



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

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.)	Thymuril®	Vitamin A, Vitamin C, Vitamin E, Zinc, Selenium, Proprietary Thymus Polypeptide Fractions/Glandular Complex, Echinacea Purpurea Root, Lysine, Blue Flag (Iris verisicolor) Root, Goldenseal (Hydrastis canadensis) Root	Dietary supplement to provide vitamins and minerals essential for proper immune 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

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
Chief Financial Officer

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Thymuril Ip