

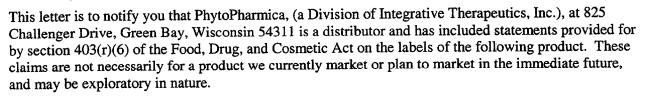
April 22, 2003

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Mr. Robert Moore Office of Nutritional Products, Labeling & Dietary Supplements, HFS 811 Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Mr. Moore:



COMPANY	PRODUCT	DIETARY INGREDIENTS	STATEMENTS
	<u>NAME</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 HCI, Grape Seed Extract, Bromelain, Papain, Bilberry Fruit Extract, Pepsin, Lipase, Boron, Lutein, Silicon, Vanadium, Zeaxanthin	Clinical Nutrients <sup>TM</sup> for 45-Plus Women provides vital nutrients for menopausal and postmenopausal women, including calcium and vitamin D for maintaining strong bones, dong quai and fennel seed, which contain high levels of phytoestrogens and flavonoids, which are perfect for women facing normal mid-life changes.*  825 CHALLENGER DRIVE GREEN BAY, WI 54311-832 920-469-9099

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TOLL FREE 800-553-2370
FAX 920-469-4418
FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM

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: 4/22/03

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