



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

October 20, 2004

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.

Fiber Formula	An exclusive, balanced blend of dietary fiber and intestinal absorbants with key botanical extracts and nutritional synergists for gentle intestinal support.*	Vitamin C (as Ascorbic Acid), Psyllium Hull (Plantago ovata), Oat Bran (Avena sativa), Bentonite, Guar Gum (Cyamopsis tetragonolobus), Prune Powder (Prunus domestica), Marshmallow Root (Althaea officinalis), Bromelain, Papain, Ginger Rhizome (Zingiber officinale), Goldenseal Root (Hydrastis canadensis), Cranesbill Root (Geranium maculatum), Echinacea Aerial Parts (Echinacea purpurea), Echinacea Root (E. angustifolia)
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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: 10/20/04

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INTEGRATIVE THERAPEUTICS INC.™
NF Formulas ♦ PhytoPharmica
Tyler Encapsulations ♦ Vitaline Formulas

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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)

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, prominent initial "M".

Michael P. Devereux
Chief Financial Officer



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PRODUCT NAME	CLAIM	DISCLAIMER
Fiber Formula	Dietary fiber helps maintain healthy gastrointestinal function and improves colon health.*	Vitamin C (as Ascorbic Acid), Psyllium Hull (Plantago ovata), Oat Bran (Avena sativa), Bentonite, Guar Gum (Cyamopsis tetragonolobus), Prune Powder (Prunus domestica), Marshmallow Root (Althaea officinalis), Bromelain, Papain, Ginger Rhizome (Zingiber officinale), Goldenseal Root (Hydrastis canadensis), Cranesbill Root (Geranium maculatum), Echinacea Aerial Parts (Echinacea purpurea), Echinacea Root (E. angustifolia)

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