



PhytoPharmica[®]

NATURAL MEDICINES[™]

April 7, 2003

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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.)	ImmunoShield [™] with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	The proprietary trace mineral blend (24 mg) focuses on the specific compounds and elements like selenium, molybdenum and boron that offer immune support.*

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: 4/7/03

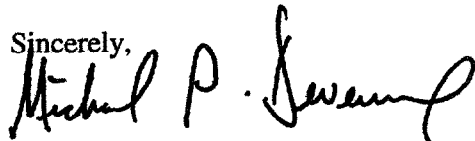
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If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

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

Michael P. Devereux
Chief Financial Officer