



August 24, 2003

6087 '03 SEP 16 11:02

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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	The immune system and mucous membranes require a variety of nutrients to function at optimal level. ImmunoShield® with Elderberry provides a combination of vitamins, minerals, antioxidants, and botanicals to support these functions.*

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: 8/24/03

975 0162

LET

13 127

85911

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 fluid and cursive, with a large initial "M" and a long, sweeping tail.

Michael P. Devereux  
Chief Financial Officer



August 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

SEP 15 2003

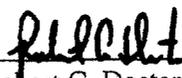
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Elder flower is know for some immune supporting properties.*

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: 8/25/03

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

ImmunoShield with Elderberry 13p

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



August 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

SEP 15 2003

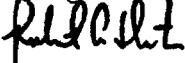
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Recent research is now focusing on the berry of that plant, which contains anthocyanins, for support of the immune 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

Title: Senior Vice President of Scientific Affairs

Date: 8/26/03

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

ImmunoShield with Elderberry 14p

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



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	In a placebo-controlled, double blind study, elderberry extract was found to support immune health.*

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: 8/26/03

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

Sincerely,

Michael P. Devereux

Michael P. Devereux  
Chief Financial Officer

ImmunoShield with Elderberry 15p

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



August 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

SEP 15 2003

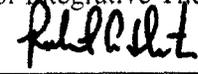
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Elderberry extract was found to activate the healthy immune system by its effects on cytokine production.* This extract also supports immune health in other ways as well.*

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: 8/26/03

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

ImmunoShield with Elderberry 16p

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



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Astragalus is also known for its immune supporting properties.*

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: 8/27/03

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

Sincerely,

Michael P. Devereux

Michael P. Devereux  
Chief Financial Officer

ImmunoShield with Elderberry 17p

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



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	The Astragalus extract used in this formula is from the root of Astragalus membranaceus. This extract is standardized to contain a minimum of 0.5% of the isoflavone, 4' hydroxy 3' methoxyisoflavone 7-glycoside. This specific isoflavone has been demonstrated to possess immune supporting attributes.*

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: 8/27/03

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

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 initial "M".

Michael P. Devereux  
Chief Financial Officer



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	In clinical trials, Astragalus has been found to have immunostimulating capacities.* This herb has been found to stimulate macrophages, promote antibody formation, and increase T cell proliferation.*

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: 8/27/03

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

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, stylized 'M' and 'D'.

Michael P. Devereux  
Chief Financial Officer



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin A designates a group of compounds essential to proper vision, growth, cellular health, reproduction, and immune-system integrity.*

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: 8/28/03

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

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



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin A has been shown to enhance T cell mediated immune responses.* Also, vitamin A has been demonstrated to promote the health of the lymphoid organs, thymus, and spleen, and stimulates the antibody-forming cells in the spleen.*

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: 8/28/03

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

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 initial "M".

Michael P. Devereux  
Chief Financial Officer



August 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

SEP 15 2003  
BY: \_\_\_\_\_

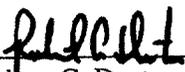
RE: Label Claims/Disclaimers

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
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	In studies, vitamin C has been shown to support skin and mucous membrane integrity.*

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.

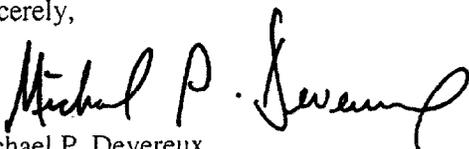
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/29/03

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

ImmunoShield with Elderberry 22p

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



August 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

SEP 15 2003

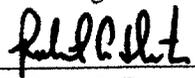
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin C has also been demonstrated to enhance natural killer cell activity and enhances B and T cell function.*

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.

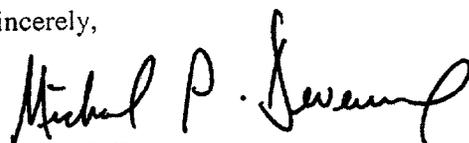
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/29/03

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

ImmunoShield with Elderberry 23p

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



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin D is a fat-soluble compound widely known for its role in calcium metabolism and importance for normal mineralization of bone and cartilage.* However, the active form of vitamin D is a potent immune regulator.*

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: 8/29/03

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

Sincerely,

Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer

ImmunoShield with Elderberry 24p

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



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	In both human and animal studies, the active form of vitamin D has been shown to have a positive effect on cellular immune responses.* In these studies, vitamin D played a significant role in the regulation of the monocyte and neutrophil function.*

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: 8/30/03

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

Sincerely,

Michael P. Devereux  
Michael P. Devereux  
Chief Financial Officer

ImmunoShield with Elderberry 25p

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



August 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

SEP 15 2003

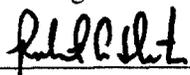
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin B12 is a water-soluble vitamin that supports peripheral nerve function.* This vitamin has also been shown to play a role in maintaining immune system regulation.*

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: 8/30/03

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

ImmunoShield with Elderberry 26p

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



August 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin B12 plays an important role in cellular immunity, especially relating to lymphocytes and natural killer cell activity, in animal studies.* From these studies, it can be concluded that vitamin B12 is a potent immunomodulator for cellular immunity.*

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: 8/30/03

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

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, reading "Michael P. Devereux". The signature is written in a cursive style with a large, stylized "M" and "D".

Michael P. Devereux  
Chief Financial Officer



# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES<sup>™</sup>

August 31, 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

SEP 15 2003

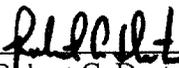
RE: Label Claims/Disclaimers

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.)	ImmunoShield <sup>®</sup> with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Pantothenic acid is widely recognized for its central role in adrenal function and cellular metabolism.*

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: 8/31/03

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

ImmunoShield with Elderberry 28p

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



August 31, 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	The adrenal glands use pantothenic acid to manufacture cortisone and other compounds. Pantothenic acid also has a role in the immune response.*

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: 8/31/03

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

ImmunoShield with Elderberry 29p

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



August 31, 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

SEP 15 2003

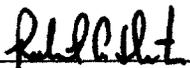
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Pantothenic acid produces a beneficial effect on immunoglobulin levels and enhances the phagocytic activity of neutrophils.*

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: 8/31/03

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

ImmunoShield with Elderberry 30p

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



September 1, 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Calcium is an important mineral, as it is required for normal growth and development of the skeleton and teeth.*

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: 9/1/03

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

ImmunoShield with Elderberry 31p

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



September 1, 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

SEP 15 2003

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Immunological studies are finding that calcium is also an important component of the immune response.*

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: 9/1/03

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

ImmunoShield with Elderberry 32p

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



# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES™

September 1, 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

SEP 15 2003

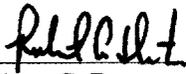
RE: Label Claims/Disclaimers

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.)	ImmunoShield <sup>®</sup> with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Calcium is an integral component in the biochemical pathways that mediate B cell stimulation.*

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.

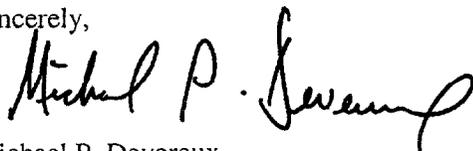
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/1/03

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

ImmunoShield with Elderberry 33p

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



September 2, 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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Magnesium is a mineral that plays a critical role in bone mineralization, healthy muscular contraction, nerve function, and enzyme activities.*

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: 9/2/03

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

ImmunoShield with Elderberry 34p

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



September 2, 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

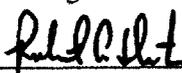
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Magnesium also has been shown to support the immune 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

Title: Senior Vice President of Scientific Affairs

Date: 9/2/03

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

ImmunoShield with Elderberry 35p

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



September 2, 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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	In one study, magnesium demonstrated specific immune support capabilities.*

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: 9/2/03

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

ImmunoShield with Elderberry 36p

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



September 2, 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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Zinc is an essential micronutrient for humans and animals. It functions as an essential component of a large number of zinc dependent enzymes, participating in the synthesis and degradation of carbohydrates, lipids, protein, and nucleic acids. *

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: 9/2/03

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

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 initial "M".

Michael P. Devereux  
Chief Financial Officer



September 2, 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

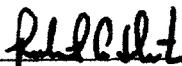
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Zinc also plays a major role in the processes of genetic expression.*

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.

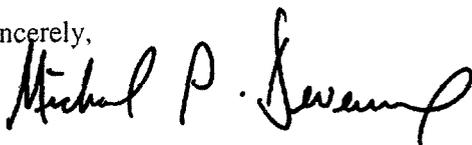
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/2/03

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

ImmunoShield with Elderberry 38p

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



September 2, 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

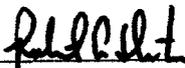
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Zinc has also been demonstrated to support the immune 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

Title: Senior Vice President of Scientific Affairs

Date: 9/2/03

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

ImmunoShield with Elderberry 39p

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



September 2, 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

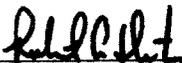
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	In clinical studies, zinc was found to enhance neutrophil activity and support healthy antigen-antibody binding.*

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.

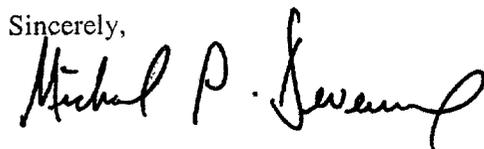
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/2/03

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

ImmunoShield with Elderberry 40p

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



September 2, 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

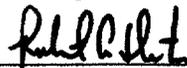
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Alfalfa is a botanical that has demonstrated some immune mediating potential.*

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: 9/2/03

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

ImmunoShield with Elderberry 41p

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



September 2, 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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Polysaccharides isolated from alfalfa ( <i>Medicago sativa</i> ) have demonstrated the ability to enhance lymphocyte and antibody formation in laboratory studies.*

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: 9/2/03

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

ImmunoShield with Elderberry 42p

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



September 2, 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

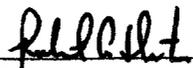
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Bioflavonoids, also know as citrus flavonoids, are a group of compounds that contribute to maintaining healthy blood vessel conditions by supporting healthy capillary permeability.*

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: 9/2/03

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

ImmunoShield with Elderberry 43p

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



September 3, 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

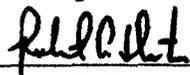
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	In recent studies, bioflavonoids have been shown to have immune supporting activities.* These studies demonstrated that components of bioflavonoids had specific types of immune supporting activity.*

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: 9/3/03

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

ImmunoShield with Elderberry 44p

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



September 3, 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

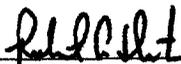
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Proprietary Trace Mineral Blend: This trace mineral blend focuses on the specific trace minerals that are especially immune supporting, such as selenium, molybdenum, and boron.*

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: 9/3/03

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

ImmunoShield with Elderberry 45p

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



September 3, 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

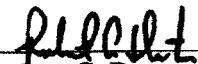
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Proprietary Trace Mineral Blend: Trace mineral supply antioxidant supplementation that is thought to improve immunity.*

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: 9/3/03

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

ImmunoShield with Elderberry 46p

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



September 3, 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

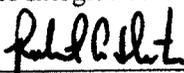
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin A: Enhances T-Helper-type 2 mediated immune responses, important for IgA 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.

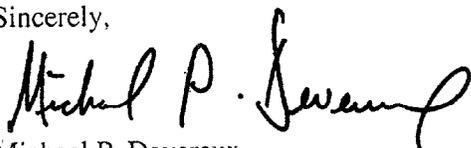
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/3/03

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

ImmunoShield with Elderberry 47p

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



September 3, 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

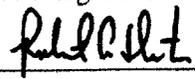
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Vitamin A: Stimulates production of antibody forming cells by the spleen.*

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.

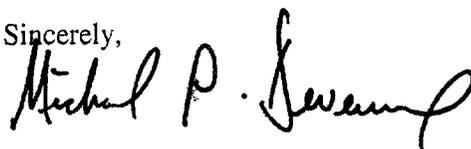
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/3/03

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

ImmunoShield with Elderberry 48p

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



September 4, 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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Pantothenic Acid: Enhances antibody formation.*

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: 9/4/03

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

ImmunoShield with Elderberry 49p

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



September 4, 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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Elderberry: Enhances antibody formation and is involved with immune support.*

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.

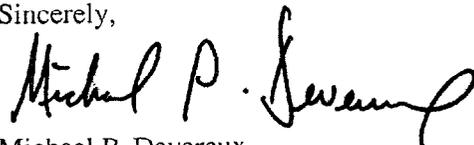
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/4/03

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

ImmunoShield with Elderberry 50p

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



September 5, 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

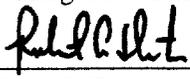
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Astragalus: Enhances leukocyte formation*

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: 9/5/03

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

ImmunoShield with Elderberry 51p

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



# PhytoPharmica<sup>®</sup>

NATURAL MEDICINES<sup>™</sup>

September 5, 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

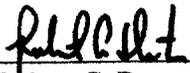
RE: Label Claims/Disclaimers

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.)	ImmunoShield <sup>®</sup> with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Astragalus: Stimulates macrophage activation*

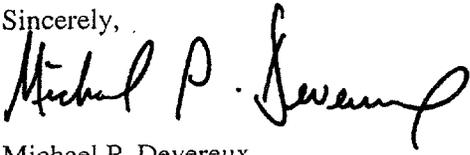
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (A Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/5/03

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  
 ImmunoShield with Elderberry 52p

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



September 5, 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

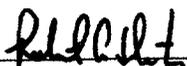
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Astragalus: Promotes antibody formation*

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: 9/5/03

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

ImmunoShield with Elderberry 53p

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



September 5, 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

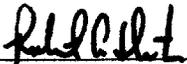
RE: Label Claims/Disclaimers

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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Astragalus: Enhances T cell proliferation*

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: 9/5/03

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

ImmunoShield with Elderberry 54p

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



September 5, 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.)	ImmunoShield® with Elderberry	Vitamin A, Vitamin C, Vitamin D, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, European Elder Berry Extract, Alfalfa Aerial Part Extract, Astragalus Root Extract, Mixed Bioflavonoids, Proprietary Trace Mineral Blend containing selenium, silicon, boron, nickel, tin, molybdenum, and vanadium	Trace Mineral Blend: Enhances antibody 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: 9/5/03

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

ImmunoShield with Elderberry 55p

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