



# PhytoPharmica<sup>®</sup>

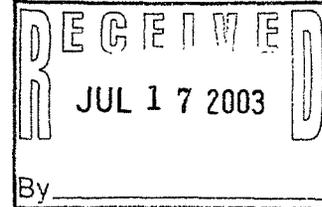
NATURAL MEDICINES™

July 8, 2003

7553 '03 JUL 31 21:59

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.)	Pantethine Plus™	Sodium, Proprietary Phytosterol Blend beta-sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, Pantethine	PhytoPharmica has developed scientific solutions specifically designed to provide the nutritional support you need to ensure optimal cardiovascular health, maintain essential fats/lipid levels, support healthy circulation, and retain healthy blood pressure already within the normal range.*

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: 7-8-03

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825 CHALLENGER DRIVE  
GREEN BAY, WI 54311-8328  
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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

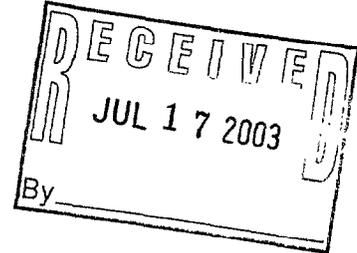
Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, prominent "M" and "D".

Michael P. Devereux  
Chief Financial Officer

July 9, 2003

Mr. Robert Moore  
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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.*

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  
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Sincerely,

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Michael P. Devereux  
Chief Financial Officer