



**INTEGRATIVE THERAPEUTICS INC.™**  
 NF Formulas • PhytoPharmica  
 Tyler Encapsulations • Vitaline Formulas

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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)

**ENZYMATIC THERAPY**

What **Better** feels like.™

0316 5 APR -7 P2:32

April 1, 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

APR -4 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.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Doctor's Choice for 45-Plus Women™	Powerful antioxidant for graceful aging*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Vitamin K (as phytonadione), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as tricalcium phosphate, calcium carbonate, and calcium citrate), Phosphorus (from tricalcium phosphoate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (as potassium aspartate), Choline Bitartrate, Ginger (Zingiber officinale) Rhizome Extract, Black Tea (Camellia sinensis) Leaf Extract, Sweet Cherry (Prunus avium) Fruit Extract, Green Tea (Camellia sinensis) Leaf Extract, Inositol, Soy (Glycine max), Cranberry (Vaccinium macrocarpon) Fruit Extract, Betaine HCl, Grape (Vitis vinifera) Seed Extract, Bromelain, Papain, Bilberry (Vaccinium myrtillus) Fruit Extract, Pepsin (acid-stable protease), Lipase, Boron (as sodium borate), Lutein (from Calendula officinalis), Silicon (as magnesium trisilicate), Vanadium (as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

97S 0162 LET 15989

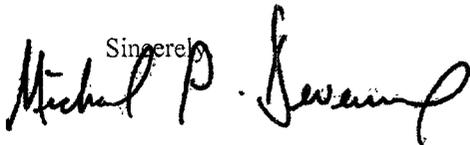
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By:   
Robert Doster

Title: Senior Vice President Scientific Affairs

Date: 4/1/05

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