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March 4, 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*	Calcium is the primary building material for bones - more than 99% of the body's calcium is found in the bones and teeth.*	Calcium

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: 3/4/04

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

OsteoPrime Forte 10p

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LET

13858

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



March 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

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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Magnesium is vital to the ongoing process of bone formation.*	Magnesium

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: 3/5/04

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



March 6, 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

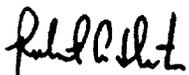
RE: Label Claims/Disclaimers

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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*	Manganese is an essential cofactor for specific enzymes in bone formation.*	Manganese

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: 

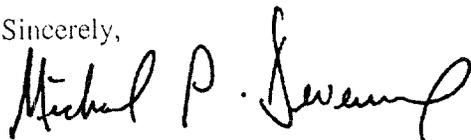
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/6/04

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

OsteoPrime Forte 12p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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WWW.PHYTOPHARMICA.COM



March 7, 2004

Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
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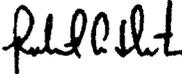
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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Folic acid & other B-vitamins help break down homocysteine, a substance which can interfere with the collagen cross-linking that creates strong bone.*	Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin)

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

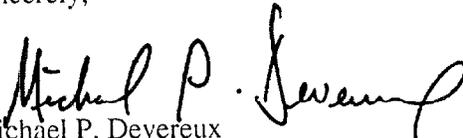
Title: Senior Vice President of Scientific Affairs

Date: 3/7/04

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
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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



March 7, 2004

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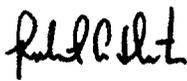
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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Boron reduces the urinary excretion of calcium*	Boron

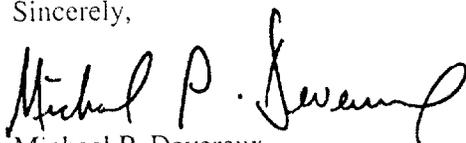
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By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 3/7/04

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

OsteoPrime Forte 14p

825 CHALLENGER DRIVE
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March 8, 2004

Office of Nutritional Products, Labeling &
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Center for Food Safety and Applied Nutrition
Food and Drug Administration
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College Park, MD 20740

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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Strontium occurs in relatively large concentrations in the bones where it may replace a small fraction of the calcium in hydroxyapatite crystals.*	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: 3/8/04

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

OsteoPrime Forte 15p

825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
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March 9, 2004

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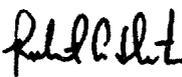
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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Silicon is found in high concentrations at calcification sites in growing bone, where it helps strengthen the connective tissue.*	Silicon

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By: 

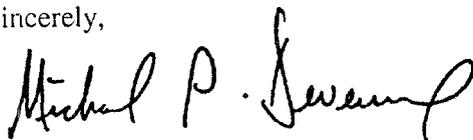
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/9/04

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

OsteoPrime Forte 16p

825 CHALLENGER DRIVE
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March 10, 2004

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

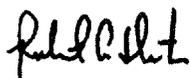
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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Zinc enhances the biochemical actions of Vitamin D.*	Zinc

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: 3/10/04

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



March 11, 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

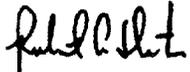
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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
OsteoPrime® Forte*	Copper is a co-factor for an enzyme which strengthens connective tissue.*	Copper

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: 3/11/04

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

OsteoPrime Forte 18p

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