



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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0115 6 11-3 27:29

December 8, 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise - The Goodness of Orange	Boosts your immune system*	Vitamin A (as beta carotene), Vitamin C (from orange fruit and sodium ascorbate), Potassium (from potassium citrate and Fruit and Vegetable Blend), Fruit and Vegetable Blend: orange fruit, whole apple, carrot root juice, carrot root, banana fruit, apricot fruit, orange fruit uice, sweet potato root, mango fruit, tomato fruit, pumpkin fruit extract, butternut squash fruit, papaya fruit, cantaloupe fruit, mangosteen fruit, Fiber Blend, Grape (Vitis vinifera) Seed Extract, Stevia Leaf Extract, Mixed Bioflavonoids (from citrus fruits), Lycopene, Lutein

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: 12/8/05

975 0162 LET 17093

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

Sincerely,


Michael P. Devereux
Chief Operations Officer



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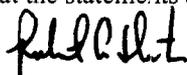
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise - The Goodness of Orange	Supports a strong heart*	Vitamin A (as beta carotene), Vitamin C (from orange fruit and sodium ascorbate), Potassium (from potassium citrate and Fruit and Vegetable Blend), Fruit and Vegetable Blend: orange fruit, whole apple, carrot root juice, carrot root, banana fruit, apricot fruit, orange fruit uice, sweet potato root, mango fruit, tomato fruit, pumpkin fruit extract, butternut squash fruit, papaya fruit, cantaloupe fruit, mangosteen fruit, Fiber Blend, Grape (Vitis vinifera) Seed Extract, Stevia Leaf Extract, Mixed Bioflavonoids (from citrus fruits), Lycopene, Lutein

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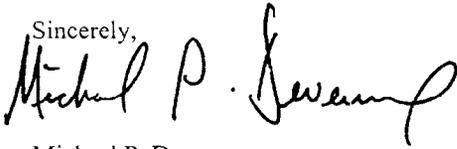
By: 

Robert Doster
Senior Vice President of Scientific Affairs

Date: 12-8-05

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 Operations Officer



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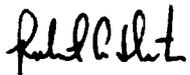
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Earth's Promise – The Goodness of Orange	Help maintains healthy vision*	Vitamin A (as beta carotene), Vitamin C (from orange fruit and sodium ascorbate), Potassium (from potassium citrate and Fruit and Vegetable Blend), Fruit and Vegetable Blend: orange fruit, whole apple, carrot root juice, carrot root, banana fruit, apricot fruit, orange fruit uice, sweet potato root, mango fruit, tomato fruit, pumpkin fruit extract, butternut squash fruit, papaya fruit, cantaloupe fruit, mangosteen fruit, Fiber Blend, Grape (Vitis vinifera) Seed Extract, Stevia Leaf Extract, Mixed Bioflavonoids (from citrus fruits), Lycopene, Lutein

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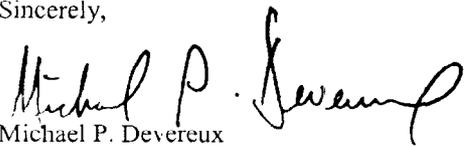
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 12-8-05

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Earth's Promise – The Goodness of Orange	The rich, vibrant colors of fruits and vegetables aren't just for decoration. They're nature's way of telling you that these foods are bursting with a wide range of vitamins, nutrients and phytonutrients – naturally occurring, plant-based antioxidants that support a vast array of health benefits ranging from immune to heart to vision health and much more.*	Vitamin A (as beta carotene), Vitamin C (from orange fruit and sodium ascorbate), Potassium (from potassium citrate and Fruit and Vegetable Blend), Fruit and Vegetable Blend: orange fruit, whole apple, carrot root juice, carrot root, banana fruit, apricot fruit, orange fruit uice, sweet potato root, mango fruit, tomato fruit, pumpkin fruit extract, butternut squash fruit, papaya fruit, cantaloupe fruit, mangosteen fruit, Fiber Blend, Grape (Vitis vinifera) Seed Extract, Stevia Leaf Extract, Mixed Bioflavonoids (from citrus fruits), Lycopene, Lutein

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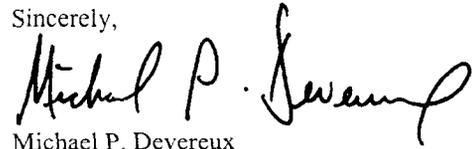
By: Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 12-8-05

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Michael P. Devereux
Chief Operations Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Orange	Supports eye, prostate, immune and cardiovascular health.*	Lycopene

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By: _____

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 12-9-05

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Earth's Promise – The Goodness of Orange	Helps maintain healthy vision*	Lutein

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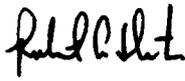
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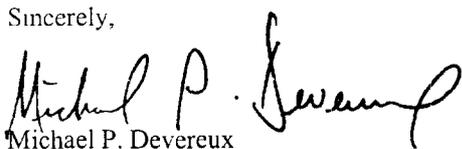
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Orange	Enhances natural killer cell activity, supporting the immune system.*	Vitamin A (as beta carotene)

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Earth's Promise – The Goodness of Orange	Supports the production of healthy collagen – essential for skin and joints*	Vitamin C (from orange fruit and sodium ascorbate)

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Earth's Promise – The Goodness of Orange	Helps maintain healthy blood pressure levels already within normal range.*	Potassium (from potassium citrate and Fruit and Vegetable Blend)

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