



ENZYMATIC THERAPY
INCORPORATED
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 30, 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>
Whole Heart Multivitamin™	In a clinical study of men and women who are aged from 65 to 102, an extremely significant direct correlation was found between zinc and support for healthy aortic valves.*	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 C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 5/30/04

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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ENZYMATIC THERAPY

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May 25, 2004

JUN 23 2004

Office of Nutritional Products, Labeling &
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Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

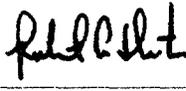
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Whole Heart Multivitamin™	Enzymatic Therapy's Whole Heart Multivitamin™ provides a comprehensive formula with multiple vitamins, antioxidants and B vitamins to support heart health.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Choline Bitartrate, Alpha Lipoic Acid, Lycopene, Lutein (from Calendula officinalis), Vanadium(as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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: 5/25/04

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