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INTEGRATIVE THERAPEUTICS INC.™
NF Formulas + PhytoPharmica
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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)

1226 07 07 28 1313

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:

SEP 27 2004

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.

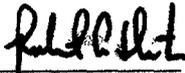
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 with Iron	A multivitamin mineral formula, including iron, specifically formulated for active individuals.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (as Ascorbic Acid), Vitamin E (as d-Alpha Tocopheryl Succinate), Thiamin (as Thiamine Hydrochloride), Riboflavin (as Riboflavin 25 mg, Riboflavin-5'-Phosphate 10mg), Niacin (as Niacinamide, Niacinol™), Vitamin B-6 (as Pyridoxine HCl 50 mg, Pyridoxal-5'-Phosphate 10 mg), Folic Acid, Vitamin B-12 (Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Lysinate, Aspartate, Citrate), Iron (as Iron Aspartate, Lysinate, Glycinate), Magnesium (as Magnesium Citrate, Aspartate, Glycinate, Lysinate), Zinc (as Zinc Picolinate, Lysinate, Aspartate, Glycinate), Selenium (as Selenium Aspartate, Glycinate, Lysinate Complexes), Copper (as Copper Citrate, Aspartate, Glycinate, Lysinate), Manganese (as Manganese Citrate, Lysinate, Aspartate, Glycinate), Chromium (as Chromium Glycinate, Aspartate, Lysinate), Molybdenum (as Molybdenum Aspartate, Glycinate, Lysinate), Potassium (as Potassium Chloride), Choline (as Choline Bitartrate), Inositol, Vanadium (as Vanadium Aspartate, Glycinate, Lysinate)

975 0162

LET

14688

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 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

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
Multiplex™-2 with Iron	Provides the full range of bio-available nutrients for the daily energy and essential nutrients that every active person needs.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (as Ascorbic Acid), Vitamin E (as d-Alpha Tocopheryl Succinate), Thiamin (as Thiamine Hydrochloride), Riboflavin (as Riboflavin 25 mg, Riboflavin-5'-Phosphate 10mg), Niacin (as Niacinamide, Niacinol™), Vitamin B-6 (as Pyridoxine HCl 50 mg, Pyridoxal-5'-Phosphate 10 mg), Folic Acid, Vitamin B-12 (Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Lysinate, Aspartate, Citrate), Iron (as Iron Aspartate, Lysinate, Glycinate), Magnesium (as Magnesium Citrate, Aspartate, Glycinate, Lysinate), Zinc (as Zinc Picolinate, Lysinate, Aspartate, Glycinate), Selenium (as Selenium Aspartate, Glycinate, Lysinate Complexes), Copper (as Copper Citrate, Aspartate, Glycinate, Lysinate), Manganese (as Manganese Citrate, Lysinate, Aspartate, Glycinate), Chromium (as Chromium Glycinate, Aspartate, Lysinate), Molybdenum (as Molybdenum Aspartate, Glycinate, Lysinate), Potassium (as Potassium Chloride), Choline (as Choline Bitartrate), Inositol, Vanadium (as Vanadium Aspartate, Glycinate, Lysinate)

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 9/21/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer



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September 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:

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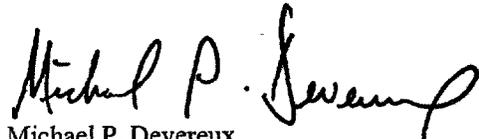
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 with Iron	High potency B vitamins for energy and endurance.*	Thiamin (as Thiamine Hydrochloride), Vitamin B-6 (as Pyridoxine HCl 50 mg, Pyridoxal-5'-Phosphate 10 mg), Vitamin B-12 (Cyanocobalamin)

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 9/22/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 with Iron	Includes high concentration of antioxidants, Vitamin A, C and E, to combat the free radical damage resulting from strenuous exercise.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (as Ascorbic Acid), Vitamin E (as d-Alpha Tocopheryl Succinate)

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 9/22/04

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Sincerely,

Michael P. Devereux
Chief Financial Officer



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September 23, 2004

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 with Iron	Contains essential nutrients to support key health needs: Trace minerals to support healthy blood sugar metabolism.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (as Ascorbic Acid), Vitamin E (as d-Alpha Tocopheryl Succinate), Thiamin (as Thiamine Hydrochloride), Riboflavin (as Riboflavin 25 mg, Riboflavin-5'-Phosphate 10mg), Niacin (as Niacinamide, Niacinol™), Vitamin B-6 (as Pyridoxine HCl 50 mg, Pyridoxal-5'-Phosphate 10 mg), Folic Acid, Vitamin B-12 (Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Lysinate, Aspartate, Citrate), Iron (as Iron Aspartate, Lysinate, Glycinate), Magnesium (as Magnesium Citrate, Aspartate, Glycinate, Lysinate), Zinc (as Zinc Picolinate, Lysinate, Aspartate, Glycinate), Selenium (as Selenium Aspartate, Glycinate, Lysinate Complexes), Copper (as Copper Citrate, Aspartate, Glycinate, Lysinate), Manganese (as Manganese Citrate, Lysinate, Aspartate, Glycinate), Chromium (as Chromium Glycinate, Aspartate, Lysinate), Molybdenum (as Molybdenum Aspartate, Glycinate, Lysinate), Potassium (as Potassium Chloride), Choline (as Choline Bitartrate), Inositol, Vanadium (as Vanadium Aspartate, Glycinate, Lysinate)

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 9/23/04

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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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 with Iron	Contains essential nutrients to support key health needs: Calcium and magnesium for bone health.*	Calcium (as Calcium Lysinate, Aspartate, Citrate), Magnesium (as Magnesium Citrate, Aspartate, Glycinate, Lysinate),

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 9/23/04

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Sincerely,

Michael P. Devereux
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 with Iron	Contains essential nutrients to support key health needs: Pantothenic acid to support digestive tract health.*	Pantothenic Acid (as Calcium Pantothenate),

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 9/23/04

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Chief Financial Officer