



**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)

October 22, 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.

Multiplex™ - 1 without Iron	A comprehensive, hypoallergenic supplement that combines multivitamin-mineral supplementation with enhanced antioxidant support.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha-tocopheryl succinate), Thiamin (as thiamin HCl), Riboflavin (as Riboflavin 25.2 mg, Riboflavin-5'-Phosphate 5mg), Niacin (as Niacinol™), Vitamin B6 (as Pyridoxine HCl 37.5 mg, Pyridoxal-5'-Phosphate 7.5 mg), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium pantothenate), Calcium (as calcium citrate, malate), Magnesium (as magnesium citrate, malate), Zinc (as Zinc Picolinate), Selenium (as L-selenomethionine), Copper (as copper citrate), Manganese (as manganese citrate), Chromium (from GlucoChrome™), Molybdenum (as molybdenum citrate) Potassium (as potassium citrate), Choline (as Choline Bitartrate), NAC (N-Acetyl-L-Cysteine), L-Glutathione, Reduced, Boron (as Boron Citrate), Vanadium (as Vanadium Citrate)
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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.

*Robert C. Doster*

By: \_\_\_\_\_

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 10/22/04

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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Multiplex™ - 1 without Iron	Formulated for maximum bioavailability with activated coenzyme forms of vitamins B2 and B6, flush-free inositol hexaniacinate (Niacinol™), true GTF chromium (GlucoChrome™), and mineral citrates and malates.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha-tocopheryl succinate), Thiamin (as thiamin HCl), Riboflavin (as Riboflavin 25.2 mg, Riboflavin-5'-Phosphate 5mg), Niacin (as Niacinol™), VitaminB6 (as Pyridoxine HCl 37.5 mg, Pyridoxal-5'-Phosphate 7.5 mg), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium pantothenate), Calcium (as calcium citrate, malate), Magnesium (as magnesium citrate, malate), Zinc (as Zinc Picolinate), Selenium (as L-selenomethionine), Copper (as copper citrate), Manganese (as manganese citrate), Chromium (from GlucoChrome™), Molybdenum (as molybdenum citrate) Potassium (as potassium citrate), Choline (as Choline Bitartrate), NAC (N-Acetyl-L-Cysteine), L-Glutathione, Reduced, Boron (as Boron Citrate), Vanadium (as Vanadium Citrate)
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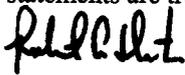
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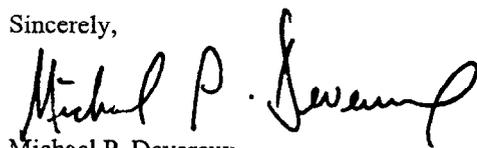
By:   
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 10/22/04

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Michael P. Devereux  
Chief Financial Officer