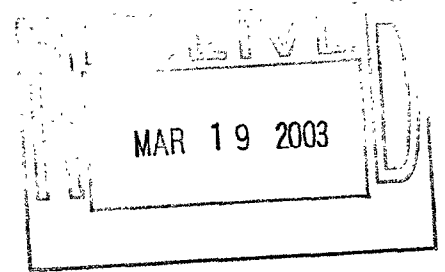




March 13, 2003

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

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Artichoke Flower Head Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Same great product with more artichoke for even higher levels of liver support.*

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: 3/13/03

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

Sincerely,

*Michael P. Devereux*  
 Michael P. Devereux  
 Chief Financial Officer

Super Milk Thistle X 8p

975 0162

LET

11602

83832  
 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

March 14, 2003

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Artichoke Flower Head Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Your liver is responsible for virtually all internal detoxification. Super Milk Thistle® X not only enhances this process through its positive effects on bile flow, it helps strengthen the liver at a cellular level so it functions at its best when you need it most.*

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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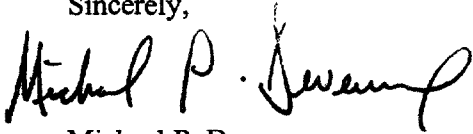
Title: Senior Vice President of Scientific Affairs

Date: 3/14/03

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Sincerely,

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

Michael P. Devereux  
Chief Financial Officer