



INTEGRATIVE THERAPEUTICS INC.™
 NF Formulas ♦ PhytoPharmica
 Tyler Encapsulations ♦ Vitaline Formulas

ENZYMATIC THERAPY™
 &
PHYTOPHARMICA™

ENZYMATIC THERAPY
 INCORPORATED
*What **Better** feels like.™*

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)

2175 5 NOV 22 P2:26

NOV - 3 2005

November 1, 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
HDL Booster™*	Both HDL and LDL levels are important indicators of healthy cardiovascular function.* Therefore, supplements that increase the level of good cholesterol can profoundly impact heart health.*	Vitamin C (ascorbic acid), Vitamin E (as natural mixed tocopherols), Niacin (as niacinamide), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Magnesium (from Magnesium amino acid chelate), Selenium (as L-Selenomethionine), L-arginine (from L-arginine HCl), L-Carnitine (from L-carnitine L-tartrate), Coenzyme Q10 (CoQ10) (ubiquinone 10), Policosanol, Hawthorn Berry Extract, Taurine, Garlic, Grape Seed Extract, Grape Skin Extract, N-acetyl-L-cysteine, Alpha Lipoic Acid, Soy Isoflavones, Tocotrienols

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: 11/1/05

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

Sincerely,

 Michael P. Deveretx
 Chief Financial Officer

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INTEGRATIVE THERAPEUTICS INC.™
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Tyler Encapsulations + Vitamine Formulas

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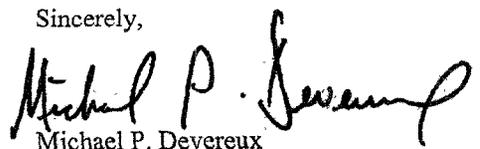
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
HDL Booster™*	A derivative of amino acid, cysteine, NAC is a key intermediary in the conversion of cysteine into glutathione, one of the body's primary cellular antioxidants.*	N-Acetyl-L-Cysteine (NAC)

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: 11/1/05

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Michael P. Devereux
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
HDL Booster™*	Replaces the CoQ10 depleted by cholesterol lowering (statin) drugs.*	Vitamin C (ascorbic acid), Vitamin E (mixed d-alpha tocopherols), Niacin (niacinamide), Vitamin B6 (pyridoxine HCl), Folic Acid, Vitamin B12 (cyanocobalamin), Magnesium, L-Selenomethionine, L-Arginine HCl, Carnitine, CoQ10, Policosanol, Hawthorn Berry Extract, Taurine, Garlic, Grape Seed Extract, Grape Skin Extract, N-acetyl-L-cysteine, Alpha Lipoic Acid, Soy Isoflavones, Tocotrienols

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