



ENZYMATIC THERAPY
INCORPORATED

*What **Better** feels like.™*

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:

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.

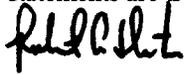
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 without Iron	A multivitamin mineral formula, without iron, specifically formulated for active individuals.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (as Ascorbic Acid), Vitamin E (as d-Alpha Tocopheryl 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), 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)

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14690

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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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)

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Multiplex™-2 without 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), 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 9/20/04

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

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer



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September 21, 2004

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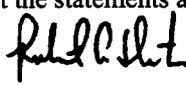
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Multiplex™-2 without Iron	High potency B vitamins for energy and endurance*	Thiamin (as Thiamine Hydrochloride), Vitamin B-6 (as Pyridoxine HCl 50 mg, Pyridoxal-5'-Phosphate 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 9/21/04

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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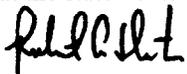
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 without Iron	Includes high concentration of antioxidants, Vitamin A, C and E, to combat the free radical damage resulting from strenuous exercise.*	Vitamin A (as Natural Beta-Carotene 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 9/21/04

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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
Multiplex™-2 without Iron	Contains essential nutrients to support key healthy 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), 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)

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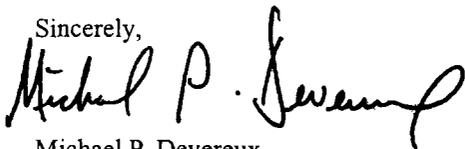
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 9/22/04

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Michael P. Devereux
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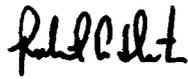
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 without Iron	Contains essential nutrients to support key healthy needs: Calcium and magnesium for bone health*	Calcium (as Calcium Lysinate, Aspartate, Citrate), Magnesium (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.

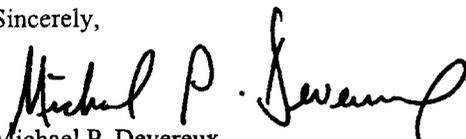
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/22/04

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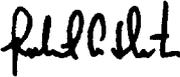
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Multiplex™-2 without Iron	Contains essential nutrients to support key healthy needs: Pantothenic acid to support digestive tract health*	Pantothenic Acid (as Calcium Pantothenate)

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.

By: 

Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date 9/23/04

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