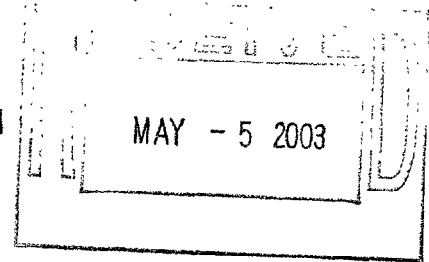




May 1, 2003

2728 '03 MAY 27 P3:14



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:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), 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. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<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 Male Teens	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Mixed Bioflavonoids, Alfalfa Aerial Part Extract, Dandelion Root Extract, Ginger Rhizome Extract, Sarsaparilla Root Extract, Choline Bitartrate, Inositol, Boron, Vanadium	Clinical Nutrients™ for Male Teens is an iron-free formula featuring vitamin A, which fights free radicals, contributes to the immune system, and supports clear skin; and zinc, an important mineral for boys going through sexual maturation.*

84351

97S 0162 LET 11969

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

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: 

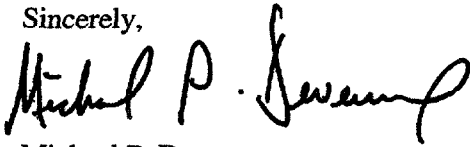
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/1/03

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