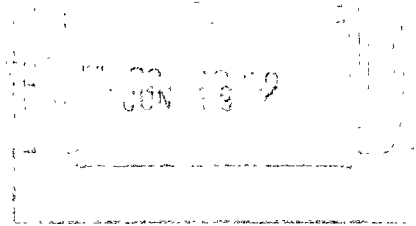




June 14, 2002

2777



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 Nutrient™ Antioxidant	Vitamin A, Vitamin C, Vitamin E, Riboflavin, Zinc, Selenium, Manganese, N-Acetylcysteine, Red Cabbage Leaf Extract, Garlic Bulb Powder, Ginger Rhizome Extract, Green Tea Leaf Extract, Klamath Blue-Green Algae, Turmeric Root Extract, Grape Seed Extract	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
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
Clinical Nutrient Antioxidant 2p

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