



PhytoPharmica[®]

NATURAL MEDICINES[™]

September 9, 2003

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SEP 15 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Mr. Moore:

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. 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.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
Phyto-Pharmica (a Division of Integrative Therapeutics, Inc.)	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, Choline Bitartrate, Saw Palmetto Berry Extract, Sour Cherry Fruit Extract, Black Tea Leaf Extract, Ginger Rhizome Extract, Green Tea Leaf Extract, Inositol, Betaine HCl, Grape Seed Extract, Panax Ginseng Root Extract, Bromelain, Papain, Bilberry Fruit Extract, Pepsin, Lipase, Boron, Lycopene, Lutein, Vanadium, Zeaxanthin	Powerful whole food antioxidants for healthy cell development.*

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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: 4/9/03

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