



INTEGRATIVE THERAPEUTICS INC.*
 NF Formulas + PhytoPharmica
 Tyler Encapsulations + Vitaline Formulas

ENZYMATIC THERAPY*
 &
PHYTOPHARMICA*

ENZYMATIC THERAPY
 INCORPORATED

*What **Better** feels like.™*

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)

November 12, 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

NOV 30

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.

VITALINE		
Vitaline® CoQ10	Vitaline CoQ10 is the first CoQ10 containing product which has clinical proof of its ability to be absorbed by the body, enter the bloodstream, cross the blood-brain barrier and increase neural mitochondrial levels of CoQ10.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are true and not misleading.

RECALL

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-12-04

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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INTEGRATIVE THERAPEUTICS INC.*

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PRODUCT	CLAIMS	
Vitaline® CoQ10	With more than 25 independent, peer-reviewed published clinical trial and studies, Vitaline CoQ10 has been proven to cross the cell wall, to increase serum and mitochondrial levels of CoQ10 and to impact patient health.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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: 

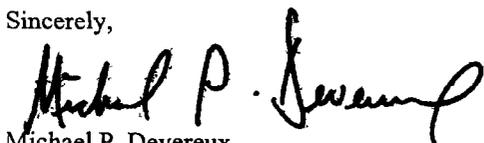
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-12-04

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Michael P. Devereux
Chief Financial Officer



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November 15, 2004

Office of Nutritional Products, Labeling &
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RE: Label Claims/Disclaimers

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Vitaline® CoQ10	Vitaline CoQ10 was the first to have proven absorption, and to be shown to increase mitochondrial levels of CoQ10, cross the blood brain barrier, and impact the health of users.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)
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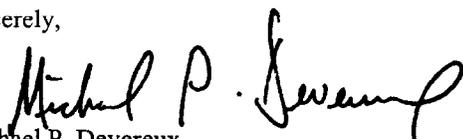
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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