



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 22, 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

NOV - 7

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.

<p>Multiplex™-2 with Iron</p>	<p>A comprehensive, hypoallergenic supplement that combines complete multivitamin supplementation with Active Transport Minerals® and citrates for optimal mineral absorption.*</p>	<p>Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (Ascorbic Acid), Vitamin E (as d-Alpha-Tocopheryl Succinate), Thiamin (as Thiamin HCl), Riboflavin (as Riboflavin 25.2 mg, Riboflavin-5'-Phosphate 10mg), Niacin (as Niacinamide, Niacinol™), Vitamin B6 (as Pyridoxine HCl 50 mg, Pyridoxal-5'-Phosphate 10 mg), Folic Acid, Vitamin B12 (as Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Lysinate, Aspartate, Citrate), Iron (as Iron Aspartate, Lysinate, Glycinate), Magnesium (as Magnesium Aspartate, Citrate, 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 Aspartate, Lysinate, Citrate, 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)</p>
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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 10/22/04

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



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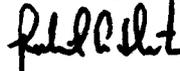
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PRODUCT NAME		
Multiplex™-2 with Iron	Contains active coenzyme forms of vitamins B2 and B6, flush-free inositol hexaniacinate (Niacinol™), and additional levels of pantothenic acid for nutritional support of the intestinal mucosa.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids), Vitamin C (Ascorbic Acid), Vitamin E (as d-Alpha-Tocopheryl Succinate), Thiamin (as Thiamin HCl), Riboflavin (as Riboflavin 25.2 mg, Riboflavin-5'-Phosphate 10mg), Niacin (as Niacinamide, Niacinol™), VitaminB6 (as Pyridoxine HCl 50 mg, Pyridoxal-5'-Phosphate 10 mg), Folic Acid, Vitamin B12 (as Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Lysinate, Aspartate, Citrate), Iron (as Iron Aspartate, Lysinate, Glycinate), Magnesium (as Magnesium Aspartate, Citrate, 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 Aspartate, Lysinate, Citrate, 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.

By: 

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

Date 10/23/04

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Michael P. Devereux
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