



August 12, 2002

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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™ Immune Defense	Vitamin A, Vitamin C, Vitamin B6, Zinc, European Black Elderberry Fruit Extract	Sea Friends™ Immune Defense features elderberry, zinc, and Vitamin C and A to strengthen your child's immune system and help them feel better faster.*

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: 8/12/02

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer

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825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
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WWW.PHYTOPHARMICA.COM

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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: 8/13/02

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