



INTEGRATIVE THERAPEUTICS INC.
 NF Formulas • PhytoPharmica
 Tyler Encapsulations • Vitaline Formulas
 9755 SW Commerce Circle, Suite B2
 Wilsonville, OR 97070
 253-592-8355 • 1-800-352-9167

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
 INCORPORATED

What **Better** feels like.™

June 28, 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

JUN 30 2005

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>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
FlexAgility™* Max	The proprietary Flex Blend in FlexAgility Max includes natural inhibitors of pain and inflammation enzymes like COX-2.* The COX-2 inhibition is mild and benefits occur over time, rather than immediately.* The overall effect is much more in tune with the body's own natural pain and inflammation pathways.*	Vitamin C (ascorbic acid), Proprietary Flex Blend, Bromelain, hops (<i>Humulus lupulus</i>) (<i>IsoOxygene™</i> brand) flower extract, ginger (<i>Zingiber officinale</i>) rhizome extract, <i>Boswellia serrata</i> gum extract, Bromelain, Japanese Sophora (<i>Sophora japonica</i>) Flower Bud, European Elder (<i>Sambucus nigra</i>) Berry Extract, Green Tea (<i>Camellia sinensis</i>) Leaf Extract, N-Acetylcysteine (NAC)

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

Date: 6/28/05

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

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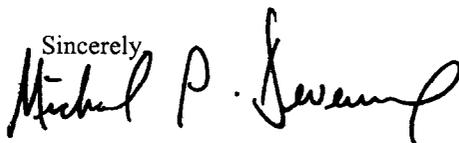
<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
FlexAgility™* Max	FlexAgility Max has enzyme support from bromelain and antioxidants that can help reduce the damage of oxidative stress – especially during times of pain and inflammation due to overexertion.*	Bromelain

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<u>PRODUCT NAME</u>	<u>STATEMENT</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
FlexAgility™* Max	Bromelain, an herbal extract noted for its support of healthy flexibility and its reduction of pain and stiffness due to overuse.*	Bromelain

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.

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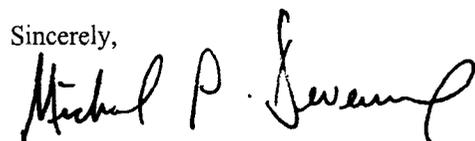
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