



**INTEGRATIVE THERAPEUTICS INC.™**  
 NF Formulas • PhytoPharmica  
 Tyler Encapsulations • Vitamine Formulas

**ENZYMATIC THERAPY®**  
 &  
**PHYTOPHARMICA®**

**ENZYMATIC THERAPY**  
 INCORPORATED

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)

What *Better* feels like.™

0483 6 JAN 12 P2:38

December 22, 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

DEC 23 2005

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>
Cell Forte® with IP-6 & Inositol	It's time to take serious action toward defending your deep immune health naturally with the patented, powerful protection of Cell Forte with IP-6 and Inositol.*	Calcium (from calcium magnesium phytate), Phosphorus (from calcium magnesium phytate), Magnesium (from calcium magnesium phytate), IP-6 (inositol hexaphosphate) (from calcium magnesium phytate), Inositol

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: 12/22/05

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

Sincerely,  


Michael P. Devereux  
 Chief Operations Officer

975 0162 LET 17146



**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)

**ENZYMATIC THERAPY**  
 INCORPORATED

What **Better** feels like™

December 22, 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>
Cell Forte® with IP-6 & Inositol	This special blend of IP-6 and inositol helps give you the power to prevail by delivering scientifically studied, exceptional support for the most critical cells in your immune system.*	Calcium (from calcium magnesium phytate), Phosphorus (from calcium magnesium phytate), Magnesium (from calcium magnesium phytate), IP-6 (inositol hexaphosphate) (from calcium magnesium phytate), Inositol

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: 12/22/05

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

Sincerely,

Michael P. Devereux  
 Chief Operations Officer



**ENZYMATIC THERAPY**  
INCORPORATED

What Better feels like.™

December 22, 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
Cell Forte® with IP-6 & Inositol	Cell Forte with patented IP-6 & Inositol helps you take serious action toward defending your deep immune health naturally by supporting the most critical cells in your immune system.*	Calcium (from calcium magnesium phytate), Phosphorus (from calcium magnesium phytate), Magnesium (from calcium magnesium phytate), IP-6 (inositol hexaphosphate) (from calcium magnesium phytate), Inositol

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: 12/22/05

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

Sincerely,

Michael P. Devereux  
Chief Operations Officer

**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)