



INTEGRATIVE THERAPEUTICS INC.
 NF Formulas • PhytoPharmica
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ENZYMATIC THERAPY*
 &
PHYTOPHARMICA*

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)

ENZYMATIC THERAPY
 INCORPORATED

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0247 5 APR -7 P2:29

March 23, 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>
Better Bladder™*	The pumpkin plant (<i>Cucubita pepo</i>) has a long history of use by traditional Native American healers. While both the seed and flower have been used for a variety of health benefits, the whole, dried, ripe seed of <i>Cucubita pepo</i> has been most notably recognized for its support of prostate health in men and bladder health in women.*	Pumpkin (<i>Cucurbita pepo</i>) Seed 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.

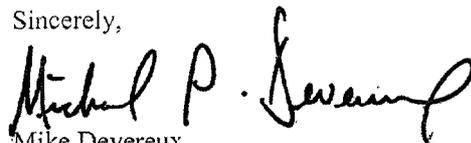
By: Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/23/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,


 Mike Devereux
 Chief Financial Officer

975 0162

LET 15920



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Better Bladder™*	Better Bladder* provides a concentrated, 18 to 1, extract of <i>Cucurbita pepo</i> . Patented processing removes the lipophilic, or fat soluble, components from the seed, yielding a more potent extract, which has been clinically shown to promote urinary tract and bladder health.*	Pumpkin (<i>Cucurbita pepo</i>) Seed 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: 3/23/05

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Sincerely,

Mike Devereux
Chief Financial Officer



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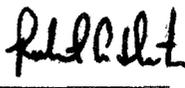
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Better Bladder™*	Balances hormone levels, particularly testosterone*	Pumpkin (Cucurbita pepo) Seed Extract

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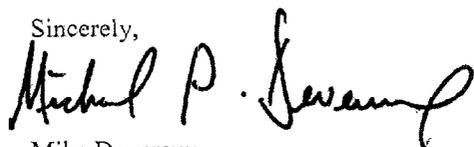
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/23/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,



Mike Devereux
Chief Financial Officer



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March 24, 2005

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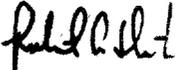
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Better Bladder™*	The pumpkin plant is native to North and Central America. However, it has been cultivated throughout the world for its nutritive value and various health benefits for thousands of years. Native American healers utilized the seeds to help maintain proper balance of intestinal flora.* This practice, while not conclusively supported by scientific research, has been continued by some herbalists to this day. In addition, the plant's flowers have historically been used to reduce pain due to occasional overuse.*	Pumpkin (Cucurbita pepo) Seed 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: 3/24/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

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".

Mike Devereux
Chief Financial Officer



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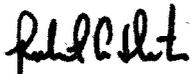
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Better Bladder™*	There is also evidence that pumpkin possesses antioxidant properties. However, by far the most well known health benefit of pumpkin is its role in prostate, bladder, and kidney health.* For centuries, Native American Indian tribes have utilized pumpkin to enhance the function of these glands.*	Pumpkin (Cucurbita pepo) Seed Extract

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By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/24/05

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Mike Devereux
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March 25, 2005

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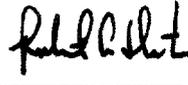
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Better Bladder™*	Although the exact mechanism by which pumpkin seed promotes prostate and bladder health is unknown, scientific research initially focused on the actions of the fatty acid components.* Linoleic acid, for example, has been widely studied with particular focus on prostate support.*	Pumpkin (Cucurbita pepo) Seed 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: 3/25/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,



Mike Devereux
Chief Financial Officer



ENZYMATIC THERAPY

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Better Bladder™*	While original research examined benefits for prostate health, new studies have found pumpkin seed provides equally significant support for bladder health in women.*	Pumpkin (Cucurbita pepo) Seed Extract

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March 26, 2005

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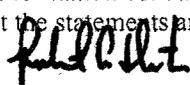
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Better Bladder™*	Recent research has focused on pumpkin's phytosterol components. In particular, the lignan or phenolic compounds, such as sitosterol, stigmasterol, and stigmastenol, present in pumpkin seed have shown promising results in the application of bladder health.* Clinical studies reveal that these phytosterols can significantly impact urinary tract health through their ability to modulate two key enzymes involved in maintaining hormonal balance.*	Pumpkin (Cucurbita pepo) Seed Extract

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By: 

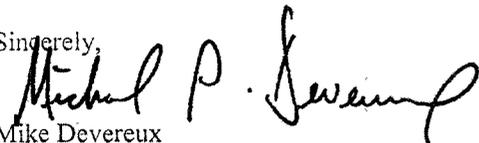
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/26/05

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Better Bladder™*	Excess levels of DHT may not be associated with optimum prostate or bladder health.* Therefore, modulation of the 5-alpha reductase enzyme can help maintain healthy testosterone and DHT levels. By balancing the levels of these key hormones, pumpkin seed phytosterols provide support for prostate and bladder health.*	Pumpkin (Cucurbita pepo) Seed Extract

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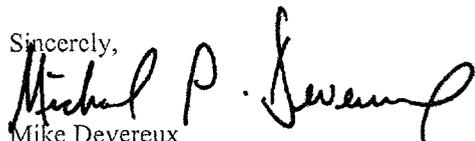
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Better Bladder™*	Inhibition of the aromatase conversion can help maintain healthy testosterone levels in women, which has been shown to strengthen pelvic muscles and bladder function.* In fact, a clinical study, involving the patented oil-free pumpkin extract present in Better Bladder in conjunction with soy, resulted in significant support for bladder health.* After two weeks of supplementation, 23 of the 39 postmenopausal women enrolled in the study experienced significantly improved bladder function.* By the end of the six week study, 74.4 percent of participants found pumpkin extract safely and significantly improved urinary tract and bladder function as well as improved sleep quality.*	Pumpkin (Cucurbita pepo) Seed Extract

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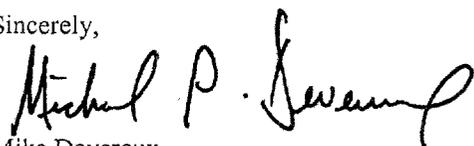
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Mike Devereux
Chief Financial Officer