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BY:

April 8, 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, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.).	Derma Care™	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Riboflavin, Niacin, Vitamin B6, Folic Acid, Biotin, Pantothenic Acid, Zinc, Unsaturated Free Fatty Acids, Lecithin, Choline Bitartrate, Intrinsic Glandular Lipids, Inositol	DermaCare™ contains a variety of nutrients needed for healthy hair and skin, including vitamin A (3,332 IU) and zinc (30 mg) to help skin texture, integrity and moisture; essential fatty acids (600 mg) to support body oils that keep the skin and scalp in good condition; and lecithin (soy, 400 mg), nature's fat emulsifier.*

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: 4/8/03

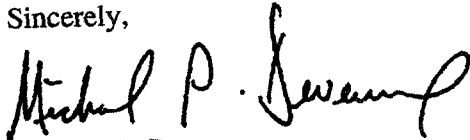
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If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

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

Michael P. Devereux
Chief Financial Officer