

March 22, 2002

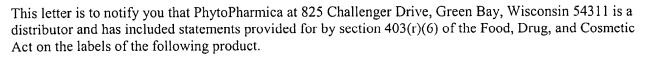
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Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U. S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE:

Label Claims/Disclaimers

Dear Sir/Madam:



COMPANY	PRODUCT NAME	<u>DIETARY</u> INGREDIENTS	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	7-KETO™ Lean	lodine, Copper, Manganese, 7-keto dehydroephiandrosterone, L-Tyrosine, Asparagus (Asparagus officinalis) Rhizome Extract, Choline Bitartrate, Inositol	Dietary supplement clinically studied to help burn fat and promote weight loss*

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:

3/22/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608

Since

Michael P. Devereux

Chief Financial Officer

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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

7-Keto Lean 1p



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Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition U. S. Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740-3835

APR 03 2002

RE:

Label Claims/Disclaimers

Dear Sir/Madam:

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.

COMPANY	PRODUCT NAME	<u>DIETARY</u> INGREDIENTS	STATEMENTS
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	7-KETO™ Lean	lodine, Copper, Manganese, 7-keto dehydroephiandrosterone, L-Tyrosine, Asparagus (Asparagus officinalis) Rhizome Extract, Choline Bitartrate, Inositol	Clinically studied 7-KETO is an improved, safe metabolite of DHEA*

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.

Title: Senior Vice President of Scientific Affairs

Date: 3/23/62

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608

Michael P. Devereux

Chief Financial Officer

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