



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

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.

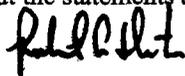
PRODUCT NAME	STATEMENTS	INGREDIENTS TO WHICH THE CLAIMS REFER
Detoxification Factors™*	Formulated to support hepatic detoxification, Detoxification Factors offers nutritional support for Phase 1 and 11 detoxification pathways in convenient, easy to use capsules.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids, Palmitate), Vitamin C (as Magnesium Ascorbate), Vitamin E (as d-Alpha Tocopheryl Succinate), Thiamine (as Thiamine HCl, Thiamine Pyrophosphate), Riboflavin (as Riboflavin-5'-Phosphate), Niacin, Vitamin B-6 (as Pyridoxal-5'-Phosphate) Folic Acid, Vitamin B-12 (as Cyanocobalmin, Adenosylcobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Magnesium (as magnesium Citrate, Ascorbate, Malate), Zinc (as Zinc Picolinate), Selenium (as L-Selenomethionine), Copper (as Copper Sebacate), Manganese (as Manganese Glycinate), Molybdenum as Molybdenum Citrate, Calcium D-Glucarate, L-Methionine, Glycine, L-Glutamic Acid HCl, Taurine, L-Glutamine, Choline (as Choline Bitartrate), NAC (N-Acetyl-L-Cysteine), Quercetin, Inositol, L-Ornithine-L-Aspartate, Broccoli Aerial Parts Extract (Brassica oleracea), Milk Thistle Seed Extract (Silybum marianum) (80% Silymarin), L-Glutathione, L-Serine, L-Histidine, L-Carnitine (as L-Carnitine Tartrate), Coenzyme Q10 (Ubiquinone), Proanthocyanidins (from Grape Seed Extract (Vitis vinifera), Superoxide Dismutase, Catalase

975 0162

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14819

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 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
Chief Financial Officer



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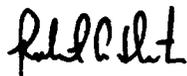
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Detoxification Factors™*	Selected amino acids (methionine, glutamine and taurine) and other nutrients, calcium D-glucarate, choline, and N-Acetyl-L-Cysteine are known to support detoxification.*	Calcium D-Glucarate, L-Methionine, Taurine, Choline (as Choline Bitartrate), NAC (N-Acetyl-L-Cysteine),
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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

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