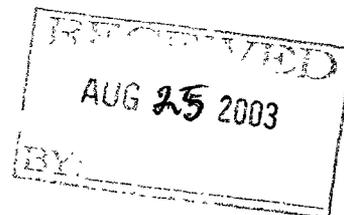




5735 '03 10 29 10:10

August 13, 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, (a Division of Integrative Therapeutics, Inc.) 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
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	Glucosamine occurs naturally in the body. It is a basic building block for the biosynthesis of glycosaminoglycans (GAGs) and proteoglycans (PGs) (giant molecules with many GAGs attached), which are important constituents of the articular cartilage.* It also is required for the formation of lubricants and protective agents for the joints.*

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.

By: Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/13/03

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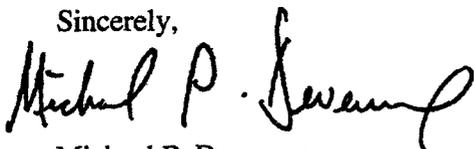
825 CHALLENGER DRIVE
 GREEN BAY, WI 54311-8328
 920-469-9099
 TOLL FREE 800-553-2370
 FAX 920-469-4418
 FAX TOLL FREE 888-311-5657
 WWW.PHYTOPHARMICA.COM

975 0162 LET

12744

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,

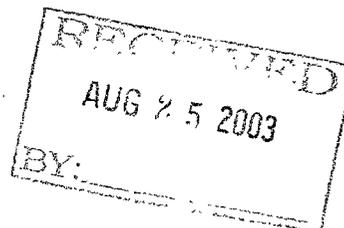
A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



August 13, 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



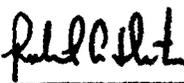
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	Depletion of sulfate leads to decreased synthesis of GAGs, and sulfate administration helps counteract sulfate depletion.*

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.

By: 

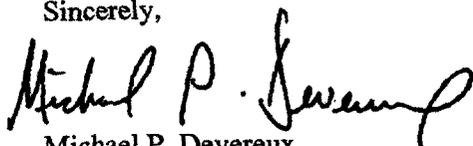
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/13/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer

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



August 13, 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

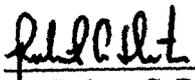
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This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and 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.

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PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	To date, more than 20 clinical studies using glucosamine sulfate have been reported, with nearly 3,000 patients receiving either glucosamine sulfate or placebo. These studies show a favorable response to glucosamine sulfate vs. placebo in supporting healthy joint function.*

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.

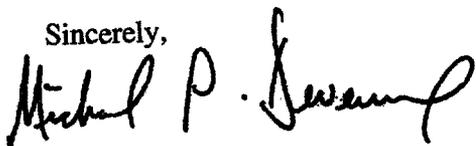
By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/13/03

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-832
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
FAX TOLL FREE 888-311-565
WWW.PHYTOPHARMICA.COM

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



PhytoPharmica
NATURAL MEDICINES™

August 13, 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

RECEIVED
AUG 25 2003
BY: _____

RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	Healthy chondroitin sulfate is associated with joint health.

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.

By: Robert C. Doster
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/13/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,

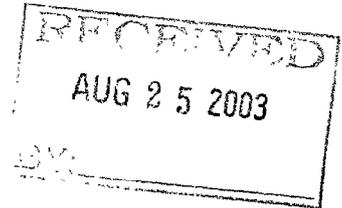
Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

825 CHALLENGER DRIVE
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WWW.PHYTOPHARMICA.COM



August 13, 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:

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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	Research has shown that supplementation of chondroitin sulfate is beneficial to the status of chondroitin sulfate in joint cartilage.*

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.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/13/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,

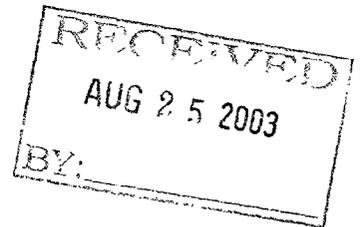
Michael P. Devereux
Chief Financial Officer

825 CHALLENGER DRIVE
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August 14, 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

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	The mechanism of action of CS is probably similar in nature to GS, since it can also provide substrates (or building blocks) for proteoglycan synthesis.*

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.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,

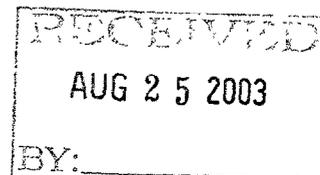

Michael P. Devereux
Chief Financial Officer

825 CHALLENGER DRIVE
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August 14, 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



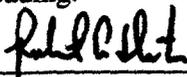
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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	CS could also influence the in vitro growth and metabolism of glycosaminoglycans.*

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.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer

825 CHALLENGER DRIVE
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August 14, 2003

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



RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	A meta-analysis in the United States located 9 trials with 799 patients taking CS, while another meta-analysis in Austria located 7 trials with 372 patients taking CS. Both of them concluded that CS is superior to placebo in supporting healthy joint function.*

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.

By: Robert C. Doster

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

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

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



August 14, 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

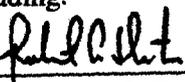
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COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	Evidence indicates that a combination of GS and CS may produce a synergistic effect in supporting healthy joint function.*

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.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-832
920-469-9099
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FAX TOLL FREE 888-311-562
WWW.PHYTOPHARMICA.COM



August 14, 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

RECEIVED
AUG 25 2003
BY:

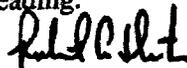
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PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	In laboratory studies, a combination of GS and CS produced other effects also supportive of joint health.* They may also modulate articular cartilage matrix metabolism.*

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.

By: 

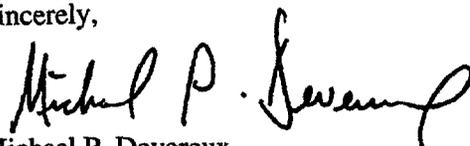
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/14/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer

825 CHALLENGER DRIVE
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August 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

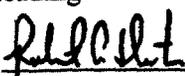
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	In a randomized, double-blind, placebo-controlled crossover trial, a combination of GS and CS significantly provided significant support for healthy joint function in the knee and spine.*

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.

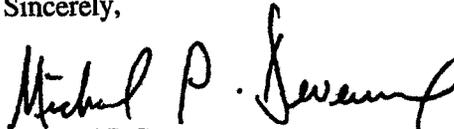
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/15/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer



August 15, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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RE: Label Claims/Disclaimers

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PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	In another randomized, placebo-controlled human study, administration of a combination of GS and CS for 6 months provided support for knee and joint health.*

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.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/15/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer

Glucosamine Sulfate and Chondroitin 30p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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August 15, 2003

Mr. Robert Moore
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Dietary Supplements, HFS 811
Food and Drug Administration
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College Park, MD 20740

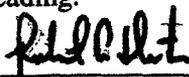
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PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Glucosamine Sulfate and Chondroitin	Chloride, Sodium, Glucosamine Sulfate, Chondroitin Sulfate	A study reported that administration of LMW marine CS (800 mg/day) supports joint health.* Another study showed that oral ingestion of LMW marine CS provided support for healthy joint function in older adults.*

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.

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/15/03

If you have any questions, please contact Robert Doster, Senior Vice President Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer

Glucosamine Sulfate and Chondroitin 31p

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