



INTEGRATIVE THERAPEUTICS INC.™
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 &
PHYTOPHARMICA®

9755 SW Commerce Circle, Suite B2
 Wilsonville, OR 97070
 P: 503.582.8386 F: 503.582.0467

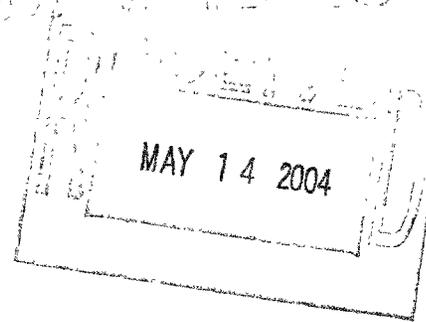
825 Challenger Drive, Green Bay, WI 54311-8328
 P: 920.469.1313 F: 888.570.6460 (Enzymatic)
 P: 920.469.9099 F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY

*What **Better** feels like™*

May 4, 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Chewable Echinacea with Vitamin C & Elderberry	Select synergistic nutrients that support the immune system in a convenient chewable tablet.*	Vitamin A (as Vitamin A palmitate and 50% from natural beta carotene with mixed carotenoids), Vitamin C (65% as ascorbic acid and 35% as sodium ascorbate), Vitamin B6 (as pyridoxine HCl), Zinc (as zinc gluconate), Echinacea Proprietary Blend Echinacea pupurea whole plant extract 4:1 and Echinacea angustifolia root extract 4:1, European Elder (Sambucus nigra) Fruit Extract 5:1

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

Title: Senior Vice President of Scientific Affairs

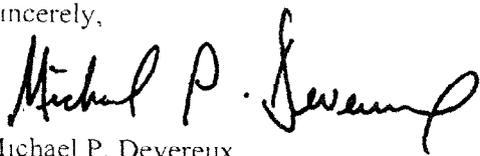
Date: 5-11-04

975 0162

LET 14074

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized "M" and "D".

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>
Echinacea with Vitamin C & Elderberry	Standardized extracts of echinacea have been found to support healthy immune response.*	Echinacea Proprietary Blend Echinacea pupurea whole plant extract 4:1 and Echinacea angustifolia root extract 4:1,

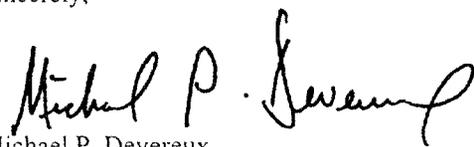
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By: 
 Robert Doster
 Title: Senior Vice President of Scientific Affairs

Date: 5/4/04

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Sincerely,


 Michael P. Devereux
 Chief Financial Officer



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May 5, 2004

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RE: Label Claims/Disclaimers

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Vitamin C acts as an antioxidant.*	Vitamin C (65% as ascorbic acid and 35% as sodium ascorbate)

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By: 

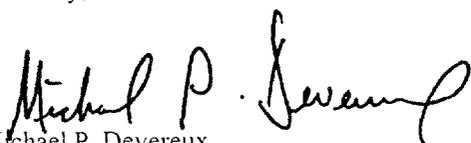
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/5/04

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



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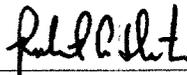
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Shown to enhance immune function.*	European Elder fruit (Sambucus nigra)

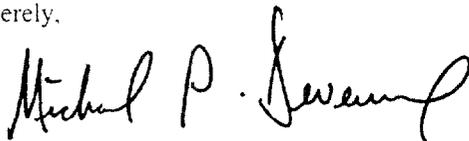
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By: 
 Robert Doster
 Title: Senior Vice President of Scientific Affairs

Date: 5/5/04

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Sincerely,



Michael P. Devereux
 Chief Financial Officer



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May 6, 2004

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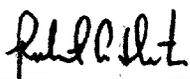
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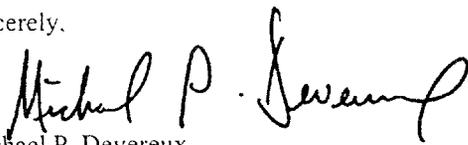
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Vitamin A has antioxidant properties, and promotes healthy cellular growth.* It works synergistically with vitamin C to boost the immune system.*	Vitamin A (as vitamin A palmitate and 50% from natural beta-carotene with mixed carotenoids)

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
Title: Senior Vice President of Scientific Affairs

Date: 5/6/04

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



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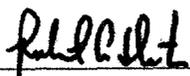
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Echinacea with Vitamin C & Elderberry	Zinc boosts immunity, helps healthy cells reproduce and protects against free radicals.*	Zinc (as zinc gluconate)

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

Title: Senior Vice President of Scientific Affairs

Date: 5/6/04

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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>
Echinacea with Vitamin C & Elderberry	Features supplements that work together synergistically to boost the immune system during times of stress*	Vitamin A (as vitamin A palmitate and 50% from natural beta-carotene with mixed carotenoids), Vitamin C (65% as ascorbic acid and 35% as sodium ascorbate), Vitamin B6 (as pyridoxine HCl), Zinc (as zinc gluconate), Echinacea Proprietary Blend Echinacea purpurea whole plant extract 4:1 and Echinacea angustifolia root extract 4:1, European Elder (Sambucus nigra) Fruit Extract 5:1

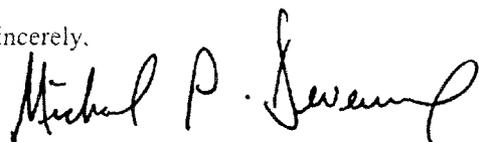
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By: Robert Doster
Robert Doster
Title: Senior Vice President of Scientific Affairs

Date: 5/6/04

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

Sincerely,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

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>
Echinacea with Vitamin C & Elderberry	This potent formula is a great tasting chewable tablet, which boosts the immune system and strengthens the body's natural defense mechanisms.*	Vitamin A (as vitamin A palmitate and 50% from natural beta-carotene with mixed carotenoids), Vitamin C (65% as ascorbic acid and 35% as sodium ascorbate), Vitamin B6 (as pyridoxine HCl), Zinc (as zinc gluconate), Echinacea Proprietary Blend Echinacea purpurea whole plant extract 4:1 and Echinacea angustifolia root extract 4:1, European Elder (Sambucus nigra) Fruit Extract 5:1

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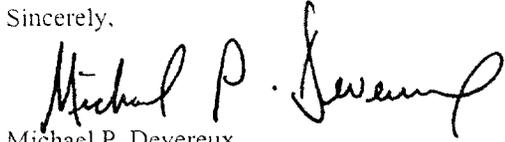
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 Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/6/04

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Stimulates key cells of the immune system*	Echinacea Proprietary Blend Echinacea purpurea whole plant extract 4:1 and Echinacea angustifolia root extract 4:1

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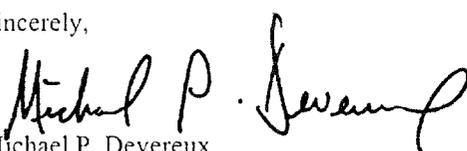
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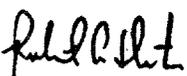
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Stimulates the immune system*	European Elder (Sambucus nigra) Fruit Extract 5:1

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By: 
 Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/7/04

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May 7, 2004

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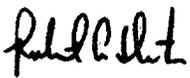
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Supports a healthy thymus gland, one of the key organs of the immune system*	Vitamin A (as vitamin A palmitate and 50% from natural beta carotene with mixed carotenoids)

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

Title: Senior Vice President of Scientific Affairs

Date: 5/7/04

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



ENZYMATIC THERAPY

What Better feels like™

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)

May 8, 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

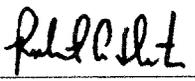
RE: Label Claims/Disclaimers

Dear Sir or Madam:

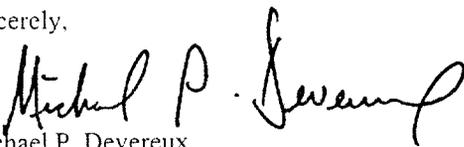
This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Plays a key role in cell multiplication, which is particularly important for immune system cells, which must replicate rapidly.*	Vitamin B6 (as pyridoxine HCl)

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
Title: Senior Vice President of Scientific Affairs
Date: 5/8/04

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



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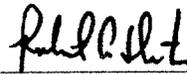
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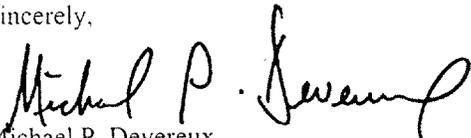
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Echinacea with Vitamin C & Elderberry	Plays a key role in nearly every aspect of immune system function, including production of the thymic hormones, white blood cells, and T cells.*	Zinc (as zinc gluconate)

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
Title: Senior Vice President of Scientific Affairs

Date: 5/8/04

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

Sincerely,

Michael P. Devereux
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