



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.™*

June 28, 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>
Immune Health*	Works with the body's immune system so your customers will feel better, faster!* Studies have shown that users are able to spend more time at the workplace (or doing what they love) during the months of the year that place the most stress on the immune system.*	Milk protein (Immunolin® brand)

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: *6/28/04*

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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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Immune Health*	Stress, poor nutrition, second-hand smoke, dieting, travel, strenuous athletic training and growing older can all contribute to a strained immune system, Stressed immune systems produce less immunoglobulin (IgG). Immunoglobulin are so important to the effectiveness of the immune system that immunoglobulin concentrations are the primary indicator of immune system health.*	Milk protein (Immunolin® brand)

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: 6/29/04

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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June 30, 2004

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Immune Health*	The GI Tract and its mucosal surfaces are a perpetual battleground and overall wellness is a result of how well a person's immune system can fight each and every battle. Immunoglobulin is important to winning these battles.*	Milk protein (Immunolin® brand)

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: 6/30/04

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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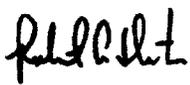
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Immune Health*	Immunoglobulins, a collective term for antibodies, attach to environmental toxins preventing the uptake of the toxins by the body.*	Milk protein (Immunolin® brand)

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: 6/30/04

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