



INTEGRATIVE THERAPEUTICS INC.™

NF Formulas < PhytoPharmica
Tyler Encapsulations < Vitamine Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY™

**&
PHYTOPHARMICA™**

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 F: 888.570.6460 (Enzymatic)
P: 920.469.9099 F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY

June 21, 2005

What Better feels like™

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

2744 5 JUL 25 P2:13

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™ Revitalizing Sleep Formula*	Clinically studied ingredients for restless sleep*	Valerian (Valeriana officinalis) Root Extract, Passionflower (Passiflora incarnate) Leaf and Flower Extract, L- Theanine, Hops (Humulus lupulus) Flower Extract, Wild Lettuce (Lactuca virosa) Leaf Extract, Jamaica Dogwood (Piscidia piscipula) Root Extract, Wild Lettuce (Lactuca virosa) Leaf

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: 6/21/05

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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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
End Fatigue™ Revitalizing Sleep Formula*	The comprehensive and synergistic formulation of End Fatigue Revitalizing Sleep Formula* helps you get to sleep faster plus maintain a healthy sleep cycle so you wake up energized in the morning.*	Valerian (Valeriana officinalis) Root Extract, Passionflower (Passiflora incarnate) Leaf and Flower Extract, L-Theanine, Hops (Humulus lupulus) Flower Extract, Wild Lettuce (Lactuca virosa) Leaf Extract, Jamaica Dogwood (Piscidia piscipula) Root Extract, Wild Lettuce (Lactuca virosa) Leaf

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
End Fatigue™ Revitalizing Sleep Formula*	Valerian root, clinically studied to support better sleep is combined with L-Theanine, Hops, Jamaica Dogwood and other ingredients shown to promote relaxation and restful sleep.*	Valerian (Valeriana officinalis) Root Extract, Passionflower (Passiflora incarnate) Leaf and Flower Extract, L-Theanine, Hops (Humulus lupulus) Flower Extract, Wild Lettuce (Lactuca virosa) Leaf Extract, Jamaica Dogwood (Piscidia piscipula) Root Extract, Wild Lettuce (Lactuca virosa) Leaf

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