

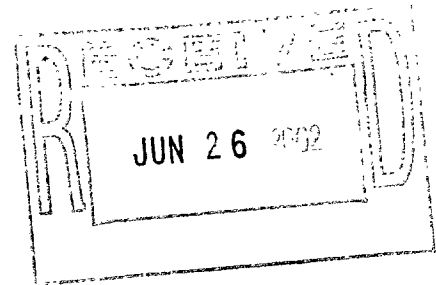


PhytoPharmica[®]

NATURAL MEDICINES[™]

June 17, 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



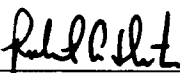
RE: Label Claims/Disclaimers

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 manufacturer 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>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	MascuPlex [™]	Vitamin E, Muira Puama Root Extract, Liquid Liver Fractions, Wheat Germ Oil, Beta-sitosterol, Damiana Leaf Extract, Saw Palmetto Berry Extract, Cola Nut Extract, Korean Ginseng Root Extract, Ginkgo Leaf Extract	The special formula in MascuPlex [™] includes vital nutrients like ginseng, to promote stamina and endurance; Ginkgo biloba, for increased blood and oxygen flow; and saw palmetto, for nutritional support of proper prostate function.*

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: 6-17-02

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

MascuPlex 2p

975 0162

LET 10472

80947
 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

June 19, 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

RE: Label Claims/Disclaimers

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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.)	MascuPlex™	Vitamin E, Muira Puama Root Extract, Liquid Liver Fractions, Wheat Germ Oil, Beta-sitosterol, Damiana Leaf Extract, Saw Palmetto Berry Extract, Cola Nut Extract, Korean Ginseng Root Extract, Ginkgo Leaf Extract	It also provides vitamin E, a powerful antioxidant that neutralizes free radicals in your body and promotes healthy cells.*

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.

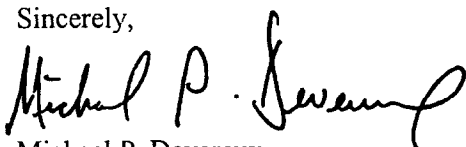
By: 
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-19-02

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

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PhytoPharmica®

NATURAL MEDICINES™

June 20, 2002

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 Center for Food Safety and Applied Nutrition
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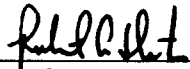
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	MascuPlex™	Vitamin E, Muira Puama Root Extract, Liquid Liver Fractions, Wheat Germ Oil, Beta-sitosterol, Damiana Leaf Extract, Saw Palmetto Berry Extract, Cola Nut Extract, Korean Ginseng Root Extract, Ginkgo Leaf Extract	Several scientific studies indicate vitamin E is the main antioxidant in sperm cell membranes, making it a primary source of protection against free radical damage.*

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: 6-20-02

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

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June 21, 2002

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
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5100 Paint Branch Parkway
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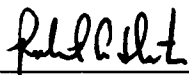
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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	MascuPlex™	Vitamin E, Muira Puama Root Extract, Liquid Liver Fractions, Wheat Germ Oil, Beta-sitosterol, Damiana Leaf Extract, Saw Palmetto Berry Extract, Cola Nut Extract, Korean Ginseng Root Extract, Ginkgo Leaf Extract	Together, the ingredients in MascuPlex deliver a safe, reliable way for active men to achieve and sustain optimum performance.*

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.

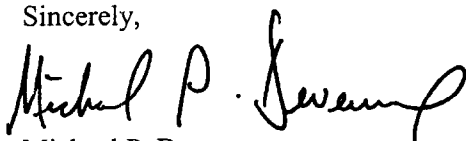
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-21-02

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

Sincerely,


Michael P. Devereux
Chief Financial Officer

MascuPlex 5p

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