



**ENZYMATIC THERAPY**  
INCORPORATED

*What **Better** feels like.™*

**INTEGRATIVE THERAPEUTICS INC.™**  
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Tyler Encapsulations • Vitaline Formulas

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**ENZYMATIC THERAPY™**  
&  
**PHYTOPHARMICA™**

825 Challenger Drive, Green Bay, WI 54311-8328  
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P: 920.469.9099 • F: 920.469.4418 (Phyto)

September 21, 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

001 3 011

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
Esberitox®	Esberitox contains two types of Echniacea (Echinacea purpurea and pallida), plus two immune-enhancing herbs – baptisia and thuja – which activate your immune system and arm your body's defense system for a speedy return to feeling your best!* This unique herbal trio promotes your body's resistive functions.*	Wild indigo (Baptisia tinctoria) Root, Echinacea purpurea and pallida Root (Coneflower root), Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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: 9/21/05

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

975 0162 LET 16793