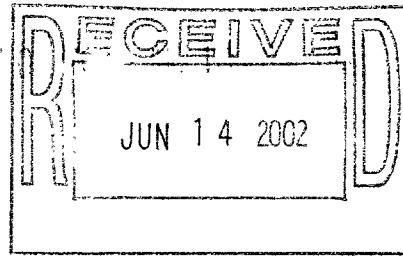


June 10, 2002



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:

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 Male Teens	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, Mixed Bioflavonoids, Alfalfa Aerial Part Extract, Dandelion Root Extract, Ginger Rhizome Extract, Sarsaparilla Root Extract, Choline Bitartrate, Inositol, Boron, Vanadium	Clinical Nutrients™ for Teens: Male Formula features 33 vitamins, minerals, and herbs, including vitamin A, which supports clear skin, fights free radicals, and supports the immune system; sarsaparilla, which researchers believe plays an important role in skin health; and zinc, which contributes to the immune system and sex glands.*

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
 Robert C. Doster
 Title: Senior Vice President of Scientific Affairs
 Date: 6-10-02

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CN for Teens: Male Formula 1p

80853
 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

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