



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.*

0764 5 MAY -2 P3 06

March 31, 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 -7 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>
Diabetes Rx Companion*	Replenishes B vitamins depleted by oral diabetes medications.*	Vitamin B12 (as cyanocobalamin), Coenzyme Q10 (CoQ10) (ubiquinone 10), Folic Acid

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.

Robert Doster

By: _____

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 3/31/05

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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ENZYMATIC THERAPY

INTEGRATIVE THERAPEUTICS INC.

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April 1, 2005

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Diabetes Rx Companion*	Replenishes B vitamins depleted by oral diabetes medications.* Provides additional nutrients to support healthy nerve and mental function.*	Vitamin B12 (as cyanocobalamin), Coenzyme Q10 (CoQ10) (ubiquinone 10), Folic Acid

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.

Robert

By: _____

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/1/05

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

Sincerely,

Michael P. Devereux

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Chief Financial Officer