

NORTH AMERICAN PHARMACAL Inc.

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March 16, 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

MAR 23 2005

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:

Deflect® O

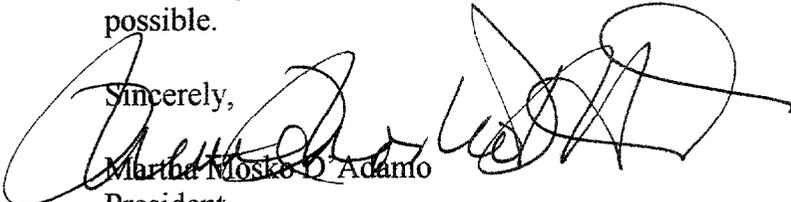
Dr. Peter D'Adamo has identified dietary lectins (proteins found in many common foods) as an important influence on the body's immune system and metabolism. As a result of this research, he has designed specific "lectin blocking" formulas to help support the body's immune system and metabolism.

Directions: (2) Two capsules 2-3 times daily with meals, as a dietary supplement, for lectin-sensitive individuals.

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

12 High Street, Norwalk, CT 06851 U.S.A.  
Phone/ 203-866-7664 FAX/ 203-838-4066

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