



March 11, 2004

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Office of Nutritional Products, Labeling &
 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>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
End Fatigue™ Daily Energy Enfusion™*	This ultimate-strength formula contains high levels of magnesium, B-vitamins, minerals, amino acids, malic acid and other powerhouse nutrients essential for everyone who wants optimum energy, mental clarity and heart health!*	Vitamin A (50% as beta carotene and as retinyl acetate), Vitamin C (as ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acetate), Biotin, Iodine (as potassium iodide), Magnesium (as manganese citrate), Zinc (as zinc sulfate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (from whey protein, guar gum, potassium citrate, and potassium iodide), Whey Protein, Malic Acid, Inositol, Inulin (from chicory root), Hesperidin 50% (from citrus fruits), L-Taurine, L-Glycine, L-Tyrosine, N-Acetylcysteine (NAC), L-Serine, Boron (as sodium borate)

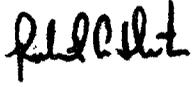
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 FAX 920-469-4418
 FAX TOLL FREE 888-311-5657
 WWW.PHYTOPHARMICA.COM

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

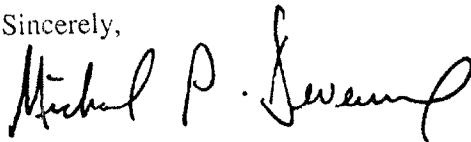
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/11/04

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