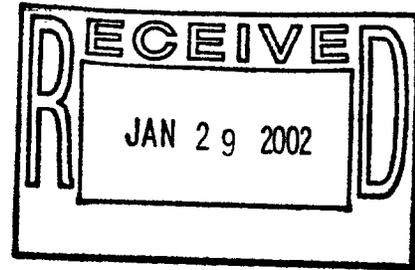


3536 '02 FEB 19 P2:21



January 8, 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 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.

| <u>COMPANY</u> | <u>PRODUCT NAME</u> | <u>DIETARY INGREDIENTS</u> | <u>STATEMENTS</u> |
|----------------|------------------------------------|---|--|
| PhytoPharmica | Clinical Nutrients for 50-Plus Men | Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Mixed Bioflavonoids, Saw Palmetto, Ginger rhizome extract, Alfalfa aerial part extract, Choline Bitartrate, Inositol, PABA, Green Tea leaf extract, Betaine HCl, L-Glutamic Acid HCl, Korean Ginseng, Bromelain, Papain, Pepsin, Lipase, Boron, Vanadium | Niacin is important to maintain healthy cholesterol levels that are already within the normal range. |

79086

 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 Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

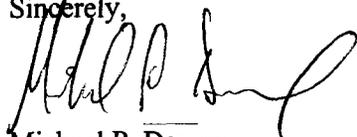
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/8/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at
(920) 469-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer