



**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)

0548 5 DEC 12 P2:26

November 21, 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
Earth's Promise – The Goodness of Purple	Earth's Promise Purple is the easy way to enhance your diet, boost memory function, maintain urinary tract health and support healthy aging.*	Vitamin A (from acerola cherry fruit extract and sodium ascorbate), Fruit and Vegetable Blend: cranberry fruit, whole apple, strawberry fruit, blueberry fruit, acerola cherry fruit extract, elderberry fruit, blackberry fruit, concord grape fruit, cranberry fruit extract, pomegranate fruit, raspberry fruit, sweet cherry fruit extract, eggplant fruit, bilberry fruit extract, mangosteen fruit, prune fruit extract, whole red bell pepper, Fiber Blend: inulin from chicory root, guar gum seed extract, Stevia Leaf Extract, Proprietary Antioxidant Fruit Blend: grape fruit, grape seed, blueberry fruit, raspberry fruit, raspberry seed, bilberry fruit extracts, cranberry, plum, strawberry, tart cherry fruits, Anthocyaninis (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

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 Doster  
Robert Doster

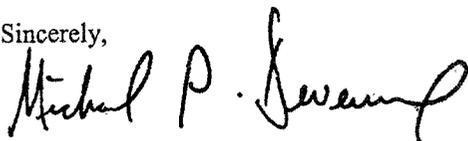
Title: Senior Vice President of Scientific Affairs

Date: 11/21/05

975 0162 LET 17036

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 that reads "Michael P. Devereux". The signature is written in a cursive style with a large, prominent initial "M".

Michael P. Devereux  
Chief Financial Officer



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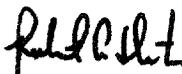
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	A delicious way to use the earth's bounty to fortify your body and spirit.*	Vitamin A (from acerola cherry fruit extract and sodium ascorbate), Fruit and Vegetable Blend: cranberry fruit, whole apple, strawberry fruit, blueberry fruit, acerola cherry fruit extract, elderberry fruit, blackberry fruit, concord grape fruit, cranberry fruit extract, pomegranate fruit, raspberry fruit, sweet cherry fruit extract, eggplant fruit, bilberry fruit extract, mangosteen fruit, prune fruit extract, whole red bell pepper, Fiber Blend: inulin from chicory root, guar gum seed extract, Stevia Leaf Extract, Proprietary Antioxidant Fruit Blend: grape fruit, grape seed, blueberry fruit, raspberry fruit, raspberry seed, bilberry fruit extracts, cranberry, plum, strawberry, tart cherry fruits, Anthocyaninis (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

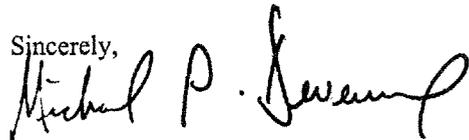
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By:   
Robert Doster  
Title: Senior Vice President of Scientific Affairs

Date: 11/21/05

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Michael P. Devereux  
Chief Financial Officer