



ENZYMATIC THERAPY INCORPORATED

What **Better** feels like.™

September 14, 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
EHB	Standardized Echinacosides, Hydrastine, and Berberine for immune support.*	Vitamin A (as vitamin A palmitate and 50% as beta-carotene; Betatene® natural mixed carotenoids), Vitamin C (as ascorbic acid), Vitamin B6 (as pyridoxine hydrochloride), Zinc (as zinc picolinate), Echinacea proprietary blend, Bioflavonoids, Garlic bulb (Allium sativum) deodorized, 0.2% allicin, Licorice root (Glycyrrhiza glabra) deglycyrrhizinated, Bromelain, Ginger root (Zingiber officinale), Oregon Grape root (Mahonia aquifolium), Goldenseal proprietary blend

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: 9/14/05

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 16760



ENZYMATIC THERAPY

INCORPORATED

*What **Better** feels like.*

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2

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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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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
EHB	Physician-formulated EHB contains selected vitamins, minerals and botanicals for targeted, comprehensive immune support.*	Vitamin A (as vitamin A palmitate and 50% as beta-carotene; Betatene® natural mixed carotenoids), Vitamin C (as ascorbic acid), Vitamin B6 (as pyridoxine hydrochloride), Zinc (as zinc picolinate), Echinacea proprietary blend, Bioflavanoids, Garlic bulb (<i>Allium sativum</i>) deodorized, 0.2% allicin, Licorice root (<i>Glycyrrhiza glabra</i>) deglycyrrhizinated, Bromelain, Ginger root (<i>Zingiber officinale</i>), Oregon Grape root (<i>Mahonia aquifolium</i>), Goldenseal proprietary blend

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