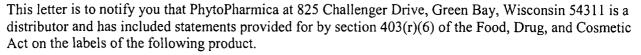


March 24, 2002

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:



COMPANY	PRODUCT NAME	<u>DIETARY</u> INGREDIENTS	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Glucoril™	Vitamin C, Vitamin E, Vitamin B6, Vitamin B12, Biotin, Magnesium, Zinc, Selenium, Manganese, Chromium, Bilberry (Vaccinium myrtillus) Fruit Extract, Gymnema (Gymnema sylvestre) Leaf Extract, Bitter Melon (Momordica charantia) Fruit Extract, Fenugreek (Trigonella foenum- groecum) Seed Extract	Dietary supplement to help support proper carbohydrate metabolism*

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: 3/24/02

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608 79930

Michael P. Devereux Chief Financial Officer

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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

Glucoril 2p