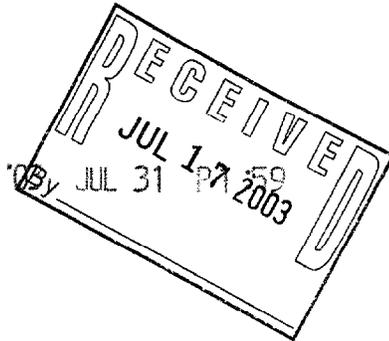




July 7, 2003

7651



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> |
|--|-----------------------|--|-------------------------------------|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | Digestive, Liver and Lymph Cleanse* |

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: 7/7/03

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

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

975 0162

LET

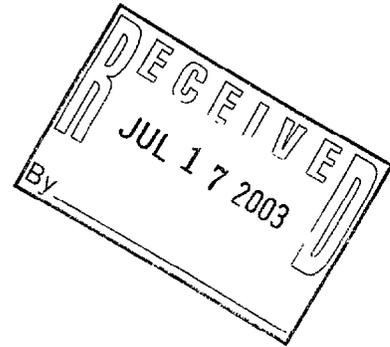
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825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM

July 8, 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

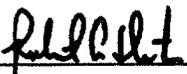


Dear Mr. Moore:

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> |
|--|-----------------------|--|---|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | Finally, a high-strength gentle Whole Body Cleanse that enhances your body's own natural internal cleansing process for thorough 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: 7/8/03

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

Sincerely,

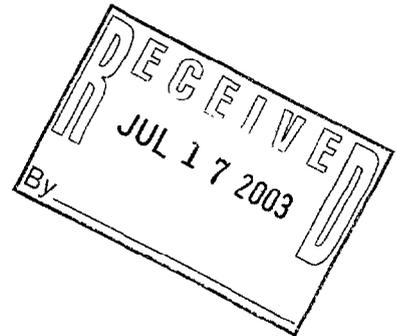

Michael P. Devereux
Chief Financial Officer

Super Milk Thistle X 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

July 9, 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

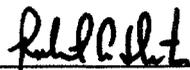


Dear Mr. Moore:

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.

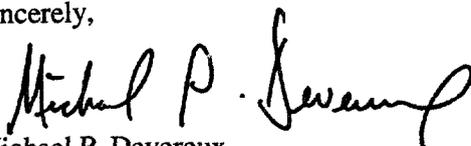
| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|--|-----------------------|---|--------------------------------|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super-Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | Safe, Natural, and Effective!* |

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: 7/9/03

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

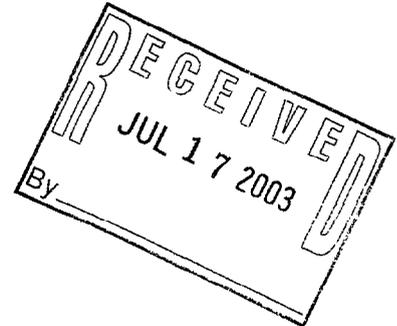
Sincerely,


 Michael P. Devereux
 Chief Financial Officer



July 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

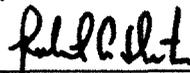


Dear Mr. Moore:

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> |
|--|-----------------------|---|---|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | Simple 2-week Whole Body Program to cleanse, detoxify and refortify!* |

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: 7/10/03

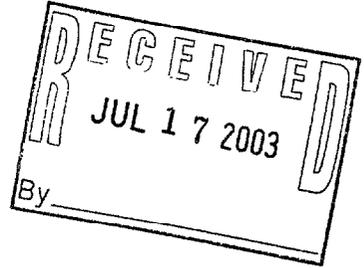
If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer

July 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> |
|--|-----------------------|---|--|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | The Whole Body Cleanse supports detoxification of the intestines, liver, gall bladder, circulatory and lymphatic systems.* |

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: 7/10/03

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

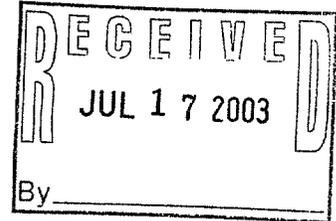
Sincerely,

Michael P. Devereux
 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

July 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

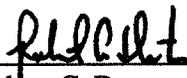


Dear Mr. Moore:

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| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|--|-----------------------|---|---|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | Super Milk Thistle® X supports healthy liver function and detoxification and helps strengthen the liver while you cleanse.* |

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: 7/10/03

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

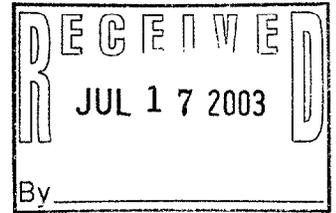
Sincerely,



Michael P. Devereux
 Chief Financial Officer

July 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

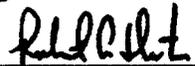


Dear Mr. Moore:

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 |
|--|-----------------------|--|---------------------------|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | Safe, Natural, Complete!* |

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.

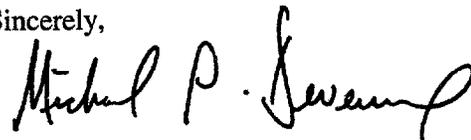
By: 
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/11/03

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



July 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

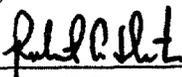


Dear Mr. Moore:

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> |
|--|-----------------------|---|--|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | Super Milk Thistle® X | Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract | This kit has everything you need for a 2-week cleanse, including a complete Detox Guide with additional tips on lifestyle, exercise and 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: 7/12/03

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

Super Milk Thistle X 32p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
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