

February 3, 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 (A Division of Integrative Therapeutics, Inc., at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.	Probiotic Pearls with patented True Delivery Technology	Proprietary Probiotic Blend	Dietary Supplement with l.acidophilus and b. longum for healthy intestinal flora.*

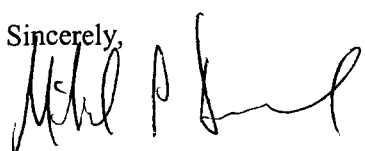
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc., has substantiation that the statements are truthful and not misleading.

By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 2/3/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  
  
 Mike Devereux  
 Chief Financial Officer

975 0162 LET9486

79745

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 9, 2002

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
U. S. Food and Drug Administration  
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RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.	Probiotic Pearls™ with patented True Delivery™ Technology	Proprietary Probiotic Blend	Guaranteed Delivery*

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: \_\_\_\_\_

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,

Michael P. Devereux  
Chief Financial Officer

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March 10, 2002

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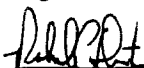
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.	Probiotic Pearls™ with patented True Delivery™ Technology	Proprietary Probiotic Blend	Patented True Delivery™ Technology protects microflora from stomach acids and releases them healthy and intact in the intestine*

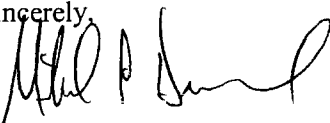
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By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/10/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  


Michael P. Devereux  
Chief Financial Officer

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March 11, 2002

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RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™ with patented True Delivery™ Technology	Proprietary Probiotic Blend	Supports gastro-intestinal health*

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: 3/11/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,

Michael P. Devereux  
Chief Financial Officer

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March 12, 2002

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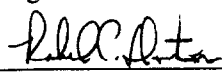
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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™ with patented True Delivery™ Technology	Proprietary Probiotic Blend	Supports immune health*

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: 3/12/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,



Michael P. Devereux  
Chief Financial Officer

825 CHALLENGER DRIVE  
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March 13, 2002

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™ with patented True Delivery™ Technology	Proprietary Probiotic Blend	Reduces lactose intolerance*

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.

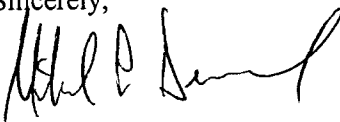
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/13/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,

  
Michael P. Devereux  
Chief Financial Officer

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March 8, 2002

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™ with patented True Delivery™ Technology	Proprietary Probiotic Blend	Probiotic Pearls™ with patented True Delivery™ Technology protect the <i>Lactobacillus acidophilus</i> and <i>Bifidobacterium longum</i> from stomach acids, and guarantee deliver into the intestine, where they are released intact, to increase healthy intestinal flora.*


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: 3/8/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,  


Michael P. Devereux  
Chief Financial Officer  
Probiotic Pearls 2e

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