



INTEGRATIVE THERAPEUTICS INC.
 NF Formulas • PhytoPharmica
 Tyler Encapsulations • Vitaline Formulas

ENZYMATIC THERAPY*
 &
PHYTOPHARMICA*

ENZYMATIC THERAPY
 INCORPORATED

*What **Better** feels like.™*

August 24, 2005

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)

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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

AUG 31 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>
Alluna™ Sleep	Alluna doesn't make you sleep. It lets you sleep.*	Valerian Root Extract, Hops 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: 8/24/05

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
 Chief Financial Officer

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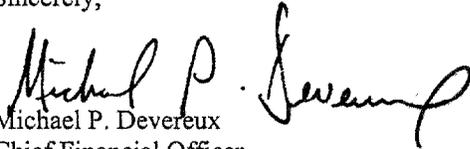
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Alluna™ Sleep	Alluna helps promote your body's own natural sleep pattern, helping you get the sleep you need to take full advantage of the day ahead.*	Valerian Root Extract, Hops Extract

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: 8/24/05

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



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Alluna™ Sleep	The safe, natural ingredients in Alluna let you relax so the stress that occasionally keeps you up at night can give way to a restful, natural sleep.*	Valerian Root Extract, Hops 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: 8/24/05

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

Sincerely,
Michael P. Devereux
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>
Alluna™ Sleep	The ingredients in Alluna help you drift off to sleep...gently, safely, naturally, with no groggy or drowsy side effects the next morning.*	Valerian Root Extract, Hops 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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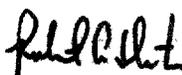
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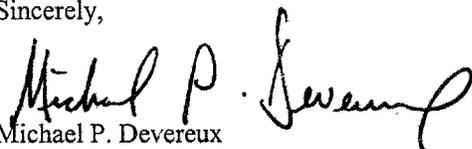
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Alluna™ Sleep	Alluna Sleep delivers the sound, restful sleep your body needs to repair and refresh itself.*	Valerian Root Extract, Hops Extract

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

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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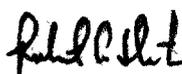
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Alluna™ Sleep	Alluna is the only natural sleep aid shown in clinical studies to effectively: Help you relax so you can drift off to sleep up to 2X faster and experience healthy sleep through the night.*	Valerian Root Extract, Hops 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

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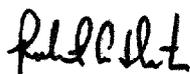
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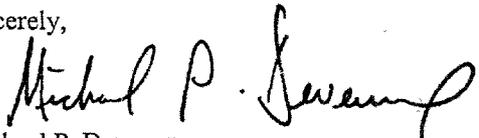
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Alluna™ Sleep	Alluna is the only natural sleep aid shown in clinical studies to effectively: Promotes your body's natural sleep pattern for long-term sleep improvement.*	Valerian Root Extract, Hops Extract

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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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Alluna™ Sleep	Alluna is the only natural sleep aid shown in clinical studies to effectively: Neutralize the stimulating effects of caffeine.*	Valerian Root Extract, Hops 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.

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Title: Senior Vice President of Scientific Affairs

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Alluna™ Sleep	Alluna is the only natural sleep aid shown in clinical studies to effectively: Reduce night awakenings.*	Valerian Root Extract, Hops Extract

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 Title: Senior Vice President of Scientific Affairs

Date: 8/25/05

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