



March 25, 2002

023 00 0000 2002

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Super Immuno-Tone™	Vitamin A, Vitamin C, Vitamin B6, Zinc, Astragalus (Astragalus membranaceus) Root Extract, Echinacea Angustifolia Root Extract, Goldenseal (Hydrastis canadensis) Root and Rhizome Extract, Shiitake (Lentinus edodes) Mushroom Extract, Licorice (Glycyrrhiza glabra) Root Extract	Dietary supplement for proper immune system function*

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*

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/25/02

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
 Chief Financial Officer

Super Immuno-Tone Ip

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