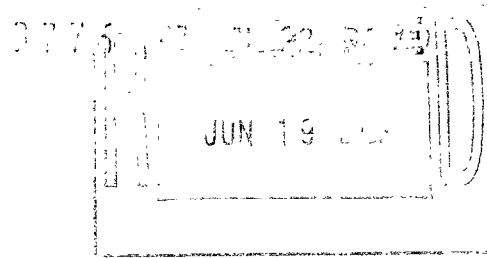


June 14, 2002



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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Clinical Nutrients™ Flax Oil Capsules fortified with Borage & Pumpkin	Flaxseed Oil, Pumpkin Seed Oil, Borage Seed Oil	Omega-3 is linked to cardiovascular function, immunity, cell integrity, and a host of other body systems.*

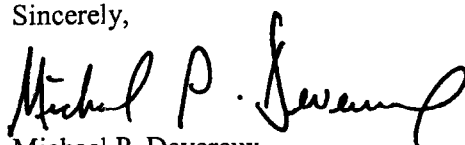
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

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

Date: 6-14-02

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

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80876
 825 CHALLENGER DRIVE
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 TOLL FREE 800-553-2370
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 WWW.PHYTOPHARMICA.COM