



September 24, 2002

78-00-002-001 301 1159

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 50-Plus Men	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, Saw Palmetto Berry Extract, Cherry Fruit Extract, Black Tea Leaf Extract, Ginger Rhizome Extract, Green Tea Leaf Extract, Inositol, Betaine HCl, Grape Seed Extract, Korean Ginseng Root Extract, Bromelain, Papain, Bilberry Fruit Extract, Pepsin, Lipase, Boron, Lycopene, Lutein, Vanadium, Zeaxanthin	Iron-Free Clinical Nutrients™ for 50-Plus Men features a full range of vitamins, herbs and minerals important for the daily energy and nutritional needs of mature men,* including: Lutein (1.5 mg) and zeaxanthin (60 mcg) for eye health.*

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LET 11059

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.

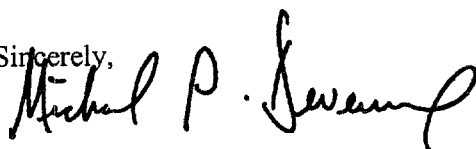
By: 
Robert C. Doster

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

RECEIVED
 OCT 04 2002
 BY:

Office of Special Nutritionals (HFS-430)
 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:


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By: 

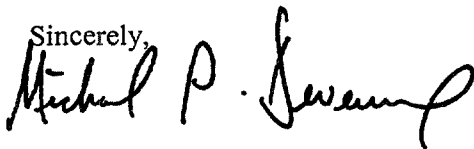
Robert C. Doster

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
 5100 Paint Branch Parkway
 College Park, MD 20740-3835

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RE: Label Claims/Disclaimers

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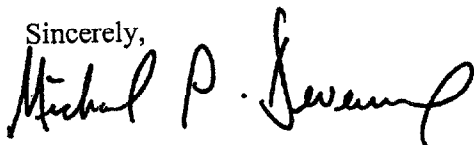
By: Robert C. Doster
Robert C. Doster

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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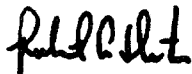
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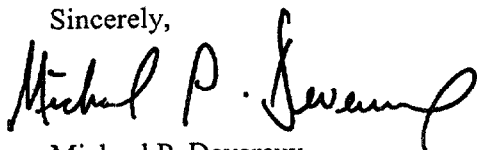
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/27/02

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Michael P. Devereux
Chief Financial Officer