



May 7, 2003

2855 '03 JUN -6 P2:22

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

MAY 22 2003

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 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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Adrenal Soluble Fractions™	Vitamin C, Vitamin B6, Pantothenic Acid, Adrenal Polypeptide Fractions, Betaine, L-Tyrosine, Pituitary Extract, Adrenal Cortex Extract	Manage Excess Stress*

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: 5/7/03

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

Sincerely,

 Michael P. Devereux
 Chief Financial Officer

843
 825 CHALLENGER DRIVE
 GREEN BAY, WI 54311-8328
 920-469-9099
 TOLL FREE 800-553-2370
 FAX 920-469-4418
 FAX TOLL FREE 888-311-5457

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Adrenal Soluble Fractions™	Vitamin C, Vitamin B6, Pantothenic Acid, Adrenal Polypeptide Fractions, Betaine, L-Tyrosine, Pituitary Extract, Adrenal Cortex Extract	Unleash your energy with this easy three-step program.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, 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: 5/8/03

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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