



**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)

**ENZYMATIC THERAPY**  
 INCORPORATED

*What **Better** feels like.™*

September 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

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by PhytoPharmica (a Division of Integrative Therapeutics, 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. PhytoPharmica 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	INGREDIENTS TO WHICH THE CLAIM REFERS
Probiotic Pearls™	Helps your body achieve a balance of healthy bacteria*	Proprietary Probiotic Blend Lactobacillus acidophilus, Bifidobacterium longum

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

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

Date: 9/20/04

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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September 21, 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

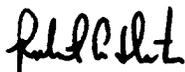
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Probiotic Pearls™	Supports healthy yeast balance*	Proprietary Probiotic Blend Lactobacillus acidophilus, Bifidobacterium longum

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

By: 

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/21/04

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Sincerely,



Michael P. Devereux  
Chief Financial Officer