

August 1, 2002

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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

BY:

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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Sea Friends Immune Defense	Vitamin A, Vitamin C, Vitamin B6, Zinc, European Black Elderberry Fruit Extract	Targeted nutrition to enhance your child's immune system*

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.

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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

975 0162 LET 10862 920-469-9099 TOLL FREE 800-553-2370

825 CHALLENGER DRIVE GREEN BAY, WI 54311-8328

Fax 920-469-4418