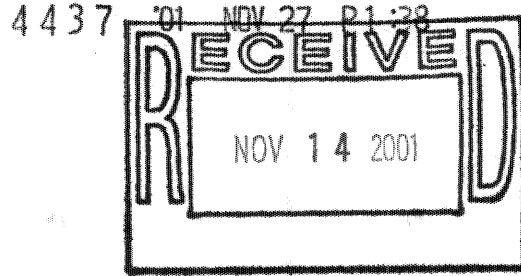




November 3, 2001



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.

| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|---|---------------------|--|---|
| PhytoPharmica (A Division of Integrative Therapeutics Inc.) | FlexAbility | Ginger (Zingiber officinale), Greater Galangal (Alpinia galanga) | Reduces joint pain and stiffness due to occasional overuse* |

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: 11-3-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,

Jeanene Moenckmeier
Jeanene Moenckmeier
Director of Legal Affairs
FlexAbility1p

975-0162 LET 8824

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



November 4, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204


RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.

| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|---|---------------------|--|--|
| PhytoPharmica (A Division of Integrative Therapeutics Inc.) | FlexAbility | Ginger (Zingiber officinale), Greater Galangal (Alpinia galanga) | Reduces joint pain and stiffness due to everyday activity* |

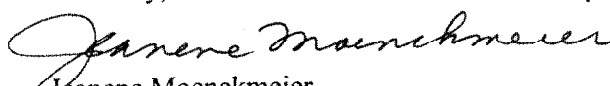
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 11-4-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs
FlexAbility2p

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



November 6, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.

| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|--|---------------------|--|---|
| PhytoPharmica (A Division of Integrative Therapeutics Inc.) | JointEase | Ginger (Zingiber officinale), Greater Galangal (Alpinia galanga) | Reduces pain and stiffness due to occasional overuse* |

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: 11-6-2001

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,

Jeanene Moenckmeier
Director of Legal Affairs

JointEase1p

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



November 5, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

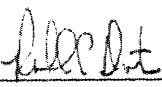
RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.

| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|---|---------------------|---|--|
| PhytoPharmica (A Division of Integrative Therapeutics Inc.) | Fiber Delights | Enriched inulin, fructose, oat fiber | Promotes and helps maintain regularity* |

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.

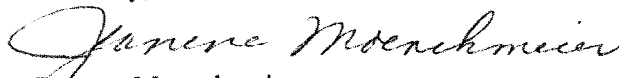
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-5-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs
Fiber Delights 1p

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