



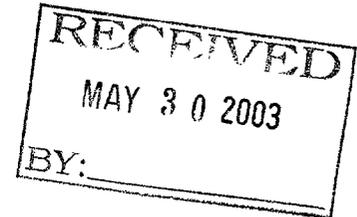
PhytoPharmica[®]

NATURAL MEDICINES[™]

May 27, 2003

2904 '03 JUN -6 P2:24

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.) | End Fatigue [™] Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Valerian Root Extract: A placebo-controlled, crossover trial of 128 volunteers reported that valerian extract taken at bedtime led to improved sleep quality, decreased sleep latency, and reduced the number of night awakenings.* Two other clinical studies using valerian before bedtime also demonstrated improved sleep quality.* |

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: 5/27/03

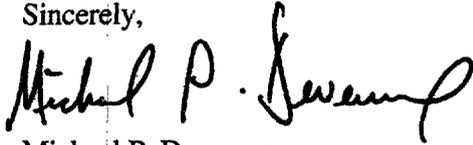
84572

979 0162 LET

12058

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

Sincerely,

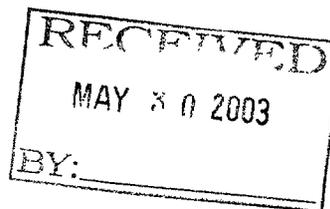
A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive, flowing style with a large initial 'M' and 'D'.

Michael P. Devereux
Chief Financial Officer



May 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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Valerian Root Extract: In a double-blind, cross-over, placebo-controlled trial, subjective sleep latency and wake time after sleep-onset were reduced.* |

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: 5/11/03

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

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

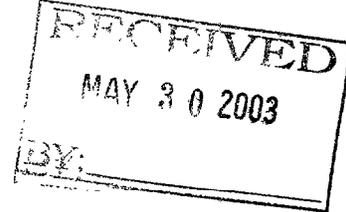
End Fatigue Revitalizing Sleep Formula 25p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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May 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



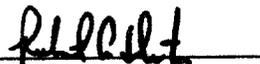
RE: Label Claims/Disclaimers

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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | One electroencephalographical (EEG) study reported that valerian, taken three times daily, improved deep sleep (stages 3 and 4) and decreased stage 1 sleep.* |

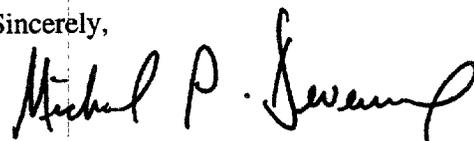
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

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

Date: 5/12/03

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

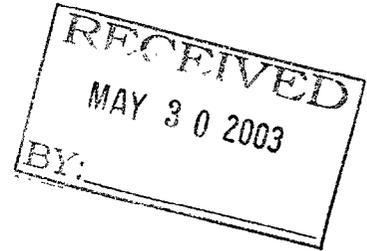
End Fatigue Revitalizing Sleep Formula 26p

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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:

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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Recently, two human trials also demonstrated that valerian extract was effective in improvement of sleep structure and perception in subjects.* |

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
Michael P. Devereux
Chief Financial Officer

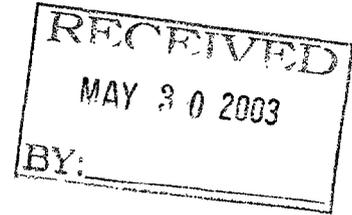
End Fatigue Revitalizing Sleep Formula 27p

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WWW.PHYTOPHARMICA.COM



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



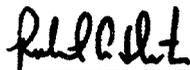
RE: Label Claims/Disclaimers

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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | In general, clinical studies with valerian extracts suggest that the mild sleep-inducing effect of valerian decreases sleep latency and improves sleep quality.* |

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: 5/14/03

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
End Fatigue Revitalizing Sleep Formula 28p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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WWW.PHYTOPHARMICA.COM



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

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.

| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|---|---|---|---|
| Phyto-Pharmica (a Division of Integrative Therapeutics Inc.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | A recent double-blind randomized controlled trial of 36 volunteers reported that passionflower extract is effective in calming restlessness.* |

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: 5/15/03

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer

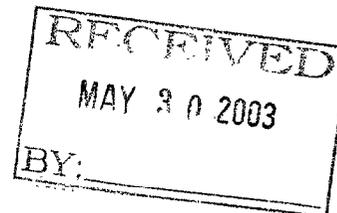
End Fatigue Revitalizing Sleep Formula 29p

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WWW.PHYTOPHARMICA.COM



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



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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L- Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | The key ingredient in green tea that provides health benefits is l- theanine.* |

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

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

End Fatigue Revitalizing Sleep Formula 30p

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[™]

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.) | End Fatigue [™] Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L- Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | In clinical trials, L-theanine causes significant increases of certain neurotransmitter concentrations in brain, such as serotonin and dopamine, which promotes muscle relaxation and improves sleep.* |

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: 5/17/03

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer

End Fatigue Revitalizing Sleep Formula 31p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
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FAX 920-469-4418
FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM



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

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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | In a recent study, the brain activity of 50 volunteers was measured after the oral administration of 50-200 mg of L-theanine. L-theanine promotes the generation of alpha-brain waves, considered to be an index of relaxation, in the volunteers.* This study concluded that L-theanine promotes relaxation in humans by increasing alpha brain waves.* |

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

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,

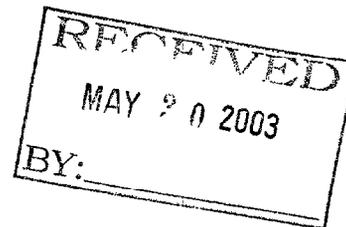
A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

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



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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Hops flower (Humulus lupulus) extract has been studied for its ability to calm restlessness and can be used to support restful sleep.* |

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
Chief Financial Officer

End Fatigue Revitalizing Sleep Formula 33p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
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PhytoPharmica[®]

NATURAL MEDICINES[™]

May 20, 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.) | End Fatigue [™] Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L- Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Hops have been used for centuries for gastrointestinal health support, and have more recently been used to support healthy sleep.* |

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: 5/20/03

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

End Fatigue Revitalizing Sleep Formula 34p

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WWW.PHYTOPHARMICA.COM

May 21, 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

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|---|---|---|--|
| Phyto-Pharmica (a Division of Integrative Therapeutics Inc.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Wild lettuce (Lactuca virosa) extract and powder have been used in traditional medicine for its calmative effect.* |

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

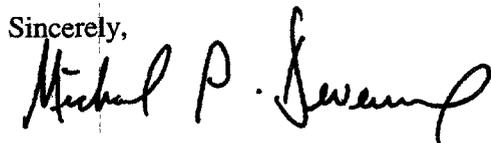
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/21/03

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

End Fatigue Revitalizing Sleep Formula 35p

825 CHALLENGER DRIVE
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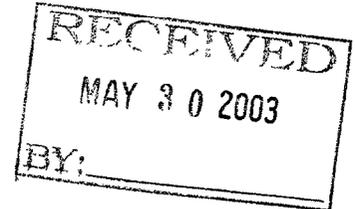


PhytoPharmica[®]

NATURAL MEDICINES™

May 22, 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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Wild lettuce supports restful sleep by promoting a relaxed feeling.* |

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: 5/22/03

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

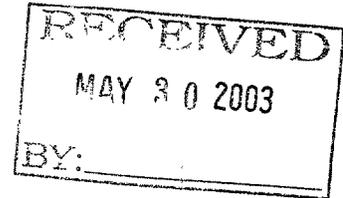
End Fatigue Revitalizing Sleep Formula 36p

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



May 23, 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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Jamaica Dogwood (<i>Piscidia piscipula</i>) root extract contains isoflavonoids and tannins that help promote restful sleep.* This herb helps individual fall asleep, and promotes musculoskeletal relaxation.* |

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: 5/23/03

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

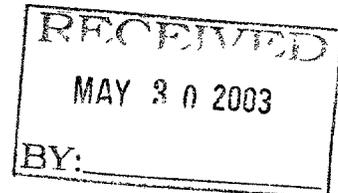
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May 24, 2003

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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Jamaica Dogwood Root Extract: This botanical ingredient has also been found to resolve nervous irritability, thus promoting quality sleep.* |

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: 5/24/03

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

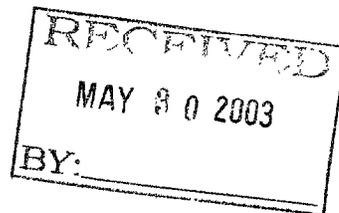
End Fatigue Revitalizing Sleep Formula 38p

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May 25, 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.) | End Fatigue™ Revitalizing Sleep Formula | Valerian Root Extract, Passionflower Leaf and Flower Extract, L-Theanine, Hops Flower Extract, Wild Lettuce Leaf Extract, Jamaica Dogwood Root Extract, Wild Lettuce Leaf | Even though the older adults need less sleep, almost one-half of people over 60 experience some degree of occasional sleep difficulties.* |

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: 5/25/03

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

End Fatigue Revitalizing Sleep Formula 39p

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