



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

APR 03 2002

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.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<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

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

Sincerely,

Michael P. Devereux
Chief Financial Officer

Glucoril 2p

375 0162

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