



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.*

August 23, 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.

AUG 31 2005

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)

0173 5 SEP 22 P2:21

| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | One way to support the liver is through periodic supplementation with the proper balance of herbal ingredients, phytosterols and fiber.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) 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
Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/22/05

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 16671



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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | Complete Liver Cleanse is a convenient, multi-ingredient formula that supports overall liver health and detoxification.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|---|
| Complete Liver Cleanse* | Complete Liver Cleanse contains a variety of herbal extracts that have noted benefits for supporting the body's healthy bile flow and free-radical scavenging effects.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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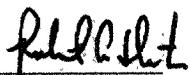
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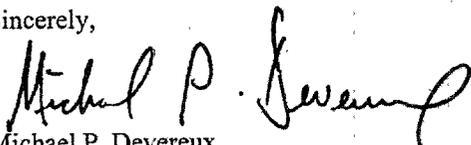
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | Milk Thistle provides support, at a cellular level, for healthy liver function.* | Milk Thistle (Silybum marianum) Fruit Phytosome™, |

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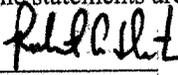
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Complete Liver Cleanse* | Herbal ingredients that support liver and gallbladder health.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Complete Liver Cleanse* | Detoxifying ingredients that keep bound toxins from being reabsorbed.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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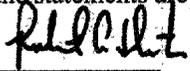
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|-------------------------|--|---|
| Complete Liver Cleanse* | Phytosterols to block cholesterol absorption in the intestines.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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| Complete Liver Cleanse* | Fiber that moves cholesterol and toxins out of the body.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols; and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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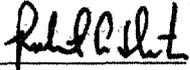
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Complete Liver Cleanse* | The ingredients in Complete Liver Cleanse provide a wide spectrum of liver supportive benefits.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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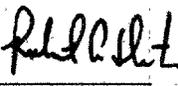
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| Complete Liver Cleanse* | Burdock has a long history of traditional use for gastrointestinal support.* | Burdock (Arctium lappa) Root Extract |

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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.

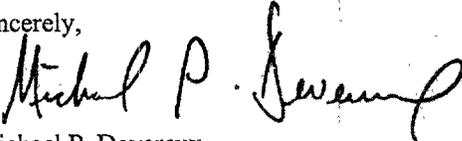
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|--|
| Complete Liver Cleanse* | Artichoke's role in supporting healthy cholesterol levels within normal limits has also been investigated.* | Artichoke (Cynara scolymus) Leaf Extract |

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: 8/24/05

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



ENZYMATIC THERAPY
INCORPORATED

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August 24, 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

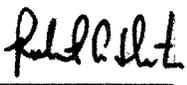
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|--|
| Complete Liver Cleanse* | Turmeric (Curcuma longa) is a perennial shrub native to southern Asia with a long history as both a food ingredient and for health support.* | Turmeric (Curcuma longa) Rhizome 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: 8/24/05

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Sincerely,

Michael P. Devereux
Chief Financial Officer

INTEGRATIVE THERAPEUTICS INC.™
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Tyler Encapsulations • Vitaline Formulas
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August 25, 2005

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5100 Paint Branch Parkway
College Park, MD 20740

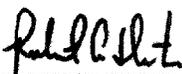
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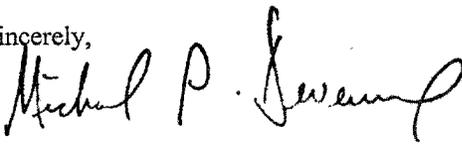
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | More recently, turmeric has been investigated for its support of healthy bile secretion, and pancreatic and gastric function.* | Turmeric (<i>Curcuma longa</i>) Rhizome 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: 8/25/05

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Chief Financial Officer

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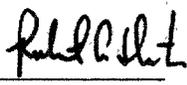
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|--|
| Complete Liver Cleanse* | In a scientific study, dietary curcuminoids derived from turmeric supported healthy lipid metabolism and cholesterol levels already within normal limits.* | Turmeric (Curcuma longa) Rhizome Extract |

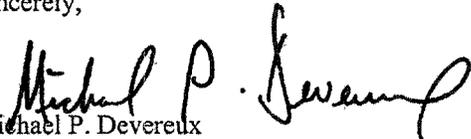
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Robert Doster
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|--|
| Complete Liver Cleanse* | Curcumin has also been shown in scientific studies to enhance the activity of glutathione S-transferase – an enzyme responsible for linking glutathione (one of the body’s natural antioxidants) with toxins to help remove them from the body.* In this way, it provides additional support for healthy liver function.* | Turmeric (Curcuma longa) Rhizome 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
Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/25/05

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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Tyler Encapsulations ♦ Vitaline Formulas
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August 25, 2005

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | The phytosteol blend in Complete Liver Cleanse can help minimize the absorption of cholesterol from high-protein food sources, help retain healthy cholesterol levels that are within normal limits, and move bile salt through the digestive system.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) 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: 8/25/05

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Tyler Encapsulations ♦ Vitaline Formulas

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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

A handwritten signature in cursive script that reads "Michael P. Devereux". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Michael P. Devereux
Chief Financial Officer



ENZYMATIC THERAPY
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August 25, 2005

Office of Nutritional Products, Labeling &
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|---|
| Complete Liver Cleanse* | Oat beta-glucan has been a widely studied fiber source for supporting healthy cholesterol levels within normal limits.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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By: Robert Doster
Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/25/05

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Sincerely,
Michael P. Devereux
Michael P. Devereux
Chief Financial Officer

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August 25, 2005

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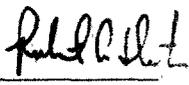
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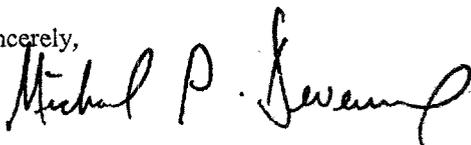
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|--|
| Complete Liver Cleanse* | Complete Liver Cleanse contains a combination of oat beta-glucan and glucomanan that has been shown in scientific studies to bind to bile salts.* | Visciber® Oat β-Glucan Concentrate, glucomanan |

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: 8/25/05

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August 25, 2005

Office of Nutritional Products, Labeling &
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Food and Drug Administration
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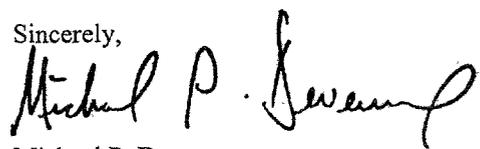
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|--|
| Complete Liver Cleanse* | In clinical studies, glucomanan has shown positive results in maintaining healthy cholesterol levels already within normal limits.* This beneficial effect is due to glucomanan's ability to boost excretion of bile acid.* | Visciber® Oat β-Glucan Concentrate, glucomanan |

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: 8/25/05

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August 25, 2005

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | In a randomized clinical study, oat beta-glucan showed support of healthy HDL/LDL ratios already within normal limits in individuals over a three week trial.* | Visciber® Oat β-Glucan Concentrate |

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
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Date: 8/25/05

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Michael P. Devereux
Chief Financial Officer



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| <u>PRODUCT NAME</u> | <u>STATEMENTS</u> | <u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u> |
|-------------------------|--|--|
| Complete Liver Cleanse* | Closely linked to cholesterol, oat beta-glucan has also been studied for its support of healthy bile excretion.* | Viscifer® Oat β-Glucan Concentrate |

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Robert Doster
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August 26, 2005

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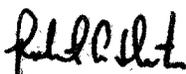
RE: Label Claims/Disclaimers

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.

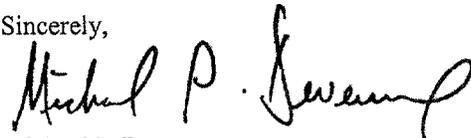
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | When milk thistle (or other herbs) are bound with phosphatidylcholine, the phosphatidylcholine molecule facilitates absorption through the intestines into the bloodstream.* | Milk Thistle (Silybum marianum) Fruit Phytosome™ |

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: 8/26/05

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



ENZYMATIC THERAPY
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August 26, 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

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | Milk Thistle is a mixture of flavonoids with a long history of liver support.* | Milk Thistle (Silybum marianum) Fruit Phytosome™ |

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: 8/26/05

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Sincerely,
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Michael P. Devereux
Chief Financial Officer

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|--|
| Complete Liver Cleanse* | Milk Thistle supports the health of Kupffer cells, specialized liver cells responsible for removing bacteria, old blood cells, and other foreign matter from the liver's blood supply.* | Milk Thistle (Silybum marianum) Fruit Phytosome™ |

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.

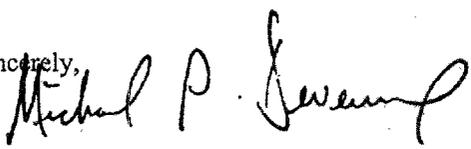
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August 27, 2005

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|---|
| Complete Liver Cleanse* | Milk Thistle scavenges free radicals (superoxide anion radical and nitric oxide) produced by activated Kupffer cells, supports healthy leukotriene levels, and supports glutathione production that is used in detoxification.* | Milk Thistle (Silybum marianum) Fruit Phytosome™ |

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

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | Milk Thistle also supports the health of hepatocytes, highly versatile liver cells with unique physiologic functions.* | Milk Thistle (Silybum marianum) Fruit Phytosome™ |

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.

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Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/27/05

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | Studies of milk thistle have demonstrated that it supports the health of the hepatocyte outer membrane, which is crucial to the liver's detoxification processes.* | Milk Thistle (Silybum marianum) Fruit Phytosome™ |

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: 8/27/05

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|-------------------------|--|---|
| Complete Liver Cleanse* | Milk Thistle also supports the healthy regenerative ability of the liver through support of protein synthesis in the hepatocytes.* | Milk Thistle (Silybum marianum) Fruit Phytosome™ |

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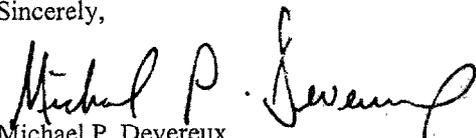
By: 
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Date: 8/27/05

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| Complete Liver Cleanse* | Research has shown increased blood and serum levels for phytosome herbs in comparison to the individual herb alone.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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By: Robert Doster
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/27/05

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Sincerely,

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Michael P. Devereux

Chief Financial Officer

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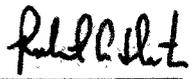
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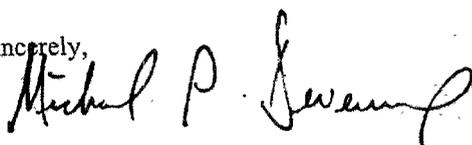
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|--|
| Complete Liver Cleanse* | Dandelion root extract supports healthy bile flow from the gallbladder.* | Dandelion (<i>Taraxacum officinale</i>) Root Extract |

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 Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/28/05

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | Burdock root (<i>Arctium lappa</i>) supports the natural physiologic processes of organs involved in detoxification and elimination: notably, the liver, kidneys, and intestines.* | Burdock (<i>Arctium lappa</i>) 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 Doster

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/28/05

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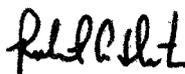
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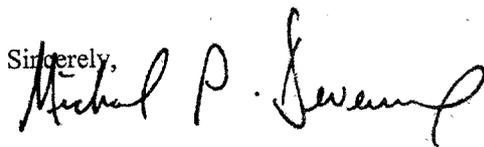
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | In scientific studies, boldo appears to have strong free-radical scavenging ability, mostly attributed to the catechin and flavonoid content of its leaves.* | Boldo (Peumus boldus) 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: 
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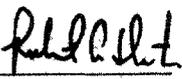
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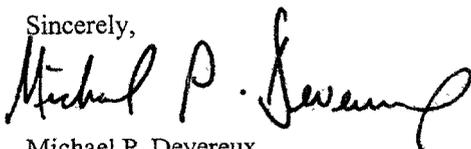
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|---|
| Complete Liver Cleanse* | In a clinical study, boldo also appears to relax smooth muscle and support intestinal transit time.* | Boldo: (Peumus boldus) Leaf Extract |

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August 28, 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.

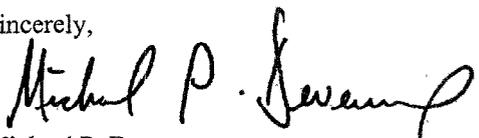
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|--|--|
| Complete Liver Cleanse* | Artichoke Leaf extract specifically supports healthy bile production in the liver and healthy gastrointestinal function in general.* | Artichoke (Cynara scolymus) Leaf 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: 8/28/05

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 • Vitamine Formulas
9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

**ENZYMATIC THERAPY®
&
PHYTOPHARMICA®**
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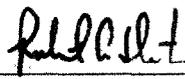
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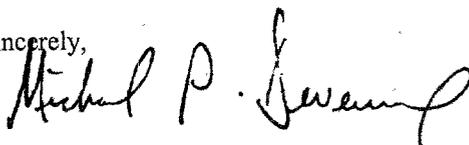
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|-------------------------|---|--|
| Complete Liver Cleanse* | Research into artichoke's gastrointestinal supportive properties has included at least three positive clinical trials.* | Artichoke (Cynara scolymus) Leaf Extract |

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Complete Liver Cleanse* | Calcium d-glucarate enhances the body's detoxification systems by inhibiting the actions of beta-glucuronidase.* This helps decrease the portion of active compounds that could be hazardous to the body.* | Calcium D-Glucarate |

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By: Robert Doster
Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 8/28/05

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Chief Financial Officer

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Complete Liver Cleanse* | Taken with, or just before meals, phytosterols block the cholesterol receptor sites so that cholesterol is excreted from the body rather than absorbed.* Phytosterols also have the additional role of helping promote healthy bile salt excretion in the intestines.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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By: _____

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: _____

8/28/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



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| <u>PRODUCT NAME</u> | <u>STATEMENTS</u> | <u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u> |
|-------------------------|--|---|
| Complete Liver Cleanse* | Fiber plays a key role in the removal and excretion of intestinal toxins in detoxification.* Only fibers that can effectively bind toxins will be successful in eliminating these harmful substances.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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By: Robert Doster
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Title: Senior Vice President of Scientific Affairs

Date: 8/28/05

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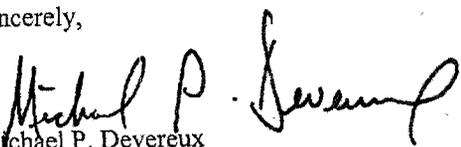
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| Complete Liver Cleanse* | Due to the unique benefits of individual fibers, the best binding, removal, and elimination effects are noted when combining different fiber types.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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Michael P. Devereux
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|-------------------------|---|---|
| Complete Liver Cleanse* | While fiber itself doesn't necessarily provide nutrients, it does promote laxation and modulate gastric and intestinal physiology.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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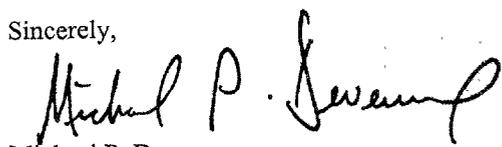
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| Complete Liver Cleanse* | Short chain fatty acids have a simple, but important job: to be absorbed by the colon mucosa, increasing fecal matter bulk and providing energy.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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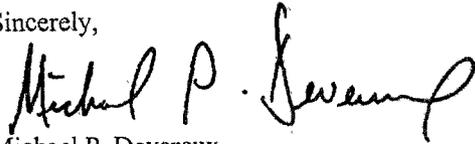
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| Complete Liver Cleanse* | Fiber has been demonstrated in numerous clinical studies to provide support of gastrointestinal, cardiovascular, immune, and endocrine function health.* | Calcium (as calcium D-glucarate), Proprietary Fiber Blend: Viscfiber® Oat β-Glucan Concentrate, phytosterols (beta sitosterol, campesterol, stigmasterol, brassicasterol, and other plant sterols, and glucomanan, Milk Thistle (Silybum marianum) Fruit Phytosome™, Burdock (Arctium lappa) Root Extract, Calcium D-Glucarate, Boldo (Peumus boldus) Leaf Extract, Turmeric (Curcuma longa) Rhizome Extract, Dandelion (Taraxacum officinale) Root Extract, Artichoke (Cynara scolymus) Leaf Extract |

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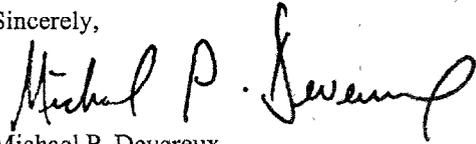
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