

June 14, 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 (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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 | STATEMENTS |
|---------------------------------------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| PhytoPharmica (A Division of Integrative Therapeutics, Inc.). | CranGuard™ | Vitamin C, Cranberry (Vaccinium macrocarpon) Fruit Extract, Uva Ursi (Arctostaphylos uva ursi) Leaf Extract | CranGuard contains the standardized cranberry extracts recognized for their roles in urinary tract health.* |

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.

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10-14-02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Michael P. Devereux

Chief Financial Officer

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CranGuard 2p