



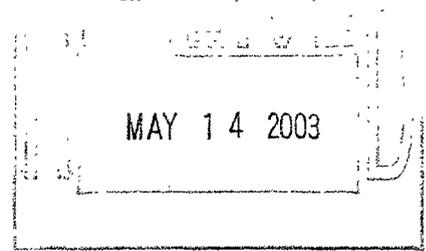
# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES™

May 12, 2003

2 8 6 9 '03 JUN -6 P2:22

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 811  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740



RE: Label Claims/Disclaimers

Dear Mr. Moore:

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Adrenal Soluble Fractions™	Vitamin C, Vitamin B6, Pantothenic Acid, Adrenal Polypeptide Fractions, Betaine, L-Tyrosine, Pituitary Extract, Adrenal Cortex Extract	Build an Exceptional Nutritional Foundation*

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: 5/12/03

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

975 0162

LET 12021

Adrenal Soluble Fractions 3p

84511

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