



INTEGRATIVE THERAPEUTICS INC.™

NF Formulas PhytoPharmica
Tyler Encapsulations Vitaline Formulas

9755 SW Commerce Circle, Suite B2

Wilsonville, OR 97070

P: 503.582.3368 F: 503.582.0167

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

JUL 11 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
Prostate Advantage™*	Quad-Action Prostate Support*	Saw Palmetto (Serenoa repens) Berry Extract, Pumpkin (Cucurbita pepo) Seed Extract, Pygeum (Prunus africana) Bark Extract, Uva-Ursi (Arctostaphylos uva-ursi) Leaf 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 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

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Prostate Advantage™*	Complete nutrition for healthy prostate*	Saw Palmetto (Serenoa repens) Berry Extract, Pumpkin (Cucurbita pepo) Seed Extract, Pygeum (Prunus africana) Bark Extract, Uva-Ursi (Arctostaphylos uva-ursi) Leaf Extract

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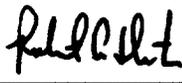
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Prostate Advantage™*	Prostate Advantage combines four essential extracts for maximum results: Saw Palmetto Berry and Pumpkin Seed – Support healthy prostate function.*	Saw Palmetto (Serenoa repens) Berry Extract, Pumpkin (Cucurbita pepo) Seed 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 Doster
Title: Senior Vice President of Scientific Affairs

Date: 7/5/05

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July 6, 2005

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Prostate Advantage™*	Prostate Advantage combines four essential extracts for maximum results: Pygeum Bark and Uva-Ursi Leaf – Support urinary tract health.*	Pygeum (Prunus africana) Bark Extract, Uva-Ursi (Arctostaphylos uva-ursi) Leaf Extract

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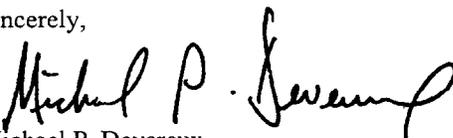
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Title: Senior Vice President of Scientific Affairs

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