



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)

ENZYMATIC THERAPY

*What **Better** feels like.*

June 24, 2005

JUN 30 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
OsteoPrime®* Ultra	OsteoPrime Ultra is an exclusive formulation containing the 15 essential vitamins and minerals scientifically proven to impact bone health.*	Magnesium (as magnesium oxide and magnesium aspartate Calcium (from tricalcium phosphate, calcium carbonate, calcium lactate, calcium Krebs cycle chelates, citrate carbonate), Zinc (as zinc picolinate), Copper (as copper gluconate), Manganese (as manganese aspartate), Boron (as boron Krebs cycle chelates), Strontium (as strontium chloride), Silicon (as magnesium trisilicate), Phosphorus (as tricalcium phosphate), Folic Acid, Vitamin B12 (as cyanocobalamin), Vitamin B6 (as pyridoxine HCl), Vitamin C (ascorbic Acid), Vitamin K (as phytonadione), Vitamin D3 (as cholecalciferol)

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: 6-24-2005

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

Sincerely,

A handwritten signature in black ink, appearing to read "Michael P. Devereux". The signature is fluid and cursive, with a large initial "M" and a distinct "P" and "D".

Michael P. Devereux
Chief Financial Officer