



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.™*

2779 5 JUL 25 P2:20

July 5, 2005

JUL 11 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

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
B ₁₂ Infusion™	Preferred form of B ₁₂ for increased energy*	Vitamin B12 (as methylcobalamin)

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: 7/5/05

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

975 0162

LET

16462



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

*What **Better** feels like.™*

July 5, 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

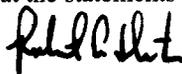
RE: Label Claims/Disclaimers

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
B ₁₂ Infusion™	B12 Infusion uses the most natural, bio-identical form of vitamin B ¹² . As a result, it is immediately available for use in the body and doesn't have to be converted.*	Vitamin B12 (as methylcobalamin)

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: 7/5/05

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



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

What *Better* feels like.™

July 6, 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

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
B ₁₂ Infusion™	One daily dose of B ¹² Infusion provides 1,000 micrograms of B ¹² – a clinical dose that absorbs quickly to help keep you energized and kick fatigue...fast!*	Vitamin B12 (as methylcobalamin)

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: 7/6/05

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