



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: 920.469.9089 F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY

what Better feels like™

December 8, 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.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
UBQH™	Animal trials have shown a substantial impact on health and wellness as well as healthy aging benefits from using UBQH.*	Ubiquinol

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: 12-8-05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 469-3608.

Sincerely,
Michael P. Devereux
Michael P. Devereux
Chief Operations Officer

975 0162 LET 17096



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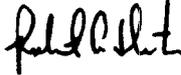
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
UBQH™	A well known and extensively studied cofactor in the ATP cycle, CoQ10 supplementation has been shown to improve cell energy production and extend cell life by enhancing cellular mitochondrial levels of CoQ10, thus supporting all physical systems, including support of cardiac, neurological, periodontal, skin and immune health.*	Ubiquinol

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: 12-8-05

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Chief Operations Officer



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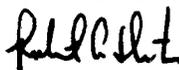
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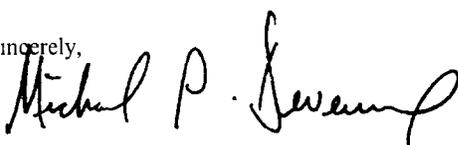
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
UBQH™	For those patients who are older, who test positive for NQO1, or require substantial CoQ10 supplementation for neurological health, recommend UBQH – the only patented, stable and proven effective QH solution available.*	Ubiquinol

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