



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)

June 16, 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

JUN 29 2004

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>
Esberitox®	ViraPlex™ EB provides the nutrient building blocks necessary for optimal immune system function in adults, while Esberitox® stimulates the immune system into action.*	Wild indigo Root, Echinacea purpurea and pallida Root (Coneflower root), Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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: 6/16/04

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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June 17, 2004

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[Faint stamp: JUN 29 2004]

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Esberitox®	For children, use Sea Buddies™ Immune Defense* with Esberitox® for a double boost of immune support.*	Wild indigo Root, Echinacea purpurea and pallida Root (Coneflower root), Thuja (Thuja occidentalis) Leaf (White cedar leaf)

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.

[Handwritten signature]

By: _____
 Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/17/04

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

Sincerely,

[Handwritten signature: Michael P. Devereux]

Michael P. Devereux
 Chief Financial Officer