



0889 '03 MAR -3 P153

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

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.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	It is theorized that when IP-6 and inositol, maitake mushrooms, and POA Cat's Claw Extract are combined they work synergistically to support healthy cell developoment.*

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 Doster
Robert 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

975 0162

LET

11429

Cellular Forte Max3 32p

83271
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



January 20, 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

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	The three ingredients in Cellular Forte® Max ³ all have scientifically demonstrated immune supportive effects, including support of healthy lymphocytes: B cells, helper T cells, killer T cells, suppressor T cells, neutrophils, and macrophages.*

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 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
Chief Financial Officer

Cellular Forte Max3 31p

825 CHALLENGER DRIVE
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FAX 920-469-4418
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WWW.PHYTOPHARMICA.COM



PhytoPharmica[®]

NATURAL MEDICINES[™]

January 18, 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

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte [®] Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	While POAs support immune health,* tetracyclic oxindole alkaloids have decidedly different effects in the body, none supporting immune system cells.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has the substantiation that the statements are truthful and not misleading.

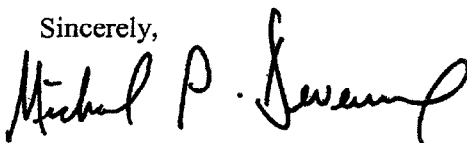
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/18/03

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

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418



January 19, 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

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	Most importantly, however, when POAs and TOAs are mixed together, the TOAs work against the POAs. Even as little as 1% TOA content can cause POAs to lose their ability to beneficially support the immune system.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has the substantiation that the statements are truthful and not misleading.

By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/19/03

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

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418



PhytoPharmica
NATURAL MEDICINES™

January 17, 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

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosme 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.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	In published and unpublished studies, POA Cat's Claw has been shown to support immune health in humans.*

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.

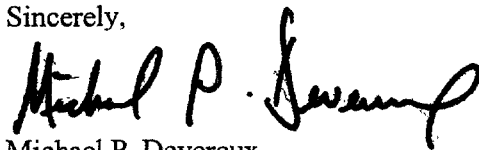
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1-17-03

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

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418



PhytoPharmica
NATURAL MEDICINES™

January 16, 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

Handwritten: 1/16/03

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	Cat's claw POAs support a balanced immune system and healthy immune response.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has provided substantiation that the statements are truthful and not misleading.

By: *Robert Doster*
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/16/03

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

Sincerely,

Michael P. Devereaux
Michael P. Devereaux
Chief Financial Officer

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418



January 15, 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

REC-100-223

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosm 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.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	The POAs in cat's claw root extract also have immune-modulating effects in T lymphocyte response. POAs support the release of mature cytotoxic CD8 T cells (killer T cells), mature CD4 T cells, and other mature T cells.* Release of these immature cells, called lymphoblasts, actually reduces the effectiveness of the immune system response.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica substantiation that the statements are truthful and not misleading.

By: Robert Doster
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/15/03

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Michael P. Devereux
Chief Financial Officer



January 14, 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

Dear Mr. Moore:

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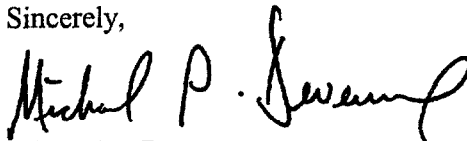
<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	Cat's claw POAs also increase B cells, resulting in an increased supply of antibodies.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica substantiation that the statements are truthful and not misleading.

By: Robert Doster
Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 1/14/03

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

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418



January 13, 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

FEB 01 2003

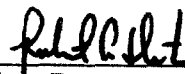
RE: Label Claims/Disclaimers

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	Certain POAs increase the rate of macrophase phagocytosis and the production of interleukin secreted by macrophages.*

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.

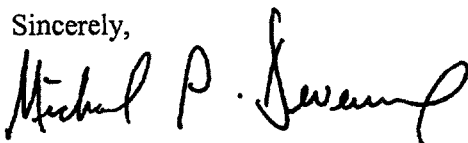
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/13/03

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

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



January 12, 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

FEB 03 2003

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Cellular Forte® Max ³	IP-6 (inositol hexaphosphate), Inositol, Miatake Mushroom Extract, POA Cat's Claw (Uncaria tomentosa) Root Extract	Cat's claw POAs have important immune supportive health properties.*

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 Doster
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/12/03

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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GREEN BAY, WI 54311-8328
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