



INTEGRATIVE THERAPEUTICS INC.™

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825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 ♦ F: 888.570.6460 (Enzymatic)
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March 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

MAR 15 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Research has confirmed that diets high in natural foods are associated with benefits for immune, gastrointestinal and cardiovascular health.* Greens Formula provides vegetables and grasses, rich in vitamins, minerals, and antioxidants, in a convenient and great tasting drink mix.*	<i>Fiber Blend:</i> Inulin and fructooligosaccharides (FOS) from chicory root, guar gum seed extract, <i>Greens Blend:</i> barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate European Elder Berry Extract, <i>Vegetable Blend:</i> broccoli flower, cabbage leaf, carrot root, collard greens, tomato fruit, mustard greens, kale leaf, spinach leaf <i>Green Tea Leaf Extract;</i> <i>Seaweed Blend:</i> 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

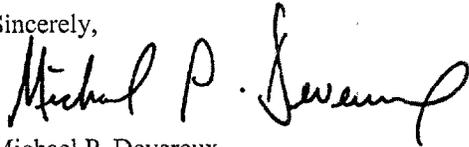
Title: Senior Vice President of Scientific Affairs

Date: 3/8/05

975 0162 LE3 15824

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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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Grasses, vegetables, and fiber for overall nutritional support.*	<i>Fiber Blend:</i> Inulin and fructooligosaccharides (FOS) from chicory root, guar gum seed extract, <i>Greens Blend:</i> barley grass, alfalfa sprouts, broccoli sprouts, radish sprouts, oat grass, wheat grass, alfalfa juice concentrate European Elder Berry Extract, <i>Vegetable Blend:</i> broccoli flower, cabbage leaf, carrot root, collard greens, tomato fruit, mustard greens, kale leaf, spinach leaf Green Tea Leaf Extract, <i>Seaweed Blend:</i> dulse, blue-green algae, kelp leaf and stem Stevia Leaf Extract

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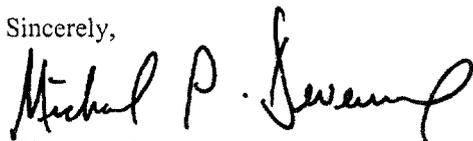
By: Robert C. Doster
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/8/05

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Michael P. Devereux
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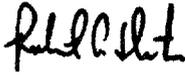
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Fiber supports colon health, and aids in the absorption of calcium, which is crucial for healthy bone formation.* Inulin and FOS are prebiotics that act as a food source to stimulate the growth of beneficial microflora (and probiotics) in the intestines. As an insoluble fiber also increase stool frequency and stool weight. Also, shown in clinical studies to enhance the absorption of calcium by 18%.*	Inulin and fructooligosaccharides (FOS) from chicory root

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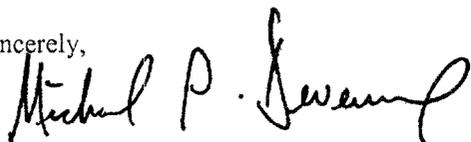
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Title: Senior Vice President of Scientific Affairs

Date: 3/8/05

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Michael P. Devereux
Chief Financial Officer



1988-1998

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Barley supports the retention of healthy blood sugar and cholesterol levels already within normal limits.*	Barley grass

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By: Robert C. Doster
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

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March 9, 2005

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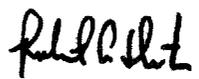
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Alfalfa sprouts are one of the highest sources of phytoestrogens, which support immune system, bone health and cardiovascular health.*	Alfalfa sprouts, Alfalfa juice concentrate

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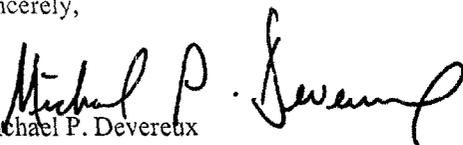
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/9/05

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



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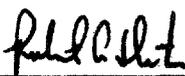
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	The phyoestrogens found in alfalfa sprouts have been studied for their support of thyroid health.*	Alfalfa sprouts

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

Date: 3/9/05

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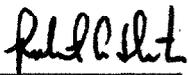
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Both broccoli and broccoli sprouts are a source of sulforaphanes. Sulforaphanes are associated with immune health support.*	Broccoli sprouts

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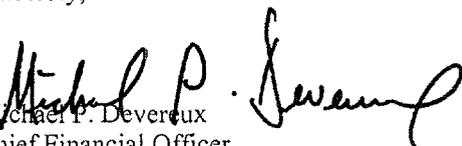
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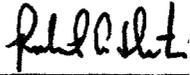
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Broccoli sprouts have been scientifically studied for their support of cardiovascular health.*	Broccoli sprouts

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

Date: 3/10/05

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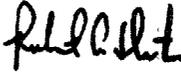
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Greens Formula	Fourteen weeks of treatment with broccoli sprouts that contained the naturally occurring compound, glucoraphnin, showed significant antioxidant support for cardiovascular and kidney function.*	Broccoli sprouts

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Radish sprouts have twice the antioxidant level of vitamin C alone.*	Radish sprouts

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Title: Senior Vice President of Scientific Affairs

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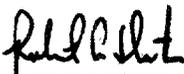
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Like barley and wheat grass, oat grass is a source of chlorophyll, which has been studied for its immune supportive effects.*	Oat grass

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: 3/11/05

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



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March 11, 2005

Office of Nutritional Products, Labeling &
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Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

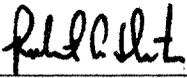
RE: Label Claims/Disclaimers

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Greens Formula	Wheat grass may also support gastric and colonic health.*	Oat grass

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Robert C. Doster
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Sincerely,


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Chief Financial Officer

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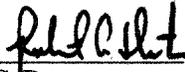
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Broccoli is a source of sulforaphanes. Sulforaphanes are associated with immune health support.* In one clinical study, men consuming high levels of lutein and zeaxanthin intake showed greater support of healthy eye function than men with lower intakes.* Specific findings found in carotenoids like broccoli and spinach were most consistently associated with beneficial effects.*	Broccoli flower

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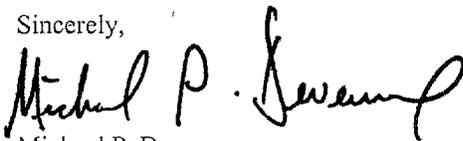
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/11/05

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



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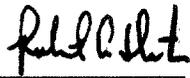
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	Beta-carotene is well known for its support of the immune system.*	Carrot root

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: 3/12/05

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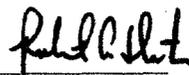
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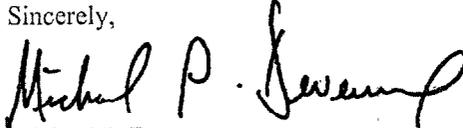
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	In a scientific study, beta-carotene supports healthy cholesterol levels already within normal limits.*	Carrot root

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	In another scientific study, beta-carotene from carrots significantly increased antioxidant levels.*	Carrot root

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Greens Formula	Lutein and zeaxanthin have documented support for immune, eye, and cardiovascular health.*	Collard green

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Greens Formula	In a clinical study, mustard greens showed antioxidant properties.*	Mustard greens

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