



**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**

What *Better* feels like™

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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.

<b>PRODUCT NAME</b>	<b>STATEMENTS</b>	<b>INGREDIENT(S) TO WHICH THE CLAIM REFERS</b>
Detoxification Factors™*	Supports healthy detoxification and microbial byproducts.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids, Palmitate), Vitamin C (as Magnesium Ascorbate), Vitamin E (as d-Alpha Tocopheryl Succinate), Thiamin (as Thiamine HCl, Thiamine Pyrophosphate), Riboflavin (as Riboflavin-5'-Phosphate), Niacin, Vitamin B-6 (as Pyridoxal-5'-Phosphate) Folic Acid, Vitamin B-12 (as Cyanocobalmin, Adenosylcobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Magnesium(as Magnesium Citrate, Ascorbate, Malate), Zinc (as Zinc Picolinate), Selenium (as L-Selenomethionine), Copper (as Copper Sebicate), Manganese (as Manganese Glycinate), Molybdenum (as Molybdenum Citrate), Calcium D-Glucarate, L-Methionine, Glycine, L-Glutamic Acid HCl, L-Taurine, L-Glutamine, Choline (as Choline Bitartrate), NAC (N-Acetyl-L-Cysteine), Quercetin, Inositol, L-Ornithine-L-Aspartate, Broccoli Aerial Parts Extract (Brassica oleracea), Milk Thistle Seed Extract (Silybum marianum) (80% Silymarin), L-Glutathione Reduced, L-Serine, L-Histidine, L-Carnitine (as L-Carnitine Tartrate), Coenzyme Q10 (as Ubiquinone), Grape Seed Extract (Vitis vinifera), Superoxide Dismutase, Catalase

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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: 

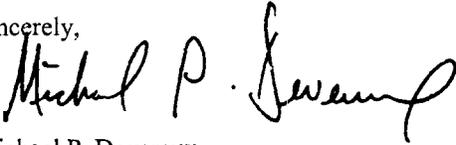
Robert C. Doster

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 Operations Officer