



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.*

August 25, 2005

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

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)

0180 5 SEP 22 P2:22

AUG 31 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
Petadolex® Proactive	Clinically proven for long-term benefits*	Purple Butterbur (Petasites hybridus) (Petadolex® brand) 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: 8/25/05

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

975 0162

LET 16678



ENZYMATIC THERAPY
INCORPORATED

What **Better** feels like.™

August 25, 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)

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

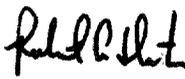
RE: Label Claims/Disclaimers

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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Petadolex® Proactive	The exclusive, patented processing used to create Petadolex Proactive removes toxins naturally present in butterbur, making it the only safe form available.*	Purple Butterbur (<i>Petasites hybridus</i>) (Petadolex® brand) Root Extract

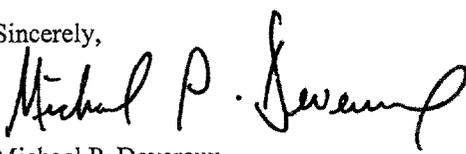
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/25/05

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



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.*

August 25, 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)

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

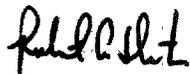
RE: Label Claims/Disclaimers

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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Petadolex® Proactive	For soothing comfort that improves with continued use, trust Petadolex Proactive for your entire family.*	Purple Butterbur (<i>Petasites hybridus</i>) (Petadolex® brand) 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.

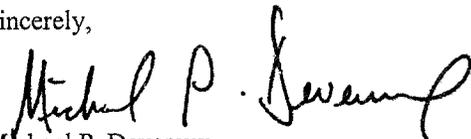
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/25/05

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



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
INCORPORATED

*What **Better** feels like.™*

August 25, 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Petadolex® Proactive	It's clinically studied to be well tolerated, produces no significant adverse effects and is effective in both adults and children!*	Purple Butterbur (Petasites hybridus) (Petadolex® brand) 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: 8/25/05

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



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.*

August 26, 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)

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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Petadolex® Proactive	Results from 3-month clinical studies show Petadolex Proactive can reduce occurrences by as much as 62% following 2 months of continuous use.*	Purple Butterbur (Petasites hybridus) (Petadolex® brand) 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: 8/26/05

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
INCORPORATED

What **Better** feels like.™

August 26, 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)

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

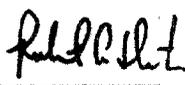
RE: Label Claims/Disclaimers

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
Petadolex® Proactive	For Everyday Support*	Purple Butterbur (Petasites hybridus) (Petadolex® brand) 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: 

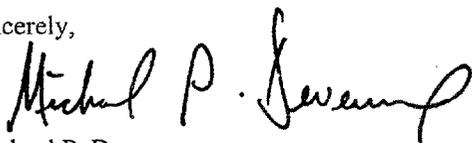
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/26/05

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
INCORPORATED

What **Better** feels like.™

August 26, 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)

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
Petadolex® Proactive	The Only Safe, Pure Butterbur*	Purple Butterbur (<i>Petasites hybridus</i>) (Petadolex® brand) 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: 8/26/05

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

Sincerely,

Michael P. Devereux
Michael P. Devereux
Chief Financial Officer