



September 5, 2002

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RECEIVED
747 8235
SEP 11 2002
BY: _____

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U. S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Concentration™ Formula	DMAE, Phosphatidylserine, N-acetylcysteine (NAC), Taurine, L-Theanine	Chewable formula to support focus and attentiveness*

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.

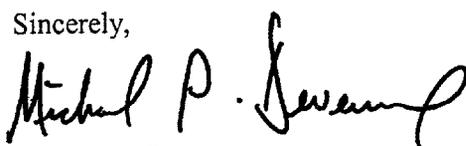
By: 
Cheryl Myers

Title: Director of Product Development

Date: 9-5-02

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

975 0162

LET 10993

81788

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



September 6, 2002

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SEP 11 2002
BY:

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U. S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

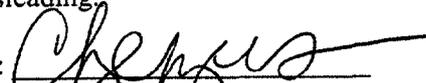
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Concentration™ Formula	DMAE, Phosphatidylserine, N- acetylcysteine (NAC), Taurine, L-Theanine	Sea Friends Concentration™ Formula is a delicious, chewable formula with five ingredients that help support healthy focus and concentration in children.*

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.

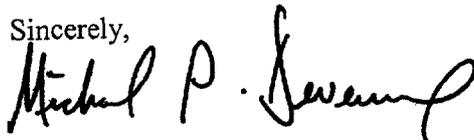
By: 
Cheryl Myers

Title: Director of Product Development

Date: 9-6-02

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

Concentrate Formula 4p

825 CHALLENGER DRIVE
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September 7, 2002

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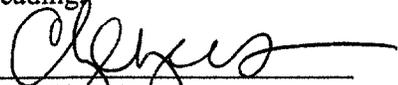
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Concentration™ Formula	DMAE, Phosphatidylserine, N-acetylcysteine (NAC), Taurine, L-Theanine	Phosphatidylserine supports brain health at a cellular level.*

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: 
 Cheryl Myers
 Title: Director of Product Development
 Date: 9-7-02

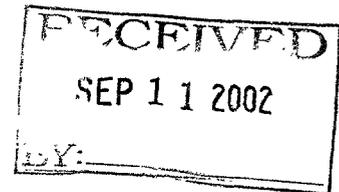
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Sincerely,


 Michael P. Devereux
 Chief Financial Officer

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September 8, 2002



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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Concentration™ Formula	DMAE, Phosphatidylserine, N-acetylcysteine (NAC), Taurine, L-Theanine	DMAE is clinically studied in children to support focus, concentration, and healthy brain function.*

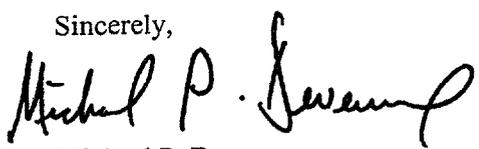
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: 
 Cheryl Myers

Title: Director of Product Development

Date: 9-8-02

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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September 9, 2002

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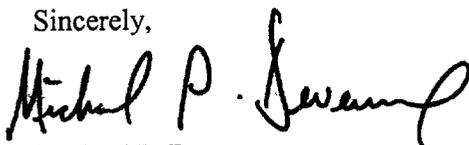
<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Concentration™ Formula	DMAE, Phosphatidylserine, N- acetylcysteine (NAC), Taurine, L-Theanine	L-theanine is an amino acid that helps promote a relaxed state without diminishing daytime alertness.*

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: 
Cheryl Myers
Title: Director of Product Development
Date: 9-9-02

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Sincerely,



Michael P. Devereux
Chief Financial Officer