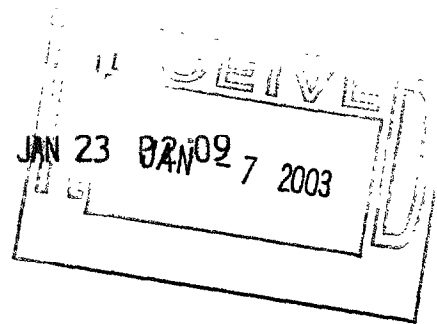




January 6, 2003

0357 '03



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 distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosm 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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Pantethine Plus™	Sodium, Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Cholesterol in the diet is found only in animal-derived foods (meat, milk, eggs, poultry, etc.). 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 substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/6/03

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

Sincerely,

Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer

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11269

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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



January 7, 2003

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

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Pantethine Plus™	Sodium, Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Pantethine acts at the synthesis stage in the liver to help support healthy 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  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/7/03

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

Sincerely,

Michael P. Devereux  
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