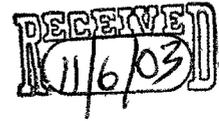




October 22, 2003

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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™ Daily Multiple	Vitamin A, Vitamin C, Calcium, Iron, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Phosphorus, Iodide, Magnesium, Zinc, Selenium, Manganese, Chromium, Iodine, Sour Cherry Fruit Extract, European Elder Berry Extract, Bilberry Fruit Extract, Cranberry Fruit Extract	Vitamin A: This important nutrient supports healthy vision, skin integrity, and bone growth.*

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: 10/22/03

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

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13299

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



October 23, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
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 5100 Paint Branch Parkway  
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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: 10/23/03

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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 initial "M".

Michael P. Devereux  
Chief Financial Officer



October 24, 2003

Mr. Robert Moore  
 Office of Nutritional Products, Labeling &  
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 5100 Paint Branch Parkway  
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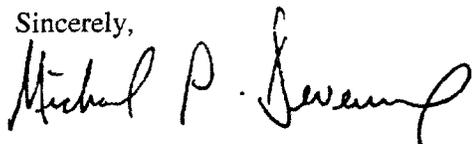
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster  
 Robert C. Doster  
 Title: Senior Vice President of Scientific Affairs  
 Date: 10/24/03

825 CHALLENGER DRIVE  
 GREEN BAY, WI 54311-8328  
 920-469-9099  
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 FAX 920-469-4418  
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Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux  
Chief Financial Officer



October 24, 2003

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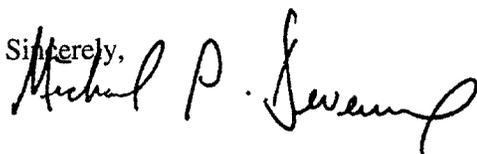
By: Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/24/03

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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