



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

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January 3, 2006

0501 6 JAN 12 P2:39

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

3-1 - 6 2006

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>
Fiber Fusion™	Fiber has the key role of safely absorbing and eliminating toxins in the cleansing process. The toxins bind to the fiber and are excreted from the body. Without this important part of the process, eliminated toxins can go right back into the blood stream.*	Proprietary Fiber Blend -psyllium (Plantago ovata) husk, oat (Avena sativa) bran, guar gum (Cyamopsis tetragonoloba) seed extract, pectin (from citrus fruit), and marshmallow (Althaea officinalis) 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 Doster
 Robert Doster
 Title: Senior Vice President of Scientific Affairs
 Date: 1-3-06

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 17164



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January 4, 2006

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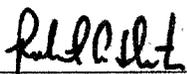
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fiber Fusion™	Without fiber, toxins may be reabsorbed and you cannot thoroughly detoxify.†	Proprietary Fiber Blend -psyllium (Plantago ovata) husk, oat (Avena sativa) bran, guar gum (Cyamopsis tetragonoloba) seed extract, pectin (from citrus fruit), and marshmallow (Althaea officinalis) root extract

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By: 
 Robert Doster
 Title: Senior Vice President of Scientific Affairs

Date: 1-4-06

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Fiber Fusion™	Contains psyllium rather than flax for more thorough cleansing.*	Proprietary Fiber Blend -psyllium (Plantago ovata) husk, oat (Avena sativa) bran, guar gum (Cyamopsis tetragonoloba) seed extract, pectin (from citrus fruit), and marshmallow (Althaea officinalis) root extract

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Michael P. Devereux
Chief Operations Officer

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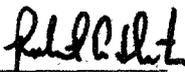
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fiber Fusion™	Periodic cleansing supports digestive and liver health which can be beneficial for skin health and weight management.*	Proprietary Fiber Blend -psyllium (Plantago ovata) husk, oat (Avena sativa) bran, guar gum (Cyamopsis tetragonoloba) seed extract, pectin (from citrus fruit), and marshmallow (Althaea officinalis) root extract

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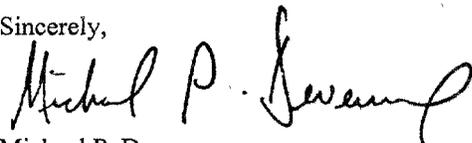
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fiber Fusion™	A unique fiber blend for safe and effective cleansing.*	Proprietary Fiber Blend -psyllium (Plantago ovata) husk, oat (Avena sativa) bran, guar gum (Cyamopsis tetragonoloba) seed extract, pectin (from citrus fruit), and marshmallow (Althaea officinalis) root extract

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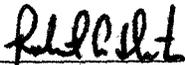
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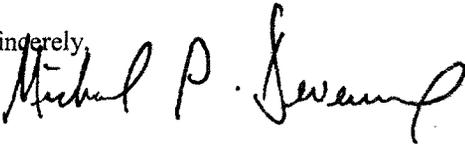
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Fiber Fusion™	Fiber supports healthy hormone balance.*	Proprietary Fiber Blend -psyllium (Plantago ovata) husk, oat (Avena sativa) bran, guar gum (Cyamopsis tetragonoloba) seed extract, pectin (from citrus fruit), and marshmallow (Althaea officinalis) root extract

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Fiber Fusion™	Besides being good for you, fiber provides a feeling of fullness, which means you're less likely to eat more pound-adding calories from other foods.*	Proprietary Fiber Blend -psyllium (Plantago ovata) husk, oat (Avena sativa) bran, guar gum (Cyamopsis tetragonoloba) seed extract, pectin (from citrus fruit), and marshmallow (Althaea officinalis) root extract

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