



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

ENZYMATIC THERAPY*
 &
PHYTOPHARMICA*

ENZYMATIC THERAPY
 INCORPORATED

*What **Better** feels like.™*

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)

October 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 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.

L-Carnitine	L-Carnitine is a natural substance whose main physiological role is to transport long-chain fatty acids from the cytoplasm to within the mitochondrial matrix for their B-oxidation in various tissues.* The presence of adequate carnitine concentrations in the intracellular compartment is essential for healthy fatty acid metabolism in the human body,* which preferentially uses fatty acid for primary energy sources.	L-Carnitine

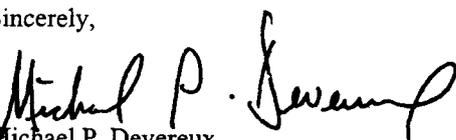
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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

Date: 10/20/04

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

975 0162 LET 14833



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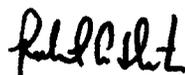
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PRODUCT NAME		
L-Carnitine	A crucial nutrient for heart and muscle function.*	L-Carnitine

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By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/21/04

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