



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

1008 SEP 16 2003

RECEIVED
 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
Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	End Fatigue™ Adrenal Stress-End™*	Betaine Anhydrous, Raw Adrenal Cortex, Adrenal Hydrolysate, Vitamin C, Pantothenic Acid, Vitamin B6, L-Tyrosine, Licorice Root Extract, Rose hips w/25% Vitamin C	End Fatigue™ Adrenal Stress-End™* supplies the necessary nutrients to support adrenal gland function.* Give your adrenals the support they need to keep your energy alive and kicking!*

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
 Chief Financial Officer
 End Fatigue Adrenal Stress End 8p

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