



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)

April 26, 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

MAY 12 2004

RE: Label Claims/Disclaimers

Dear Sir or Madam:

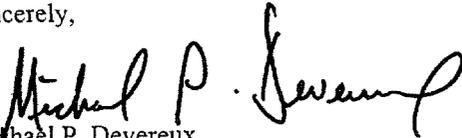
This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic 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
VariCare®	Butcher's broom has a long history of use in Europe for support of healthy circulation.*	Butcher's Broom (<i>Ruscus aculeatus</i>) Root and Rhizome 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: 4/26/04

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 14059



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April 27, 2004

Office of Nutritional Products, Labeling &
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Center for Food Safety and Applied Nutrition
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5100 Paint Branch Parkway
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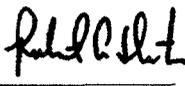
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
VariCare®	Natural ingredients that have been shown to promote healthy circulation and veins in legs*	Butcher's Broom (<i>Ruscus aculeatus</i>) Root and Rhizome Extract

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: 

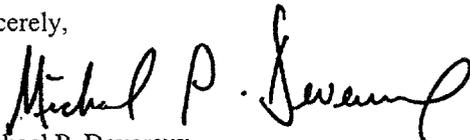
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 4/27/04

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Chief Financial Officer