



INTEGRATIVE THERAPEUTICS INC.
 NF Formulas • PhytoPharmica
 Tyler Encapsulations • Vitaline Formulas

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

What **Better** feels like.™

0277 5 APR -7 P2:30

March 28, 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

APR - 4 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>
Protective Breast Formula™*	Calcium D-Glucarate is the calcium salt of d-glucaric acid. Naturally occurring both in the human body, and in certain plant sources, supplementation with calcium d-glucarate has been shown in research studies to support immune system function, promote estrogen metabolism, and enhance the body's detoxification systems through inhibition of beta-glucuronidase.* By decreasing the portion of active compounds that could be hazardous to the body through its inhibition of β-glucuronidase, calcium d-glucarate provides significant support of breast tissue health.*	Calcium (as calcium D-glucarate)

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 Doster
 Robert Doster
 Title: Senior Vice President of Scientific Affairs

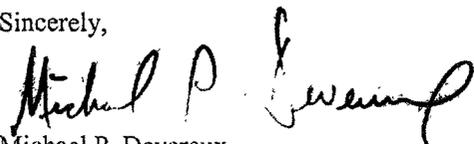
Date: 3/28/05

975 0162

LET 15950

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, appearing to read "Michael P. Devereux". The signature is written in a cursive style with a large, prominent 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>
Protective Breast Formula™*	A 40-year study of over 8,000 people found that green tea supported breast health in 57% of women*	Green Tea (Camellia 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 Doster

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/29/05

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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INCORPORATED

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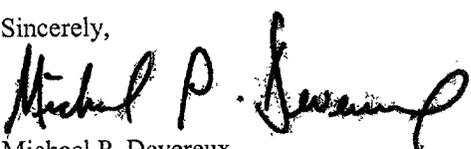
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Protective Breast Formula™*	Complete Breast Health Made Simple!*	Vitamin D (as cholecalciferol), Calcium (as calcium D-glucarate), Turmeric (Curcuma longa) Rhizome Extract, Calcium d-Glucarate, Green Tea (Camellia sinensis) Leaf Extract, Indolplex Complex, Grape (Vitis vinifera) Seed Extract, Maitake (Frifola frondosa) Mushroom 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 Doster
Title: Senior Vice President of Scientific Affairs

Date: 3/29/05

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