

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

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.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	A poor diet can make you more fatigued. However, a diet rich in the proper vitamins, minerals, amino acids, and essential B vitamins can help restore healthy energy levels and certain herbs can improve the quality of your sleep.*

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

8/1/02 Date:

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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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



July 30, 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:

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Ultimate-strength Daily Energy B Complex contains the nutrients necessary for healthy function of blood, brain, and nerve cells that are vital for sustained energy,* including: Folic Acid (800 mcg), for energy production and healthy homocysteine levels.*

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

By: 1

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

7/30/02 Date:

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

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



July 28, 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:

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COMPANY .	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Ultimate-strength Daily Energy B Complex contains the nutrients necessary for healthy function of blood, brain, and nerve cells that are vital for sustained energy,* including: Pantothenic Acid (50 mg), an important catalyst required for the conversion of carbohydrates, fats, and protein into energy.*

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

By:

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

Date: 7/28/02

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 FAX 920-469-4418 FAX TOLL FREE 888-311-5657



July 31, 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 distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmet Act on the labels of the following product.

COMPANY	PRODUCT NAME		<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	PhytoPharmica is pleased to introduce the End Fatigue Revitalization System, a program created by Dr. Teitelbaum that features three targeted nutritional formulas specifically designed to build energy and endurance and improve your quality of sleep, so you feel more energized all day long.*

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

Bv:

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

Date: 7/31/02

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

Sincerely, wenn

Chief Financial Officer

825 CHALLENGER DRIVE GREEN BAY, WI 54311-8328 920-469-9099 TOLL EDGE 800-553-2370 FAX 920-469-4418 FAX TOLL FREE 888-311-5657



July 27, 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 distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosme Act on the labels of the following product.

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Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy B Complex	Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Choline Bitartrate	Ultimate-strength Daily Energy B Complex contains the nutrients necessary for healthy function of blood, brain, and nerve cells that are vital for sustained energy,* including: Vitamins B1 (75 mg), B2 (75 mg), B6 (85 mg), B12 (500 mcg) and niacinamide (50 mg), which are critical building blocks for energy production.*

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

By:

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

Date: 7/27/02

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

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