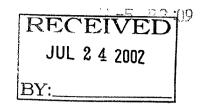


July 19, 2002

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 (A Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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
PhytoPharmica (A Division of Integrative Therapeutics, Inc.)	Iron Complex™	Vitamin C, Folic Acid, Vitamin B12, Iron, Liquid Liver Fractions, Chlorophyll	Iron Complex also includes other synergistic factors known to increase iron absorption and promote healthy red blood cells.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica (A Division of Integrative Therapeutics, Inc. has substantiation that the statements are truthful and not misleading.

Title: Senior Vice President of Scientific Affairs

7/19/02

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

975 0162

LET

10675

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