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December 9, 2003

Office of Nutritional Products, Labeling &  
 Dietary Supplements, HFS 810  
 Center for Food Safety and Applied Nutrition  
 Food and Drug Administration  
 5100 Paint Branch Parkway  
 College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by PhytoPharmica (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. PhytoPharmica wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Clinical Nutrients™ for Women	Take Control of Your: <ul style="list-style-type: none"> <li>• Menstrual cramps</li> <li>• Occasional PMS</li> <li>• Carbohydrate cravings</li> <li>• Unbalanced vitamin levels</li> <li>• Moodiness</li> <li>• Calcium needs</li> <li>• Lack of energy*</li> </ul>	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iron, Phosphorus, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Choline Bitartrate, Black Tea Leaf Extract, Sour Cherry Fruit Extract, Green Tea Leaf Extract, Inositol, Ginger Rhizome Extract, Cranberry Fruit Extract, Chaste Tree Berry Extract, Grape Seed Extract, Bilberry Fruit Extract, Boron, Lutein, Silicon, Vanadium, Zeaxanthin

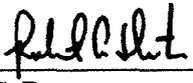
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825 CHALLENGER DRIVE  
 GREEN BAY, WI 54311-8328  
 920-469-9099  
 TOLL FREE 800-553-2370  
 FAX 920-469-4418  
 FAX TOLL FREE 888-311-5657  
 WWW.PHYTOPHARMICA.COM

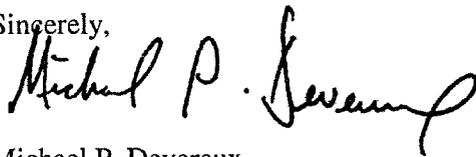
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

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

Date: 12/9/03

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



December 10, 2003

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Clinical Nutrients™ for Women	Take Control of Your: <ul style="list-style-type: none"> <li>• Vitamin imbalances</li> <li>• Irregular or difficult periods</li> <li>• Troubled sleep-no energy</li> <li>• Occasional flushing or hot flashes</li> <li>• Brain fog</li> <li>• Mood swings</li> <li>• Abdominal weight gain</li> <li>• Calcium levels*</li> </ul>	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iron, Phosphorus, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Choline Bitartrate, Black Tea Leaf Extract, Sour Cherry Fruit Extract, Green Tea Leaf Extract, Inositol, Ginger Rhizome Extract, Cranberry Fruit Extract, Chaste Tree Berry Extract, Grape Seed Extract, Bilberry Fruit Extract, Boron, Lutein, Silicon, Vanadium, Zeaxanthin

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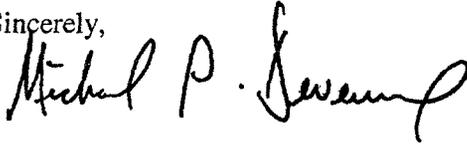
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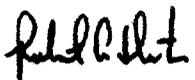
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Clinical Nutrients™ for Women	Specifically designed for women, this multivitamin and mineral formula provides everything you need for energy and essential nutrition.*	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iron, Phosphorus, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Choline Bitartrate, Black Tea Leaf Extract, Sour Cherry Fruit Extract, Green Tea Leaf Extract, Inositol, Ginger Rhizome Extract, Cranberry Fruit Extract, Chaste Tree Berry Extract, Grape Seed Extract, Bilberry Fruit Extract, Boron, Lutein, Silicon, Vanadium, Zeaxanthin

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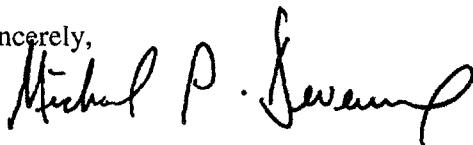
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