



**INTEGRATIVE THERAPEUTICS INC.™**  
 NF Formulas PhytoPharmica  
 Tyler Encapsulations Vitaline Formulas

**ENZYMATIC THERAPY®**  
 &  
**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™

April 13, 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>
Eleuthero Extract	Eleuthero Root Extract is a good choice for someone experiencing mild to moderate stress.* In contrast, Panax ginseng may be a better choice for someone who's been under a great deal of stress.*	Eleuthero (Eleutherococcus senticosus) Root 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 Doster  
 Robert Doster

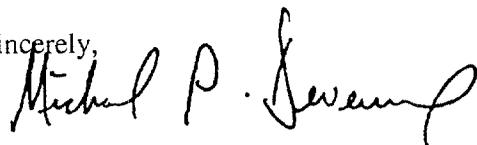
Title: Senior Vice President Scientific Affairs

Date: 4/13/04

97S 0162 LET 13897

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, prominent initial "M".

Michael P. Devereux  
Chief Financial Officer



**INTEGRATIVE THERAPEUTICS INC.™**

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April 12, 2004

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

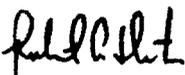
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Eleuthero Extract	Scientific studies show Eleuthero Root Extract (Eleutherococcus senticosus) has beneficial effects on adrenal function and enhances resistance to stress, both physical and mental.*	Eleuthero (Eleutherococcus senticosus) Root Extract

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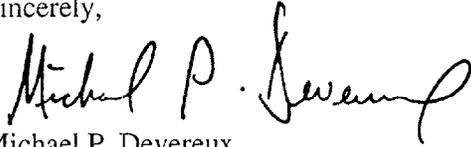
By: 

Robert Doster  
Title: Senior Vice President Scientific Affairs

Date: 4/12/04

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, reading "Michael P. Devereux". The signature is written in a cursive style with a large, stylized "M" and "D".

Michael P. Devereux  
Chief Financial Officer