

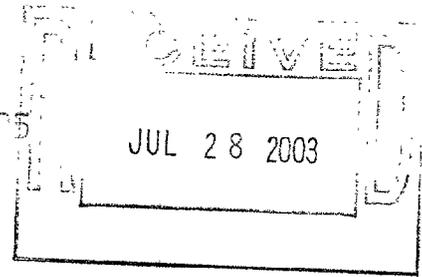


PhytoPharmica.

NATURAL MEDICINES™

July 20, 2003

7730 '03 JUL 31 22:05



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.).	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Super Milk Thistle® X supports healthy liver and gall bladder function and detoxification.* It helps eliminate the toxins and excretory matter loosened up by the Laxative and absorbed by the Fiber.*

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: 7/20/03

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

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

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Super Milk Thistle X 33p

85260
825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
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FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM



July 21, 2003

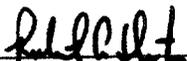
Mr. Robert Moore
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Super Milk Thistle® X contains: Milk Thistle, one of nature's finest liver-supporting herbs and a powerful antioxidant.*

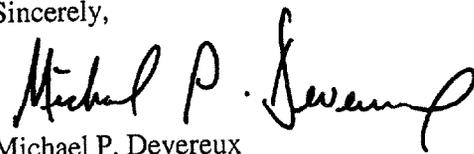
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: 
 Robert C. Doster
 Title: Senior Vice President of Scientific Affairs

Date: 7/21/03

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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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Super Milk Thistle® X contains: Artichoke extract to support healthy bile production.*

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: 7/22/03

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

825 CHALLENGER DRIVE
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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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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Super Milk Thistle® X contains: Licorice and Dandelion for support of healthy bile flow.*

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.

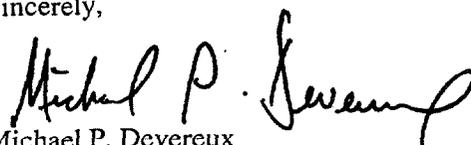
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/23/03

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

Super Milk Thistle X 36p

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July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740
RE: Label Claims/Disclaimers

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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.).	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Phase One: Cleansing In the first seven-day phase the Laxative purges the intestine of build-up toxins and excretory matter.* Next, the Fiber Formula reabsorbs and binds the toxins.* And third, Super Milk Thistle® X helps to eliminate the toxins and excretory matter by initiating bile flow.*

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.

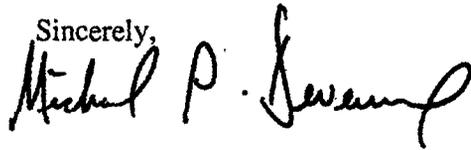
By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 7/24/03

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Sincerely,

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

Michael P. Devereux
Chief Financial Officer



July 24, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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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.).	Super Milk Thistle® X	Milk Thistle Fruit Phytosome, Artichoke Leaf Extract, Dandelion Root Extract, Licorice Root and Rhizome Extract	Phase Two: Transition During the next seven days of the Transition Phase, the Laxative dose will be reduced, while The Super Milk Thistle® X will be increased to support greater bile flow.* The Fiber Formula will remain the same and continue to bind and eliminate purged toxins.*

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: 7/24/03

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Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer