



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)

ENZYMATIC THERAPY

INDICATED BY

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MAY -2 P3:10

April 18, 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 20 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	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Thyroid Advantage Formula™*	Enhances thyroid function*	Vitamin B12 (as cyanocobalmin), Iodine (as potassium iodide), Magnesium (as magnesium oxide), Zinc (as zinc gluconate), Copper (as copper gluconate), Manganese (as manganese gluconate), Molybdenum (as sodium molybdate), L-Tyrosine, Multi-Glandular Complex liver, lung, pancreas, heart, kidney, and spleen, Thyroid Extract (thyroxin-free)

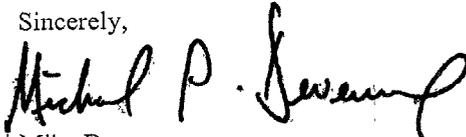
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-18-05

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

Sincerely,

Mike Devereux
Chief Financial Officer

975 0162 LET 16103



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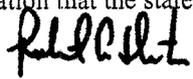
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Thyroid Advantage Formula™*	Thyroid Advantage Formula provides essential ingredients for healthy thyroid function.*	Vitamin B12 (as cyanocobalmin), Iodine (as potassium iodide), Magnesium (as magnesium oxide), Zinc (as zinc gluconate), Copper (as copper gluconate), Manganese (as manganese gluconate), Molybdenum (as sodium molybdate), L-Tyrosine, Multi-Glandular Complex liver, lung, pancreas, heart, kidney, and spleen, Thyroid Extract (thyroxin-free)

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Date: 4-18-05

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Thyroid Advantage Formula™*	Contains L-Tyrosine, an amino acid that is needed by the thyroid to produce one of the most important hormones that control metabolism.*	L-Tyrosine

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PHARMACEUTICAL

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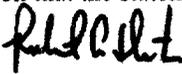
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Thyroid Advantage Formula™*	Keeps you feeling energetic*	Vitamin B12 (as cyanocobalmin), Iodine (as potassium iodide), Magnesium (as magnesium oxide), Zinc (as zinc gluconate), Copper (as copper gluconate), Manganese (as manganese gluconate), Molybdenum (as sodium molybdate), L-Tyrosine, Multi-Glandular Complex liver, lung, pancreas, heart, kidney, and spleen, Thyroid Extract (thyroxin-free)

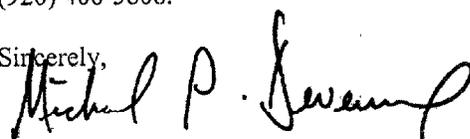
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Date: 4-18-05

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Chief Financial Officer



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NOT FOR SALE

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April 19, 2005

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Thyroid Advantage Formula™*	Influences metabolism*	Vitamin B12 (as cyanocobalmin), Iodine (as potassium iodide), Magnesium (as magnesium oxide), Zinc (as zinc gluconate), Copper (as copper gluconate), Manganese (as manganese gluconate), Molybdenum (as sodium molybdate), L-Tyrosine, Multi-Glandular Complex liver, lung, pancreas, heart, kidney, and spleen, Thyroid Extract (thyroxin-free)

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Thyroid Advantage Formula™*	Supports weight loss*	Vitamin B12 (as cyanocobalmin), Iodine (as potassium iodide), Magnesium (as magnesium oxide), Zinc (as zinc gluconate), Copper (as copper gluconate), Manganese (as manganese gluconate), Molybdenum (as sodium molybdate), L-Tyrosine, Multi-Glandular Complex liver, lung, pancreas, heart, kidney, and spleen, Thyroid Extract (thyroxin-free)

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