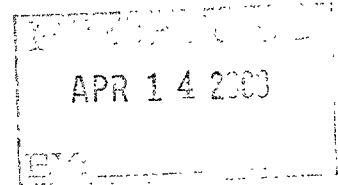


April 3, 2003

2429 '03 MAY -5 P1:57

 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.)	Probiotic Pearls™	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidobacterium longum	Probiotic Pearls™ features a one-of-a-kind blend of two probiotics you need for a healthy digestive 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 Doster

Robert Doster

Title: Senior Vice President of Scientific Affairs

 Date: 4/3/03

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

975 0162

LET

Probiotic Pearls 15p

11860

84253

 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