

January 13, 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

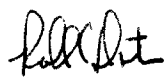
RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer 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.

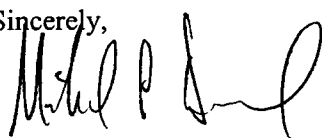
<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica	GugulPlex	Vitamin C, Niacin, Chromium, Guggul gum extract, Ginger rhizome extract	Maintains healthy cholesterol levels that are already within the normal range.

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: 1/13/02

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

97S 0162 LET 9370

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