



September 23, 2002

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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

**RECEIVED**  
 OCT 04 2002  
 BY: \_\_\_\_\_

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 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 HCl, Grape Seed Extract, Bromelain, Papain, Bilberry Fruit Extract, Pepsin, Lipase, Boron, Lutein, Silicon, Vanadium, Zeaxanthin	Clinical Nutrients™ for 45-Plus Women provides a full range of vital nutrients for daily energy and essential nutrition for menopausal and postmenopausal women,* including: Calcium (800 mg), vitamin D (400 IU), and vitamin K (120 mcg) for maintaining strong bones.*


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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 has substantiation that the statements are truthful and not misleading.


By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/23/02

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



September 24, 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

**RECEIVED**  
 OCT 04 2002  
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RE: Label Claims/Disclaimers

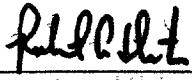
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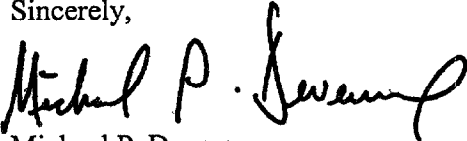
82103  
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By:   
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs  
Date: 9/24/02

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



September 26, 2002

Office of Special Nutritionals (HFS-450)  
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 5100 Paint Branch Parkway  
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**RECEIVED**  
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RE: Label Claims/Disclaimers

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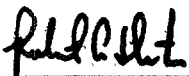
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825 CHALLENGER DRIVE  
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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/26/02

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



September 25, 2002

Office of Special Nutritionals (HFS-450)  
 Center for Food Safety and Applied Nutrition  
 U.S. Food and Drug Administration  
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 College Park, MD 20740-3835

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RE: Label Claims/Disclaimers


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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.

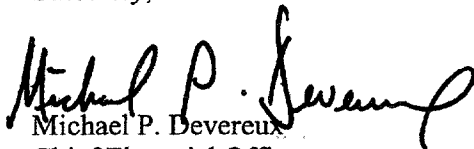
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/25/02

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





September 27, 2002

Office of Special Nutritionals (HFS-450)  
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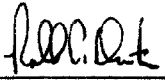
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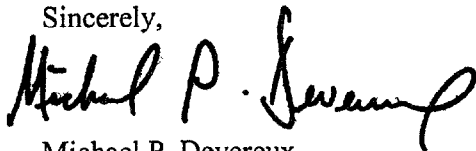
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/27/02

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