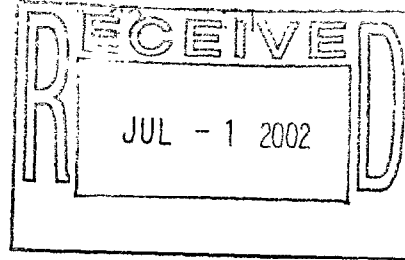


June 23, 2002



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.)	Pantethine Plus™	Sodium, Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	The breakthrough Triple-Action formula in Pantethine Plus™ combines two clinically studied ingredients that work together in three ways to help you retain healthy cholesterol levels already within the normal limits.*

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: 6-23-02

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

Pantethine Plus 8p

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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



PhytoPharmica[®]

NATURAL MEDICINES[™]

June 24, 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

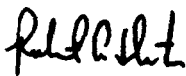
RE: Label Claims/Disclaimers

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.)	Pantethine Plus [™]	Sodium, Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Cholesterol is a soft, waxy substance found among the lipids (fats) in the bloodstream and in all cells. It is essential for the formation of cell membranes. It also plays a role in the synthesis of certain hormones, the formation of cholic acid in the liver, and supports skin integrity.*

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.

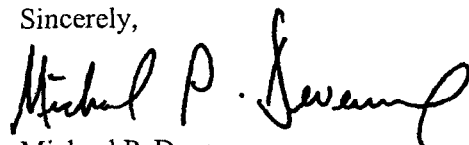
By: 
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-24-02

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

Sincerely,



Michael P. Devereux
 Chief Financial Officer

Pantethine Plus 9p

825 CHALLENGER DRIVE
 GREEN BAY, WI 54311-8328
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 FAX 920-469-4418
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 WWW.PHYTOPHARMICA.COM



June 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

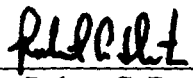
RE: Label Claims/Disclaimers

Dear Sir/Madam:

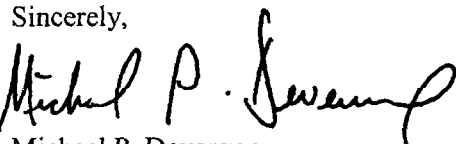
This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Pantethine Plus™	Sodium, Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Triple Action Pantethine Plus™ features clinically studied ingredients that work with your body's natural cholesterol-making activity to help support healthy cholesterol production, impede the body's ability to absorb cholesterol from foods, and impede reabsorption of cholesterol from bile.*

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: 6/25/02

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
Pantethine Plus 10p

825 CHALLENGER DRIVE
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