



ENZYMATIC THERAPY
INCORPORATED

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)

January 18, 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™	Earth's Promise is gluten and cholesterol free, and provides a natural source of antioxidants and immune system-boosting green tea.*	Green Tea 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: 1/18/05

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

975 0162

LET 15477



ENZYMATIC THERAPY
INCORPORATED

*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)

January 19, 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™	By taking Earth's Promise, you are adding to your daily defense against harmful cellular oxidation.* Greens and vegetables found in Earth's Promise provide additional antioxidants that expel free radicals.*	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, Dulce, Blue-Green Algae, Kelp Leaf and Stem, Stevia Leaf Extract

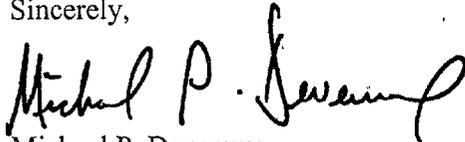
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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

Date: 1/19/05

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

Sincerely,



Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*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)

January 19, 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™	Wheat grass has twice the fiber of bran, which helps promote colon health, regulate blood sugar metabolism already within normal limits and support healthy cholesterol levels already within normal limits.*	Wheat Grass

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: _____

1/19/05

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



ENZYMATIC THERAPY
INCORPORATED

*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)

January 18, 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™	Earth's Promise is gluten and cholesterol free, and provides a natural source of antioxidants and immune system-boosting green tea.*	Green Tea (Carnellia sinensis) 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

Title: Senior Vice President of Scientific Affairs

Date: 1/18/05

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*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)

January 19, 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™	By taking Earth's Promise, you are adding to your daily defense against harmful cellular oxidation.* Greens and vegetables found in Earth's Promise provide additional antioxidants that expel free radicals.*	Inulin (from Chicory root), Guar Gum Seed Extract, Barley Grass (Hordeum vulgare), Alfalfa Sprouts, Broccoli Sprouts, Daikon Radish Sprouts (Raphanus sativus), Oat Grass (Avena sativa), Wheat Grass, Alfalfa Juice Concentrate, Broccoli Flower, Cabbage Leaf, Tomato Fruit (Lycopersicon esculentum), Carrot Root, Collard Greens (Brassica oleracea acephala), Mustard Greens, Kale Leaf (Brassica oleracea acephala), Spinach Leaf (Spinacia oleracea), Green Tea (Camellia sinensis) Leaf Extract, Dulse, Blue-Green algae, Kelp Leaf and Stem (Ascophyllum nodosum & Laminaria digitata), Stevia Leaf Extract

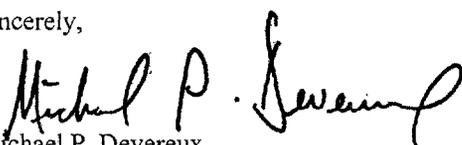
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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

Date: 1/19/05

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED

*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)

January 19, 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™	Wheat grass has twice the fiber of bran, which helps promote colon health, regulate blood sugar metabolism already within normal limits and support healthy cholesterol levels already within normal limits.*	Wheat Grass

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.

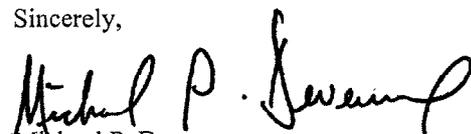
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/19/05

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY

INCORPORATED

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)

January 19, 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™	Earth's Promise is gluten and cholesterol free, and provides a natural source of antioxidants and immune system-boosting green tea.*	Green Tea 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: 1/19/05

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



ENZYMATIC THERAPY

INCORPORATED

*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)

January 19, 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

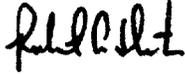
RE: Label Claims/Disclaimers

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™	By taking Earth's Promise, you are adding to your daily defense against harmful cellular oxidation.* Greens and vegetables found in Earth's Promise provide additional antioxidants that expel free radicals.*	Inulin from Chicory root, Guar Gum Seed Extract, Barley Grass, Alfalfa Sprouts, Broccoli Sprouts, Radish Sprouts, Oat Grass, Wheat Grass, Alfalfa Juice Concentrate, Peppermint (Mentha x piperita) Leaf, Broccoli Flower, Cabbage Leaf, Carrot Root, Collard Greens, Tomato Fruit, Mustard Greens, Kale Leaf, Spinach Leaf, Green Tea Leaf Extract, Dulce, 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: _____

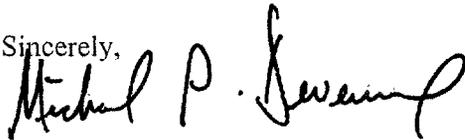
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1/19/05

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

Sincerely,



Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
INCORPORATED
*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)

January 19, 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

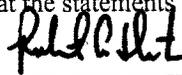
RE: Label Claims/Disclaimers

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™	Wheat grass has twice the fiber of bran, which helps promote colon health, regulate blood sugar metabolism already within normal limits and support healthy cholesterol levels already within normal limits.*	Wheat Grass

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: 1/19/05

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

Sincerely,

Michael P. Devereux
Chief Financial Officer