



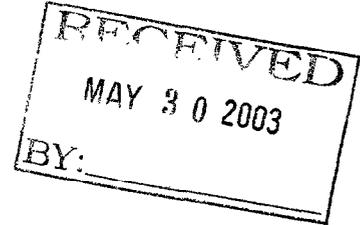
PhytoPharmica[®]

NATURAL MEDICINES[™]

May 12, 2003

2877 '03 JUN -6 P2:23

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.)	Acceleration [™]	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	Acceleration [™] is an energizing, natural herbal dietary supplement with thermogenic (calorie burning) properties.*

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.

Robert C. Doster

By: _____
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

84572

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer
Acceleration 3p

975 0162

LET 12029

825 CHALLENGER DRIVE
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FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM



PhytoPharmica[®]

NATURAL MEDICINES™

May 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:

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	The cola nut extract and green tea leaf extract in this formula support overall health, physical stamina, and boost energy 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
 Robert C. Doster
 Title: Senior Vice President of Scientific Affairs
 Date: 5/13/03

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

Sincerely,

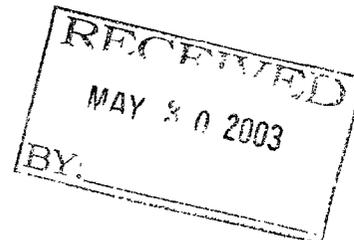
 Michael P. Devereux
 Chief Financial Officer
 Acceleration 4p

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May 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.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	The bitter orange fruit extract contains an alkaloid, synephrine, which has thermogenic properties and boosts metabolic rates.*

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: 5/14/03

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
Acceleration 5p

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May 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

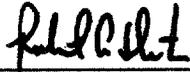
RE: Label Claims/Disclaimers

Dear Mr. Moore:

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	The ingredients in Acceleration™ work synergistically to boost energy levels, increase physical stamina, and promote weight loss.*

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: 5/15/03

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
Acceleration 6p

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May 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

RECEIVED
MAY 20 2003
BY: _____

RE: Label Claims/Disclaimers

Dear Mr. Moore:

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	Bitter orange extract contains a natural alkaloid, synephrine, that is related to the ephedrine alkaloids. Similar in structure to ephedrine, synephrine may suppress appetite and increase metabolic rate without serious negative side effects.*

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: 5/16/03

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Sincerely,

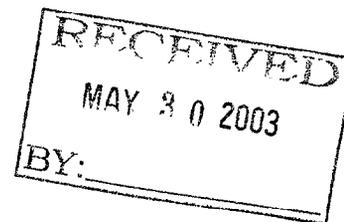
A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer



May 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.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	In clinical studies, bitter orange extract has been found to increase resting metabolic rates, which can lead to promotion of weight loss.*

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: 5/19/03

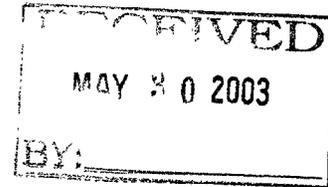
If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer
Acceleration 8p

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May 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:

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	In an eight week study, the effect of bitter orange extract was measured. The authors concluded that bitter orange extract induced a significant increase in resting metabolic rate, as well as increasing metabolic rate after ingestion of a meal.*

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: 5/18/03

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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



May 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
 MAY 30 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.)	Acceleration™	Bitter Orange (Citrus x aurantium) Fruit Extract, Cola (Cola nitida) Nut Extract, Green Tea (Camellia sinensis) Leaf Extract	Another clinical study determined the effect of bitter orange extract on body composition and metabolic rates. In this randomized, double-blind, placebo-controlled study, participants received either a combination of bitter orange extract and caffeine, or placebo. Compared to subjects in the placebo and control groups, subjects in the treatment group experienced a 3.1 lb loss of body weight, corresponding to a significant reduction in body mass index (BMI). This study concluded that the combination of bitter orange extract and caffeine is safe and effective when combined with caloric restriction and exercise for promoting weight loss in healthy overweight adults.*

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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: 5/19/03

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