



October 22, 2003

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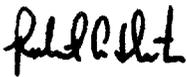
Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740
RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (A Division of Integrative Therapeutics, Inc.).	Surf Buddies™ Concentrate!™*	DMAE, Phosphatidylserine, Taurine, N-Acetylcysteine (NAC), L-Theanine	In studies, phosphatidylserine has been shown to support concentration and healthy brain function in children.*

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: 

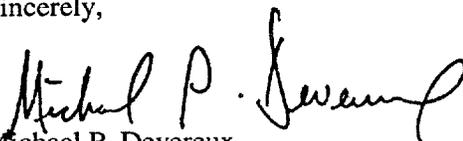
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/22/03

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

Sincerely,



Michael P. Devereux
Chief Financial Officer

Surf Buddies Concentrate 30p

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