

March 25, 2002

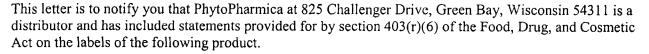
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Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition U. S. Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740-3835

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.)	Super Immuno- Tone™	Vitamin A, Vitamin C, Vitamin B6, Zinc, Astragalus (Astragalus membranaceus) Root Extract, Echinacea Angustifolia Root Extract, Goldenseal (Hydrastis candensis) 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.

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at

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Super Immuno-Tone Ip