



**INTEGRATIVE THERAPEUTICS INC.**  
 NF Formulas PhytoPharmica  
 Tyler Encapsulations Vitaline Formulas

**ENZYMATIC THERAPY\***  
 &  
**PHYTOPHARMICA\***

**ENZYMATIC THERAPY**

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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what **Better** feels like.™

January 16, 2006

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>
Probiotic Pearls™	Supports healthy digestion during occasional constipation.*	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidobacterium longum

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: 1-16-06

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

Sincerely,  
  
 Michael P. Devereux  
 Chief Financial Officer

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Probiotic Pearls™	In clinical studies, probiotics containing L. acidophilus and B. longum have been shown to reduce the duration of and discomfort associated with occasional loose stools.*	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidobacterium longum

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.

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Probiotic Pearls™	Enhance detoxification of DNA-toxic substances in the intestines.*	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidobacterium longum

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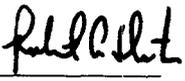
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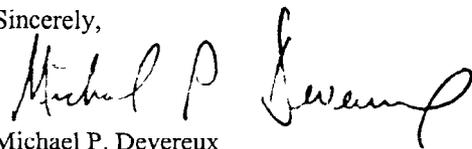
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Probiotic Pearls™	Probiotics help reduce occasional loose stools.*	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidobacterium longum

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.

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