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MAY - 5 2003

April 21, 2003

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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.)	Pantethine Plus™	Sodium, Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	Pantethine (600 mg) acts at the synthesis stage in the liver to help support healthy cholesterol production.* Phytosterols (1,200 mg) work in the intestines to help impede the body's ability to absorb cholesterol from foods.* They also impede reabsorption of cholesterol from bile.*

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: 4/21/03

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

Sincerely,  
Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer  
Pantethine Plus 15p

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