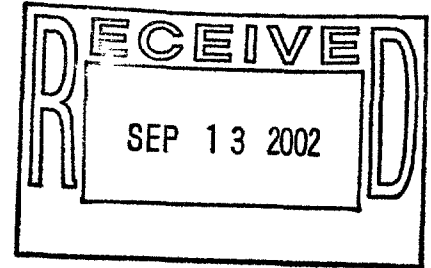


September 10, 2002



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.)	Concentration™ Formula	DMAE, Phosphatidylserine, N-acetylcysteine (NAC), Taurine, L-Theanine	NAC supports neurological health and enhances detoxification processes in the body.*

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: *Cheryl Myers*  
 Cheryl Myers  
 Title: Director of Product Development

Date: 9-10-02

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

975 0162

LET

11013

Concentrate Formula 8p

81819

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



September 11, 2002

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Concentration™ Formula	DMAE, Phosphatidylserine, N- acetylcysteine (NAC), Taurine, L-Theanine	Taurine supports overall health in the central nervous system.*

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.

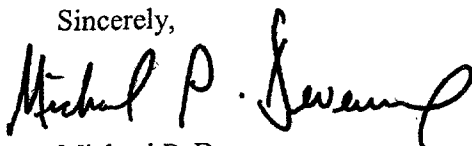
By:   
Cheryl Myers

Title: Director of Product Development

Date: 9-11-02

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Michael P. Devereux  
Chief Financial Officer

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