



ENZYMATIC THERAPY

INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas → PhytoPharmica
Tyler Encapsulations → Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 → F: 503.582.0467

ENZYMATIC THERAPY® & PHYTOPHARMICA®

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 → F: 888.570.6460 (Enzymatic)
P: 920.469.9099 → F: 920.469.4418 (Phyto)

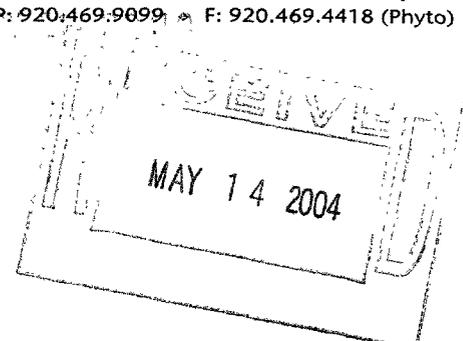
May 10, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.



PRODUCT NAME	STATEMENT	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Fatigued to Fantastic!® Adrenal Stress-End™*	Supports healthy adrenal gland function to help avoid adrenal burnout and fatigue.*	Vitamin C (ascorbic acid and from rose hips), Vitamin B6 (as pyridoxine HCl), Pantothenic acid (as calcium D-pantothenate), Adrenal Polypeptide Fractions, Betaine, L-Tyrosine, Licorice (Glycyrrhiza glabra) root and rhizome extract standardized to contain 5% glycyrrhizic acid, Adrenal Cortex Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. 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: 5/10/04

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

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

975 0162

LET

14089



INTEGRATIVE THERAPEUTICS INC.*
 NF Formulas → PhytoPharmica
 Tyler Encapsulations → Vitaline Formulas

9755 SW Commerce Circle, Suite B2
 Wilsonville, OR 97070
 P: 503.582.8386 → F: 503.582.0467

ENZYMATIC THERAPY*
 &
PHYTOPHARMICA*

825 Challenger Drive, Green Bay, WI 54311-8328
 P: 920.469.1313 → F: 888.570.6460 (Enzymatic)
 P: 920.469.9099 → F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY
 INCORPORATED
*What **Better** feels like.™*

May 10, 2004

Office of Nutritional Products, Labeling &
 Dietary Supplements, HFS 810
 Center for Food Safety and Applied Nutrition
 Food and Drug Administration
 5100 Paint Branch Parkway
 College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	Since it is not stored in the body, it is essential to have some vitamin C intake each day. It has been shown to help maintain connective tissue and boost the immune system, which may need extra support during periods of chronic stress.*	Vitamin C (ascorbic acid and from rose hips)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

Robert C. Doster

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/10/04

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
 Chief Financial Officer



ENZYMATIC THERAPY

INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas ♦ PhytoPharmica
Tyler Encapsulations ♦ Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 ♦ F: 503.582.0467

ENZYMATIC THERAPY™ & PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 ♦ F: 888.570.6460 (Enzymatic)
P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

May 11, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	Vitamin B6 supports the absorption of fats and protein; healthy red blood cell formation, healthy nervous system function and the healthy synthesis of nucleic acids RNA and DNA, which contain the genetic instructions for the reproduction of all cells and for healthy cellular growth.*	Vitamin B6 (as pyridoxine HCl)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

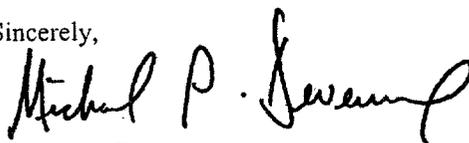
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/11/04

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

Sincerely,



Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas → PhytoPharmica
Tyler Encapsulations → Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 → F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 → F: 888.570.6460 (Enzymatic)
P: 920.469.9099 → F: 920.469.4418 (Phyto)

May 11, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

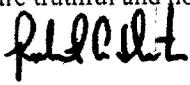
RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	Vitamin B is required to make serotonin, melatonin and dopamine - all vital in maintaining energy levels.*	Vitamin B6 (as pyridoxine HCl)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/11/04

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

Sincerely,

Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas → PhytoPharmica
Tyler Encapsulations → Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 → F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 → F: 888.570.6460 (Enzymatic)
P: 920.469.9099 → F: 920.469.4418 (Phyto)

May 11, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

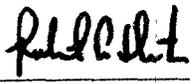
RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	Vitamin B6 aids in the formation of several neurotransmitters and therefore is an essential nutrient in the regulation of mental processes and possibly even moods - quite important when dealing with stress-filled lifestyles.*	Vitamin B6 (as pyridoxine HCl)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

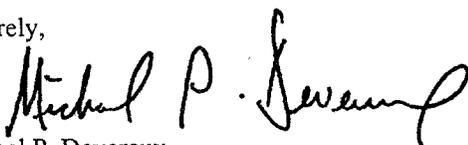
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/11/04

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

Sincerely,



Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY

INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas → PhytoPharmica
Tyler Encapsulations → Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 → F: 503.582.0467

ENZYMATIC THERAPY® & PHYTOPHARMICA®

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 → F: 888.570.6460 (Enzymatic)
P: 920.469.9099 → F: 920.469.4418 (Phyto)

May 11, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	Pantothenic acid is an essential component in the production of coenzyme A, a vital catalyst that is required for the conversion of carbohydrates, fats, and protein into energy.*	Pantothenic acid (as calcium D-pantothenate)

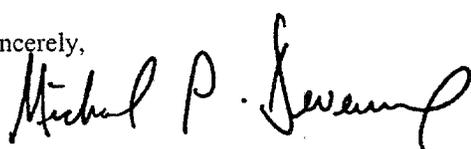
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/11/04

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas → PhytoPharmica
Tyler Encapsulations → Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 → F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 → F: 888.570.6460 (Enzymatic)
P: 920.469.9099 → F: 920.469.4418 (Phyto)

May 12, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	Pantothenic acid is also necessary in the synthesis of hormones and cholesterol.*	Pantothenic acid (as calcium D-pantothenate)

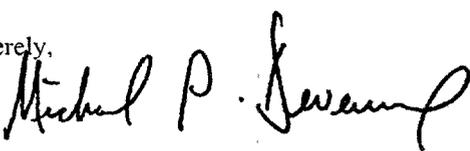
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/12/04

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED
What Better feels like.™

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas ♦ PhytoPharmica
Tyler Encapsulations ♦ Vitamine Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 ♦ F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 ♦ F: 888.570.6460 (Enzymatic)
P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

May 13, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	L-Tyrosine (also known simply as "tyrosine") is an amino acid that supports healthy nerve transmission and healthy functioning of the adrenal, thyroid, and pituitary glands.*	L-Tyrosine

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

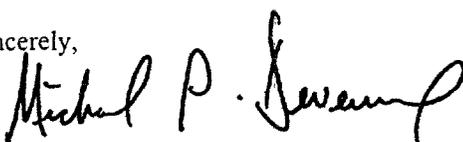
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/13/04

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

Sincerely,



Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.*

May 13, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

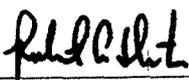
RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

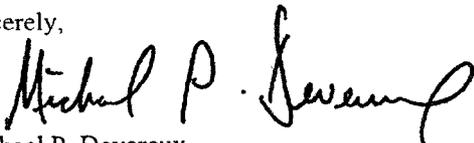
<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic! [®] Adrenal Stress-End [™] *	Because of its effect on neurotransmitters, L-tyrosine may have an effect on mood and environmental stress.*	L-Tyrosine

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 5/13/04

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

Sincerely,

Michael P. Devereux
Chief Financial Officer

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas ♦ PhytoPharmica
Tyler Encapsulations ♦ Vitaline Formulas
9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 ♦ F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™
825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 ♦ F: 888.570.6460 (Enzymatic)
P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)



ENZYMATIC THERAPY
INCORPORATED
What Better feels like.™

INTEGRATIVE THERAPEUTICS INC.™
NF Formulas → PhytoPharmica
Tyler Encapsulations → Vitaline Formulas

9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 → F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 → F: 888.570.6460 (Enzymatic)
P: 920.469.9099 → F: 920.469.4418 (Phyto)

May 14, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fatigued to Fantastic!® Adrenal Stress-End™*	One of the most important constituents of licorice is glycyrrhizin, which breaks down into glycyrrhizic or glycyrrhetic acid.* It inhibits the breakdown of cortisol produced by the body, helping support a balanced level of this important hormone.* It does this by inhibiting human 11-β-hydroxysteroid dehydrogenase, the enzyme that catalyzes the conversion of cortisol to cortisone, and bacterial 3-alpha, 20-beta-hydroxysteroid dehydrogenase.* By doing this, it helps prevent 11-β-hydroxysteroid dehydrogenase, from minimizing the binding of cortisol to mineral corticoid receptors.*	Licorice (Glycyrrhiza glabra) root and rhizome extract standardized to contain 5% glycyrrhizic acid

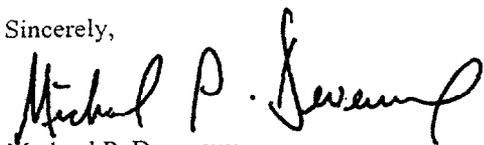
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiated that the statements are truthful and not misleading.

By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 5/14/04

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer