



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

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.)	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 HCl, Wild Yam (Dioscorea villosa) Root, Pituitary Extract, Barberry (Berberis vulgaris) Bark of Root	Dietary supplement to support carbohydrate and sugar 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: 3/25/02

79930

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

Hyporil 1p

3/5 0162

LET 9756

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael P. Devereux
Chief Financial Officer