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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)

November 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

NOV 23 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.

| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|--|--|
| BP Manager™ | The proprietary blend includes the herbs dandelion, stevia, olive leaf, and hawthorn in combination with lycopene, a potent antioxidant with proven support for heart health.* | Proprietary Phytotensive Blend – Stevia (Stevia rebaudiana) leaf extract, olive (Olea europaea) leaf extract, hawthorn (Crataegus oxyacantha) leaf and flower extract, dandelion (Taraxacum officinale) leaf, Lycopene |

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: 11-16-04

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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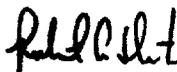
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| BP Manager™ | The ingredients in BP Manager individually have a long history of traditional use, and have been shown in modern scientific studies to have significant benefits for heart health.* This proprietary blend was recently utilized in a clinical trial in which 100% of participants experienced significant support for retention of healthy blood pressure levels already within normal limits.* | Proprietary Phytotensive Blend – Stevia (Stevia rebaudiana) leaf extract, olive (Olea europaea) leaf extract, hawthorn (Crataegus oxyacantha) leaf and flower extract, dandelion (Taraxacum officinale) leaf, Lycopene |

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By: 

Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 11-16-04



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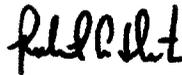
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| BP Manager™ | BP Manager contains clinically-studied ingredients that support healthy systolic and diastolic blood pressure already within normal limits.* | Proprietary Phytotensive Blend – Stevia (Stevia rebaudiana) leaf extract, olive (Olea europaea) leaf extract, hawthorn (Crataegus oxyacantha) leaf and flower extract, dandelion (Taraxacum officinale) leaf, Lycopene |

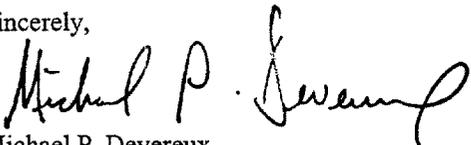
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By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-16-04

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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November 17, 2004

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Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| BP Manager™ | Research on other nutrients for the support of healthy blood pressure levels typically have found significant benefits only for the retention of healthy systolic blood pressure levels already within normal limits.* Support for diastolic was less consistently noted.* | Proprietary Phytotensive Blend – Stevia (Stevia rebaudiana) leaf extract, olive (Olea europaea) leaf extract, hawthorn (Crataegus oxyacantha) leaf and flower extract, dandelion (Taraxacum officinale) leaf, Lycopene |

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: 11-17-04

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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November 18, 2004

Office of Nutritional Products, Labeling &
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| BP Manager™ | Dandelion has a long history of traditional use associated with support of healthy fluid balance in the body.* Flavonoids isolated found in dandelions may be responsible for its beneficial effects.* | Dandelion (<i>Taraxacum officinale</i>) Leaf, |

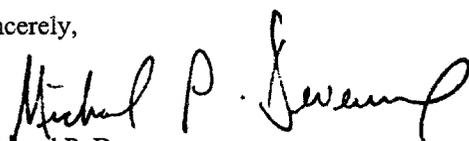
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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

Date: 11-18-04

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

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| BP Manager™ | Because dandelion is also a rich source of potassium, it supports healthy potassium levels in the body.* | Dandelion (<i>Taraxacum officinale</i>) 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 C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 11-18-04

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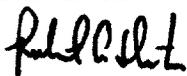
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|---|---|
| BP Manager™ | Research shows that lycopene is associated with greater free-radical scavenging ability than any other carotenoid.* | Lycopene |

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By: 

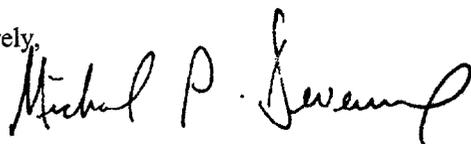
Robert C. Doster

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Date: 11-18-04

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
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| BP Manager™ | Increased intake of lycopene has been associated with beneficial support of heart health in clinical studies, including a multi-center study.* | Lycopene |

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: 11-18-04

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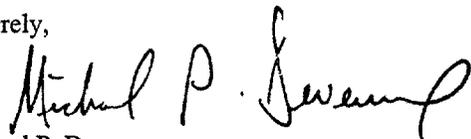
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| BP Manager™ | Lycopene is also currently being studied for its association with immune system and prostate health.* | Lycopene |

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Date: 11-18-04

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November 19, 2004

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| BP Manager™ | The leaf of stevia is considered the beneficial part of the plant.* Extracts of stevia have been shown to support healthy vasodilation, arterial wall health and blood pressure already within normal limits.* | Stevia (Stevia rebaudiana) Leaf Extract |

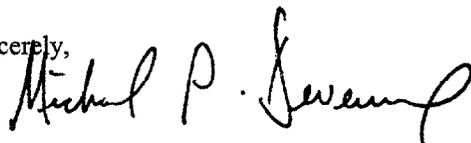
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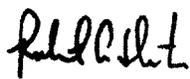
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| BP Manager™ | Scientific and clinical studies also associated stevia extract with support of healthy blood sugar already within normal limits in all participants.* | Stevia (Stevia rebaudiana) Leaf Extract |

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Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 11-19-04

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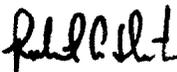
RE: Label Claims/Disclaimers

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 |
|--------------|--|---|
| BP Manager™ | Modern research considers bioflavonoid complexes in hawthorn leaf and flower, including vitex-2-rhamnoside, responsible for the plant's beneficial effects.* Hawthorn extract is associated with healthy arterial blood flow, normal blood vessel dilation and healthy sodium balance already within normal limits.* | Hawthorn (Crataegus oxyacantha) Leaf and Flower Extract |

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.

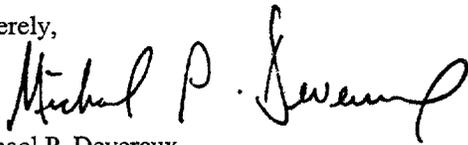
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-20-04

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



EST. 1981

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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)

November 20, 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

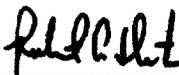
RE: Label Claims/Disclaimers

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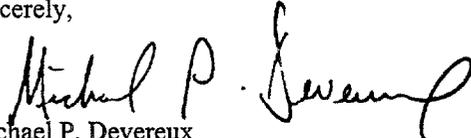
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|---|---|
| BP Manager™ | Hawthorn also supports healthy cholesterol levels already within normal limits, possibly through antioxidant activity.* | Hawthorn (Crataegus oxyacantha) Leaf and Flower Extract |

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: 11-20-04

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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RE: Label Claims/Disclaimers

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|--|---|
| BP Manager™ | Like stevia extract, hawthorn also shows potential benefits supporting normal blood sugar levels already within healthy limits.* | Hawthorn (Crataegus oxyacantha) Leaf and Flower Extract |

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: 11-20-04

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

Sincerely,
Michael P. Devereux
Michael P. Devereux
Chief Financial Officer



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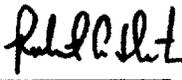
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|---|---|
| BP Manager™ | Lycopene is a member of the carotenoid family that shows great antioxidant activity.* | Lycopene |

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: 

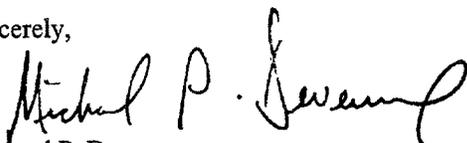
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-20-04

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Sincerely,



Michael P. Devereux
Chief Financial Officer



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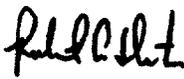
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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|--|---|
| BP Manager™ | Traditionally used to support heart health.* | Hawthorn (Crataegus oxyacantha) Leaf and Flower Extract |

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.

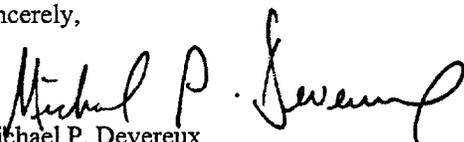
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-20-04

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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November 20, 2004

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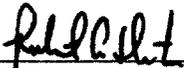
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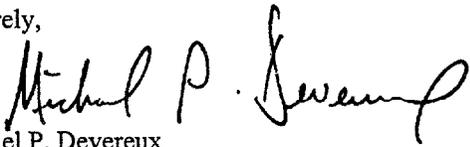
| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|--|---|
| BP Manager™ | Hawthorn contains procyanidins, which are associated with its beneficial effects for supporting heart health.* | Hawthorn (Crataegus oxyacantha) Leaf and Flower Extract |

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: 11-20-04

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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November 20, 2004

Office of Nutritional Products, Labeling &
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RE: Label Claims/Disclaimers

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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 |
|--------------|--|---|
| BP Manager™ | Shows support of healthy blood pressure already within normal limits, and is associated with normal arterial wall thickness and support of healthy blood vessel dialtion.* | Stevia (Stevia rebaudiana) Leaf Extract |

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: 11-20-04

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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November 19, 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

RE: Label Claims/Disclaimers

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| PRODUCT NAME | STATEMENTS | INGREDIENT(S) TO WHICH THE CLAIM REFERS |
|--------------|---|---|
| BP Manager™ | Scientific and clinical studies also associated stevia extract with support of healthy blood sugar already within normal limits in all participants.* | Stevia (Stevia rebaudiana) Leaf Extract |

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: 

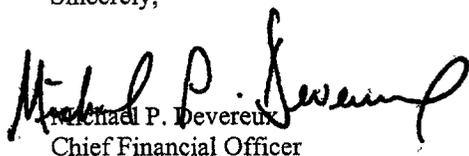
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 11-19-04

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