



**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)

0115 5 FEB - 2005

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

JAN 24 2005

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.

PRODUCT NAME	STATEMENT	INGREDIENT(S) TO WHICH THE CLAIM REFERS
FlexAgility™* Max	Supports Flexibility!*	Vitamin C (Ascorbic Acid), Proprietary Flex Blend: hops (Humulus lupulus) (IsoOxygene™ brand) flower extract, ginger (Zingiber officinale) rhizome extract, Boswellia serrata, gum extract, Bromelain, Japanese Sophora (Sophora japonica) Flower Bud, European Elder (Sambucus nigra) Berry Extract, Green Tea (Camellia sinensis) Leaf Extract, N-Acetylcysteine (NAC)

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*

Michael P. Devereux  
Chief Financial Officer

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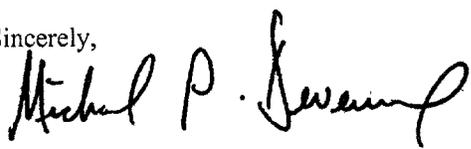
PRODUCT NAME	STATEMENT	INGREDIENT(S) TO WHICH THE CLAIM REFERS
FlexAgility™* Max	FlexBlend with IsoOxygene™ delivers superior relief*	Vitamin C (Ascorbic Acid), Proprietary Flex Blend: hops ( <i>Humulus lupulus</i> ) ( <i>IsoOxygene™</i> brand) flower extract, ginger ( <i>Zingiber officinale</i> ) rhizome extract, <i>Boswellia serrata</i> , gum extract, Bromelain, Japanese Sophora ( <i>Sophora japonica</i> ) Flower Bud, European Elder ( <i>Sambucus nigra</i> ) Berry Extract, Green Tea ( <i>Camellia sinensis</i> ) Leaf Extract, N-Acetylcysteine (NAC)

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<b>PRODUCT NAME</b>	<b>STATEMENT</b>	<b>INGREDIENT(S) TO WHICH THE CLAIM REFERS</b>
FlexAgility™* Max	A soothing enzyme that reduces inflammation due to occasional overuse*	Vitamin C (Ascorbic Acid), Proprietary Flex Blend: hops ( <i>Humulus lupulus</i> ) (IsoOxygene™ brand) flower extract, ginger ( <i>Zingiber officinale</i> ) rhizome extract, <i>Boswellia serrata</i> , gum extract, Bromelain, Japanese Sophora ( <i>Sophora japonica</i> ) Flower Bud, European Elder ( <i>Sambucus nigra</i> ) Berry Extract, Green Tea ( <i>Camellia sinensis</i> ) Leaf Extract, N-Acetylcysteine (NAC)

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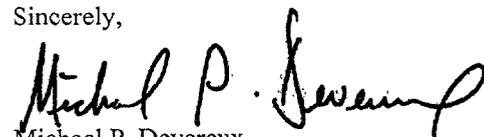
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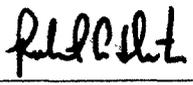
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PRODUCT NAME	STATEMENT	INGREDIENT(S) TO WHICH THE CLAIM REFERS
FlexAgility™* Max	Powerful antioxidant protection*	Vitamin C (Ascorbic Acid), Proprietary Flex Blend: hops ( <i>Humulus lupulus</i> ) ( <i>IsoOxygene™</i> brand) flower extract, ginger ( <i>Zingiber officinale</i> ) rhizome extract, <i>Boswellia serrata</i> , gum extract, Bromelain, Japanese Sophora ( <i>Sophora japonica</i> ) Flower Bud, European Elder ( <i>Sambucus nigra</i> ) Berry Extract, Green Tea ( <i>Camellia sinensis</i> ) Leaf Extract, N-Acetylcysteine (NAC)

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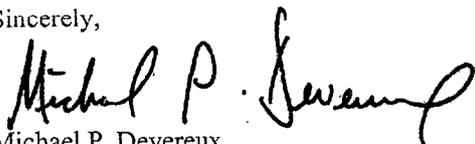
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