



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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2792 5 JUL 25 P2:21

July 13, 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 18 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
Artery Advantage™*	Promotes healthy arteries and blood flow.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 7/13/05

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

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Artery Advantage™*	Promotes normal, unrestricted blood flow.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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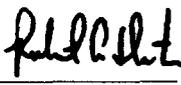
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Artery Advantage™*	Maintains clean and open arteries.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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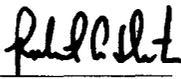
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Artery Advantage™*	Support healthy cardiovascular function.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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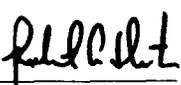
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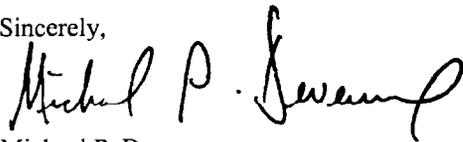
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Artery Advantage™*	Maintains healthy LDL cholesterol already within normal range.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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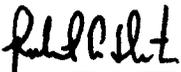
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Artery Advantage™*	Supports healthy cholesterol levels already within normal ranges.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Artery Advantage™*	Reduces blood homocysteine levels.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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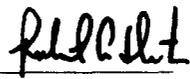
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Artery Advantage™*	Promotes calcium transfer from blood to bones.*	Garlic (allium sativum) Bulb Extract, Natto K2, Folic Acid, vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pomegranate

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