

Handwritten: 5/6/02
LCS

May 30, 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

RECEIVED
 JUN 05 2002
 BY: _____

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.)	Clinical Nutrients™ for 45-Plus Women	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Phosphorus, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Choline Bitartrate, Ginger Rhizome Extract, Black Tea Leaf Extract, Cherry Fruit Extract, Green Tea Leaf Extract, Inositol, Soy, Cranberry Fruit Extract, Betaine HCl, Grape Seed Extract, Bromelain, Papain, Bilberry Fruit Extract, Pepsin, Lipase, Boron, Lutein, Silicon, Vanadium, Zeaxanthin	It provides 43 vital nutrients, including a high level of calcium for bone health; vitamin D, which helps your body absorb and use calcium properly; and dong quai and fennel seed, which are sources of phytoestrogens and flavonoids that play vital roles in supporting women's health. It's also iron-free, since extra iron isn't required at this stage of a woman's life.*


97S 0162

LET 10276

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

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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: 

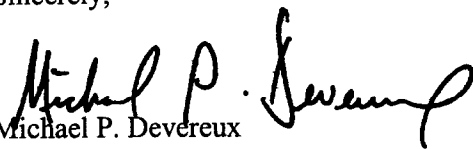
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5-30-02

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