



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)

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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
Smart Q10™*	Smart Q10 Heart's unique chewable form has been shown in scientific studies to be up to 214% more absorbable than other forms of CoQ10.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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 C. Doster

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,

Michael P. Devereux

Mike Devereux
Chief Financial Officer

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ENZYMATIC THERAPY

ALLERGEN INFORMATION

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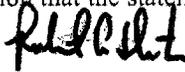
RE: Label Claims/Disclaimers

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Smart Q10™*	The Smart Choice for Heart Health!*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Smart Q10™*	It features natural CoQ10 in a delicious, chewable form that delivers better, faster, more complete absorption in both your bloodstream and cells.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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.

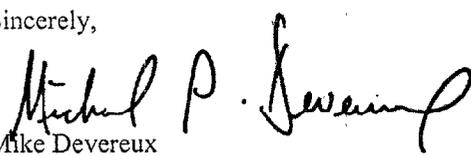
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4-18-05

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Sincerely,


Mike Devereux
Chief Financial Officer



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RE: Label Claims/Disclaimers

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Smart Q10™*	Its great support to help keep your cardiovascular system strong.* That's important, because a healthy heart works 24/7 and relies on CoQ10's energy support.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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: 4-19-05

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



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Smart Q10™*	Experience the Pure Proven Power of Smart Q10™ Heart*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Smart Q10™*	Clinically proven to support heart and cardiovascular health.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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Robert C. Doster

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Smart Q10™*	CoQ10 supports healthy cell rejuvenation, circulation and exercise endurance.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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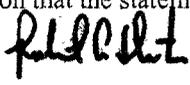
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Smart Q10™*	Restores the CoQ10 depleted by most cholesterol medications including Zocor®, Lipitor®, and Pravachol®*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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Smart Q10* 8e

Brands listed are trademarks of their respective companies.



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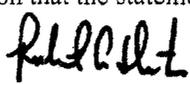
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Smart Q10™*	An easy, tasty way to replenish levels of CoQ10 that can decrease with aging.*	Vitamin E (as di-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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