



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

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

9755 SW Commerce Circle, Suite B2  
 Wilsonville, OR 97070  
 P: 503.582.8386 F: 503.582.0467

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**

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1916 6 27 10:10

January 16, 2006

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

2006

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>
Super Milk Thistle® X	Milk thistle enhances bile production, which supports healthy digestion and detoxification.*	Milk Thistle (Silybum marianum) Fruit Phytosome, Artichoke (Cynara scolymus) Leaf Extract, Dandelion (Taraxacum officinale) Root Extract, Licorice (Glycyrrhiza glabra) Root and Rhizome Extract

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: 1-16-06

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

Sincerely,  
  
 Michael P. Devereux  
 Chief Operations Officer

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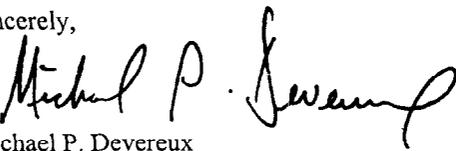
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Super Milk Thistle® X	Dandelion enhances immune function and has specific effects on TNF alpha activity.*	Dandelion (Taraxacum officinale) Root Extract

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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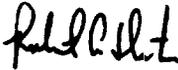
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<b>PRODUCT NAME</b>	<b>STATEMENTS</b>	<b>INGREDIENT(S) TO WHICH THE CLAIM REFERS</b>
Super Milk Thistle® X	Supper Milk Thistle X supports immune system function by promoting an increase in interferon gamma, interleukin (IL)-4 and IL-10 cytokines.*	Milk Thistle (Silybum marianum) Fruit Phytosome, Artichoke (Cynara scolymus) Leaf Extract, Dandelion (Taraxacum officinale) Root Extract, Licorice (Glycyrrhiza glabra) Root and Rhizome Extract

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Super Milk Thistle® X	Artichoke promotes bile flow, which supports healthy gastrointestinal function.*	Artichoke (Cynara scolymus) Leaf Extract

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