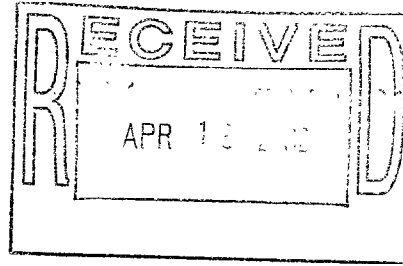


April 7, 2002



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

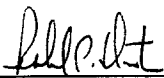
RE: Label Claims/Disclaimers

Dear Sir/Madam:

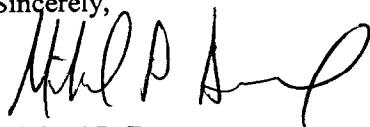
This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	7-KETO™ Lean	Iodine, Copper, Manganese, 7-keto dehydroepiandrosterone, L-Tyrosine, Asparagus (Asparagus officinalis) Rhizome Extract, Choline Bitartrate, Inositol	Safety assessments have reported that 7-Keto is not mutagenic (does not harm the DNA of the cells).*

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: 4/7/02

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

975 0162

LET
 9899

80146

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