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6-27-02*

June 14, 2002

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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™ For Bone Health	Vitamin C, Vitamin D, Vitamin K, Folic Acid, Vitamin B12, Calcium, Magnesium, Zinc, Copper, Sodium, Mixed Flavonoids, Betaine HCl, Soy Bean Extract, Boron, Silicon, Strontium	Calcium, PLUS important vitamins and minerals for overall healthy bone structure.*

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*

Michael P. Devereux  
Chief Financial Officer

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*10469*

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

*80947*

June 15, 2002

Office of Special Nutritionals (HFS-450)  
 Center for Food Safety and Applied Nutrition  
 U. S. Food and Drug Administration  
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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.

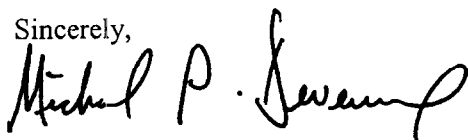
By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-15-02

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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June 16, 2002

Office of Special Nutritionals (HFS-450)  
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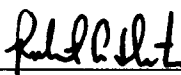
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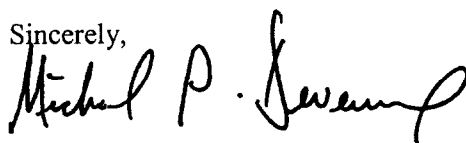
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-16-02

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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June 17, 2002

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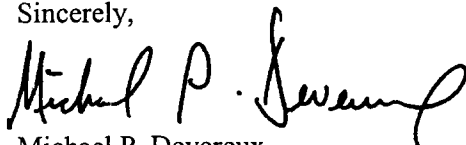
By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-17-02

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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June 18, 2002

Office of Special Nutritionals (HFS-450)  
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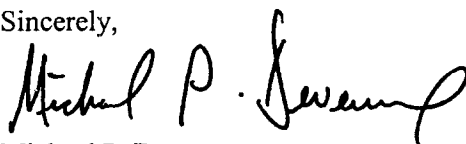
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-18-02

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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June 19, 2002

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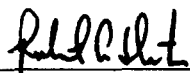
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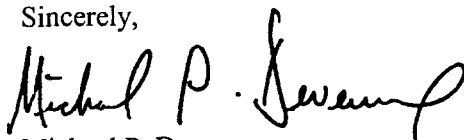
By:   
 Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-19-02

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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June 20, 2002

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By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6-20-02

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