

April 22, 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 APR 2 5 2002

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  DIETARY INGREDIENTS  STATEMENTS    NAME			
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Childrens Everyday Defense	Vitamin A, Vitamin B6, Vitamin C, Zinc, Elderberry Extract (Sambucus nigra)	Targeted Nutrition to Enhance Your Child's Immune System*

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.

Bv:

Robert C. Doster Title: Senior Vice President of Scientific Affairs

Date: 4-22-02

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

Childrens Everyday Defense 1p

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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