

May 3, 2005

NORTH AMERICAN PHARMACAL Inc.

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

www.fda.gov  
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MAY 10 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:

ClearCal®

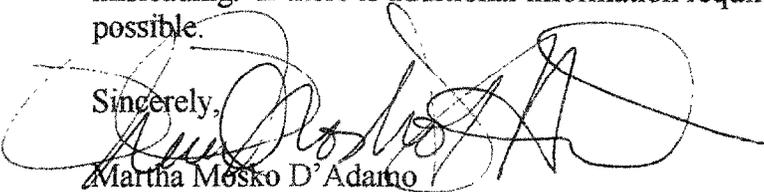
Designed by Dr. Peter D'Adamo without any additional mineral cofactors, this product features a unique source of calcium: Maerl a small red seaweed (Lithothamnium) found only in isolated areas off the coast of Ireland. Of all sources of calcium Maerl has one of the lowest levels of undesirable contaminants. Maerl is composed of a wide variety of essential nutrients including calcium, and trace amounts of magnesium, boron and zinc. Its superior buffering capacity allows Maerl-based sea calcium to maintain very high rates of absorption and therefore a phenomenal rate of bioavailability. This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Directions: (2) capsules twice daily with meals as a dietary supplement.

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

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 Mesko D'Adamo  
President

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12 High Street, Norwalk, CT 06851 U.S.A.  
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