

March 25, 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



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.

| COMPANY  | PRODUCT<br>NAME      | DIETARY INGREDIENTS  | STATEMENTS  |
|--|----------------------|--|---|
| Phyto-<br>Pharmica<br>(a Division<br>of Integrative<br>Therapeutics<br>Inc.) | OsteoPrime®<br>Forte | Vitamin C, Vitamin D,<br>Vitamin K, Thiamin,<br>Riboflavin, Niacin, Vitamin<br>B6, Folic Acid, Vitamin<br>B12, Pantothenic Acid,<br>Calcium, Magnesium,<br>Zinc, Selenium, Copper,<br>Manganese, Chromium,<br>Molybdenum, Sodium,<br>Betaine HCI, Boron,<br>Silicon, Strontium | Dietary supplement to<br>support and maintain<br>healthy bones and bone<br>structure* |

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 C. Doster Title: Senior Vice President of Scientific Affairs

Date: 3/25/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608

Sincerely

Michael P. Devereux Chief Financial Officer 97 OsteoPrim Forte 1p

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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