



January 20, 2003

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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 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. 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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	CurcuMax™	Vitamin C, Pantothenic Acid, Magnesium, Turmeric Root Extract, Bromelain, Butcher's Broom Root and Rhizome Extract, Pancreatic Enzymes, L-Cysteine HCl	Provides nutritional support for body functions dealing with physical exertion.*

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: 1/20/03

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

Sincerely,
Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

CurcuMax 2p

97S 0162

LET 11423

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

83271



January 21, 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

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	CurcuMax™	Vitamin C, Pantothenic Acid, Magnesium, Turmeric Root Extract, Bromelain, Butcher's Broom Root and Rhizome Extract, Pancreatic Enzymes, L-Cysteine HCl	CurcuMax™ contains essential nutrients that must be present for body functions that deal with physical exertion.*

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: 1/21/03

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

Sincerely,


Michael P. Devereux
Chief Financial Officer

CurcuMax 3p

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January 22, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	CurcuMax™	Vitamin C, Pantothenic Acid, Magnesium, Turmeric Root Extract, Bromelain, Butcher's Broom Root and Rhizome Extract, Pancreatic Enzymes, L-Cysteine HCl	Vitamin C affects strength and integrity of collagen, the basic supporting structure in the tendons, cartilage, and connective tissues that help muscles and joints work.*

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.

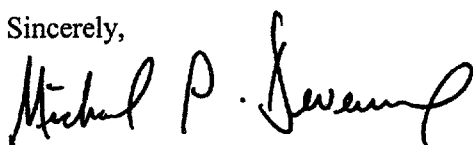
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/22/03

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

Sincerely,



Michael P. Devereux
Chief Financial Officer

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January 23, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	CurcuMax™	Vitamin C, Pantothenic Acid, Magnesium, Turmeric Root Extract, Bromelain, Butcher's Broom Root and Rhizome Extract, Pancreatic Enzymes, L-Cysteine HCl	Pantothenic acid, magnesium, and cysteine are included for synergistic support.*

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.

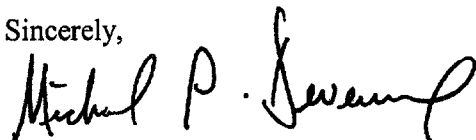
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/23/03

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

Sincerely,



Michael P. Devereux
Chief Financial Officer

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January 24, 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

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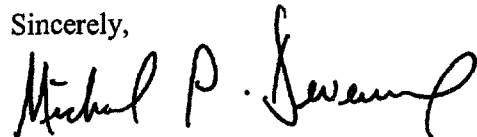
<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	CurcuMax™	Vitamin C, Pantothenic Acid, Magnesium, Turmeric Root Extract, Bromelain, Butcher's Broom Root and Rhizome Extract, Pancreatic Enzymes, L-Cysteine HCl	This formula also provides standardized, high-quality extracts of curcuma (turmeric), which supports healthy joint functions, and butcher's broom, which offers additional benefits related to the effects of exertion on the body.*

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: 1/24/03

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

Sincerely,

Michael P. Devereux
Chief Financial Officer
CurcuMax 6p

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