



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

INCORPORATED
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January 17, 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

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.

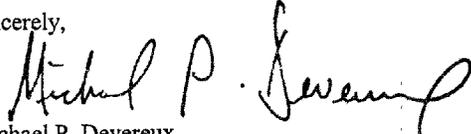
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Earth's Promise Purple is the easy way to enhance your diet, boost memory function, maintain urinary tract health and support healthy aging.*	Vitamin C (from acerola cherry fruit extract and sodium 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 fruit, Anthocyanins (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: 1-17-06

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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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Earth's Promise Purple are also high in antioxidant activity to help reduce the effects of oxidative stress.*	Vitamin C (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 fruit, Anthocyanins (from Fruit and Vegetable Blends), Ellagic Acid (from Fruit and Vegetable Blends), Quercetin (from Fruit and Vegetable Blends)

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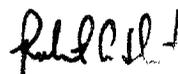
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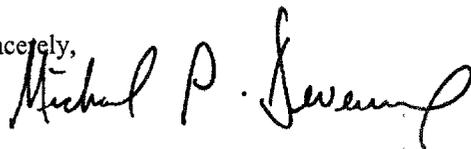
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	Vitamin C is one of the best-known vitamins, especially for its support of immune health.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate)

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

Date: 1-17-06

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GREENSBORO, NC

What *Better* feels like.™

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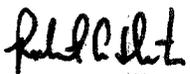
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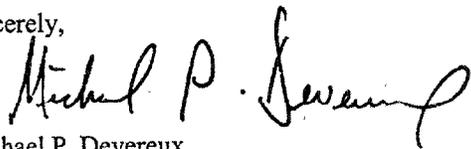
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	Less well-know, however, is the role that vitamin C has in supporting healthy joints and connective tissue.*	Vitamin C (from acerola cherry fruit extract and sodium ascorbate)

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	Scientific studies have shown that quercetin supports healthy cholesterol levels already within the normal limits, and supports healthy immune response.*	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

Title: Senior Vice President of Scientific Affairs

Date: _____

1-17-06

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise – The Goodness of Purple	Ellagic acid is a component of ellagitannins – dietary polyphenols with antioxidant properties.*	Ellagic Acid (from Fruit and Vegetable Blends)

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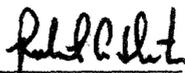
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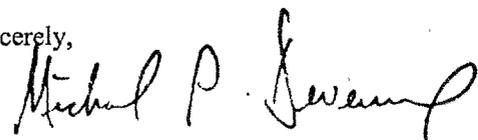
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	Clinical studies suggest that ellagitannins and ellagic acid act as antioxidants in the gastrointestinal tract.*	Ellagic Acid (from Fruit and Vegetable Blends)

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.

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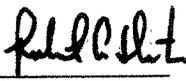
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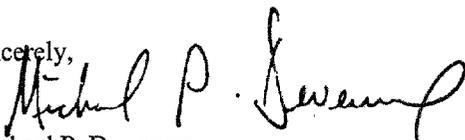
<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Earth's Promise – The Goodness of Purple	ATP (adenosine triphosphate) is the molecule that provides the primary energy source for the cells in the human body. In scientific studies, ellagic acid supported healthy cellular ATP production.*	Ellagic Acid (from Fruit and Vegetable Blends)

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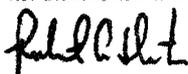
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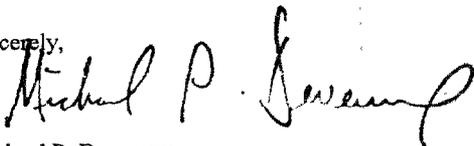
PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Earth's Promise - The Goodness of Purple	The inulin and fructooligosaccarides in Earth's Promise Purple supports calcium absorption, a crucial factor in maintaining healthy bone density.*	Anthocyanins (from Fruit and Vegetable Blends)

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