



INTEGRATIVE THERAPEUTICS INC.
 NF Formulas PhytoPharmica
 Tyler Encapsulations Vitaline Formulas

ENZYMATIC THERAPY
 &
PHYTOPHARMICA

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

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™

1936 6 27 12:20

January 16, 2006

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

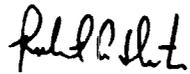
RE: Label Claims/Disclaimers

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>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Buffered Vitamin C with Larch Arabinogalactan	Vitamin C boosts T-lymphocyte, phagocyte function, leukocyte mobility, and possibly antibody and interferon production.*	Vitamin C (as ascorbic acid), Calcium (as calcium carbonate), Magnesium (as magnesium carbonate), Potassium (as potassium bicarbonate), Western Larch arabinogalactan gum (<i>Larix occidentalis</i>)

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: 1-16-06

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

Sincerely,


Michael P. Devereux
 Chief Operations Officer

975 0162 LET 17216



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Buffered Vitamin C with Larch Arabinogalactan	Larch arabinogalactan has immunostimulatory effects.*	Vitamin C (as ascorbic acid), Calcium (as calcium carbonate), Magnesium (as magnesium carbonate), Potassium (as potassium bicarbonate), Western Larch arabinogalactan gum (<i>Larix occidentalis</i>)

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By: Robert C. Doster

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

Date: 1-16-06

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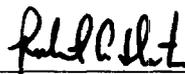
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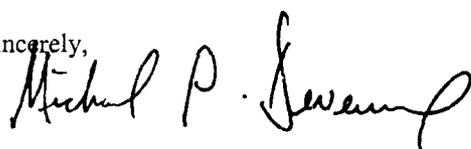
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Buffered Vitamin C with Larch Arabinolgalactan	Stimulates phagocytosis and natural killer cell activity.*	Vitamin C (as ascorbic acid), Calcium (as calcium carbonate), Magnesium (as magnesium carbonate), Potassium (as potassium bicarbonate), Western Larch arabinolgalactan gum (<i>Larix occidentalis</i>)

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