



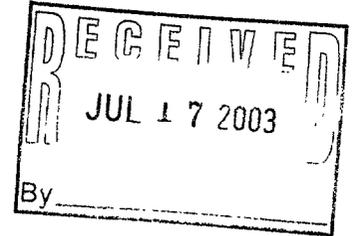
PhytoPharmica[®]

NATURAL MEDICINES[™]

July 2, 2003

7645 '03 JUL 31 P1:59

Mr. Robert Moore
 Office of Nutritional Products, Labeling &
 Dietary Supplements, HFS 811
 Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740



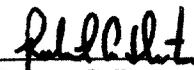
RE: Label Claims/Disclaimers

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.)	Mental Acuity Formula ^{™*}	Vitamin B6, Folic Acid, Vitamin B12, Alpha Lipoic Acid, Bacopa Aerial Part Extract, Ginkgo Leaf Extract	Alpha lipoic acid (ALA) is a coenzyme that has extremely potent biologic antioxidant activity, antioxidant recycling activity, and activity in enhancing biologic energy productions.*

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.

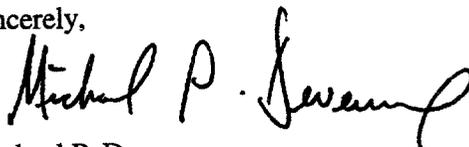
By: 
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/2/03

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
 Mental Acuity Formula 16p

975 0162

LET

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