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January 25, 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 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
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Myo-Comp™	Vitamin C, Vitamin D, Vitamin E, Thiamine, Riboflavin, Niacin, Vitamin B6, Vitamin B12, Calcium, Magnesium, Manganese, Sodium, Potassium Chloride, Choline Bitartrate, Muscle Extract, Inositol, Betaine HCI, Ammonium Chloride, Ribonucleic Acid	The other nutrients in this formula work with vitamins C and E to synergistically support collagen synthesis and functions.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

Robert C. Doster Title: Senior Vice President of Scientific Affairs

Date: 1/25/03

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851 825 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

By:

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

Sincerely, even

Michael P. Devereux Chief Financial Officer



January 24, 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

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

Robert C. Doster Title: Senior Vice President of Scientific Affairs

Date: 1/24/03

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Sincerely, Michael P. Jevenn Sincerely,

Michael P. Devereux Chief Financial Officer



January 23, 2003

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By:

Robert C. Doster Title: Senior Vice President of Scientific Affairs

Date: $\frac{1}{23}/03$

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Chief Financial Officer