

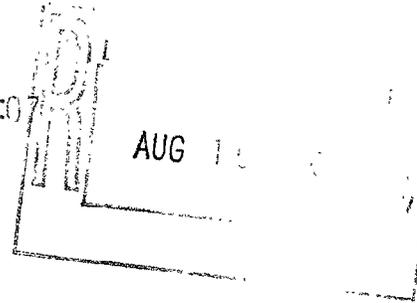


# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES<sup>™</sup>

August 4, 2003

5687 '03 AUG 29 12:07



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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	True Dispersion™ fiber provides a better cleanse than other products because you get the full benefit of fiber that goes to work quickly and cleans all the way down.*

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: 8/4/03

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

Super Milk Thistle X 42p

97S 0162

LET

12700

85621

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

August 5, 2003

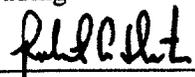
Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740  
 RE: Label Claims/Disclaimers

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.

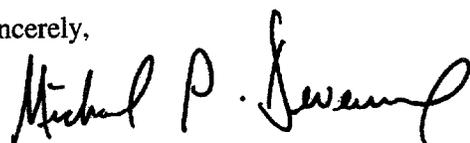
COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Better health can be achieved through PhytoPharmica's Whole Body approach to detoxification and rebuilding.*

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: 8/5/03

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

Super Milk Thistle X 43p

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