



# ENZYMATIC THERAPY

NON-DECEIVED

What **Better** feels like.™

## 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)

December 8, 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™ Elderberry	The rich, vibrant colors of fruits and vegetables aren't just for decoration. They're nature's way of telling you that these foods are bursting with a wide range of vitamins, nutrients and phytonutrients – naturally occurring, plant-based antioxidants that support a vast array of health benefits ranging from immune to heart to vision health and much more.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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.

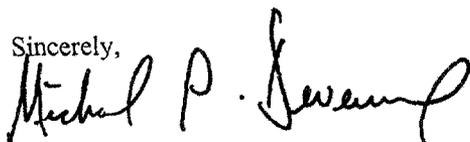
By: Robert C. Doster  
Robert C. Doster  
Title: Senior Vice President of Scientific Affairs

Date: 12-8-05

975 0162 LET 17091

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux  
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise™ Elderberry	Helps maintain healthy vision*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

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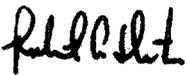
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise™ Elderberry	Enhances natural killer cell activity, supporting the immune system*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, European Elder Berry Extract, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulse, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

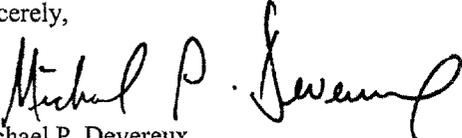
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