



**ENZYMATIC THERAPY**  
INCORPORATED

*What **Better** feels like.*

September 14, 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)

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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

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>
7-KETO	Immune Optimizer*	7-keto (DHEA) Acetate (7-KETO™ Brand)

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: 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

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
7-KETO	Age Defying Memory Booster*	7-keto (DHEA) Acetate (7-KETO™ Brand)

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: 9/14/05

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Sincerely,

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Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
7-KETO	With 7-KETO, you'll get the following benefit of DHEA, which supports: Proper immune response.*	7-keto (DHEA) Acetate (7-KETO™ Brand)

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: 9/20/05

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
7-KETO	With 7-KETO, you'll get the following benefit of DHEA, which supports: Healthy thyroid function.*	7-keto (DHEA) Acetate (7-KETO™ Brand)

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
7-KETO	With 7-KETO, you'll get the following benefit of DHEA, which supports: Mental well-being and memory.*	7-keto (DHEA) Acetate (7-KETO™ Brand)

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