

June 14, 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 NAME	<u>DIETARY INGREDIENTS</u>	STATEMENTS
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Hyporil™	Vitamin A, Vitamin C, Thiamin, Riboflavin, Niacin, Vitamin B6, Vitamin B12, Pantothenic Acid, Zinc, Manganese, Chromium, Potassium, Inositol, Pancreas Extract, Choline Bitartrate, L-Methionine, Beet (Beta vulgaris) Root, Adrenal Extract, Betaine HCI, Wild Yam (Dioscorea villosa) Root, Pituitary Extract, Barberry (Berberis vulgaris) Bark of Root	It's especially important for people who wish to maintain optimum energy levels throughout the day.*

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.

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: (0-14-02

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

Michael P. Devereux

Chief Financial Officer

Hyporil 2p

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

825 CHALLENGER DRIVE