



December 9, 2003

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JAN - 5 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>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Take Control of: <ul style="list-style-type: none"> • Vitamin imbalances • Irregular or difficult periods • Troubled sleep-no energy • Occasional flushing or hot flashes • Brain fog • Mood swings • Abdominal weight gain • Calcium levels* 	Vitamin C, Vitamin D, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Betaine HCl, Boron, Silicon, Strontium

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: 12/9/03

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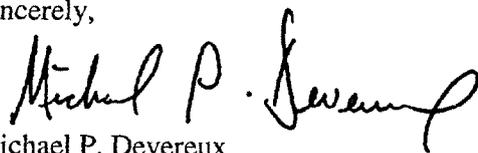
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OsteoPrime Forte 8p

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 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



December 9, 2003

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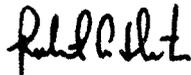
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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Take Control of: <ul style="list-style-type: none"> • Hot flashes • Night sweats • Low energy • Mood swings • Restless sleep • Irritability • Calcium needs • Inadequate vitamin levels* 	Vitamin C, Vitamin D, Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Betaine HCl, Boron, Silicon, Strontium

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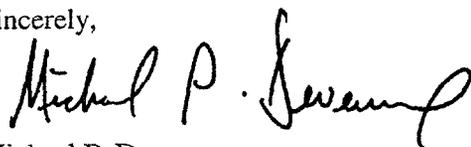
Robert C. Doster
 Title: Senior Vice President of Scientific Affairs

Date: 12/9/03

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Michael P. Devereux
Chief Financial Officer