



November 21, 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

DEC 04 2002  
02 16531 P158

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) 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
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Dandelion Root Extract, Artichoke Flower Head Extract, Licorice Root and Rhizome Extract	Dramatically improved absorption – research indicates Phytosomes may be absorbed 3 to 7 times more effectively than non-Phytosome products.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) 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: 11-21-02

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

Super Milk Thistle X 3p

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LET

11260

82787

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



November 25, 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

REC 04 2002

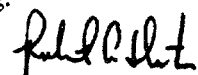
RE: Label Claims/Disclaimers

Dear Sir/Madam:

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Dandelion Root Extract, Artichoke Flower Head Extract, Licorice Root and Rhizome Extract	When the herbal compound is combined with phosphatidylcholine, the result is a new Phytosome molecule, which is more rapidly and more efficiently absorbed.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

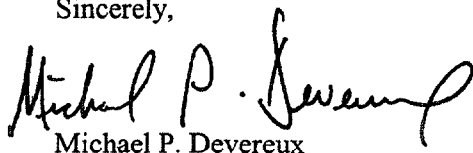
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-25-02

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

Super Milk Thistle X 7p

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
920-469-9099  
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WWW.PHYTOPHARMICA.COM



November 22, 2002

Office of Special Nutritionals (HFS-450)  
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Dandelion Root Extract, Artichoke Flower Head Extract, Licorice Root and Rhizome Extract	Increased biological activity – the health-supporting properties of the herb last longer in your body.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

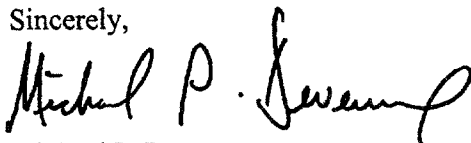
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-22-02

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

Super Milk Thistle X 4p

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
920-469-9099  
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November 23, 2002

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Dandelion Root Extract, Artichoke Flower Head Extract, Licorice Root and Rhizome Extract	Enhanced delivery – more of the herbal molecules get where they're needed most, to the cells in your body.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) 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: 11-23-02

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  
Super Milk Thistle X 5p

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
920-469-9099  
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November 20, 2002

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

RECEIVED  
DEC 04 2002  
BY: \_\_\_\_\_

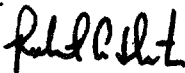
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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Dandelion Root Extract, Artichoke Flower Head Extract, Licorice Root and Rhizome Extract	Phytosomes™ are advanced forms of herbal products that are better absorbed, utilized, and as a result produce better results than conventional herbal extracts.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-20-02

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  
Super Milk Thistle X 2p

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
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November 24, 2002

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

DEC 04 2002

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Extract, Dandelion Root Extract, Artichoke Flower Head Extract, Licorice Root and Rhizome Extract	With a non-Phytosome, fewer molecules of the herbal compound penetrate and are absorbed by the membrane of the intestinal wall, where most of the body's nutrients are absorbed.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) 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: 11-24-02

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

Super Milk Thistle X 6p

825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
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