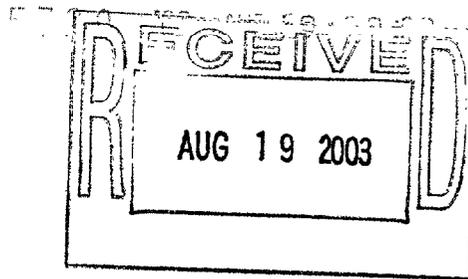


August 10, 2003

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula with Indoplex™	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Chaste tree berry extract to support the production of progesterone.*

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: 8/10/03

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

85637

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<sup>®</sup>

NATURAL MEDICINES™

August 10, 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

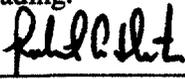
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula with Indoplex™	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Calcium, magnesium and vitamin D, which play a crucial and synergistic role in supporting women experiencing PMS.*

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: 8/10/03

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

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 10, 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

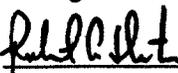
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula with Indoplex™	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Iodine to help support healthy thyroid function and breast health.*

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: 8/10/03

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



August 11, 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

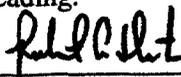
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	The ingredients in PMS Formula* with Indoplex® provide dietary support for healthy estrogen metabolism, modulate elevations in luteal phase estradiol associated with PMS, encourage healthy pregnenolone metabolism, promote breast health, enhance calcium, vitamin D, and magnesium levels, and support increased progesterone production through prolactin modulation.*

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: 8/11/03

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with the first name being the most prominent.

Michael P. Devereux  
Chief Financial Officer



August 11, 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

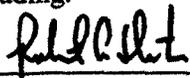
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	The supplement can contribute to breast and uterine health, as well as menstrual comfort.*

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: 8/11/03

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  
PMS Formula with Indolplex 9p

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 11, 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

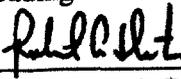
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Vitamin D: Mood Support*

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: 8/11/03

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  
PMS Formula with Indolplex 10p

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 11, 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

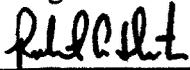
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Calcium: Mood Support*

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.

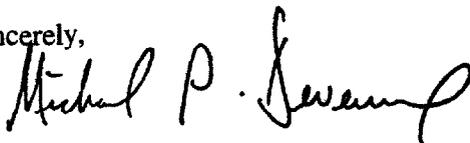
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/11/03

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  
PMS Formula with Indolplex 11p

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 12, 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

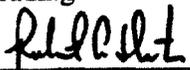
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Indoplex®: Mood Support*

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: 8/12/03

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer  
PMS Formula with Indoplex 12p

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 12, 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

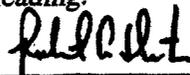
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Calcium: Support of healthy calcium/magnesium levels associated with reduction of PMS symptoms*

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: 8/12/03

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer  
PMS Formula with Indoplex 13p

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 12, 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

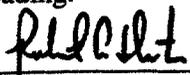
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Magnesium: Support of healthy calcium/magnesium levels associated with reduction of PMS symptoms*

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: 

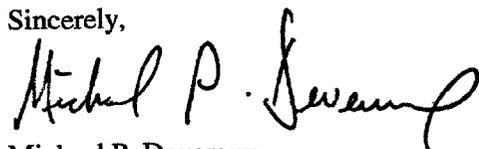
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/12/03

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer  
PMS Formula with Indolplex 14p

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 13, 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

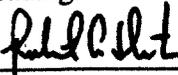
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Vitamin D: Support of healthy calcium/magnesium levels associated with reduction of PMS symptoms*

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: 8/13/03

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  
PMS Formula with Indolplex 15p

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 13, 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

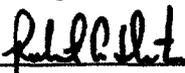
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Chaste Tree Berry (Vitex agnus) Extract: Supports production of progesterone, which is associated with PMS symptom reduction*

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: 8/13/03

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  
PMS Formula with Indoplex 16p

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 13, 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

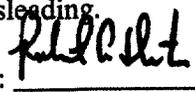
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Indoplex®: Modulation of estrogen activity associated with PMS and breast discomfort*

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: 8/13/03

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  
PMS Formula with Indoplex 17p

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 14, 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

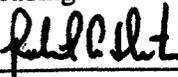
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Indoplex®: Reduce Luteal Phase estradiol*

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: 8/14/03

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  
PMS Formula with Indoplex 18p

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 14, 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

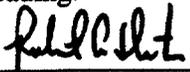
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolymethane(DIM)	Vitamin D: Modulation of estrogen activity associated with PMS and breast discomfort.*

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: 

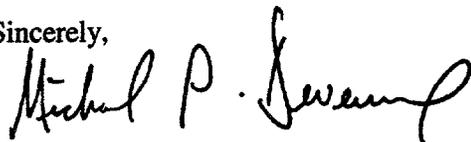
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

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  
PMS Formula with Indolplex 19p

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 14, 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

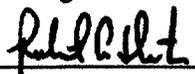
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Vitamin D: Reduce Luteal Phase estradiol*

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.

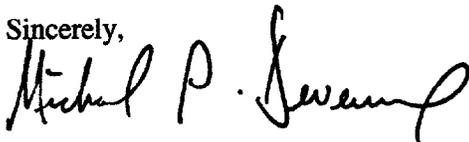
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

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  
PMS Formula with Indolplex 20p

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 14, 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

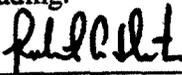
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Indoplex®: Support for healthy estrogen metabolism and thyroid 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: 

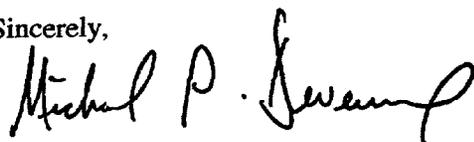
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

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  
PMS Formula with Indoplex 21p

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 15, 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

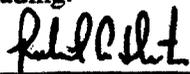
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Iodine: Support for healthy estrogen metabolism and thyroid 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: 8/15/03

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  
PMS Formula with Indoplex 22p

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 15, 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	DIM, when consumed in food or in absorbable formulations, encourages its own metabolism. This special metabolic pathway for DIM precisely overlaps and promotes the enzyme pathway needed for healthy estrogen metabolism.*

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: 8/15/03

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

PMS Formula with Indoplex 24p

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™

August 15, 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Despite their DIM content, it is difficult to consume cruciferous vegetables in sufficient quantities to consistently effect estrogen metabolism or support detoxification enzymes.* In one study, consumption of 500 grams per day of broccoli produced only a minor shift in estrogen metabolism.*

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

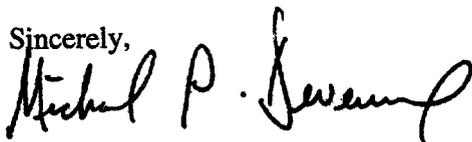
Title: Senior Vice President of Scientific Affairs

Date: 8/15/03

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux  
Chief Financial Officer



August 16, 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

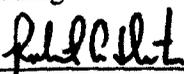
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	DIM modifies cytochrome p450 (CYP) enzyme activity and supports detoxification.*

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: 8/16/03

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  
PMS Formula with Indoplex 26p

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 15, 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

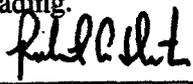
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	DIM only enhances the activity of the CYP1A enzymes. These are the enzymes that are important in healthy estrogen metabolism.*

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: 

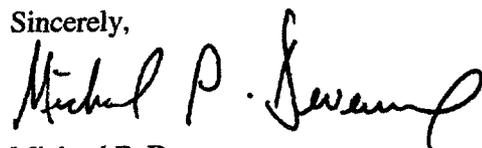
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/15/03

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  
PMS Formula with Indoplex 27p

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 16, 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

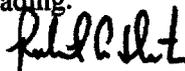
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	DIM has been shown to increase the production of 2-hydroxy estrogen metabolites.*

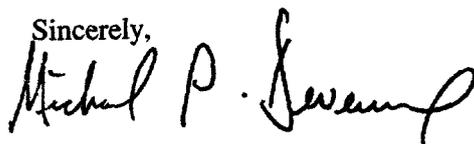
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/16/03

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  
PMS Formula with Indolplex 28p

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 16, 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

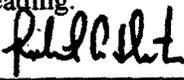
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	DIM is the most potent inducer of 2-hydroxylase, the enzyme responsible for this beneficial shift in estrogen metabolism.*

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: 8/16/03

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  
PMS Formula with Indoplex 29p

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 16, 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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	DIM induces 2-hydroxyestrone (2OH1) and 2-hydroxyestradiol (2-OH2) in diverse tissues, leading to net inhibition of excessive estrogen stimulation. Once present in the circulation, 2-OH1 and 2-OH2 are metabolized by catechol-O-methyl transferase (COMT), resulting in 2-methoxyestrone and 2-methoxyestradiol. These critical metabolites have been shown to promote healthy cell development in animals and humans.*

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: 8/16/03

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

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, looping initial "M".

Michael P. Devereux  
Chief Financial Officer



August 16, 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

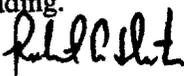
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Indoplex® is a dietary supplement that promotes healthy changes in estrogen metabolites.*

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: 

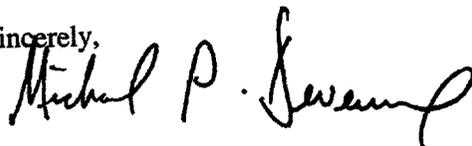
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/16/03

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  
PMS Formula with Indoplex 31p

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 17, 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

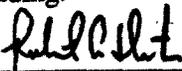
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Indoplex® supplies DIM to supplement cruciferous vegetables in the diet.*

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: 8/17/03

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  
PMS Formula with Indoplex 32p

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<sup>®</sup>

NATURAL MEDICINES™

August 17, 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

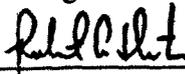
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Calcium, the most abundant mineral in the human body, plays a critical role in relieving the symptoms of PMS.*

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: 

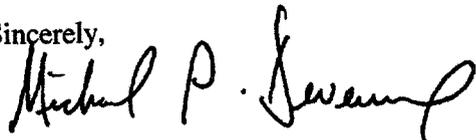
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/17/03

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  
PMS Formula with Indoplex 33p

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 17, 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

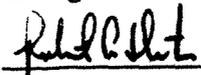
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	There is growing scientific evidence that calcium modulates cyclic fluctuations during the menstrual cycle that may help explain some of the symptoms of PMS.*

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: 8/17/03

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  
PMS Formula with Indolplex 34p

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 17, 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

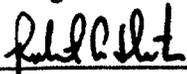
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indolplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Clinical trials in women with PMS have found that calcium supplementation effectively alleviates mood and somatic symptoms.*

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: 8/17/03

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  
PMS Formula with Indolplex 35p

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 17, 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

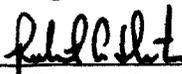
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Magnesium affects more than 300 enzymatic reactions in the body, with nearly sixty percent of the body's magnesium is found in bone tissue.*

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: 8/17/03

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  
PMS Formula with Indoplex 36p

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™

August 18, 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

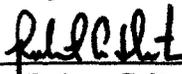
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	In several research trials, data indicate that magnesium supplementation could be effective in relieving premenstrual symptoms related to mood changes, especially if given in conjunction with calcium supplementation.*

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: 8/18/03

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

PMS Formula with Indoplex 37p

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™

August 18, 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

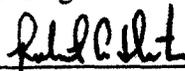
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	In clinical trials to investigate the effect that Chaste Tree Berry Extract has on four characteristic PMS symptom complexes of mood swings, anxiety, food craving, and hyperhydration, 93% of the women reported a decrease in the number of symptoms or even total cessation of these PMS complaints.*

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: 8/18/03

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

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized "D" at the end.

Michael P. Devereux  
Chief Financial Officer



August 18, 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

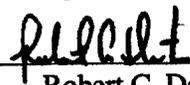
RE: Label Claims/Disclaimers

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Chaste Tree Berry Extract has an approved monograph in The Complete German Commission E Monographs for premenstrual syndrome (PMS) and menopausal complaints.*

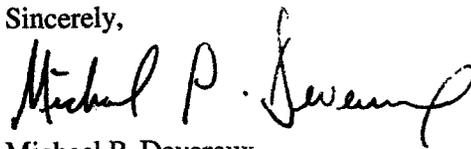
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 8/18/03

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  
PMS Formula with Indoplex 39p

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 18, 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

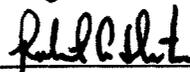
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Iodine is involved in making thyroid hormones, which helps regulate reproduction, maintenance of healthy metabolic rates, and cell growth.*

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: 8/18/03

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  
PMS Formula with Indoplex 40p

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 18, 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Clinical studies have demonstrated that iodine is essential for breast health.*

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.

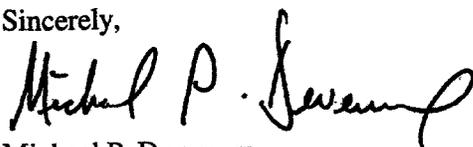
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/18/03

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  
PMS Formula with Indoplex 41p

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 18, 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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	The effects of iodine in breast tissue are thought to render intralobular duct cells less sensitive to circulating estrogens.*

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: 8/18/03

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

Sincerely,



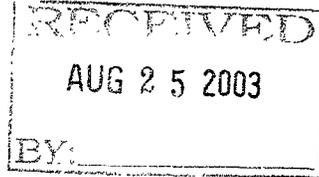
Michael P. Devereux  
Chief Financial Officer  
PMS Formula with Indoplex 42p

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 15, 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



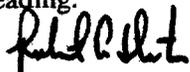
RE: Label Claims/Disclaimers

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Cruciferous vegetables are a source of phytochemicals capable of significantly modifying the metabolism of estrogen.*

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: 8/13/03

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  
PMS Formula with Indoplex 23p

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 19, 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

RECEIVED  
AUG 25 2003  
BY:

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
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	PMS Formula* with Indoplex®	Vitamin D, Calcium, Iodine, Magnesium, Chastetree Berry Extract, Diindolylmethane(DIM)	Research trials show evidence that women in the second phase of their cycle show symptoms of calcium deficiencies and vitamin D deficiency. This strongly suggests that PMS is affected by calcium fluctuations with a secondary hyperparathyroidism and vitamin D deficiency states.*

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: 8/19/03

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Michael P. Devereux  
Chief Financial Officer