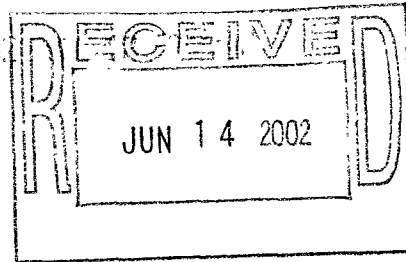


June 10, 2002



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 Female Teens	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iron, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Mixed Bioflavonoids, Alfalfa Aerial Part Extract, Choline Bitartrate, Inositol, Ginger Rhizome Extract, Dandelion Root Extract, Licorice Root Extract, Boron, Silicon, Vanadium	Clinical Nutrients™ for Teens: Female Formula includes 35 vitamins, minerals, and herbs, including silica, which is found in high concentrations at calcification sites in growing bone; vitamin B6, important in some of the hormonal processes of the menstrual cycle; and iron, because deficiencies are common in teen-age girls.*

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: 6-10-02

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975 0162 LET  
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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