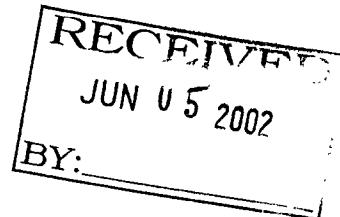


May 28, 2002

1531 72 2002 02:02

 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.)	Acidophilus Ultra-Strength	Proprietary blend of active cultures Containing a specific mixture of Lactobacillus acidophilus, Lactobacillus rhamnosus, Bifidobacteria longum, Bifidobacteria breve	Now, you can support the balance of good bacteria in your digestive tract with PhytoPharmica's Ultra-Strength Acidophilus, it's most potent acidophilus product.*

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.

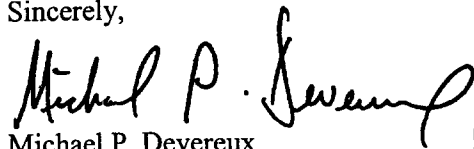
 By: Robert C. Doster
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

 Date: 5-28-02

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
 Acidophilus Ultra-Strength 1p

975 0162

 LET
 10185

 80741
 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

May 29, 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

RECEIVED
 JUN 05 2002
 BY: _____

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.)	Acidophilus Ultra-Strength	Proprietary blend of active cultures Containing a specific mixture of Lactobacillus acidophilus, Lactobacillus rhamnosus, Bifidobacteria longum, Bifidobacteria breve	It contains four billion bacteria per capsule, one of the highest concentrations of live, active cultures available. This bacteria helps support digestion and a healthy intestinal 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.

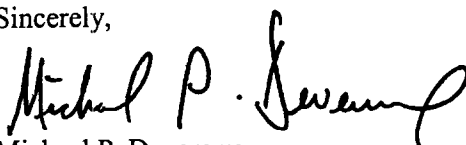
By: 
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5-29-02

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

Acidophilus Ultra-Strength 2p

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

May 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

RECEIVED
 JUN 05 2002
 BY: _____

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.)	Acidophilus Ultra-Strength	Proprietary blend of active cultures Containing a specific mixture of Lactobacillus acidophilus, Lactobacillus rhamnosus, Bifidobacteria longum, Bifidobacteria breve	<i>Lactobacillus acidophilus</i> is the most commonly used lactic acid bacteria and is vital to several functions of the body, including the immune system and vitamin synthesis.*

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

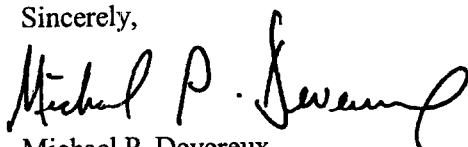
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5-30-02

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

Acidophilus Ultra-Strength 3p

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

May 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

RECEIVED
 JUN 05 2002
 BY: _____

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.)	Acidophilus Ultra-Strength	Proprietary blend of active cultures Containing a specific mixture of Lactobacillus acidophilus, Lactobacillus rhamnosus, Bifidobacteria longum, Bifidobacteria breve	It contains calcium carbonate, a compound that helps reduce the toxicity of free bile acids during the digestion process (which can destroy friendly bacteria);* and fructooligosaccharides, which favor the growth and activity of bifidobacteria during their transit through the small intestine.*

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: 5-31-02

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
 Acidophilus Ultra-Strength 4p

825 CHALLENGER DRIVE
 GREEN BAY, WI 54311-8328
 920-469-9099
 TOLL FREE 800-553-2370
 FAX 920-469-4418
 FAX TOLL FREE 888-311-3607
 WWW.PHYTOPHARMICA.COM