

December 27, 2004

NORTH AMERICAN PHARMACAL Inc.

www.4yourtype.com

JAN 24 2005

Office of Nutritional Products, Labeling, and Dietary Supplement (HFS-800)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Madam:

In order to comply with Part 101 Food Labeling, Subpart F Specific Requirements for Descriptive Claims that are Neither Nutrient Content nor Health Claims, I am submitting the following:

The name and address of the distributor of the dietary supplement that bears the statement is:

North American Pharmacal, Inc
12 High Street
Norwalk, CT 06851

The text of the statement that is being made is:

Phytocal® O

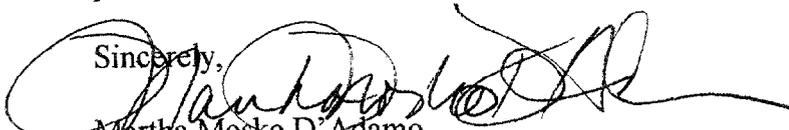
Designed by Dr. Peter D'Adamo, this product features a unique source of minerals: "Maerl" a small red seaweed (Lithothamnium) found only in isolated areas off the coast of Ireland. Of all sources of calcium Maerl has one of the lowest levels of undesirable contaminants. Maerl is composed of a wide variety of essential nutrients including calcium, and trace amounts of magnesium, boron and zinc. Its unique structure gives it a great versatility, and when woven into formulas tailored to the genetics of our ABO blood type, insures a phenomenal rate of bioavailability and utilization.

Directions: (3) Three capsules 1-2 times daily with meals as a dietary supplement.

The name of the dietary supplement is: The Blood Type Diet® Phytocal®, O

I certify that the information contained in this notice is complete and accurate and that North American Pharmacal, Inc has substantiation that the statement is truthful and not misleading. If there is additional information required, please let me know as soon as possible.

Sincerely,


Martha Mosko D'Adamo

President

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