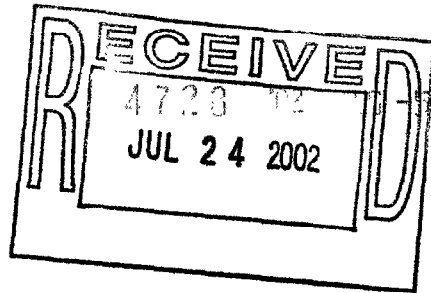


July 19, 2002

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



P219

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	STATEMENTS
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	Clinical Nutrients™ for Bone Health* is designed to provide extra nutritional support for proper bone health* and should be used in conjunction with the Clinical Nutrients gender-specific multiple, and Clinical Nutrients Flax Oil products.

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
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/19/02

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

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

975 0162 LET

10676

81301

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