



April 9, 2003

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MAY -5 P1:59  
APR 14 2003  
BY:

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, (a Division of Integrative Therapeutics, Inc.), 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
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Hepatox®	Vitamin A, Vitamin C, Niacin, Vitamin B12, Biotin, Sodium, Choline Bitartrate, Red Beet Root, L-Methionine, Barberry Bark of Root, Boldo Leaf Extract, Celandine Whole Plant, Fringe Tree, Ox Bile Extract, Betaine HCl, Inositol, Liver, Evening Primrose Seed Oil	Hepatox also features lipotropic factors such as methionine (250 mg) and choline (850 mg) that researchers have linked to fat metabolism and support of liver function.*

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 Doster

Title: Senior Vice President of Scientific Affairs

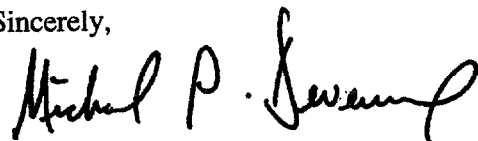
Date: 4/9/03

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

Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux  
Chief Financial Officer