

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**  
**September 22, 2008**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-13227**

**In the Matter of**

**Ramsin Product Development, Inc.,  
Raycomm Transworld Industries, Inc.,  
RDC International, Inc.,  
Realax Software AG,  
ReClaim, Inc., and  
Red Bell Brewing Co.,**

**Respondents.**

**ORDER INSTITUTING  
PROCEEDINGS AND NOTICE OF  
HEARING PURSUANT TO SECTION  
12(j) OF THE SECURITIES  
EXCHANGE ACT OF 1934**

**I.**

The Securities and Exchange Commission (“Commission”) deems it necessary and appropriate for the protection of investors that public administrative proceedings be, and hereby are, instituted pursuant to Section 12(j) of the Securities Exchange Act of 1934 (“Exchange Act”) against Respondents Ramsin Product Development, Inc., Raycomm Transworld Industries, Inc., RDC International, Inc., Realax Software AG, ReClaim, Inc., and Red Bell Brewing Co.

**II.**

After an investigation, the Division of Enforcement alleges that:

**A. RESPONDENTS**

1. Ramsin Product Development, Inc. (CIK No. 1044123) is a New York corporation located in Rochester, New York with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). Ramsin is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-QSB for the period ended April 30, 2002, which reported a net loss of \$30,563 for the prior three months.

2. Raycomm Transworld Industries, Inc. (CIK No. 82213) is a void Delaware corporation located in Manalapan, New Jersey with a class of securities registered with

the Commission pursuant to Exchange Act Section 12(g). Raycomm is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-Q for the period ended September 30, 1993, which reported a net loss of \$381,000 for the prior three months.

3. RDC International, Inc. (CIK No. 1107343) is a dissolved Florida corporation located in Sarasota, Florida with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). RDC is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-QSB for the period ended March 31, 2004, which reported a net loss of over \$13 million since the company's inception on September 8, 1999.

4. Relax Software AG (CIK No. 1049897) is a German corporation located in Karlsruhe, Germany with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). Relax is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 20-F for the period ended December 31, 1999, which reported a net loss of over \$1 million for the prior twelve months.

5. ReClaim, Inc. (CIK No. 832149) is a void Delaware corporation located in Milan, Italy with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). ReClaim is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-QSB for the period ended September 30, 1995, which reported a net loss of over \$2.29 million for the prior nine months.

6. Red Bell Brewing Co. (CIK No. 1129615) is a Pennsylvania corporation located in Philadelphia, Pennsylvania with a class of securities registered with the Commission pursuant to Exchange Act Section 12(g). Red Bell is delinquent in its periodic filings with the Commission, having not filed any periodic reports since it filed a Form 10-QSB for the period ended September 30, 2001, which reported a net loss of over \$2.4 million for the prior three months.

## B. DELINQUENT PERIODIC FILINGS

7. As discussed in more detail above, all of the Respondents are delinquent in their periodic filings with the Commission (*see* Chart of Delinquent Filings, attached hereto as Appendix 1), have repeatedly failed to meet their obligations to file timely periodic reports, and failed to heed delinquency letters sent to them by the Division of Corporation Finance requesting compliance with their periodic filing obligations or, through their failure to maintain a valid address on file with the Commission as required by Commission rules, did not receive such letters.

8. Exchange Act Section 13(a) and the rules promulgated thereunder require issuers of securities registered pursuant to Exchange Act Section 12 to file with the Commission current and accurate information in periodic reports, even if the registration is voluntary under Section 12(g). Specifically, Rule 13a-1 requires issuers to file annual reports, and Rule 13a-13 requires domestic issuers to file quarterly reports. Rule 13a-16

requires foreign private issuers to furnish quarterly and other reports to the Commission under cover of Form 6-K if they make or are required to make the information public under the laws of the jurisdiction of their domicile or in which they are incorporated or organized; if they file or are required to file information with a stock exchange on which their securities are traded and the information was made public by the exchange; or if they distribute or are required to distribute information to their security holders.

9. As a result of the foregoing, Respondents failed to comply with Exchange Act Section 13(a) and Rules 13a-1 and 13a-13 or 13a-16 thereunder.

### **III.**

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate for the protection of investors that public administrative proceedings be instituted to determine:

A. Whether the allegations contained in Section II are true and, in connection therewith, to afford the Respondents an opportunity to establish any defenses to such allegations; and,

B. Whether it is necessary and appropriate for the protection of investors to suspend for a period not exceeding twelve months, or revoke the registration of each class of securities of the Respondents identified in Section II registered pursuant to Section 12 of the Exchange Act.

### **IV.**

IT IS HEREBY ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice [17 C.F.R. § 201.110].

IT IS HEREBY FURTHER ORDERED that Respondents shall file an Answer to the allegations contained in this Order within ten (10) days after service of this Order, as provided by Rule 220(b) of the Commission's Rules of Practice [17 C.F.R. § 201.220(b)].

If Respondents fail to file the directed Answers, or fail to appear at a hearing after being duly notified, the Respondents may be deemed in default and the proceedings may be determined against them upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f), and 310 of the Commission's Rules of Practice [17 C.F.R. §§ 201.155(a), 201.220(f), 201.221(f), and 201.310].

This Order shall be served forthwith upon Respondents personally or by certified, registered, or Express Mail, or by other means of verifiable delivery.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 120 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice [17 C.F.R. § 201.360(a)(2)].

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

By the Commission.

Florence E. Harmon  
Acting Secretary

Attachment

## Appendix 1

### Chart of Delinquent Filings *In the Matter of Ramsin Product Development, Inc., et al.*

Company Name	Form Type	Period Ended	Due Date	Date Received	Months Delinquent (rounded up)
<b>Ramsin Product Development, Inc.</b>	10-QSB	07/31/02	09/16/02	Not filed	72
	10-QSB	10/31/02	12/16/02	Not filed	69
	10-KSB	01/31/03	05/01/03	Not filed	64
	10-QSB	04/30/03	06/16/03	Not filed	63
	10-QSB	07/31/03	09/15/03	Not filed	60
	10-QSB	10/31/03	12/15/03	Not filed	57
	10-KSB	01/31/04	04/30/04	Not filed	53
	10-QSB	04/30/04	06/14/04	Not filed	51
	10-QSB	07/31/04	09/14/04	Not filed	48
	10-QSB	10/31/04	12/15/04	Not filed	45
	10-KSB	01/31/05	05/02/05	Not filed	40
	10-QSB	04/30/05	06/14/05	Not filed	39
	10-QSB	07/31/05	09/14/05	Not filed	36
	10-QSB	10/31/05	12/15/05	Not filed	33
	10-KSB	01/31/06	05/01/06	Not filed	28
	10-QSB	04/30/06	06/14/06	Not filed	27
	10-QSB	07/31/06	09/14/06	Not filed	24
	10-QSB	10/31/06	12/15/06	Not filed	21
	10-KSB	01/31/07	05/01/07	Not filed	16
	10-QSB	04/30/07	06/14/07	Not filed	15
10-QSB	07/31/07	09/14/07	Not filed	12	
10-QSB	10/31/07	12/17/07	Not filed	9	
10-KSB	01/31/08	04/30/08	Not filed	5	
10-Q <sup>1</sup>	04/30/08	06/16/08	Not filed	3	
<b>Total Filings Delinquent</b>		<b>24</b>			

<sup>1</sup>Regulation S-B and its accompanying forms, including Forms 10-QSB and 10-KSB, are in the process of being removed from the federal securities laws. See Release No. 34-56994 (Dec. 19, 2007). The removal is taking effect over a transition period that will conclude on March 15, 2009, so by that date, all reporting companies that previously filed their periodic reports on Forms 10-QSB and 10-KSB will be required to use Forms 10-Q and 10-K instead. Forms 10-QSB and 10-KSB will no longer be available, though issuers that meet the definition of a "smaller reporting company" (generally, a company that has less than \$75 million in public equity float as of the end of its most recently completed second fiscal quarter) will have the option of using new, scaled disclosure requirements that Regulation S-K now includes.

Company Name	Form Type	Period Ended	Due Date	Date Received	Months Delinquent (rounded up)
<b>Raycomm Transworld Industries, Inc.</b>	10-Q	12/31/93	02/14/94	Not filed	175
	10-K	03/31/94	06/29/94	Not filed	171
	10-Q	06/30/94	08/15/94	Not filed	169
	10-Q	09/30/94	11/14/94	Not filed	166
	10-Q	12/31/94	02/14/95	Not filed	163
	10-K	03/31/95	06/29/95	Not filed	159
	10-Q	06/30/95	08/14/95	Not filed	157
	10-Q	09/30/95	11/14/95	Not filed	154
	10-Q	12/31/95	02/14/96	Not filed	151
	10-K	03/31/96	07/01/96	Not filed	146
	10-Q	06/30/96	08/14/96	Not filed	145
	10-Q	09/30/96	11/14/96	Not filed	142
	10-Q	12/31/96	02/14/97	Not filed	139
	10-K	03/31/97	06/30/97	Not filed	135
	10-Q	06/30/97	08/14/97	Not filed	133
	10-Q	09/30/97	11/14/97	Not filed	130
	10-Q	12/31/97	02/17/98	Not filed	127
	10-K	03/31/98	06/29/98	Not filed	123
	10-Q	06/30/98	08/14/98	Not filed	121
	10-Q	09/30/98	11/16/98	Not filed	118
	10-Q	12/31/98	02/16/99	Not filed	115
	10-K	03/31/99	06/29/99	Not filed	111
	10-Q	06/30/99	08/16/99	Not filed	109
	10-Q	09/30/99	11/15/99	Not filed	106
	10-Q	12/31/99	02/14/00	Not filed	103
	10-K	03/31/00	06/29/00	Not filed	99
	10-Q	06/30/00	08/14/00	Not filed	97
	10-Q	09/30/00	11/14/00	Not filed	94
	10-Q	12/31/00	02/14/01	Not filed	91
	10-K	03/31/01	06/29/01	Not filed	87
	10-Q	06/30/01	08/14/01	Not filed	85
	10-Q	09/30/01	11/14/01	Not filed	82
	10-Q	12/31/01	02/14/02	Not filed	79
	10-K	03/31/02	07/01/02	Not filed	74
10-Q	06/30/02	08/14/02	Not filed	73	
10-Q	09/30/02	11/14/02	Not filed	70	
10-Q	12/31/02	02/14/03	Not filed	67	
10-K	03/31/03	06/30/03	Not filed	63	
10-Q	06/30/03	08/14/03	Not filed	61	

Company Name	Form Type	Period Ended	Due Date	Date Received	Months Delinquent (rounded up)
<b>Raycomm Transworld Industries, Inc.</b>					
	10-Q	09/30/03	11/14/03	Not filed	58
	10-Q	12/31/03	02/17/04	Not filed	55
	10-K	03/31/04	06/29/04	Not filed	51
	10-Q	06/30/04	08/16/04	Not filed	49
	10-Q	09/30/04	11/15/04	Not filed	46
	10-Q	12/31/04	02/14/05	Not filed	43
	10-K	03/31/05	06/29/05	Not filed	39
	10-Q	06/30/05	08/15/05	Not filed	37
	10-Q	09/30/05	11/14/05	Not filed	34
	10-Q	12/31/05	02/14/06	Not filed	31
	10-K	03/31/06	06/29/06	Not filed	27
	10-Q	06/30/06	08/14/06	Not filed	25
	10-Q	09/30/06	11/14/06	Not filed	22
	10-Q	12/31/06	02/14/07	Not filed	19
	10-K	03/31/07	06/29/07	Not filed	15
	10-Q	06/30/07	08/14/07	Not filed	13
	10-Q	09/30/07	11/14/07	Not filed	10
	10-Q	12/31/07	02/14/08	Not filed	7
	10-K	03/31/08	06/30/08	Not filed	3
	10-Q	06/30/08	08/14/08	Not filed	1
Total Filings Delinquent					59
<b>RDC International, Inc.</b>					
	10-QSB	06/30/04	08/16/04	Not filed	49
	10-KSB	09/30/04	12/29/04	Not filed	45
	10-QSB	12/31/04	02/14/05	Not filed	43
	10-QSB	03/31/05	05/16/05	Not filed	40
	10-QSB	06/30/05	08/15/05	Not filed	37
	10-KSB	09/30/05	12/29/05	Not filed	33
	10-QSB	12/31/05	02/14/06	Not filed	31
	10-QSB	03/31/06	05/15/06	Not filed	28
	10-QSB	06/30/06	08/14/06	Not filed	25
	10-KSB	09/30/06	12/29/06	Not filed	21
	10-QSB	12/31/06	02/14/07	Not filed	19
	10-QSB	03/31/07	05/15/07	Not filed	16
	10-QSB	06/30/07	08/14/07	Not filed	13
	10-KSB	09/30/07	12/29/07	Not filed	9

Company Name	Form Type	Period Ended	Due Date	Date Received	Months Delinquent (rounded up)
<b>RDC International, Inc.</b>					
	10-QSB	12/31/07	02/14/08	Not filed	7
	10-QSB	03/31/08	05/15/08	Not filed	4
	10-QSB	06/30/08	08/14/08	Not filed	1
Total Filings Delinquent	17				
<b>Realax Software AG</b>					
	20-F	12/31/00	07/02/07	Not filed	14
	20-F	12/31/01	07/01/02	Not filed	74
	20-F	12/31/02	06/30/03	Not filed	63
	20-F	12/31/03	06/30/04	Not filed	51
	20-F	12/31/04	06/30/05	Not filed	39
	20-F	12/31/05	06/30/06	Not filed	27
	20-F	12/31/06	07/02/07	Not filed	14
	20-F	12/31/07	06/30/08	Not filed	3
Total Filings Delinquent	8				
<b>ReClaim, Inc.</b>					
	10-KSB	12/31/95	04/01/96	Not filed	149
	10-QSB	03/31/96	05/15/96	Not filed	148
	10-QSB	06/30/96	08/14/96	Not filed	145
	10-QSB	09/30/96	11/14/96	Not filed	142
	10-KSB	12/31/96	03/31/97	Not filed	138
	10-QSB	03/31/97	05/15/97	Not filed	136
	10-QSB	06/30/97	08/14/97	Not filed	133
	10-QSB	09/30/97	11/14/97	Not filed	130
	10-KSB	12/31/97	03/31/98	Not filed	126
	10-QSB	03/31/98	05/15/98	Not filed	124
	10-QSB	06/30/98	08/14/98	Not filed	121
	10-QSB	09/30/98	11/16/98	Not filed	118
	10-KSB	12/31/98	03/31/99	Not filed	114
	10-QSB	03/31/99	05/17/99	Not filed	112
	10-QSB	06/30/99	08/16/99	Not filed	109
	10-QSB	09/30/99	11/15/99	Not filed	106
	10-KSB	12/31/99	03/30/00	Not filed	102
	10-QSB	03/31/00	05/15/00	Not filed	100
	10-QSB	06/30/00	08/14/00	Not filed	97
	10-QSB	09/30/00	11/14/00	Not filed	94



Company Name	Form Type	Period Ended	Due Date	Date Received	Months Delinquent (rounded up)
<b>ReClaim, Inc.</b>					
	10-KSB	12/31/00	04/02/01	Not filed	89
	10-QSB	03/31/01	05/15/01	Not filed	88
	10-QSB	06/30/01	08/14/01	Not filed	85
	10-QSB	09/30/01	11/14/01	Not filed	82
	10-KSB	12/31/01	04/01/02	Not filed	77
	10-QSB	03/31/02	05/15/02	Not filed	76
	10-QSB	06/30/02	08/14/02	Not filed	73
	10-QSB	09/30/02	11/14/02	Not filed	70
	10-KSB	12/31/02	03/31/03	Not filed	66
	10-QSB	03/31/03	05/15/03	Not filed	64
	10-QSB	06/30/03	08/14/03	Not filed	61
	10-QSB	09/30/03	11/14/03	Not filed	58
	10-KSB	12/31/03	03/30/04	Not filed	54
	10-QSB	03/31/04	05/17/04	Not filed	52
	10-QSB	06/30/04	08/16/04	Not filed	49
	10-QSB	09/30/04	11/15/04	Not filed	46
	10-KSB	12/31/04	03/31/05	Not filed	42
	10-QSB	03/31/05	05/16/05	Not filed	40
	10-QSB	06/30/05	08/15/05	Not filed	37
	10-QSB	09/30/05	11/14/05	Not filed	34
	10-KSB	12/31/05	03/31/06	Not filed	30
	10-QSB	03/31/06	05/15/06	Not filed	28
	10-QSB	06/30/06	08/14/06	Not filed	25
	10-QSB	09/30/06	11/14/06	Not filed	22
	10-KSB	12/31/06	04/02/07	Not filed	17
	10-QSB	03/31/07	05/15/07	Not filed	16
	10-QSB	06/30/07	08/14/07	Not filed	13
	10-QSB	09/30/07	11/14/07	Not filed	10
	10-KSB	12/31/07	03/31/08	Not filed	6
	10-Q <sup>1</sup>	03/31/08	05/15/08	Not filed	4
	10-Q <sup>1</sup>	06/30/08	08/14/08	Not filed	1
Total Filings Delinquent		51			

**Red Bell Brewing Co.**

10-KSB	12/31/01	04/01/02	Not filed	77
10-QSB	03/31/02	05/15/02	Not filed	76
10-QSB	06/30/02	08/14/02	Not filed	73
10-QSB	09/30/02	11/14/02	Not filed	70
10-KSB	12/31/02	03/31/03	Not filed	66
10-QSB	03/31/03	05/15/03	Not filed	64

Company Name	Form Type	Period Ended	Due Date	Date Received	Months Delinquent (rounded up)
<b>Red Bell Brewing Co.</b>					
	<i>10-QSB</i>	06/30/03	08/14/03	Not filed	61
	<i>10-QSB</i>	09/30/03	11/14/03	Not filed	58
	<i>10-KSB</i>	12/31/03	03/30/04	Not filed	54
	<i>10-QSB</i>	03/31/04	05/17/04	Not filed	52
	<i>10-QSB</i>	06/30/04	08/16/04	Not filed	49
	<i>10-QSB</i>	09/30/04	11/15/04	Not filed	46
	<i>10-KSB</i>	12/31/04	03/31/05	Not filed	42
	<i>10-QSB</i>	03/31/05	05/16/05	Not filed	40
	<i>10-QSB</i>	06/30/05	08/15/05	Not filed	37
	<i>10-QSB</i>	09/30/05	11/14/05	Not filed	34
	<i>10-KSB</i>	12/31/05	03/31/06	Not filed	30
	<i>10-QSB</i>	03/31/06	05/15/06	Not filed	28
	<i>10-QSB</i>	06/30/06	08/14/06	Not filed	25
	<i>10-QSB</i>	09/30/06	11/14/06	Not filed	22
	<i>10-KSB</i>	12/31/06	04/02/07	Not filed	17
	<i>10-QSB</i>	03/31/07	05/15/07	Not filed	16
	<i>10-QSB</i>	06/30/07	08/14/07	Not filed	13
	<i>10-QSB</i>	09/30/07	11/14/07	Not filed	10
	<i>10-KSB</i>	12/31/07	03/31/08	Not filed	6
	<i>10-Q<sup>1</sup></i>	03/31/08	05/15/08	Not filed	4
	<i>10-Q<sup>1</sup></i>	06/30/08	08/14/08	Not filed	1
Total Filings Delinquent					27