



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)

What **Better** feels like.™

1027 6 1027 8910

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.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Oxyperm™	"Targeted" antioxidant support for the intestinal mucosa.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (from Poly-Ascorbates) (calcium, magnesium, potassium, and zinc ascorbates), Vitamin E (as d-Alpha Tocopheryl Succinate), Calcium (as Calcium Ascorbate), Magnesium (as magnesium Ascorbate), Zinc (as Zinc Picolinate, Ascorbate), Selenium (as a Selenium Aspartate Complex), Copper (as Copper Aspartate), Potassium (as Potassium Ascorbate), Quercetin, NAC (N-Acetyl-L-Cysteine), Ginkgo Leaf (Ginkgo biloba) (24% Ginkgo Flavone Glycosides)

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 Operations Officer

975 0162 LET 17207

Oxyperm 3e



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Oxyperm™	Promotes normal mast cell function in the intestinal mucosa.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (from Poly-Ascorbates) (calcium, magnesium, potassium, and zinc ascorbates), Vitamin E (as d-Alpha Tocopheryl Succinate), Calcium (as Calcium Ascorbate), Magnesium (as magnesium Ascorbate), Zinc (as Zinc Picolinate, Ascorbate), Selenium (as a Selenium Aspartate Complex), Copper (as Copper Aspartate), Potassium (as Potassium Ascorbate), Quercetin, NAC (N-Acetyl-L-Cysteine), Ginkgo Leaf (Ginkgo biloba) (24% Ginkgo Flavone Glycosides)

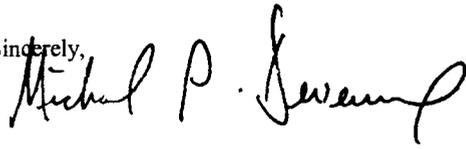
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D.D.D.

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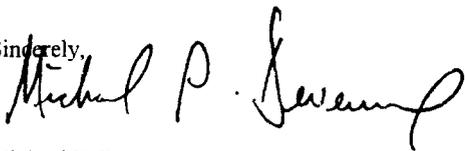
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Oxyperm™	Helps replenish intracellular glutathione in the intestinal mucosa.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (from Poly-Ascorbates) (calcium, magnesium, potassium, and zinc ascorbates), Vitamin E (as d-Alpha Tocopheryl Succinate), Calcium (as Calcium Ascorbate), Magnesium (as magnesium Ascorbate), Zinc (as Zinc Picolinate, Ascorbate), Selenium (as a Selenium Aspartate Complex), Copper (as Copper Aspartate), Potassium (as Potassium Ascorbate), Quercetin, NAC (N-Acetyl-L-Cysteine), Ginkgo Leaf (Ginkgo biloba) (24% Ginkgo Flavone Glycosides)

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