



INTEGRATIVE THERAPEUTICS INC.™
 NF Formulas ♦ PhytoPharmica
 Tyler Encapsulations ♦ Vitamine 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)

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JAN -3 P2:27

November 9, 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

RECEIVED
 11/17/05

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
Sweet Defense™	May reduce sugar cravings*	Vitamin A (53% beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pantothenic Acid (as calcium D-pantothenate), Zinc (as zinc gluconate), Manganese (as manganese gluconate), Chromium (as chromium picolinate), Sodium, Potassium (as potassium aspartate), Inositol, Pancreas Extract (freeze dried), Choline Bitartrate, L-Methionine, Beet (Beta vulgaris) Root, Adrenal Extract, Betaine HCl, Wild Yam (Dioscorea villosa) Root, Barberry (Berberis vulgaris) Bark of 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 C. Doster
 Robert C. Doster

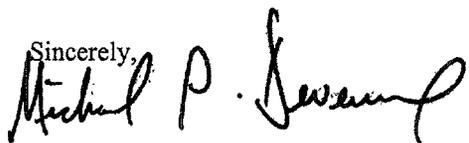
Title: Senior Vice President of Scientific Affairs

Date: 11/9/05

975 0162 LET 17061

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer



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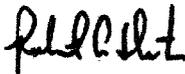
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Sweet Defense™	Supports proper carbohydrate and sugar metabolism.*	Vitamin A (53% beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pantothenic Acid (as calcium D-pantothenate), Zinc (as zinc gluconate), Manganese (as manganese gluconate), Chromium (as chromium picolinate), Sodium, Potassium (as potassium aspartate), Inositol, Pancreas Extract (freeze dried), Choline Bitartrate, L-Methionine, Beet (Beta vulgaris) Root, Adrenal Extract, Betaine HCl, Wild Yam (Dioscorea villosa) Root, Barberry (Berberis vulgaris) Bark of Root Extract

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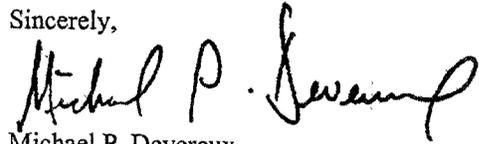
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Chief Financial Officer



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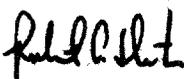
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Sweet Defense™	Sweet Defense provides nutrients that must be present in the diet for blood glucose, carbohydrate, and energy metabolism.*	Vitamin A (53% beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pantothenic Acid (as calcium D-pantothenate), Zinc (as zinc gluconate), Manganese (as manganese gluconate), Chromium (as chromium picolinate), Sodium, Potassium (as potassium aspartate), Inositol, Pancreas Extract (freeze dried), Choline Bitartrate, L-Methionine, Beet (Beta vulgaris) Root, Adrenal Extract, Betaine HCl, Wild Yam (Dioscorea villosa) Root, Barberry (Berberis vulgaris) Bark of Root Extract

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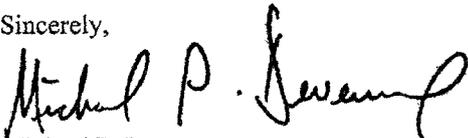
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Sweet Defense™	Nutrients in Sweet Defense are used by the glands and organs most intricately involved in carbohydrate metabolism.*	Vitamin A (53% beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Pantothenic Acid (as calcium D-pantothenate), Zinc (as zinc gluconate), Manganese (as manganese gluconate), Chromium (as chromium picolinate), Sodium, Potassium (as potassium aspartate), Inositol, Pancreas Extract (freeze dried), Choline Bitartrate, L-Methionine, Beet (Beta vulgaris) Root, Adrenal Extract, Betaine HCl, Wild Yam (Dioscorea villosa) Root, Barberry (Berberis vulgaris) Bark of Root Extract

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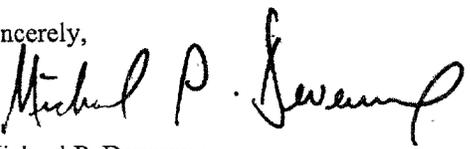
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Sweet Defense™	This formula contains B vitamins and chromium picolinate, which a must be present for sugar metabolism.*	Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Vitamin B12 (as cyanocobalamin), Chromium (as chromium picolinate),

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