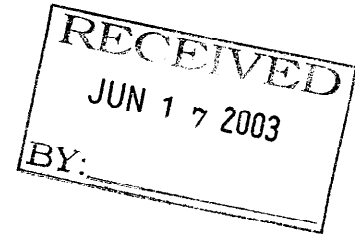
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June 4, 2003

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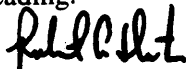
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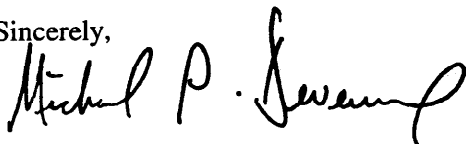
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/14/03

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Chief Financial Officer

Starch Away 11p

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June 5, 2003

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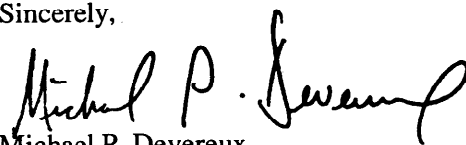
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/5/03

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FAX 920-469-4418
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WWW.PHYTOPHARMICA.COM



June 5, 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, (a Division of Integrative Therapeutics, Inc.), 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Starch Away™	Sugar, Corn Syrup, White Kidney Bean Extract (Phase 2 Starch Neutralizer), Partially Hydrogenated Coconut Oil, Xylitol, Corn Starch, Glycerin, Natural Flavor, Citric Acid, Soy Lecithin, Carrageenan, Malic Acid and Yellow 6 Lake	Starch Away™ is formulated with Phaseolamin, a natural ingredient for dieting. This "super ingredient" puts a stop to the enzyme and amylase in its path of converting starch to sugar.* Without this starch-to-fat sugar conversion, the starch is safely zapped before it can be converted and stored as fat.*

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

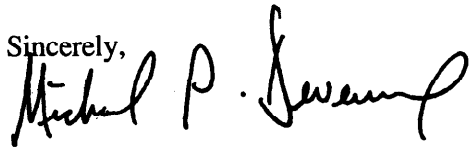
Title: Senior Vice President of Scientific Affairs

Date: 6/5/03

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

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer



June 5, 2003

Mr. Robert Moore
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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.

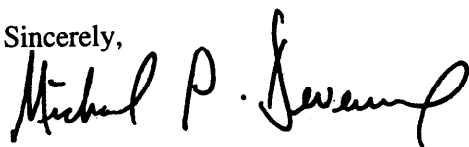
By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 6/5/03

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Sincerely,

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Michael P. Devereux
Chief Financial Officer



June 6, 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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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: 6/6/03

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

Starch Away 15p

825 CHALLENGER DRIVE
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PhytoPharmica.
NATURAL MEDICINES™

June 6, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

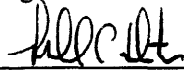
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

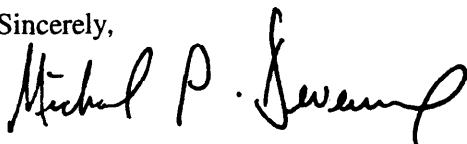
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/6/03

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

Starch Away 16p

825 CHALLENGER DRIVE
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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: 

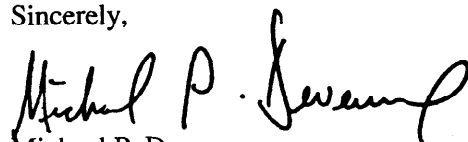
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/6/03

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

Starch Away 17p

825 CHALLENGER DRIVE
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June 7, 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

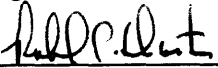
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 

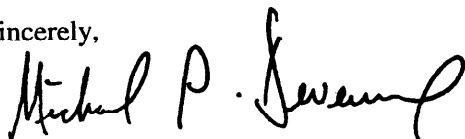
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/17/03

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

Starch Away 18p

825 CHALLENGER DRIVE
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June 7, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RECEIVED
JUN 17 2003
BY: _____

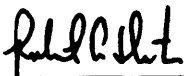
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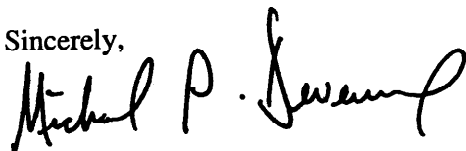
By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 6/7/03

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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(920) 406-3608

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer



PhytoPharmica.

NATURAL MEDICINES™

June 7, 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

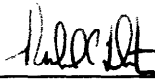
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

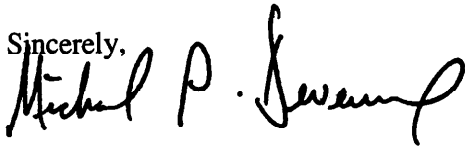
Title: Senior Vice President of Scientific Affairs

Date: 6/7/03

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Michael P. Devereux
Chief Financial Officer



June 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

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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: 6/8/03

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

Sincerely,


Michael P. Devereux
Chief Financial Officer

Starch Away 21p

825 CHALLENGER DRIVE
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June 8, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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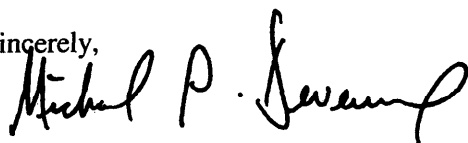
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/8/03

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

Sincerely,



Michael P. Devereux
Chief Financial Officer

Starch Away 22p

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June 8, 2003

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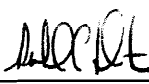
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By: 

Robert C. Doster

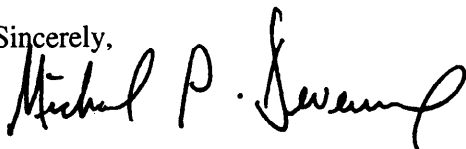
Title: Senior Vice President of Scientific Affairs

Date: 6/8/03

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Michael P. Devereux
Chief Financial Officer

June 9, 2003

Mr. Robert Moore
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 Food and Drug Administration
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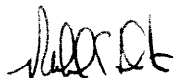
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 
 Robert C. Doster

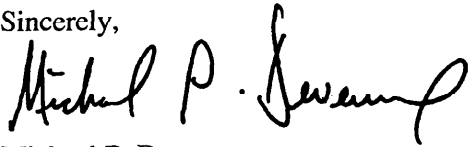
Title: Senior Vice President of Scientific Affairs

Date: 6/9/03

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

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized "M" and "D".

Michael P. Devereux
Chief Financial Officer



June 9, 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, (a Division of Integrative Therapeutics, Inc.), 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.

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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

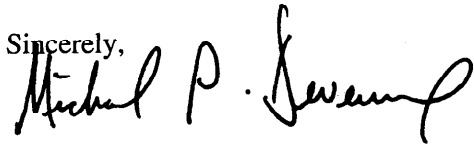
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Sincerely,

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Michael P. Devereux
Chief Financial Officer

June 9, 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

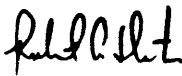
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 
 Robert C. Doster

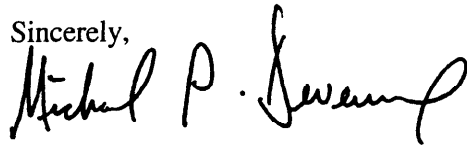
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Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael P. Devereux
Chief Financial Officer



June 10, 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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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

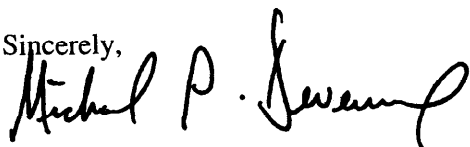
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Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer



June 10, 2003

Mr. Robert Moore
 Office of Nutritional Products, Labeling &
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 5100 Paint Branch Parkway
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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

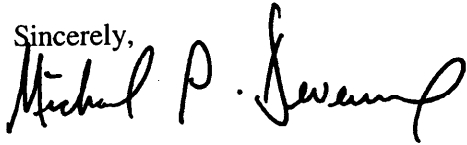
Title: Senior Vice President of Scientific Affairs

Date: 6/10/03

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Sincerely,

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Michael P. Devereux
Chief Financial Officer



June 10, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
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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

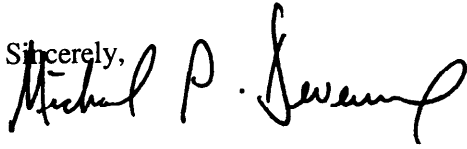
Title: Senior Vice President of Scientific Affairs

Date: 6/10/03

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Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer



June 11, 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

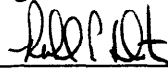
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 

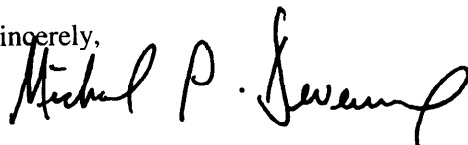
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/11/03

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

Starch Away 30p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
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WWW.PHYTOPHARMICA.COM



June 11, 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

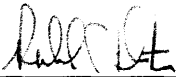
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster

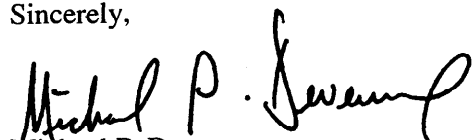
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Date: 6/11/03

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Sincerely,

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Michael P. Devereux
Chief Financial Officer



June 11, 2003

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Office of Nutritional Products, Labeling &
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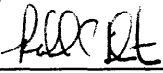
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/11/03

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Sincerely,



Michael P. Devereux
Chief Financial Officer

Starch Away 32p

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June 11, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
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College Park, MD 20740

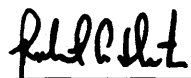
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

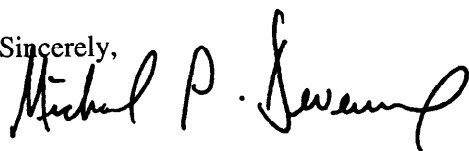
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Date: 6/11/03

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Sincerely,

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Michael P. Devereux
Chief Financial Officer



June 12, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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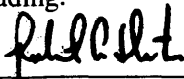
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/12/03

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

Starch Away 34p

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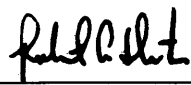
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Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	Starch Away™	Sugar, Corn Syrup, White Kidney Bean Extract (Phase 2 Starch Neutralizer), Partially Hydrogenated Coconut Oil, Xylitol, Corn Starch, Glycerin, Natural Flavor, Citric Acid, Soy Lecithin, Carrageenan, Malic Acid and Yellow 6 Lake	Two recent U.S. university-based double-blind, placebo-controlled, human cross-over pilot studies showed that starch absorption averaged 79% lower in the group taking Phase 2™.*

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

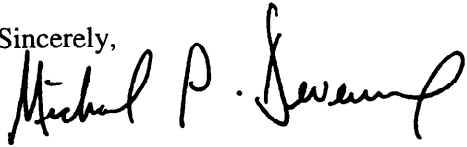
Title: Senior Vice President of Scientific Affairs

Date: 6/12/03

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

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer

June 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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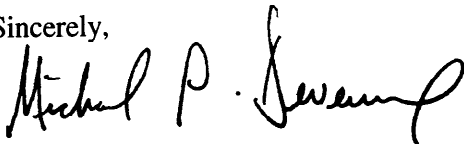
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/12/03

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

June 13, 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

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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

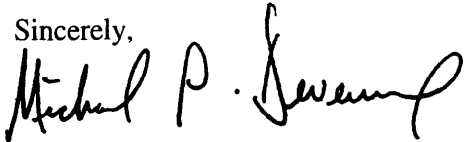
Title: Senior Vice President of Scientific Affairs

Date: 6/13/03

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Sincerely,

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Michael P. Devereux
Chief Financial Officer



June 13, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
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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.

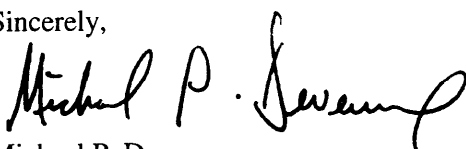
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/13/03

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

Starch Away 38p

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June 13, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

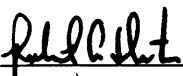
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.


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

Date: 6/13/03

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Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



June 13, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

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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: 6/13/03

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

Starch Away 40p

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June 14, 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

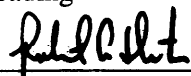
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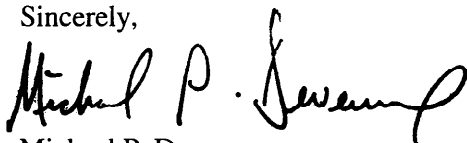
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/14/03

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

Starch Away 41p

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