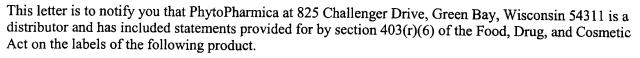


April 25, 2002

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

RE: Label Claims/Disclaimers

Dear Sir/Madam:



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 HCI, Grape Seed Extract, Korean Ginseng Root Extract, Bromelain, Papain, Bilberry Fruit Extract, Pepsin, Lipase, Boron, Lycopene, Lutein, Vanadium, Zeaxanthin	Dietary Supplement Vitamins, minerals, and herbs for daily energy and essential nutrition*

975 0162 LET 9978

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: KIRCHE

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4.25.02

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