



OCT 16 2002

1739

James Meschino, DC, MS.
President
Nutra Therapeutics International
40 East Main Street
Suite 168
Newark, Delaware 19711

Dear Dr. Meschino:

This is in response to your letter of October 9, 2002 to the Food and Drug Administration (FDA) responding to our September 17, 2002 letter concerning the claims being made for the product **Glucosamine Joint Formula**.

In your letter, you proposed to change the claim being made for your product to:
"Advanced Formula to Support Joint Function and Mobility;"
"Glucosamine Joint Formula...which work synergistically to support the structure and integrity of joint cartilage as well as joint mobility. Our unique formulation...nourish joint cartilage and help support joint health as we age."

The replacement of the claim cited in our previous letter with the claims listed above appears to resolve the issues we raised in that letter and we have no further comment on the claims you intend to make for **Glucosamine Joint Formula**.

Please contact us if we may be of further assistance.

Sincerely yours,

for Robert J. Moore

John B. Foret
Director
Division of Compliance and Enforcement
Office of Nutritional Products, Labeling
and Dietary Supplements
Center for Food Safety
and Applied Nutrition

978-0163

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Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300

FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200

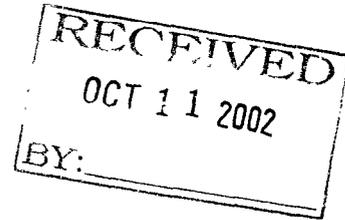
FDA, Philadelphia District Office, Office of Compliance, HFR-MA140

Bob Moore


NUTRA THERAPEUTICS™

October 9, 2002

Division of Compliance and Enforcement
Office of Nutritional Products, Labeling and Dietary Supplements
US Food & Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



Via Courier

Dear Sirs:

In response to the concerns raised in your letter received September 17, 2002, we have once again revised our Glucosamine Joint Formula. A copy of the revised label is enclosed herein.

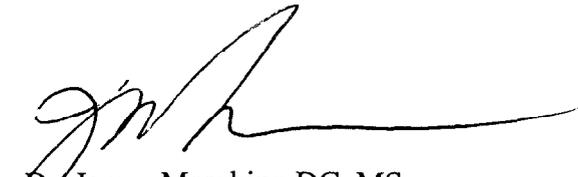
It is our belief that this label contains statements allowed for under section 403 (r) (6) of the Federal Food, Drug, & Cosmetic Act.

As President of this company, I hereby certify that the statements made are complete and accurate and our company has substantiation that the statements are truthful and not misleading.

We would appreciate your input with regards to these labels as soon as possible.

Should you require any further information with regards to this matter, please contact me at (888) 251-1010 or by email, jim@nutratherapeutics.com.

Sincerely yours,


Dr. James Meschino DC, MS.
President, Nutra Therapeutics International

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Suggested Supplementation: Adults take one capsule three times daily with meals as a dietary supplement.

Glucosamine Joint Formula provides a pure and stabilized grade of glucosamine sulfate, MSM, bromelain enzymes, and the bioflavonoid quercetin, which work synergistically to support the structure and integrity of joint cartilage as well as joint mobility. Our unique formulation provides important natural agents that nourish joint cartilage and help support joint health as we age.**

Do not use if outer seal is broken or missing.
Store in a cool, dry location. Keep out of reach of children.

**The FDA has not evaluated this statement. This product is not intended to diagnose, treat, cure, or prevent disease.



NUTRA THERAPEUTICS

*The Natural Choice of
Healthcare Professionals*

**GLUCOSAMINE
JOINT FORMULA**

• WITH MSM •

• Advanced Formula to Support
Joint Function and Mobility**

DIETARY SUPPLEMENT / 90 CAPSULES

Supplement Facts

Serving Size: 3 Capsules		Servings per Container: 30	
	Amount Per Serving	% Daily Value	
Glucosamine Sulfate	500 mg		*
MSM (Methyl Sulfonyl Methane)	400 mg		*
Quercetin	100 mg		*
Bromelain	300 mg		*

*Daily Value Not Established

Other ingredients: Stearic Acid (vegetable source) and gelatin.

Does not contain artificial preservatives, dyes, flavors, or added sugar, corn, starch, milk products, egg, wheat, yeast, and is soy free.

● Guaranteed quality, purity and potency.

Distributed by: Nutra Therapeutics International
40 East Main Street, #168, Newark, DE 19711

For research articles and education visit
www.nutra-education.com

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