



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.™

1265 5 MAY 23 P2:40

May 16, 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

MAY 19 2005

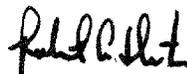
RE: Label Claims/Disclaimers

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.

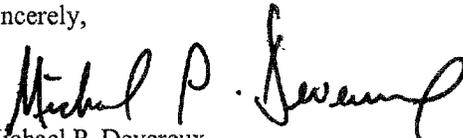
| <u>PRODUCT NAME</u> | <u>STATEMENTS</u> | <u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u> |
|-------------------------------------|------------------------------|---|
| Energizing Iron™* with Eleuthero | Iron for energy and stamina* | Vitamin B12 (as cyanocobalamin), Iron, Sodium, Liquid Liver Fractions (predigested and concentrated), Eleuthero (Eleutherococcus senticosus) Root 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: 5-16-05

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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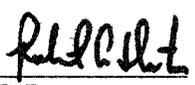
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| <u>PRODUCT NAME</u> | <u>STATEMENTS</u> | <u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u> |
|-------------------------------------|--|---|
| Energizing Iron™* with Eleuthero | Energizing Iron with eleuthero is a source of nutrients to support the body's need for iron, vitamin B12, and trace minerals. The addition of the botanical Eleuthero provides an extra boost to invigorate your vitality and energy.* | Eleuthero (Eleutherococcus senticosus) Root Extract |

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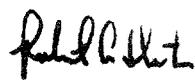
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Energizing Iron™* with Eleuthero | Enhanced Endurance and Energy...Plus Energizing Eleuthero!* | Eleuthero (Eleutherococcus senticosus) Root Extract |

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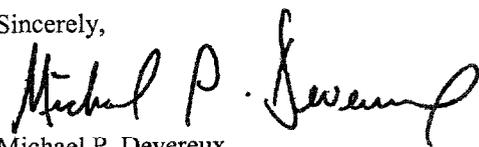
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