



September 24, 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 Men Iron-Free	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, Choline Bitartrate, Black Tea Leaf Extract, Cherry Fruit Extract, Inositol, Ginger Rhizome Extract, Green Tea Leaf Extract, Muira Puama Root Extract, Grape Seed Extract, Korean Ginseng Root Extract, Bilberry Fruit Extract, Boron, Lycopene, Lutein, Vanadium, Zeaxanthin	Clinical Nutrients™ for Men is an iron-free daily supplement containing a full range of vitamins, minerals and herbs and for the energy and essential nutrition a man needs daily.* Plus, this improved formula offers specialized ingredients like: Lutein (1.5 mg) and zeaxanthin (60 mcg), potent antioxidants particularly beneficial for eye health.*

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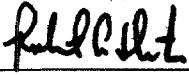
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LET

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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: 9/24/02

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)
 Center for Food Safety and Applied Nutrition
 U. S. Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740-3835

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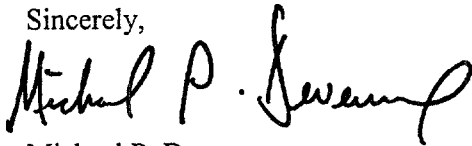
Robert C. Doster

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
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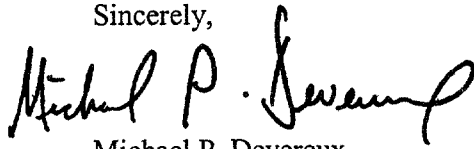
By: 
Robert C. Doster

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

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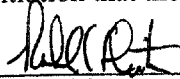
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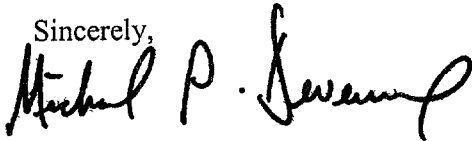
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/27/02

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Chief Financial Officer