



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*

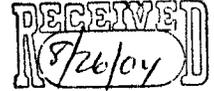
825 Challenger Drive, Green Bay, WI 54311-8328
 P: 920.469.1313 + F: 888.570.6460 (Enzymatic)
 P: 920.469.9099 + F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY
 INCORPORATED

*What **Better** feels like.™*

August 24, 2004

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
Vitaline® CoQ10	New power-packed healthy aging protocol promotes natural immune defense and provides support against the natural signs of aging.* Even more, these clinically-validated products support healthy neurological, cardiovascular and immune system function.*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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: 8/24/04

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

975 0162 LET 14592



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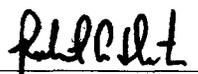
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Vitaline® CoQ10	Fermented papaya extract that has been shown to support both antioxidant and immune system function, including a clinically validated impact on two pathways that eliminate free radicals from the body (Superoxidase Mutase (SoD) and Glutathione Peroxidase).*	Vitamin E (as dl-alpha tocopheryl acetate, d-alpha tocopheryl acetate, and mixed tocopherols), Coenzyme Q10 (CoQ10) (ubiquinone 10)

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