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November 6, 2003

 Office of Nutritional Products, Labeling and
 Dietary Supplements (HFS -810)
 Center for Food Safety and Applied Nutrition,
 Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740

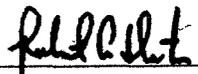

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin, 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. PhytoPharmica wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. 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>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Garlitrin 4000®	Garlitrin 4000® enteric coating ensures dissolution in the small intestine and maximum allicin production.*	Garlic Bulb Extract

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: 11/6/03

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
 Garlitrin 9

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