



**INTEGRATIVE THERAPEUTICS INC.\***  
 NF Formulas • PhytoPharmica  
 Tyler Encapsulations • Vitaline Formulas

**ENZYMATIC THERAPY\***  
 &  
**PHYTOPHARMICA\***

**ENZYMATIC THERAPY**  
 INCORPORATED

*What **Better** feels like.™*

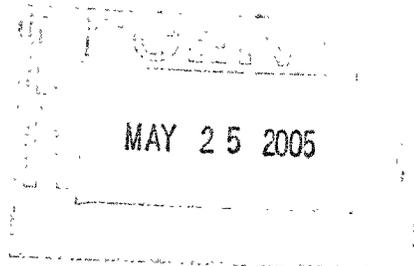
9755 SW Commerce Circle, Suite B2  
 Wilsonville, OR 97070  
 P: 503.582.8386 • F: 503.582.1460

825 Challenger Drive, Green Bay, WI 54311-8328  
 P: 920.469.1313 • F: 888.570.6460 (Enzymatic)  
 P: 920.469.9009 • F: 920.469.4418 (Phyto)

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May 24, 2005

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
Metabolic Advantage Thyroid Formula™*	Enhances thyroid function, which influences metabolism and supports weight loss.*	Vitamin B12 (as cyanocobalmin), Iodine (as potassium iodide), Magnesium (as magnesium oxide), Zinc (as zinc gluconate), Copper (as copper gluconate), Manganese (as manganese gluconate), Molybdenum (as sodium molybdate), L-Tyrosine, Multi-Glandular Complex liver, lung, pancreas, heart, kidney, and spleen, Thyroid Extract (thyroxin-free)

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: 5/24/05

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 16264