

79545

February 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

RECEIVED
 MAR 07 2002
 BY:

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.

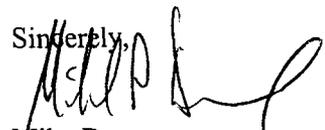
<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Remember! Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract 24%	Remember! supplies a unique blend of vitamins and herbs that deliver nutritional support for mild memory problems associated with aging, as well as enhanced focus and concentration*

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: 2/25/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,

 Mike Devereux
 Chief Financial Officer

Remember!Mental Sharpness Formula 2p

975 0162

LET 9603

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

February 26, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Remember! Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract 24%	The key ingredients-Bacopa monnieri extract and alpha lipoic acid-have been clinically studied to support brain 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: 

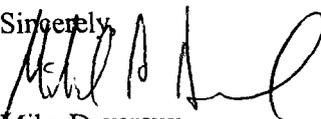
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 2/26/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,



Mike Devereux
 Chief Financial Officer

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PhytoPharmica[®]

NATURAL MEDICINES™

February 27, 2002

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 Center for Food Safety and Applied Nutrition
 U. S. Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740-3835

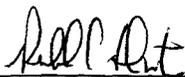
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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Remember! Mental Sharpness Formula	Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Bacopa monnieri Extract, Alpha Lipoic Acid, Ginkgo Biloba Extract 24%	B vitamins and folic acid have been shown to reduce homocysteine levels*

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.

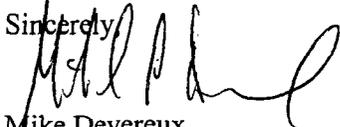
By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 2/27/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,


Mike Devereux
 Chief Financial Officer

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February 28, 2002

Office of Special Nutritionals (HFS-450)
 Center for Food Safety and Applied Nutrition
 U. S. Food and Drug Administration
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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: 2/28/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,

 Mike Devereux
 Chief Financial Officer

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March 1, 2002

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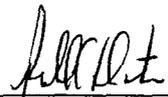
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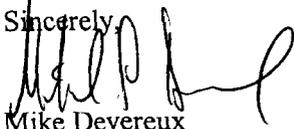
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Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/1/02

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Sincerely,

Mike Devereux
Chief Financial Officer

Remember!Mental Sharpness Formula 6p

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