



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)

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

SEP 27 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.

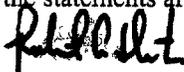
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Doctor's Choice for 50-Plus Men™	Contains essential nutrients to support the key health concerns of mature men including additional support for heart, prostate, and sexual health.*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Vitamin K (as phtonadione), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (as potassium aspartate), Choline Bitartrate, Saw Palmetto (Serenoa repens) berry extract, Sour Cherry (Prunus cerasus) Fruit Extract, Black Tea (Camellia sinensis) Leaf Extract, , Ginger (Zingiber officinale) Rhizome Extract , Green Tea (Camellia sinensis) Leaf Extract, Inositol, Beatine HCl, Grape (Vitis vinifera) Seed Extract, Panax Ginseng Root Extract, Bromelain, Papain, Bilberry (Vaccinium myrtillus) Fruit Extract, Pepsin (acid-stable protease), Lipase, Boron (as sodium borate), Lycopene, Lutein (from Calendula officinalis), Vanadium (as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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LET

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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.

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 &
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Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Doctor's Choice for 50-Plus Men™	Includes a blend of enzymes to support healthy digestion*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Vitamin K (as phtonadione), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (as potassium aspartate), Choline Bitartrate, Saw Palmetto (Serenoa repens) berry extract, Sour Cherry (Prunus cerasus) Fruit Extract, Black Tea (Camellia sinensis) Leaf Extract, , Ginger (Zingiber officinale) Rhizome Extract , Green Tea (Camellia sinensis) Leaf Extract, Inositol, Beatine HCl, Grape (Vitis vinifera) Seed Extract, Panax Ginseng Root Extract, Bromelain, Papain, Bilberry (Vaccinium myrtillus) Fruit Extract, Pepsin (acid-stable protease), Lipase, Boron (as sodium borate), Lycopene, Lutein (from Calendula officinalis), Vanadium (as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

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.

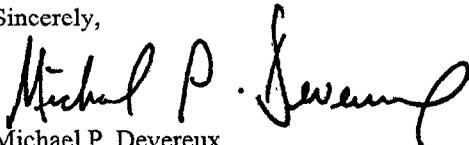
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/21/04

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

Sincerely,


Michael P. Devereux
Chief Financial Officer



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September 22, 2004

Office of Nutritional Products, Labeling &
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Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Doctor's Choice for 50-Plus Men™	Provides powerful whole food antioxidants for superior support for heart, eye, joint, and skin health and healthy cell development*	Vitamin A (75% as beta carotene and as retinyl acetate), Vitamin C (ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acid succinate), Vitamin K (as phtonadione), Thiamin (as thiamin HCl) (vitamin B1), Riboflavin (vitamin B2), Niacin (as niacinamide and niacin), Vitamin B6 (as pyridoxine HCl), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium D-pantothenate), Calcium (as calcium carbonate and calcium citrate), Iodine (as potassium iodide), Magnesium (as magnesium aspartate and magnesium oxide), Zinc (as zinc gluconate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (as potassium aspartate), Choline Bitartrate, Saw Palmetto (Serenoa repens) berry extract, Sour Cherry (Prunus cerasus) Fruit Extract, Black Tea (Camellia sinensis) Leaf Extract, , Ginger (Zingiber officinale) Rhizome Extract , Green Tea (Camellia sinensis) Leaf Extract, Inositol, Beatine HCl, Grape (Vitis vinifera) Seed Extract, Panax Ginseng Root Extract, Bromelain, Papain, Bilberry (Vaccinium myrtillus) Fruit Extract, Pepsin (acid-stable protease), Lipase, Boron (as sodium borate), Lycopene, Lutein (from Calendula officinalis), Vanadium (as vanadyl sulfate), Zeaxanthin (from Calendula officinalis)

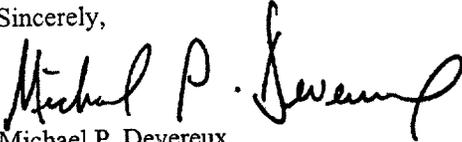
I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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