



October 10, 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

RECEIVED
 OCT 21 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.)	Whole Heart Multivitamin™*	Vitamin A, Vitamin B12, Biotin, Vitamin A, Choline Bitartrate, Manganese, Selenium, Vitamin E, Lutein, Zinc, Lycopene, Chromium, Molybdenum, Alpha Lipoic Acid, Magnesium, Calcium, Vitamin C, Vitamin D3, Magnesium, Calcium, Copper, Vanadium, Pantothenic Acid, Vitamin B1, Vitamin B6, Niacinamide, Iodine, Niacin, Folic Acid, Vitamin B2	Support your heart with PhytoPharmica's Whole Heart System.*

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: 10/10/03
 Whole Heart Multivitamin 1p

975 0162

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 13232

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 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 written in a cursive style with a large, prominent initial "M".

Michael P. Devereux
Chief Financial Officer