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Wilsonville, OR 97070
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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)

January 26, 2005

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

FEB 16 2005

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>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
UBQH™	Enhanced bioavailability*	Ubiquinol

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: 1-26-05

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

Sincerely,

Michael P. Lawrence
Michael P. Lawrence
Chief Financial Officer

975 0162

LET 15582



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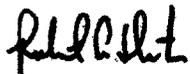
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
UBQH™	Provides supportive effects on mental acuity decline associated with aging.*	Ubiquinol

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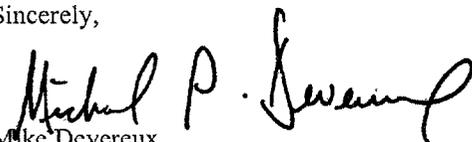
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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Mike Devereux
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	Supports neurological processes and cerebral health.*	Ubiquinol

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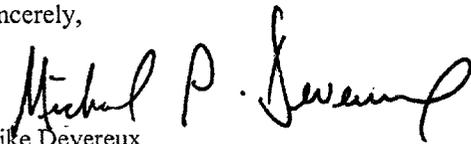
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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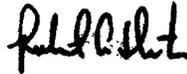
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	Promotes mental well being.*	Ubiquinol

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By: 

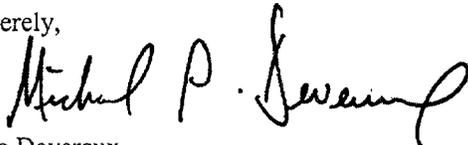
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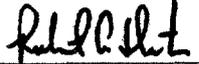
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
UBQH™	QH supports high-energy phosphate (ATP) production. Demonstrated in experimental animals to enhance stamina (rat water treading test) and provide reserve energy through its cardiovascular/anti-fatigue support.*	Ubiquinol

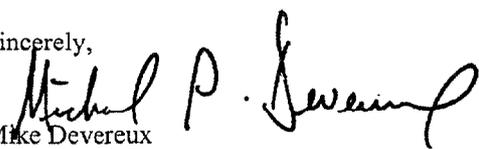
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January 28, 2005

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
UBQH™	Enhances endurance*	Ubiquinol

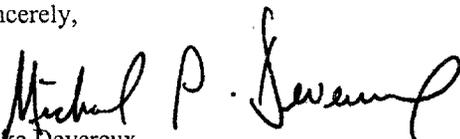
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Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 1-28-05

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Mike Devereux
Chief Financial Officer



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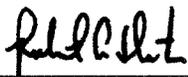
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	Increases energy*	Ubiquinol

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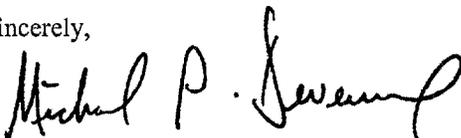
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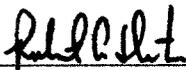
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	Combats fatigue and enhances mental stamina*	Ubiquinol

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UBQH™	Reduces general fatigue and increases mental and physical energy.*	Ubiquinol

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Date: 1-28-05

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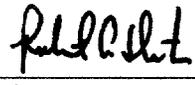
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UBQH™	Dietary supplement to maintain healthy insulin and blood sugar level that are already within normal range.*	Ubiquinol

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UBQH™	Increases antioxidant activity through free radical scavenging, resulting in support of healthy cognitive function.*	Ubiquinol

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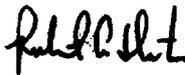
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	Supports mental clarity*	Ubiquinol

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ENZYMATIC THERAPY
INCORPORATED

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INTEGRATIVE THERAPEUTICS INC.™

NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2
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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)

January 31, 2005

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

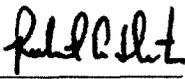
RE: Label Claims/Disclaimers

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	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	Orally administered QH bioavailability is at least 2x that of Q10.*	Ubiquinol

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: 1-31-05

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

Sincerely,



Mike Devereux
Chief Financial Officer



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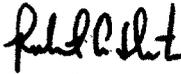
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	Better utilization and bioavailability than Q10.*	Ubiquinol

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

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