



DEC 27 2001

Ms. Jeanene Moenckmeier
Director of Legal Affairs
Enzymatic Therapy, Inc.
825 Challenger Drive
Green Bay, Wisconsin 54311

Dear Ms. Moenckmeier:

This is in response to your letter of November 14, 2001 to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that Enzymatic Therapy, Inc. is making the following claims for the following products marketed under the Enzymatic Therapy, Inc. and PhytoPharmica brand names:

The products **Enzymatic Therapy Candida Formula** and **PhytoPharmica Candimycin** use the claims "...fulfill the needs of a yeast-controlled program" and "Research suggests a link between these natural compounds and the balance of yeast in the body." These claims, including the names of the products in and of themselves (i.e., Candida Formula and Candimycin), are disease claims because they suggest that the products are intended to treat, prevent, or mitigate diseases, namely Candida yeast infections.

The products **PhytoPharmica Clinical Nutrients for 50-Plus Men** and **Enzymatic Therapy Doctor's Choice for 50-Plus Men** use the claim "...important to healthy blood cholesterol levels." In the preamble to the January 6, 2000 final rule on structure/function claims (see 65 FR 1000 at 1018), FDA stated that claims about the maintenance of normal cholesterol levels did not necessarily constitute implied disease claims. We stated, however, that because "many people think of cholesterol solely in terms of the negative role of elevated cholesterol in heart disease," in order to avoid implying that the product prevents or treats heart disease, a cholesterol maintenance claim would have to clarify that the product is only for maintenance of cholesterol levels that are already within the normal range. The claim for your product contains no such clarification, however. Therefore, FDA considers it to be an implied claim to prevent coronary heart disease by preventing the development of elevated cholesterol levels or reducing elevated cholesterol.

The products **PhytoPharmica Clinical Nutrients for Diabetics** and **Enzymatic**

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Therapy Doctor's Choice for Diabetics use the claims "...to provide nutritional support for diabetics," "provides targeted nutrition support for individuals with diabetes," "Clinical Nutrients for Diabetics is a nutritional supplement specifically formulated to provide vitamins, minerals, and herbs for individuals with elevated blood sugar levels," and "Clinical Nutrients for Diabetics includes...Gymnema sylvestre, an herb long recommended for diabetics." These claims, including the names of the products because they use the term "diabetics" (i.e., Clinical Nutrients for Diabetics and Doctor's Choice for Diabetics), are disease claims. They are disease claims because they establish that the products are intended for use in the clinical management of patients with diabetes, including the clinical management of elevated blood sugar levels.

The products **PhytoPharmica Clinical Nutrients to Retain Healthy Cholesterol Levels, Enzymatic Therapy Doctor's Choice to Retain Healthy Cholesterol Levels, Enzymatic Therapy Flush-Free HexaNiacin, PhytoPharmica Flush-Free Niacin, Enzymatic Therapy GugulPlex, and PhytoPharmica GugulPlus** use the claim "...retain healthy cholesterol levels." In the preamble to the January 6, 2000 final rule on structure/function claims (see 65 FR 1000 at 1018), FDA stated that claims about the maintenance of normal cholesterol levels did not necessarily constitute implied disease claims. We stated, however, that because "many people think of cholesterol solely in terms of the negative role of elevated cholesterol in heart disease," in order to avoid implying that the product prevents or treats heart disease, a cholesterol maintenance claim would have to clarify that the product is only for maintenance of cholesterol levels that are already within the normal range. The claim for your product contains no such clarification, however. Therefore, FDA considers it to be an implied claim to prevent coronary heart disease by preventing the development of elevated cholesterol levels or reducing elevated cholesterol. For the same reason, FDA considers the product names "**PhytoPharmica Clinical Nutrients to Retain Healthy Cholesterol Levels**" and "**Enzymatic Therapy Doctor's Choice to Retain Healthy Cholesterol Levels**" to be implied disease claims in and of themselves.

The products **Enzymatic Therapy, Inc. DMG-B15-Plus and PhytoPharmica Pro-DMG-B15** use the claims "Potassium is well-known for the role it plays in regulating blood pressure...role it plays in blood pressure" and "Researchers continue to explore the connection between calcium and cholesterol levels." In the preamble to the January 6, 2000 final rule on structure/function claims (see 65 FR 1000 at 1018), FDA stated that claims about the maintenance of normal cholesterol levels did not necessarily constitute implied disease claims. We stated, however, that because "many people think of cholesterol solely in terms of the negative role of elevated cholesterol in heart disease," in order to avoid implying that the product prevents or treats heart disease, a cholesterol maintenance claim would have to clarify that the product is only for maintenance of cholesterol levels that are already within the normal range. The claim for your product

contains no such clarification, however. Therefore, FDA considers it to be an implied claim to prevent coronary heart disease by preventing the development of elevated cholesterol levels or reducing elevated cholesterol. The same principle applies to your claim about blood pressure; that is, a claim that does not establish that the claim is about blood pressure that is already within normal limits implies that the product is intended to treat elevated blood pressure or hypertension, which is a disease.

The products **Enzymatic Therapy Garlinase 4000** and **PhytoPharmica Garlitrin 4000** use the claims "...retain healthy cholesterol levels" and "Support retention of healthy cholesterol levels." In the preamble to the January 6, 2000 final rule on structure/function claims (see 65 FR 1000 at 1018), FDA stated that claims about the maintenance of normal cholesterol levels did not necessarily constitute implied disease claims. We stated, however, that because "many people think of cholesterol solely in terms of the negative role of elevated cholesterol in heart disease," in order to avoid implying that the product prevents or treats heart disease, a cholesterol maintenance claim would have to clarify that the product is only for maintenance of cholesterol levels that are already within the normal range. The claim for your product contains no such clarification, however. Therefore, FDA considers it to be an implied claim to prevent coronary heart disease by preventing the development of elevated cholesterol levels or reducing elevated cholesterol.

The product **PhytoPharmica Glucoril** uses the claim "...an herb long recommended for diabetics." This is a disease claim because it implies that, because the product is intended for use by people with diabetes, it is intended to treat the disease that these patients have and which distinguishes them from the general consumer population.

The products **Enzymatic Therapy St. John's Wort Extract** and **PhytoPharmica HyperiMed** use the claims "...relieving occasional anxiety, apathy, sleeplessness, and feelings of worthlessness." The claims describe a group of signs and symptoms that, when considered together imply that the product is intended to treat, prevent, or mitigate diseases, namely, anxiety disorders and depression.

The products **Enzymatic Therapy Olive Leaf Extract with Hawthorn** and **PhytoPharmica Olive Leaf Extract with Hawthorn** use the claim "Useful in dilating coronary blood vessels and increasing blood flow to the heart." A claim about a product affecting blood flow to the heart is an implied disease claim. While blood flow is a normal function of the body, a claim about external intervention to affect coronary blood flow is implicitly a claim to correct a defect in coronary blood circulation because it is not necessary to improve, modify, or otherwise affect coronary blood flow unless it is impaired. Therefore, the claim for this product is a disease claim because it is a claim to treat coronary heart disease and other coronary vascular disorders.

The products **Enzymatic Therapy Potassium Plus** and **PhytoPharmica Potassium Plus** use the claims "Supports retention of healthy blood pressure levels," "...benefits blood pressure," and "...helps regulate blood pressure." As discussed above, a claim about blood pressure benefit that does not make clear that the product is only for people with blood pressure that is already within normal limits implies that a product is intended to treat elevated blood pressure or hypertension, which is a disease. The claims for these products are, therefore, disease claims.

The product **Enzymatic Therapy Quercezyme-Plus** uses the claim "...support enzyme functions that break down fibrin, a blood-clotting agent." In the preamble to the January 6, 2000 final rule on structure/function claims, we stated that although platelet aggregation is a normal function needed to maintain homeostasis, inhibiting or decreasing platelet aggregation is a well-recognized therapy for the prevention of stroke and recurrent heart attack (65 FR 1016). External intervention to affect platelet aggregation and other aspects of blood clotting is not necessary except in conditions where an underlying disease calls for intervention. In fact, absent a need to alter platelet aggregation or blood clotting ability, intervention to increase or decrease the ability of blood to clot may result in untoward effects, such as increased clotting or bleeding. Consequently, any claim that a product affects platelet aggregation or other aspects of blood clotting implies that the product is intended to correct some deviation in platelet function from the normal. Therefore, the claim you are making for this product is a disease because it is a claim to treat diseases or disorders associated with clot formation such as heart attack and stroke.

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products suggest that they are intended to treat, prevent, or mitigate diseases. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

Page 5 - Ms. Jeanene Moenckmeier

Please contact us if we may be of further assistance.

Sincerely,



John B. Foret

Director

Division of Compliance and Enforcement

Office of Nutritional Products, Labeling

and Dietary Supplements

Center for Food Safety

and Applied Nutrition

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300

**FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of
Enforcement, HFC-200**

FDA, Minneapolis District Office, Office of Compliance, HFR-MW240

Enzymatic Therapy

NATURAL MEDICINES®

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 Green Bay, WI 54311
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 BY: _____

November 14, 2001

Office of Special Nutritionals (HFS-450)
 Center for Food Safety and Applied Nutrition
 Food and Drug Administration
 200 C St. SW
 Washington, DC 20204

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RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the following labels of its products.

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
Enzymatic Therapy, Inc.	7-KETO	7-keto dehydroepiandrosterone	Enhances the immune system and memory through an improved form of DHEA* 7-keto is an improved safe metabolite of DHEA.*
PhytoPharmica	7-KETO Lean	Iodine, Copper, Manganese, 7-keto dehydroepiandrosterone, L-Tyrosine, Asparagus Root Extract, Choline Bitartrate, Inositol	Shown in clinical studies to burn fat and promote weight loss* 7-keto has been shown to be a remarkably effective weight-loss aid in a randomized, double-blind, placebo – controlled clinical trial conducted by Carlton M. Colker, M.D., Department of Medicine at Greenwich Hospital, Greenwich, Conn.* Study participants who combined 7-keto with a healthy diet and exercise lost an average of

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
		Aminobutyric Acid, Alpha-Ketoglutaric Acid, Glycine, L-Tyrosine, Pituitary Extract, L-Methionine, RNA/DNA Complex, L-Cysteine HCl, Pyridoxal-5-phosphate	
Enzymatic Therapy, Inc.	Brain Nutrition	Vitamin C, Folic Acid, Vitamin B12, Magnesium Aspartate, Zinc Aspartate, Manganese, Potassium Aspartate, L-Glutamine, L-Phenylalanine, Brain Extract, Choline, Gamma-Aminobutyric Acid, Alpha-Ketoglutaric Acid, Glycine, L-Tyrosine, Pituitary Extract, L-Methionine, RNA/DNA Complex, L-Cysteine HCl, Pyridoxal-5-phosphate	Dietary supplement for important brain functions* Provides specific nutrients for healthy brain functions* The nutrients in Brain Nutrition are important to the glands and organs involved in glucose metabolism.* Brain Nutrition also provides vitamins and minerals that support brain function.*
PhytoPharmica	Bromelain Complex	Vitamin C, Pantothenic Acid, Bromelain	Helps break down proteins* Designed for people who prefer plant-based enzymes, Bromelain Complex contains bromelain, a protein-digesting enzyme from pineapple, as an alternative to pancreatin.*
Enzymatic Therapy, Inc.	Bromelain Plus	Vitamin C, Pantothenic Acid, Bromelain	Helps break down proteins* Designed for people who prefer plant-based enzymes, Bromelain Plus contains bromelain, a protein-digesting enzyme from pineapple, as an alternative to pancreatin.*
PhytoPharmica	Calgest	Vitamin C, Vitamin B6, Calcium Chloride, Calcium Phosphate, Magnesium Glycerophosphate, Betaine HCl, Ammonium Chloride, Kidney Extract, Mixed Bioflavonoids	Supports balanced pH levels for proper calcium absorption* Calcium is essential for strengthening bones.* Acidifying compounds such as ammonium chloride, betaine hydrochloride, and calcium phosphate can help support balanced pH levels.*
Enzymatic Therapy, Inc.	Candida Formula	Oregano, Thyme, Peppermint Leaf Oil Extract, Goldenseal Root and Rhizome Extract	Dietary supplement to fulfill the needs of a yeast-controlled program.* Scientists recognize the volatile oils of oregano and thyme play a role in digestion and other body functions.* Peppermint oil is widely used in Europe to support colon function.* And goldenseal contains alkaloid compounds that show great promise for human health.* Research suggests a link between these natural compounds and the balance of yeast in the body.*

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
PhytoPharmica	Candimycin	Oregano, Thyme, Peppermint Leaf Oil Extract, Goldenseal Root and Rhizome Extract	Dietary supplement to fulfill the needs of a yeast-controlled program.* Offers support for individuals on an anti-yeast program. Dietary supplement to support individuals on an anti-yeast program. Scientists recognize the volatile oils of oregano and thyme play a role in digestion and other body functions.* Peppermint oil is widely used in Europe to support colon function.* And goldenseal contains alkaloid compounds that show great promise for human health.* Research has shown a link between these natural compounds and the balance of yeast in the body.*
PhytoPharmica	Cardio-Glycan	Highly purified bovine-derived glycosaminoglycans	Helps maintain the health and integrity of blood vessels* In the human body, GAGs are key structural components necessary for maintaining the health and integrity of blood vessels.*
Enzymatic Therapy, Inc.	Cell Forte with IP-6 and Inositol	IP-6 (Inositol Hexaphosphate) Inositol	Dietary supplement to enhance natural killer cell activity* Enhances natural killer cell activity, boosting the immune system* Cell Forte boosts the body's natural cellular defenses by increasing the levels of inositol phosphates in the cells.* As a result, it dramatically increases natural killer cell activity, which plays a key role in strengthening the body's immune system.* Scientific studies show only Cell Forte provides the ratio of IP-6 and inositol that produces real, life-changing results.*
PhytoPharmica	Cellular Forte with IP-6 and Inositol	IP-6 (Inositol Hexaphosphate) Inositol	Dietary supplement to enhance natural killer cell activity* Enhances natural killer cell activity, boosting the immune system* Cellular Forte boosts the body's natural cellular defenses by increasing the levels of inositol phosphates in the cells.* As a result, it dramatically increases natural killer cell activity, which plays a key role in strengthening the body's immune system.* Scientific studies show only Cellular Forte provides the ratio of IP-6 and inositol that produces real, life-changing results.*
Enzymatic Therapy, Inc. and PhytoPharmica	Cellu-Var	Butcher's Broom Root and Rhizome Extract, Gotu Kola, Escin	Helps improve the integrity and function of veins* Helps improve the integrity and function of veins in the lower limbs* Cellu-Var is an all-natural formula containing herbal extracts that help improve the integrity and function of veins.* Cellu-Var is an all-natural formula containing herbal extracts that help improve the integrity and function of veins in the lower limbs.* Butcher's broom helps increase the integrity of the tissue that supports the vein, which also helps improve the vein's function.* Gotu kola decreases the capillary's permeability by reducing the number and size of pores in the

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
		Garlic Bulb Extract, Ginger Root Extract, Green Tea Leaf Extract, Klamath Blue-Green Algae, Curcuma Root Extract, Grape Seed Extract	
PhytoPharmica	Clinical Nutrients Eye Formula*	Vitamin A, Vitamin C, Vitamin E, Riboflavin, Zinc, Selenium, Copper, Hachimijiogan Herbal Complex, Bilberry Berry Extract, Curcuma Root Extract, Grape Seed Extract, Lutein	<p>Dietary supplement with antioxidants to support proper vision* Clinical Nutrients Eye Formula is designed to provide extra nutritional support for proper eye function and should be used in conjunction with the Clinical Nutrients gender-specific multiple and Clinical Nutrients Flax Oil products.*</p> <p>Provides comprehensive nutritional support for eye health* The valuable nutrients in Clinical Nutrients Eye Formula include:</p> <ul style="list-style-type: none"> • Vitamin A, which is essential for eyes' adaptation to changes in light, night vision, and color vision* • Beta-carotene, which helps maintain eye moisture* • Zinc, which helps prevent night blindness and is responsible for the mobilization of vitamin A* • Vitamin C, which is essential to eye lens function.*
PhytoPharmica	Clinical Nutrients Flax Oil	Flaxseed Oil, Pumpkin Seed Oil, Borage Seed Oil, Omega-3, omega-6, Omega-9, Gamma-Linolenic Acid	Provides essential fatty acids with strong antioxidant and immune-supporting properties*
PhytoPharmica	Clinical Nutrients for 50-Plus Men	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin/Niacinamide, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid, Calcium, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Mixed Flavonoids, Saw Palmetto, Ginger, Alfalfa Leaf and Stem Juice Concentrate, Choline Bitartrate, Inositol, Para-Aminobenzoic	<p>A complete multiple vitamin and mineral formula designed for men age 50 and over* A complete multiple formula designed for men age 50 and over* Pantothenic acid is a vital nutrient for the adrenal glands, which produce hormones.* Zinc contributes to prostate function, testosterone synthesis and activity, and sperm development*</p> <p>Niacin is important to healthy blood cholesterol levels.* Saw palmetto berry contains fatty acids and sterols, which provide important nutritional support for the prostate.* Korean ginseng root is traditionally used to support masculine functions.*</p>

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
PhytoPharmica	Clinical Nutrients for Bone Health*	Acid, Green Tea, Betaine HCl, Korean Ginseng Root Extract, Bromelain, Papain, Protease, Lipase, Boron, Vanadium	
PhytoPharmica	Clinical Nutrients for Bone Health*	Vitamin C, Vitamin D, Vitamin K, Folic Acid, Vitamin B12, Calcium, Magnesium, Zinc, Copper, Sodium, Mixed Flavonoids, Betaine HCl, Soy Bean Extract, Boron, Silicon, Strontium	<p>Dietary supplement to support bone health.* Helps maintain peak bone health* Clinical Nutrients for Bone Health* provides the vitamins, minerals, and herbs needed to maintain peak bone health for a lifetime.*</p> <p>Some key ingredients include:</p> <ul style="list-style-type: none"> • Vitamin D, which regulates blood calcium levels and bone metabolism.* • Vitamin K, which is essential to bone density.* • Boron, which increases the absorption and activity of calcium in bone tissue.*
PhytoPharmica	Clinical Nutrients for Diabetics*	Vitamin C, Vitamin E, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Sodium, Gymnema Sylvestre Leaf Extract, Bitter Melon Whole Fruit Extract, Fenugreek Seed Extract, Bilberry Berry Extract, Mixed Bioflavonoids, Vanadyl Sulfate	<p>Dietary supplement to provide nutritional support for diabetics* Provides targeted nutritional support for individuals with diabetes* Clinical Nutrients for Diabetics* is a nutritional supplement specifically formulated to provide vitamins, minerals, and herbs for individuals with elevated blood sugar levels.*</p> <p>Clinical Nutrients for Diabetics* includes vitamin E, magnesium, vitamin B6, and chromium, which support glucose metabolism,* and a special standardized extract of Gymnema sylvestre, an herb long recommended for diabetics.*</p>
PhytoPharmica	Clinical Nutrients for Heart Health*	Vitamin C, Vitamin E, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Calcium Pangamate, Magnesium, Potassium, Hawthorn Leaf and Flower Extract, Hydrangea root, Black cohosh root, Buchu leaf extract, Couch Grass Rhizome Extract, Cornsilk Extract, Dandelion Leaf, Ginger Root, Khella Fruit Extract, L-Cysteine, Carbamide	<p>Dietary supplement to support the heart and vascular system* Provides essential nutrients for the heart and vascular system* Clinical Nutrients for Heart Health* is a comprehensive formula containing magnesium, niacin, and potassium to support the heart muscle and its force of contraction.*</p> <p>B vitamins such as folic acid, pyridoxine (B6), and cyanocobalamin (B12) must be present for proper nervous system function.* And the antioxidant properties of vitamins C and E help disarm damaging free radicals – an important factor for cardiovascular health.*</p> <p>Clinical Nutrients for Heart Health* also contains hawthorn, hydrangea, black cohosh, buchu leaves, couch grass, cornsilk, dandelion, ginger, and khella, herbs that maintain heart health.*</p>

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
		Dimethylglycine HCl, Glycine	the role it plays in regulating blood pressure.* Potassium is well-known for the role it plays in blood pressure.* Magnesium is involved in membrane integrity, muscle contraction, and vascular tone.* Researchers continue to explore the connection between calcium and cholesterol levels.* DMG is an intermediary of cell metabolism that may help the body use oxygen more efficiently.*
Enzymatic Therapy, Inc.	Doctor's Choice Antioxidant	Vitamin A, Vitamin C, Vitamin E, Riboflavin, Zinc, Selenium, Manganese, N-Acetylcysteine, Red Cabbage Leaf Extract, Garlic Bulb Extract, Ginger Root Extract, Green Tea Leaf Extract, Klamath Blue-Green Algae, Curcuma Root Extract, Grape Seed Extract	Provides protection against free-radical or oxidative damage to tissue cells*
Enzymatic Therapy, Inc.	Doctor's Choice Eye Formula*	Vitamin A, Vitamin C, Vitamin E, Riboflavin, Zinc, Selenium, Copper, Hachimijiogan Herbal Complex, Bilberry Berry Extract, Curcuma Root Extract, Grape Seed Extract, Lutein	Dietary supplement with antioxidants to support proper vision* Drs. Choice Eye Formula is designed to provide extra nutritional support for proper eye function and should be used in conjunction with the Drs. Choice gender-specific multiple and Drs. Choice Flax Oil products.* Provides comprehensive nutritional support for eye health* The valuable nutrients in Drs. Choice Eye Formula include: <ul style="list-style-type: none"> • Vitamin A, which is essential for eyes' adaptation to changes in light, night vision, and color vision* • Beta-carotene, which helps maintain eye moisture* • Zinc, which helps prevent night blindness and is responsible for the mobilization of vitamin A* Vitamin C, which is essential to eye lens function.*
Enzymatic Therapy, Inc.	Doctor's Choice Flax Oil fortified with Borage & Pumpkin	Flaxseed Oil, Pumpkin Seed Oil, Borage Seed Oil, Omega-3, omega-6, Omega-9, Gamma-Linolenic Acid	Provides essential fatty acids with strong antioxidant and immune-supporting properties*
Enzymatic Therapy, Inc.	Doctor's Choice for 50-Plus Men	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin/Niacinamide, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid,	A complete multiple vitamin and mineral formula designed for men age 50 and over* Pantothenic acid is a vital nutrient for the adrenal glands, which produce hormones.* A complete multiple formula designed for men age 50 and over* Zinc contributes to prostate function, testosterone synthesis and activity, and sperm

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
		Calcium, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Mixed Flavonoids, Saw Palmetto, Ginger, Alfalfa Leaf and Stem Juice Concentrate, Choline Bitartrate, Inositol, Para-Aminobenzoic Acid, Green Tea, Betaine HCl, Korean Ginseng Root Extract, Bromelain, Papain, Protease, Lipase, Boron, Vanadium	development* Niacin is important to healthy blood cholesterol levels.* Saw palmetto berry contains fatty acids and sterols, which provide important nutritional support for the prostate.* Korean ginseng root is traditionally used to support masculine functions.*
Enzymatic Therapy, Inc.	Doctor's Choice for Bone Health*	Vitamin C, Vitamin D, Vitamin K, Folic Acid, Vitamin B12, Calcium, Magnesium, Zinc, Copper, Sodium, Mixed Flavonoids, Betaine HCl, Soy Bean Extract, Boron, Silicon, Strontium	Dietary supplement to support bone health* Helps maintain peak bone health* Drs. Choice for Bone Health* provides the vitamins, minerals, and herbs needed to maintain peak bone health for a lifetime.* Some key ingredients include: <ul style="list-style-type: none"> • Vitamin D, which regulates blood calcium levels and bone metabolism.* • Vitamin K, which is essential to bone density.* • Boron, which increases the absorption and activity of calcium in bone tissue.*
Enzymatic Therapy, Inc.	Doctor's Choice for Diabetics*	Vitamin C, Vitamin E, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Sodium, Gymnema Sylvestre Leaf Extract, Bitter Melon Whole Fruit Extract, Fenugreek Seed Extract, Bilberry Berry Extract, Mixed Bioflavonoids, Vanadyl Sulfate	Dietary supplement to provide nutritional support for diabetics* Provides targeted nutritional support for individuals with diabetes* Drs. Choice for Diabetics* is a nutritional supplement specifically formulated to provide vitamins, minerals, and herbs for individuals with elevated blood sugar levels.* Drs. Choice for Diabetics* includes vitamin E, magnesium, vitamin B6, and chromium, which support glucose metabolism,* and a special standardized extract of Gymnema sylvestre, an herb long recommended for diabetics.*
Enzymatic Therapy, Inc.	Doctor's Choice for Female Teens	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Vitamin K, Thiamin, Riboflavin, Niacin/Niacinamide, Vitamin B6, Folic Acid, Vitamin B12, Biotin, Pantothenic Acid,	Complete daily vitamin and mineral multiple for female teens* Complete daily multiple for female teens* To give adolescent girls the special nutritional support they need.* Vitamin B6 is involved in some of the hormonal processes of the menstrual cycle.* In addition, rising estrogen levels in teenage girls change the way their

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
Enzymatic Therapy, Inc.	Doctor's Choice Heart Health*	Vitamin C, Vitamin E, Niacin, Vitamin B6, Folic Acid, Vitamin B12, Calcium Pangamate, Magnesium, Potassium, Hawthorn Leaf and Flower Extract, Hydrangea root, Black cohosh root, Buchu leaf extract, Couch Grass Rhizome Extract, Comsilk Extract, Dandelion Leaf, Ginger Root, Khella Fruit Extract, L-Cysteine, Carbamide	Dietary supplement to support the heart and vascular system* Provides essential nutrients for the heart and vascular system* Clinical Nutrients for Heart Health* is a comprehensive formula containing magnesium, niacin, and potassium to support the heart muscle and its force of contraction.* B vitamins such as folic acid, pyridoxine (B6), and cyanocobalamin (B12) must be present for proper nervous system function.* And the antioxidant properties of vitamins C and E help disarm damaging free radicals – an important factor for cardiovascular health.* Clinical Nutrients for Heart Health* also contains hawthorn, hydrangea, black cohosh, buchu leaves, couch grass, comsilk, dandelion, ginger, and khella, herbs that maintain heart health.*
Enzymatic Therapy, Inc.	Doctor's Choice to Retain Healthy Cholesterol Levels*	Red Yeast Rice, Artichoke Leaf Extract, Ginger, Coenzyme Q10	Helps retain healthy cholesterol levels* Red yeast rice works by helping to influence the rate at which your body produces its own cholesterol, thereby helping your body retain healthy cholesterol levels.* Red yeast rice (<i>Monascus purpureus</i>) – more than 20 studies involving thousands of subjects show red yeast rice blocks the formation of cholesterol.* Artichoke extract provides invaluable dietary support for the liver, helping it function at peak capacity.* Ginger extract – Researchers believe ginger may influence the body's ability to use and dispose of cholesterol.* CoQ10 – Coenzyme Q10, also known as ubiquinone, is present in every cell of the body and is vital to cellular energy production.* CoQ10 is especially important to the heart because of the heart's high-energy requirements.*
Enzymatic Therapy, Inc.	Escalation	Cola Nut Extract, Green Tea Leaf Extract, Ma Huang Stem and Branch Extract	Provides energy and calorie-burning activity in an all-natural formula* Escalation is an all-natural energizing dietary supplement with thermogenic properties.* The original all-natural energizing dietary supplement with thermogenic properties*
Enzymatic Therapy, Inc.	Escalert	Cola Nut Extract, Green Tea Extract, Oat Straw Extract, Schisandra Extract, Siberian Ginseng Extract, Ginger Root Extract, Korean Ginseng Root Extract, Chromium	Provides energy and thermogenic (calorie-burning) properties* Escalert is a natural energizing dietary supplement.* Chromium, an important trace mineral, is a favorite among dieters because of its role in blood sugar metabolism.* This formula is ideal for dieters, students, long-distance drivers, and people who work long or late hours.*

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
Enzymatic Therapy, Inc.	Flush-Free HexaNiacin	Niacin	Dietary supplement to retain healthy cholesterol levels* Helps retain healthy cholesterol levels* Niacin is well known for aiding fat and cholesterol metabolism, which can have an impact on circulation.*
PhytoPharmica	Flush-Free Niacin	Niacin	Dietary supplement to retain healthy cholesterol levels* Helps retain healthy cholesterol levels* Niacin is well known for aiding fat and cholesterol metabolism, which can have an impact on circulation.*
PhytoPharmica	Forskolin Extract	Coleus Forskohlii Extract	Supports the increase of cyclic-AMP*
Enzymatic Therapy, Inc. and PhytoPharmica	GABA	Gamma-aminobutyric acid (GABA)	Regulates brain nerve cell functions*
Enzymatic Therapy, Inc.	Garlinase 4000	Garlic Bulb Extract	Nutritional support to retain healthy cholesterol levels* Supports retention of healthy cholesterol levels*
PhytoPharmica	Garlitrin 4000	Garlic Bulb Extract	Nutritional support to retain healthy cholesterol levels* Supports retention of healthy cholesterol levels*
Enzymatic Therapy, Inc.	Gingerall	Ginger Root Extract	Helps soothe the stomach and prevent the nausea, vomiting, and dizziness associated with motion* Through an exclusive processing technique, the natural oil containing all ginger's beneficial compounds is extracted from the root of the ginger plant for use in Gingerall. This pure and potent oil supports healthy joint function and provides antioxidant effects.*
PhytoPharmica	GingerMax	Ginger Root Extract	Helps soothe the stomach and prevent the nausea, vomiting, and dizziness associated with motion* Through an exclusive processing technique, the natural oil containing all ginger's beneficial compounds is extracted from the root of the ginger plant for use in GingerMax. This pure and potent oil supports healthy joint function and provides antioxidant effects.*
Enzymatic Therapy, Inc. and PhytoPharmica	Ginkgo Phytosome	Ginkgo biloba Phytosome	Provides essential vitamins and minerals for improved short-term memory* Dietary supplement for improved short-term memory*
PhytoPharmica	Ginkgolidin	Ginkgo biloba Leaf Extract	Helps support short-term memory* Dietary supplement for improved short-term memory* Each capsule of Ginkgolidin provides Ginkgo biloba extract standardized for its key compounds—ginkgoflavonglycosides, terpene lactones, and bilobalide, which are

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
			important to the function of the brain's short-term memory.*
PhytoPharmica	Ginseng Phytosome	Panax ginseng Root Phytosome	Dietary supplement to enhance a sense of well-being* Promotes a sense of well-being and supports adrenal gland function* Clinical studies show Panax ginseng significantly reduces feelings of stress and anxiety.* It also increases the tone and function of the adrenal glands.* Panax ginseng is generally considered more potent than Siberian ginseng, and may be a good choice for someone who's been under a great deal of stress.* In contracts, Siberian ginseng may be the best choice for someone experiencing mild to moderate stress.*
PhytoPharmica	Glucoril	Vitamin C, Vitamin E, Vitamin B6, Vitamin B12, Biotin, Magnesium, Zinc, Selenium, Manganese, Chromium, Blueberry Extract, Gymnema Sylvestre Leaf Extract, Bitter Melon Whole Fruit Extract, Fenugreek Seed Extract	Dietary supplement for proper carbohydrate and sugar function* Helps support carbohydrate metabolism* Helps regulate blood sugar and supports carbohydrate metabolism* Glucoril provides nutrients that must be present for healthy carbohydrate metabolism.* Glucoril provides nutrients that must be present for carbohydrate metabolism.* Glucoril provides nutrients that must be present for healthy blood sugar regulation and carbohydrate metabolism.* Chromium, manganese, zinc, and biotin are all involved in insulin and blood glucose functions* Also included is Gymnema sylvestre, an herb long recommended for diabetics.* Researchers are studying the link between carbohydrate metabolism and key compounds in these herbs.*
PhytoPharmica	Glucosamine Sulfate	Chloride, Sodium Stabilized glucosamine sulfate	Helps build joint cartilage* Dietary supplement to maintain healthy joints*
PhytoPharmica	Glucosamine Sulfate Complex	Vitamin C, Chloride, Sodium, Stabilized glucosamine sulfate, L-Tyrosine	Supports connective tissue and cartilage in joints* Dietary supplement to maintain healthy joints* Vitamin C is an essential nutrient for connective tissue and cartilage.*
Enzymatic Therapy, Inc.	Golden Spleen 500	Mixed bovine spleen polypeptides, Goldenseal Root and Rhizome Extract	Helps the development of immune cells and stimulates the immune system* The spleen also produces several different polypeptides that play a direct role in the maturation of immune cells and in stimulating the immune system.*
Enzymatic Therapy, Inc. and PhytoPharmica	Grape Seed (PCO) Extract	Grape seed (PCO) Extract	Offers antioxidant activity 50 times stronger than vitamin E* It also has the ability to protect against both water and fat-soluble free radicals, offering protection to the cells against free radical damage.* Recent studies indicate the antioxidant activity of PCOs may be as much as 50 times stronger than vitamin E and 20 times stronger than vitamin C.*

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
Enzymatic Therapy, Inc. and PhytoPharmica	Grape Seed (PCO) Phytosome	Grape (Vitis vinifera) Seed (PCO) Phytosome	Provides antioxidant support 3-7 times more absorbable than unbound extracts*
Enzymatic Therapy, Inc.	Green Tea Antioxidant	Green Tea Leaf Extract	Protects cells from free-radical damage more effectively than vitamin E* Green Tea Extract, an herbal antioxidant, is more powerful than vitamin E in protecting cells from free-radical damage.*
PhytoPharmica	Green Tea Extract	Green Tea Leaf Extract	Protects cells from free-radical damage more effectively than vitamin E* Green Tea Extract, an herbal antioxidant, is more powerful than vitamin E in protecting cells from free-radical damage.*
Enzymatic Therapy, Inc. and PhytoPharmica	Green Tea Phytosome	Green Tea Leaf Phytosome	Protects cells from free-radical damage in a more absorbable form than unbound extracts* Green tea extract is stronger than vitamin E in preventing free radical damage to cellular function.* Flavonoids are the major polyphenols in green tea, and act as powerful antioxidants by providing extraordinary protection against free radical damage.*
Enzymatic Therapy, Inc.	GS-500	Chloride, Sodium Stabilized glucosamine sulfate	Helps build joint cartilage* Dietary supplement to maintain healthy joints*
Enzymatic Therapy, Inc.	GS-Complex	Vitamin C, Chloride, Sodium, Stabilized glucosamine sulfate, L-Tyrosine	Supports connective tissue and cartilage in joints* Dietary supplement to maintain healthy joints* Vitamin C is an essential nutrient for connective tissue and cartilage.*
PhytoPharmica	GugulPlex	Vitamin C, Niacin, Chromium, Guggul Gum Extract, Ginger Root Extract	Helps retain healthy cholesterol levels* The nutrients in GugulPlex contribute to proper cholesterol functions in the body.*
Enzymatic Therapy, Inc.	GugulPlus	Vitamin C, Niacin, Chromium, Guggul Gum Extract, Ginger Root Extract	Helps retain healthy cholesterol levels* The nutrients in GugulPlus contribute to proper cholesterol functions in the body.*
Enzymatic Therapy, Inc. and PhytoPharmica	Hawthorn Phytosome	Hawthorn Branch and Flower Phytosome	Supports healthy cardiovascular function* Hawthorn supplies flavonoids, nutritional compounds important to cardiovascular function.*

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
		Leaf Juice Powder, L-Methionine, Barberry Bark of Root, Boldo Leaf Extract, Greater Celandine, Fringetree Bark, Ox Bile Extract, Betaine HCl, Inositol, Liver, Unsaturated Free Fatty Acids	combination of nutrients such as vitamin B12 lipotropic factors such as methionine and choline, which may provide support for normal fat metabolism; and herbal extracts such as celandine, cheonanthus, and barberry, which support liver function.*
Enzymatic Therapy, Inc. and PhytoPharmica	Horse Chestnut Extract	Horse Chestnut Seed Extract	Supports the vascular system and circulation* Supports the vascular system and circulation in the legs* Dietary supplement to support circulation and the vascular system* Dietary supplement to support circulation of the legs and the vascular system* Horse chestnut extract is widely used to support circulatory health.* Escin has been shown to decrease capillary permeability by reducing the number and size of the pores, which improves tone.* Horse Chestnut Extract also includes a number of other valuable compounds for vascular health, such as amines, coumarins, cyclitols, flavonoids, phenolic acids, sterols, and triterpenes.*
Enzymatic Therapy, Inc.	HyperiCalm	St. John's wort	Dietary supplement for mental well-being* 25 Studies have shown St. John's wort extract helps relieve occasional anxiety, apathy, sleeplessness, and feelings of worthlessness.*
PhytoPharmica	HyperiMed	St. John's Wort Flower Head Extract	Dietary supplement for mental well-being* People throughout the world rely on St. John's wort as a daily supplement for mental well-being.* Studies have shown St. John's wort extract provides support in relieving occasional anxiety, apathy, sleeplessness, and feelings of worthlessness.*
Enzymatic Therapy, Inc.	Hypo-Ade	Vitamin A, Vitamin C, Thiamin, Riboflavin, Niacin/Niacinamide, Vitamin B6, Vitamin B12, Pantothenic Acid, Zinc, Manganese, Chromium, Sodium, Potassium Chloride, Inositol, Pancreas Extract, Choline Bitartrate, L-methionine, Green Beet Root Powder, Adrenal Extract, Betaine HCl, Wild Yam Root, Pituitary Extract, Barberry Bark of Root	Supports proper carbohydrate and sugar metabolism* Hypo-Ade provides nutrients that must be present in the diet for blood glucose, carbohydrate, and energy metabolism.* Nutrients in Hypo-Ade are used by the glands and organs most intricately involved in carbohydrate metabolism.* This formula contains B vitamins and chromium picollinate, which must be present for sugar metabolism.*

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
		Concentrate, Unsaturated Free Fatty Acids, Lung Extract	
Enzymatic Therapy, Inc. and PhytoPharmica	Olive Leaf Extract with Hawthorn	Olive Leaf Extract, Hawthorn Leaf and Flower Extract	Dietary supplement to support heart health* Supports heart health* Olive Leaf Extract also contains a standardized extract of hawthorn berry, a non-toxic herb that is useful in dilating coronary blood vessels and increasing blood flow to the heart.*
Enzymatic Therapy, Inc.	Oral Nutrient Chelates	Vitamin C, Niacin/niacinamide/Vitamin B6, Calcium Chloride, Iodine, Magnesium Orotate, Magnesium Ascorbate, Zinc Ascorbate, Selenium Ascorbate, Copper Gluconate, Manganese Ascorbate, Sodium, Potassium, Taurine, Beta-sitosterol, Mucopolysaccharide, Betaine HCl, ammonium Chloride, L-methionine, Bromelain	Provides essential vitamins and minerals for a healthy circulatory system* Lipotropic factors such as beta-sitosterol, methionine, and betaine support a healthy flow of fats and bile.* Acidifying compounds (ammonium chloride, calcium chloride, betaine hydrochloride) can assist a healthy acid-alkaline balance.* Magnesium, potassium, and antioxidants contribute to artery health.*
Enzymatic Therapy, Inc.	OsteoPrime	Vitamin C, Vitamin D, Vitamin K, Thiamin, Riboflavin, Niacinamide, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Betaine HCl, Boron, Silicon, Strontium	Dietary supplement to promote bone health* Supports and maintains healthy bones and bone structure* The body needs vitamin D to utilize calcium and phosphorus properly for building strong bones and teeth.* Vitamin K aids the production of osteocalcin, the supporting structure on which calcium crystallizes in bone.* Manganese is needed for bone mineralization and connective tissue synthesis.* Studies show zinc, strontium, vitamin B6, vitamin C, silicon, copper, and boron also help form the connective structures in bone.* OsteoPrime, formulated by Jonathan Wright, M.D., and Alan Gaby, M.D., provides a balanced combination of these important nutrients to support and maintain healthy bones.*
PhytoPharmica	OsteoPrime Forte	Vitamin C, Vitamin D, Vitamin K, Thiamin, Riboflavin, Niacinamide, Vitamin B6, Folic Acid, Vitamin B12, Pantothenic Acid, Calcium, Magnesium, Zinc, Selenium, Copper, Manganese,	Dietary supplement to promote bone health* Supports and maintains healthy bones and bone structure* The body needs vitamin D to utilize calcium and phosphorus properly for building strong bones and teeth.* Vitamin K aids the production of osteocalcin, the supporting structure on which calcium crystallizes in bone.* Manganese is needed for bone mineralization and

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			some individuals break down triglycerides and cholesterol more efficiently.*
Enzymatic Therapy, Inc.	Peppermint Plus	Peppermint Leaf Oil Extract, Rosemary Leaf and Stem Oil Extract, Thyme Whole Plant Oil Extract	Dietary supplement to support gastrointestinal tract function* Supports gastrointestinal function* Peppermint soothes stomach discomforts by smoothing the intestinal muscle.* Rosemary stimulates appetite and improves gastric tone, allowing food to be more easily digested.* Thyme comforts the stomach and relieves gas.*
Enzymatic Therapy, Inc. and PhytoPharmica	Phytodolor	Common ash bark, Aspen leaves and bark, Goldenrod aerial	Dietary supplement for optimum muscle and joint function* Provides support for optimal muscle and joint function* This synergistic combination of common ash, aspen, and goldenrod has been studied to provide powerful benefits for optimal muscle and joint function – without stomach irritation.*
PhytoPharmica	PhytoMax	St. John's Wort Flower Head Extract, Valerian Root Extract, Passion Flower	Provides soothing, natural benefits for a good night's sleep* PhytoMax contains extracts of St. John's wort for emotional well-being, and the relaxing properties of valerian and passion flower to help sleep come naturally.*
Enzymatic Therapy, Inc. and PhytoPharmica	Potassium Plus	Vitamin B6, Pantothenic Acid, Magnesium Citrate, Magnesium Sulfate, Potassium, Colloidal Alkaline Ash Mineral Concentrate, Yucca	Supports retention of healthy blood pressure levels* Potassium benefits blood pressure, and magnesium is included to help metabolize potassium and other minerals.* Potassium helps regulate blood pressure.*
Enzymatic Therapy, Inc.	PRO-50	Vitamin A, Vitamin B6, Zinc, Essential Fatty Acids, Amino Acid Complex, Prostate Extract, Saw Palmetto Berry	Provides essential vitamins and minerals for healthy prostate function* PRO-50, a dietary supplement for men, includes zinc, vitamin A, vitamin B6, essential nutrients that must be present for male glandular functions.* PRO-50 also includes essential fatty acids, an amino acid complex, and a high-quality extract of saw palmetto berries to support prostate health.* Dietary supplement containing essential vitamins and minerals for prostate function*
PhytoPharmica	Pro-DMG-B15	Calcium Gluconate, Magnesium Aspartate, Potassium Aspartate, Trimethylglycine, N-Dimethylglycine HCl, Glycine	Supports heart function and efficient use of oxygen in the body* Pro-DMG-B15 contains essential nutrients for the heart: potassium, magnesium and calcium.* Potassium is well-known for the role it plays in blood pressure.* Magnesium is involved in membrane integrity, muscle contraction, and vascular tone.* Researchers continue to explore the connection between calcium and cholesterol levels.* DMG is an intermediary of cell metabolism that may help

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
			the body use oxygen more efficiently.* Potassium plays a role in regulating blood pressure.*
PhytoPharmica	Pro-Gest	Niacinamide, Betaine HCl, L-Glutamic Acid HCl, Bromelain, Papain, Mylase, Mycozyme, Ox Bile Extract, Pancreas Extract	Dietary food enzyme supplement with HCl to support digestion* Provides enzymes to break down proteins, carbohydrates, and fats* This product contains sufficient enzymes to digest 165 grams of protein, 100 grams of carbohydrates, and 60 grams of fat.*
Enzymatic Therapy, Inc.	Pro-Gest-Ade	Niacinamide, Betaine HCl, L-Glutamic Acid HCl, Bromelain, Papain, Mylase, Mycozyme, Ox Bile Extract, Pancreas Extract	Dietary food enzyme supplement with HCl to support digestion* Provides enzymes to break down proteins, carbohydrates, and fats* This product contains sufficient enzymes to digest 165 grams of protein, 100 grams of carbohydrates, & 60 grams of fat.*
Enzymatic Therapy, Inc.	ProstaMed	Saw Palmetto Berry Extract	Dietary supplement for healthy prostate function*
PhytoPharmica	Protagest	Niacinamide, Vitamin B6, Potassium chloride, Betaine HCl, Glutamic Acid HCl, Pepsin, Ammonium Chloride, Papain, Ox Bile Extract, Pancreatic Enzymes	Aids in the digestion of protein* Protagest supplies acidifying factors (betaine hydrochloride, glutamic acid) and proteolytic enzymes necessary for protein digestion.*
PhytoPharmica	ProstaPro	Saw Palmetto Berry Extract	Dietary supplement for healthy prostate function* Supports healthy prostate function* ProstaPro is standardized to contain 85% to 95% fatty acids and sterols, and is the same standardized extract used in studies linking saw palmetto berry and prostate health.*
Enzymatic Therapy, Inc.	Protazyme	Niacinamide, Vitamin B6, Potassium chloride, Betaine HCl, Glutamic Acid HCl, Pepsin, Ammonium Chloride, Papain, Ox Bile Extract, Pancreatic Enzymes	Aids in the digestion of protein* Protazyme supplies acidifying factors (betaine hydrochloride, glutamic acid) and proteolytic enzymes necessary for protein digestion.*
Enzymatic Therapy, Inc. and PhytoPharmica	Pumpkin Seed Extract	Pumpkin Seed Extract	Supports prostate health in men and bladder health in women* Pumpkin seeds are a natural source of alpha-linolenic acid and phytosterols, which support prostate health in men and bladder health in women.*
Enzymatic Therapy, Inc.	Quercezyme-Plus	Vitamin C, Magnesium, Bromelain, Quercetin, Mixed Bioflavonoids Complex, L-Cysteine	Boosts immune functions, especially those involved in respiratory health* Studies indicate that bromelain works with the flavonoid quercetin to support enzyme functions that break down fibrin, a blood-clotting agent.* Flavonoids—especially quercetin—appear to be

BRAND NAME	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENT
			verbena – natural ingredients that have stood the test of time for supporting health.*
Enzymatic Therapy, Inc.	SinuGuard	Cowslip Flowers, Sour Dock Aerial, Elder Flowers, Verbena Aerial, Gentian Root	Dietary supplement for sinus support* Supports the sinus cavities, especially the mucus membranes* SinuGuard is an all-herbal formula popular in Europe for supporting the sinus cavities, especially the mucus membranes.* SinuGuard contains gentian root, cowslip flowers, sour dock, elder flowers, and verbena – natural ingredients that have stood the test of time for supporting health.*
Enzymatic Therapy, Inc. and PhytoPharmica	Soy Extract	Soy	Dietary supplement with phytoestrogens beneficial for women* Provides of phytoestrogens beneficial for women.* Soy Extract contains genistein and diadzein, isoflavones that play a vital role in supporting women's health.* Soy is one of the most highly concentrated sources of saponins, which are immune-enhancing compounds.* Phytic acid is believed to bind with excess iron, preventing free radicals from forming and damaging cells and tissues.*
PhytoPharmica	SP-500	Mixed bovine spleen polypeptides, Goldenseal Root and Rhizome Extract	Helps the development of immune cells and stimulates the immune system* The spleen also produces several different polypeptides that play a direct role in the maturation of immune cells and in stimulating the immune system.*
Enzymatic Therapy, Inc.	St. John's Wort Extract	St. John's Wort Flower Head Extract	Dietary supplement for mental well-being* People throughout the world rely on St. John's wort as a supplement for mental well-being.* Studies have shown wort extract provides support in relieving anxiety, apathy, sleeplessness, and feelings of worthlessness.*
PhytoPharmica	St. John's Wort Forte with Kava	St. John's Wort Flower Head Extract, Valerian Root Extract, Kava Root Extract	Dietary supplement to promote mental and emotional well-being* Offers the ultimate support for mental and emotional well-being* St. John's Wort Forte with Kava combines valerian, kava, and St. John's wort for the ultimate support of nervous system function.* Kava and valerian nutritionally support and soothe nervous system function.*
Enzymatic Therapy	St. John's Wort Plus with Kava	St. John's Wort Flower Head Extract, Valerian Root Extract, Kava Root Extract	Dietary supplement to promote mental and emotional well-being* Offers the ultimate support for mental and emotional well-being* St. John's Wort Forte with Kava combines valerian, kava, and St. John's wort for the ultimate support of nervous system function.*