



August 10, 2002

5686 RECEIVED
AUG 14 2002
BY:

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U. S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica 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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Sea Friends™ Attention!™	L-Theanine, Taurine, DMAE, Phosphatidylserine, N-Acetylcysteine, Cherry Fruit Extract, FOS	Sea Friends™ Attention!™ is a delicious, chewable formula with five ingredients that help support healthy focus and concentration in children.*

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
Robert C. Doster
Title: Senior Vice President of Scientific Affairs
Date: 8/10/02

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

Sincerely,
Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

81523

975 0162

LET 10908

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

August 11, 2002

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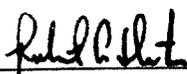
RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Sea Friends™ Attention!™	L-Theanine, Taurine, DMAE, Phosphatidylserine, N-Acetylcysteine, Cherry Fruit Extract, FOS	Chewable formula to support healthy focus and concentration in children*

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: 8/11/02

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

Sincerely,


 Michael P. Devereux
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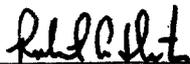
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Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Sea Friends™ Attention!™	L-Theanine, Taurine, DMAE, Phosphatidylserine, N-Acetylcysteine, Cherry Fruit Extract, FOS	Phosphatidylserine supports brain health at a cellular level.*

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.

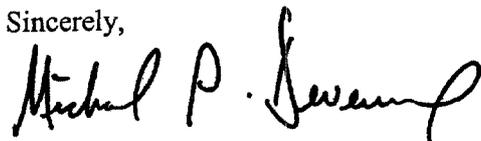
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/12/02

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

Sea Friends Attention! 3p

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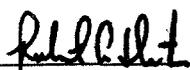
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Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Sea Friends™ Attention!™	L-Theanine, Taurine, DMAE, Phosphatidylserine, N-Acetylcysteine, Cherry Fruit Extract, FOS	DMAE is clinically studied in children to support focus, concentration, and healthy brain function.*

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: 8/13/02

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Sincerely,



Michael P. Devereux
Chief Financial Officer

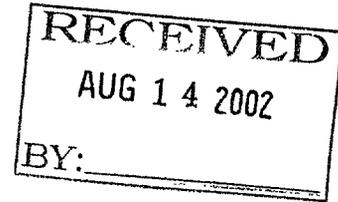
Sea Friends Attention! 4p

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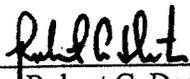
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Sea Friends™ Attention!™	L-Theanine, Taurine, DMAE, Phosphatidylserine, N- Acetylcysteine, Cherry Fruit Extract, FOS	L-theanine is an amino acid that helps promote a relaxed state without diminishing daytime alertness.*

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: 8/14/02

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Chief Financial Officer

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