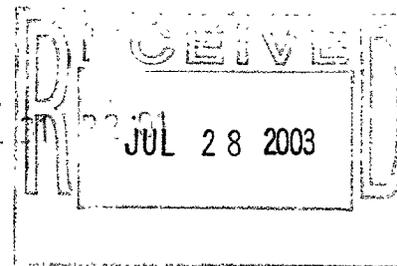




July 12, 2003

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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
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Multiple is a delicious, chewable children's formula that delivers the vitamins and minerals your child needs every day for energy and essential nutrition, in a base of natural antioxidant fruit extracts.*

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.

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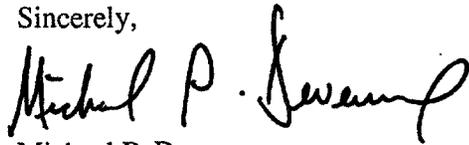
By: Robert C. Doster  
Robert C. Doster

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



July 13, 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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Multiple Ingredient - Vitamin C (as ascorbic acid and as calcium ascorbate): Vitamin C helps support healthy collagen formation, connective tissue, bone tissue, and dentin (tooth tissue).*

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.

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

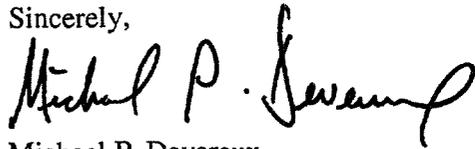
By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/13/03

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 14, 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.

<b>COMPANY</b>	<b>PRODUCT NAME</b>	<b>DIETARY INGREDIENTS</b>	<b>STATEMENTS</b>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Multiple Ingredient - Vitamin C (ascorbic acid and as calcium ascorbate): Vitamin C also supports healthy skin integrity, healthy immune system function, provides protection from free radicals (by-products of the body's metabolism) and supports the healthy absorption of iron.*

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.

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

By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/14/03

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 15, 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

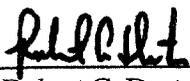
Dear Mr. Moore:

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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Multiple Ingredient - Calcium: Tricalcium phosphate provides both calcium and phosphorus, major constituents of the bone matrix.*

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.

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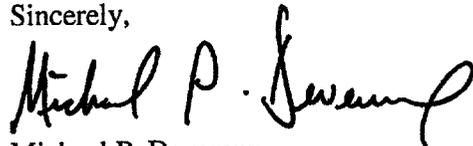
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/15/03

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 16, 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.

<b>COMPANY</b>	<b>PRODUCT NAME</b>	<b>DIETARY INGREDIENTS</b>	<b>STATEMENTS</b>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Multiple Ingredient - Calcium: Calcium supports healthy bone development and the integrity and strength of bone.* This important mineral also supports healthy nervous system impulse transmissions and iron metabolism. Sufficient vitamin D is required for calcium absorption.*

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.

825 CHALLENGER DRIVE  
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 920-469-9099  
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 FAX 920-469-4418  
 FAX TOLL FREE 888-311-5657  
 WWW.PHYTOPHARMICA.COM

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/16/03

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 17, 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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Multiple Ingredient - Iron (as ferrous fumarate): Iron supports the formation of hemoglobin and myoglobin, red blood cells carriers of oxygen to all body cells.*

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.

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 WWW.PHYTOPHARMICA.COM

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/19/03

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 17, 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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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Multiple Ingredient - Iron (as ferrous fumarate): The ferrous fumarate form of iron has high bioavailability and solubility.*

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.

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WWW.PHYTOPHARMICA.COM

By: RDOSTER

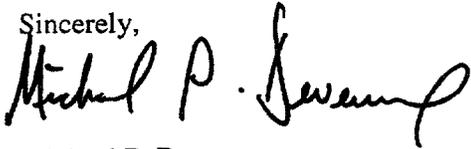
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/17/03

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 17, 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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Vitamin D (as cholecalciferol): The major function of vitamin D is to support healthy blood levels of calcium and phosphorus.*

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.

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WWW.PHYTOPHARMICA.COM

By: Robert C. Doster

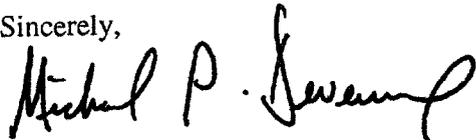
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/17/03

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 18, 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

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Vitamin D (as cholecalciferol): Vitamin D supports healthy absorption of calcium in the formation and maintenance of strong bones.*

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.

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 920-469-9099  
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 WWW.PHYTOPHARMICA.COM

By: RDOST

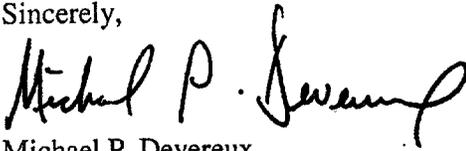
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/18/03

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 18, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Vitamin E (as d-alpha tocopheryl acid succinate): Vitamin E's antioxidant properties protect against free radicals.*

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.

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 WWW.PHYTOPHARMICA.COM

By: rdoster

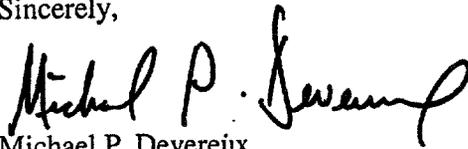
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/18/03

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 19, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Vitamin E (as d-alpha tocopheryl acid succinate): It supports healthy low-density lipid (LDL) cholesterol metabolism and healthy blood vessel walls.*

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.

825 CHALLENGER DRIVE  
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 WWW.PHYTOPHARMICA.COM

By: RDOSTER

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/19/03

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 19, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Vitamin E (as d-alpha tocopheryl acid succinate): Vitamin E also supports healthy immune system function and the health of the lens of the eye.*

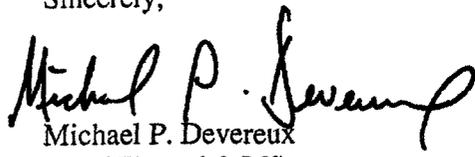
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

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 TOLL FREE 800-553-2370  
 FAX 920-469-4418  
 FAX TOLL FREE 888-311-5657  
 WWW.PHYTOPHARMICA.COM

By: RD  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs  
Date: 7/19/03

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 19, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
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 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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Vitamin K (as phytonadione): Vitamin K supports healthy synthesis of prothrombin, a crucial blood-clotting component.* It also supports the healthy carboxylation (formation) of osteocalcin, a protein that helps prevent bone loss.*

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.

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

By: RDOST

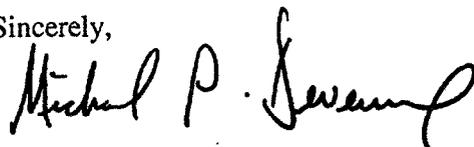
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/19/03

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 20, 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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Thiamin (as thiamin mononitrate): This B vitamin helps support healthy nerves and muscles, including the heart.* Thiamine also helps support the healthy metabolism of carbohydrates.*

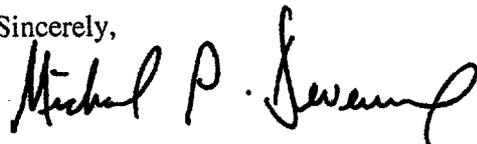
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By: RDOST  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs  
Date: 7/20/03

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 20, 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

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Riboflavin: Another member of the B vitamins, riboflavin helps support the healthy metabolism of fats, proteins, and carbohydrates.* Riboflavin also supports the health of skin, nails, and hair.*

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.

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By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/20/03

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 21, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Niacin: Niacin helps support healthy cholesterol levels that are already within normal limits, raises beneficial high density lipoprotein (HDL) cholesterol.*

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By: Robert C. Doster

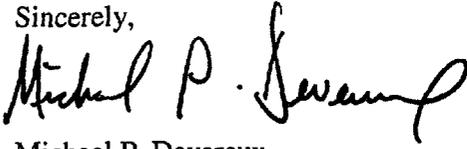
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/21/03

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer



July 21, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Vitamin B6: This water-soluble vitamin supports production of hemoglobin and antibodies.* Vitamin B6 also helps support the healthy conversion of stored carbohydrates or other nutrients to glucose to maintain normal blood sugar levels.*

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.

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By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/21/03

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer



July 21, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Folic Acid: Folic acid supports the healthy production and maintenance of new cells, especially important during periods of rapid cell division and growth such as childhood.*

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By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/21/03

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

Sincerely,



Michael P. Devereux  
Chief Financial Officer



July 22, 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

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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.

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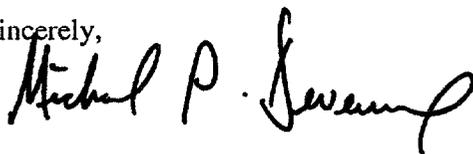
By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/22/03

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 23, 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

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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.

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 920-469-9099  
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 WWW.PHYTOPHARMICA.COM

By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/23/03

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 23, 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

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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.

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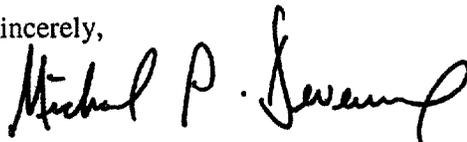
By: RDOST  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/23/03

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 23, 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

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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.

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By: RD

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/23/03

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 24, 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

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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.

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By: RD

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/24/03

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 24, 2003

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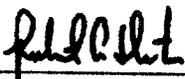
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

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By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/24/03

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 24, 2003

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 Office of Nutritional Products, Labeling &  
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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.

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 FAX 920-469-4418  
 FAX TOLL FREE 888-311-5657  
 WWW.PHYTOPHARMICA.COM

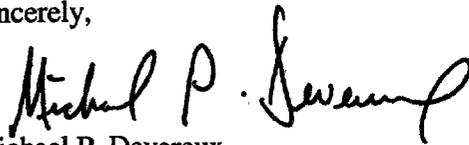
By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/24/03

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 25, 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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Zinc (as zinc ascorbate): Zinc supports healthy growth and development during childhood, and adolescence.*

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.

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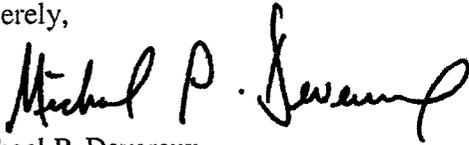
By: RD  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/25/03

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 25, 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

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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.

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By: RDOSTER

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/25/03

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 26, 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

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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.

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By: RDOSTER  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/26/03

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 26, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
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 RE: Label Claims/Disclaimers

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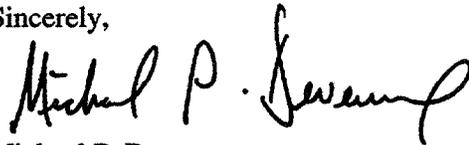
By: RD  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/26/03

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 27, 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

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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.

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 WWW.PHYTOPHARMICA.COM

By: rdoster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/27/03

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 27, 2003

Mr. Robert Moore  
Office of Nutritional Products, Labeling &  
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RE: Label Claims/Disclaimers

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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.

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By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/27/03

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 28, 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

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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.

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By: RD

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/28/03

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 28, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - European Elder (samnucus nigra) Berry Extract: Elderberry supports healthy immune system responses.*

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.

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By: RDoster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/28/03

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 29, 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

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PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Surf Buddies™ Daily Ingredient - Bilberry (Vaccinium myrtillus) Fruit Extract: Bilberries contain antioxidant effects and support healthy immune system responses, vision health, and healthy collagen.*

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.

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By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/29/03

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 29, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
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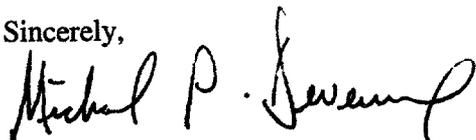
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/29/03

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 30, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 811  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
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 RE: Label Claims/Disclaimers

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By: Robert C. Doster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/30/03

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Sincerely,  


Michael P. Devereux  
Chief Financial Officer



July 30, 2003

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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.

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By: RDoster  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/30/03

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Michael P. Devereux  
Chief Financial Officer



July 30, 2003

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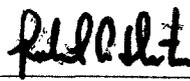
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By: 

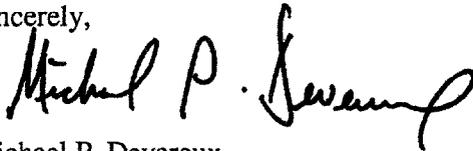
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7-30-03

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 30, 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.).	Surf Buddies™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	This delicious, one-per-day chewable children's formula delivers 25 important nutrients.*

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.

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

By: RDoster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs  
Date: 7/30/03

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