

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

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	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Clinical Nutrients™ For Bone Health	Vitamin C, Vitamin D, Vitamin K, Folic Acid, Vitamin B12, Calcium, Magnesium, Zinc, Copper, Sodium, Mixed Flavonoids, Betaine HCl, Soy Bean Extract, Boron, Silicon, Strontium	Specific Nutritional Support for Optimal Bone Health*

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.

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,

Chief Financial Officer

975 0162

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

CN for Bone Health 1p