



**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**

What **Better** feels like™

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June 23, 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

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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>
Glucosamine Sulfate Plus Chondroitin Sulfate	Combined to be more powerful than either ingredient alone, ITI's Glucosamine Sulfate Plus Chondroitin Sulfate offers superior support for healthy cartilage and joint function.*	Glucosamine Sulphate KCl, Chondroitin Sulfate, Proprietary Blend: Bromelain, Turmeric Root and Ginger Root

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  
Robert Doster  
Title: Senior Vice President of Scientific Affairs  
Date: 6/23/05

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

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