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4-18-02

March 27, 2002

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
U. S. Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740-3835

RECEIVED  
APR 18 2002  
BY:


RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica 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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Glucosamine Sulfate-750	Chloride, Sodium, Glucosamine Sulfate	Glucosamine sulfate is a basic building block of cartilage and 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 has substantiation that the statements are truthful and not misleading.

By:   
Cheryl Myers

Title: Director of Product Development

Date: 3-27-02

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

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LET 9864

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 28, 2002

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
U. S. Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740-3835

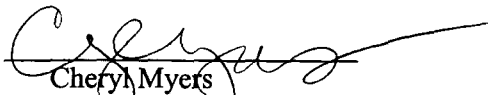
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Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Glucosamine Sulfate-750	Chloride, Sodium, Glucosamine Sulfate	PhytoPharmica's formula features stabilized glucosamine sulfate, ensuring the beneficial compounds reach your joints at full potency.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

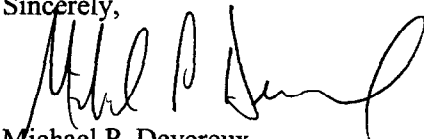
By:   
Cheryl Myers

Title: Director of Product Development

Date: 3-28-02

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

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GREEN BAY, WI 54311-8328  
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April 5, 2002

Office of Special Nutritionals (HFS-450)  
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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Glucosamine Sulfate-750	Chloride, Sodium, Glucosamine Sulfate	It's an essential companion to FlexAgility for complete support.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

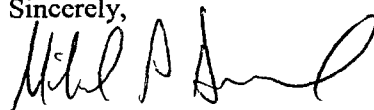
By:   
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/5/02

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