



April 20, 2003

2687 '03 MAY 27 P3:12

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RECEIVED
MAY - 5 2003

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), 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. 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.

| COMPANY | PRODUCT NAME | DIETARY INGREDIENTS | STATEMENTS |
|---|---------------------|---------------------------------------|--|
| Phyto-Pharmica (a Division of Integrative Therapeutics Inc.) | Glucosamine Sulfate | Chloride, Sodium, Glucosamine Sulfate | Glucosamine Sulfate 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, (a Division of Integrative Therapeutics, Inc.) has substantiation that the statements are truthful and not misleading.

By: Robert Doster

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/20/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer

975 0162

LET 11929

Glucosamine Sulfate 12p

84351
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



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|---|---------------------|---------------------------------------|---|
| Phyto-Pharmica (a Division of Integrative Therapeutics Inc.) | Glucosamine Sulfate | Chloride, Sodium, Glucosamine Sulfate | Glucosamine sulfate is up to 98% absorbable, so more glucosamine reaches your body's joints.* |

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.

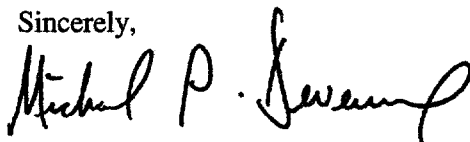
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/21/03

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Sincerely,



Michael P. Devereux
Chief Financial Officer

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