



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 19, 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

OCT 29 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	INCURRED EXEMPTION UNDER THE CLAIM REFERS
Arthro-Complex®	Joint Support Supplement*	MSM (metehylsulfonylemethane), Indian Frankincense gum resin extract (Boswellia serrata) (65% boswellic acids), Turmeric Rhizome extract (Curcuma longa) (95% curcumin), Chinese Skullcap root extract (Scutellaria baicalensis) (30% flavonoids), Ginger Rhizome extract (Zingiber officinale) (5% gingerols), White Willow bark extract (Salix alba) (15% salicin)

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 Doster
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/19/04

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

975 0162 LET 14827



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October 20, 2004

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PRODUCT NAME	STATEMENT	INGREDIENTS/CLAIM
Arthro-Complex®	This exclusive blend of MSM and selected herbs designed to provide nutritional support for normal joint function, synthesis of healthy connective tissue and of leukotriene and prostaglandin production.*	MSM (metehylsulfonylmethane), Indian Frankincense gum resin extract (Boswellia serrata) (65% boswellic acids), Turmeric Rhizome extract (Curcuma longa) (95% curcumin), Chinese Skullcap root extract (Scutellaria baicalensis) (30% flavonoids), Ginger Rhizome extract (Zingiber officinale) (5% gingerols), White Willow bark extract (Salix alba) (15% salicin)

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By: Robert Doster
Robert 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,

A handwritten signature in black ink that reads "Michael P. Devereux". The signature is written in a cursive style with a large, stylized initial "M".

Michael P. Devereux
Chief Financial Officer