



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

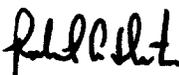
RE: Label Claims/Disclaimers

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>
Mega MultiVitamin Drink Mix	Calcium and Magnesium for bone health*	Calcium (as calcium lactate), Magnesium (as magnesium glycinate)

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

975 0162 LET 14692



ENZYMATIC THERAPY
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September 21, 2004

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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

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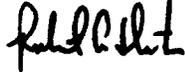
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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

PRODUCT NAME	STATEMENTS	INGREDIENTS TO WHICH THE CLAIM REFERS
Mega MultiVitamin Drink Mix	High potency antioxidants for healthy aging.*	Vitamin A (50% beta carotene and 50% retinyl acetate), Vitamin B1 (Thiamin HCl), Vitamin B2 (Riboflavin), Vitamin B6 (Pyridoxine HCl), Vitamin B12, (Cyanocobalamin), Vitamin C (ascorbic acid), Vitamin D3 (as cholecalciferol), Vitamin E (as d-a-tocopheryl acetate), Niacinamide, Biotin, Folic Acid, Pantothenate (calcium d-panthothenate), Calcium (as calcium lactate), Iodine (as potassium iodide), Magnesium (as magnesium glycinate), Zinc (as zinc sulfate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Boron (sodium boron), Potassium (from whey protein, guar gum, potassium citrate and potassium iodide), Whey Protein, Malic Acid, Inositol, Inulin (from chicory root), Lutein (from Calendula officinalis), Zeaxanthin (from Calendula officinalis), Betaine, Hesperidin (50% from citrus fruits), Taurine, Glycine, L-Tyrosine, N-Acetylcysteine (NAC), L-Serine, Stevia (Stevia rebaudiana) Leaf Extract, Sour Cherry (Prunus cerasus) Fruit Extract, Cranberry (Vaccinium

		macrocarpon) Fruit Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Potassium (from whey protein, guar gum, potassium citrate and potassium iodide), Protein
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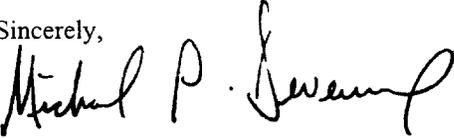
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By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/21/04

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Sincerely,

Michael P. Devereux
Chief Financial Officer