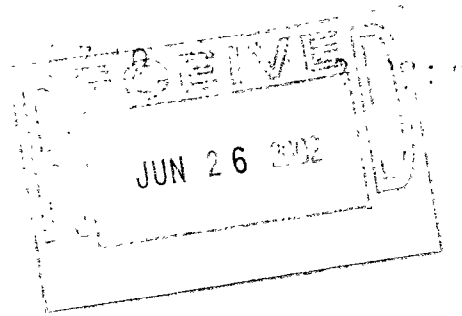




# PhytoPharmica®

NATURAL MEDICINES™

June 18, 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 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.

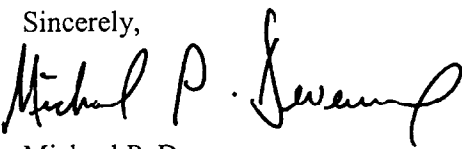
<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	7-KETO™ Lean	Iodine, Copper, Manganese, 7-keto dehydroepiandrosterone, L-Tyrosine, Asparagus (Asparagus officinalis) Rhizome Extract, Choline Bitartrate, Inositol	Research has shown 7-keto DHEA increased thermogenic enzyme (enzymes related to generating heat) activity and normalized thyroid 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  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs

Date: 6-18-02

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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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  
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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.

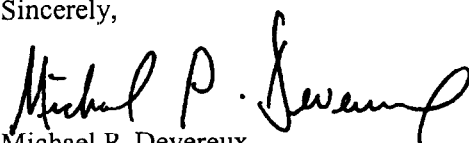
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 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



# PhytoPharmica®

NATURAL MEDICINES™

June 20, 2002

Office of Special Nutritionals (HFS-450)  
 Center for Food Safety and Applied Nutrition  
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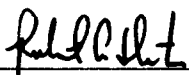
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Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	7-KETO™ Lean	Iodine, Copper, Manganese, 7-keto dehydroepiandrosterone, L-Tyrosine, Asparagus (Asparagus officinalis) Rhizome Extract, Choline Bitartrate, Inositol	A recent clinical trial shown that supplementation of 7-keto DHEA (200 mg/day), in conjunction with exercise, significantly reduced both body weight and body fat (compared with placebo).*

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.

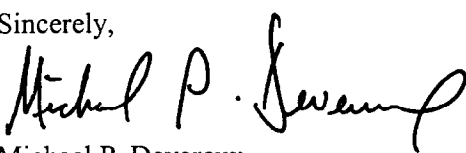
By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 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  
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