



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)

1937 6 27 12:20

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

2, 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.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Brain Fog Lifter™*	If your mind is lost in a brain fog of occasional forgetfulness or absentmindedness, this additional supplement for Triple Whammy can help clear your thoughts.*	Acetyl-L-Carnitine HCl, L-Glutamine, Lecithin, Phosphatidylcholine, Phosphatidylethanolamine, Phosphatidylinositol, L-Pyroglutamic acid, L-Tyrosine, Eleuthero Root (Eleutherococcus senticosus) extract, Ashwagandha Root (withania somnifera) Extract, Choline (as choline bitartrate), Bilberry Fruit (Vaccinium myrtillus) Extract, DMAE (dimethylaminoethanol bitartrate), Phosphatidylserine (soy lecithin source), Ginkgo Biloba Leaf Extract, Docosahexaenoic Acid

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: 1-16-06

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

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Brain Fog Lifter™*	This comprehensive formula supports the production of cellular energy, cell membrane flexibility and integrity, healthy brain vessel tone and more for healthy memory function.*	Acetyl-L-Carnitine HCl, L-Glutamine, Lecithin, Phosphatidylcholine, Phosphatidylethanolamine, Phosphatidylinositol, L-Pyroglutamic acid, L-Tyrosine, Eleuthero Root (Eleutherococcus senticosus) extract, Ashwagandha Root (withania somnifera) Extract, Choline (as choline bitartrate), Bilberry Fruit (Vaccinium myrtillus) Extract, DMAE (dimethylaminoethanol bitartrate), Phosphatidylserine (soy lecithin source), Ginkgo Biloba Leaf Extract, Docosahexaenoic Acid

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