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2100 8 FEB 15 2008

January 22, 2008

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

FEB - 1 2008

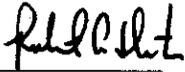
RE: Label Claims/Disclaimers

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>
Multiplex™ - 2 Without Iron	This product includes flush-free niacin (Niacinol™), Active Transport Minerals® for optimal absorption, and additional levels of pantothenic acid to help support healthy intestinal walls and proper nutrient absorption.*	Vitamin A (as natural beta-carotene with mixed carotenoids), Vitamin C (ascorbic acid), Vitamin E (as d-Alpha tocopheryl succinate), Thiamin (as thiamine hydrochloride), Riboflavin (as riboflavin, riboflavin-5'-phosphate), Niacin (as niacinamide, as Niacinol™), Vitamin B6 (as pyridoxine HCl, pyridoxal-5'-phosphate), Folic Acid, Vitamin B12 (as cyanocobalamin), Biotin, Pantothenic Acid (as calcium pantothenate), Calcium (as calcium lysinate, aspartate, citrate), Magnesium (as magnesium citrate, aspartate, glycinate, lysinate), Zinc (as zinc picolinate, aspartate, glycinate, lysinate), Selenium (as selenium aspartate, glycinate, lysinate complexes), Copper (as copper citrate, aspartate, glycinate, lysinate), Manganese (as manganese citrate, lysinate, aspartate, glycinate), Chromium (as chromium glycinate, aspartate, lysinate), Molybdenum (as molybdenum aspartate, glycinate, lysinate), Potassium (as potassium chloride), Choline (as choline bitartrate), Inositol, Vanadium (as vanadium aspartate, glycinate, lysinate)

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: 1/22/08

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

Sincerely,

Michael P. Devereux
Chief Operating Officer