



January 12, 2004

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

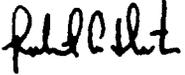
RE: Label Claims/Disclaimers

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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cellular Forte with IP-6® and Inositol	In smaller amounts, IP-6 is contained in most mammalian cells, where it supports cellular functions.* In addition, IP-6 functions as an antioxidant.*	IP-6 (inositol hexaphosphate), Inositol

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: 1/12/04

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13632

Cellular Forte 24p

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

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, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with a large initial "M" and a distinct "P" and "D".

Michael P. Devereux
Chief Financial Officer



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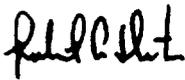
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cellular Forte with IP-6® and Inositol	Inositol supports healthy nerve transmission, healthy fat metabolism, and is needed for cell membrane structure and integrity.*	IP-6 (inositol hexaphosphate), Inositol

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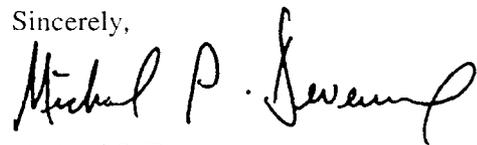
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/13/04

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Michael P. Devereux
Chief Financial Officer



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Cellular Forte with IP-6® and Inositol	While independently these molecules support immune health, the unique combination of IP-6 and inositol functions synergistically.*	IP-6 (inositol hexaphosphate), Inositol

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Title: Senior Vice President of Scientific Affairs

Date: 1/13/04

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Michael P. Devereux
Chief Financial Officer



January 15, 2004

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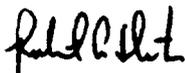
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Cellular Forte with IP-6® and Inositol	Research indicates the combination of IP-6 and inositol supports stronger healthy cell development and increased natural killer cell activity as opposed to either compound alone.*	IP-6 (inositol hexaphosphate), Inositol

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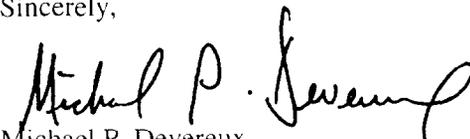
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/15/04

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Cellular Forte with IP-6® and Inositol	Inositol hexaphosphate is hypothesized to support healthy cellular function through dephosphorylation into IP-3.*	IP-6 (inositol hexaphosphate), Inositol

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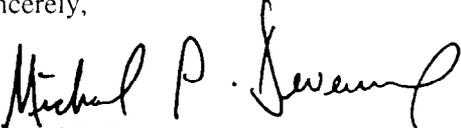
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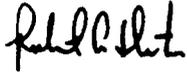
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Cellular Forte with IP-6® and Inositol	Research suggests that IP-6, and is lower phosphorylated, forms help support healthy cell development.*	IP-6 (inositol hexaphosphate), Inositol

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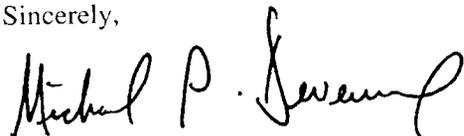
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