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March 21, 2003

BY HAND

Dockets Management Branch
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061, HFA-305
Rockville, MD 20852

Re: Regulation of NICOWater™ and Ariva™
(Docket Nos. 01P-0572, 01P-0573, and 02P-0075)

Dear Sir or Madam:

On behalf of GlaxoSmithKline Consumer Healthcare, LP ("GSK"), we are writing to advise the Food and Drug Administration ("FDA") of the plans of QT 5, Inc. ("QT5") to market a nicotine-containing beverage product, NICOWater™, in the United States. In July 2002, FDA determined that this product was being marketed as an unapproved new drug in violation of Section 505(a) of the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 355(a) ("FDCA"). In reaching that conclusion, FDA found that NICOWater was not a dietary supplement, as claimed by QT5 and the other parties then marketing the product. To avoid a similar result, QT5 now intends to call NICOWater a "homeopathic nicotinum formula" and, thereby, take advantage of FDA's more lenient enforcement policy toward homeopathic medicine products. The FDA need not, and should not, fall for this legal maneuvering. That is because NICOWater, as described by QT5 itself, does not meet one of the agency's most fundamental requirements governing marketing of over-the-counter ("OTC") homeopathic products – that is, prescription strength homeopathic products may not be sold as OTC products.[1] The bases for this conclusion are set forth below and supporting documents are included in the attached appendix.

[1] To the extent that FDA has focused on the illegal sale of homeopathic products, it has not hesitated to take enforcement action where, as here, manufacturers market prescription homeopathic products over-the-counter. *See, e.g.*, Food and Drug Administration, *Homeopathy: Real Medicine or Empty Promise*, FDA CONSUMER MAGAZINE (Dec. 1996) (statement of Edward Miracco, FDA, referring to such activities as "illegal" and a "violation" and indicating that FDA will "focus" on this problem), *available at* http://www.fda.gov/fdac/features/096_home.html.

I. To Avoid FDA Enforcement Action, QT5 Has Resurrected NICOWater As A Homeopathic Product That Is Available Over-The-Counter

In December 2001, many of the nation's leading public health organizations, led by the Campaign for Tobacco Free Kids, petitioned FDA to prohibit marketing of Nicotine Water as a drug, dietary supplement or food product.[2] That petition was filed to address the distribution of Nicotine Water over the Internet (www.nicotinewater.com) by S&F Garret, Nicotine Beverage Corporation, and QuickTest 5, Inc. In connection with marketing of this product, those companies aggressively promoted Nicotine Water as a treatment for both nicotine addiction and as an aid to smoking cessation. Based on its evaluation of this literature and the patent for this product, FDA agreed that Nicotine Water could not be marketed in this manner and it granted the public health organizations' petition.[3] To that end, FDA ruled that Nicotine Water could not be marketed as a dietary supplement since its active ingredient – nicotine or nicotine polacrilex – was first marketed as an approved new drug. At the same time, FDA indicated that Nicotine Water could not be distributed as a drug product since the agency had not approved a new drug application ("NDA") authorizing these companies to claim that Nicotine Water can be used to treat nicotine addiction or as an aid in smoking cessation programs.[4]

Shortly following FDA's decision, these companies stopped marketing Nicotine Water through their website or otherwise. Nevertheless, within the next few months, QT5 intends to renew marketing of Nicotine Water under the name NICOWater in the United States. On January 24, 2003, QT5 filed a Form 8-K with the Securities and Exchange Commission ("SEC") in which it disclosed that it had acquired the patent for nicotine beverages (Patent No. 6,268,386) from the previous owner.[5] QT5 also reported

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[2] *See* Citizen Petition filed by the National Center for Tobacco-Free Kids, American Cancer Society, American College of Preventive Medicine, American Heart Association, American Legacy Foundation, American Lung Association, American Medical Association, American Public Health Association, American Society of Addiction Medicine, American Society of Clinical Oncologists, American Thoracic Society, Latino Council on Alcohol and Tobacco, National Association of Local Boards of Health, National Education Association, Oncology Nursing Society, Oral Health America, National Spit Tobacco Education Program, and Partnership for Prevention (Dec. 18, 2001).

[3] *See* Letter from Dennis E. Baker, Associate Commissioner for Regulatory Affairs, FDA, to Mr. William Schultz, Zuckerman Spaeder, and Mr. Matthew Myers, National Center for Tobacco-Free Kids (July 1, 2002).

[4] In light of these conclusions, FDA did not consider the question whether Nicotine Water also constitutes an adulterated food product. Id.

[5] In this SEC document, QT5 indicated that, effective January 9, 2003, QuickTest 5 merged with and into MoneyZone.com, Inc., the separate corporate existence of QuickTest 5 ceased, and Moneyzone changed its name to QT 5, Inc. (Exhibit A).

that it was currently "working with regulatory counsel to determine what requirements, if any, must be satisfied prior to marketing NicoWater in the United States and worldwide." At the time that QT5 issued this SEC document, the company described NICOWater as an "odorless and tasteless liquid based nicotine adult beverage to be consumed 'when you want to smoke but can't or can smoke but shouldn't'." Just six weeks later, however, QT5 described NICOWater in a slightly different manner. In a February 27, 2003, press release announcing the "the world's first nicotine beverage as an alternative to smoking," QT5 declared that NICOWater "is a clear, colorless and odorless homeopathic nicotinum formula."[6] QT5 also indicated that its purported homeopathic product is "designed to relieve the symptoms of tobacco cravings."[7]

The characterization of NICOWater in this manner appears to be designed to take advantage of FDA's lenient enforcement policy toward treating homeopathic medicines as "new drugs" under the FDCA where, as here, such products are accompanied by therapeutic claims. To be sure, Section 201(g)(1)(A) of the FDCA provides that the term "drug" includes "articles recognized in . . . the official Homeopathic Pharmacopeia of the United States" [("HPUS")] or any supplement to that document. 21 U.S.C. § 321(g)(1)(A). And, nicotinum is recognized in the HPUS.[8] Nevertheless, FDA has taken the position that a homeopathic medicine is not a "new drug" for the purposes of Section 505(a) of the FDCA, and consequently no NDA need be in effect, if the product satisfies certain conditions set out at Section 400.400 of the agency's Compliance Policy Guide ("CPG 7132.15").[9] Thus, it appears that QT5 will assert that NICOWater meets all of the conditions governing marketing of a homeopathic medicine and, therefore, FDA

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[6] *See* Press Release, QT 5, Inc., QT 5, Inc. Introduces NICOWater; "The World's First Nicotine Beverage as an Alternative to Smoking" (Feb. 27, 2003) (Exhibit B).

[7] The courts have made clear that, whether a particular product is an official homeopathic medicine or not, it is a drug if it is offered for the cure, mitigation, prevention, or treatment of disease conditions. *See United States v. Writers & Research, Inc.*, 113 F.3d 8, 11 (2nd Cir. 1997); *United States v. Meserey*, 447 F. Supp. 548, 552 (D. Nev. 1977).

[8] *See* Homeopathic Pharmacopoeia of the United States, Section on Nicotinum (Exhibit C).

[9] *See* Food and Drug Administration, Compliance Policy Guide (CPG 7132.15), Section 400.400: Conditions Under Which Homeopathic Drugs May Be Marketed (Mar. 1995). Among other things, this document provides that OTC homeopathic products must be intended to treat self-limiting disease conditions amenable to self-diagnosis and treatment. In addition, the product must meet the standards for strength, quality, and purity set forth in the HPUS. Furthermore, as with all OTC drug products, homeopathic products must bear the name and place of business of the manufacturer, packer, or distributor, adequate directions for use, and ingredient information. 21 C.F.R. §§ 201.1, 201.5, and 201.10. Finally, homeopathic drug products must be manufactured in conformance with current Good Manufacturing Practices ("cGMP") requirements. 21 C.F.R. Part 211.

may not pursue an enforcement action against the company for its claim that the product relieves the symptoms of tobacco cravings.[10]

II. QT5 Cannot Legally Market NICOWater As An Over-The-Counter Homeopathic Product

Despite QT5's attempt to circumvent FDA's earlier determination in this manner, NICOWater cannot legally be marketed in the United States as an OTC homeopathic product. Specifically, QT5 has indicated that each bottle of NICOWater will contain approximately four milligrams of nicotine in 16.9 fluid ounces of water.[11] Based on our calculations, that formula yields a concentration of 8 parts of nicotine per one million parts of water (i.e., 8 ppm) or approximately 1 part of nicotine per 100,000 parts of water – that is, a "potency" of 5X.[12] Under the HPUS, however, nicotinum is designated for marketing as an OTC product at a potency of 6X – that is, a dilution of 1/1,000,000 of the "mother tincture" containing nicotinum. Moreover, for liquid preparations containing nicotinum (a "class B product"), that tincture is already diluted at a factor of 1/100 or 2X. Thus, a homeopathic product containing a 6X potency for nicotinum actually contains one part of nicotine per 100,000,000 parts of water. Inasmuch as NICOWater is being offered for sale at a concentration substantially greater than the permissible OTC potency, it cannot be sold as an OTC product. 21 U.S.C. § 353(b).[13] Rather, it can only be sold as a prescription homeopathic product, whose potency for nicotinum is 3X or one part of nicotine per 100,000 parts of water.[14]

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[10] QT5 may also assert that this is not an actionable claim under the FDCA. In its earlier letter on nicotine water, FDA indicated that nicotine addiction is a disease. Indeed, GSK's NRT products, Nicorette®, Nicoderm® and Commit®, are approved for the following use: "reduces withdrawal symptoms, including nicotine craving, associated with quitting smoking." The Nicotrol® Inhaler and Nasal Spray are approved for use as "an aid to smoking cessation for the relief of nicotine withdrawal symptoms."

[11] *See* Press Release, QT 5, Inc., QT 5, Inc. Introduces NICOWater; "The World's First Nicotine Beverage as an Alternative to Smoking" (Feb 27, 2003).

[12] *See* Exhibit D.

[13] In pertinent part, CPG 7132.15 provides that, "[i]f the HPUS specifies a distinction between nonprescription (over-the-counter (OTC)) and prescription status of products which is based on strength (e.g., 30x) – and which is more restrictive than Section 503(b) of the Act – the more stringent criteria will apply . . . Homeopathic products offered for conditions not amenable to OTC use must be marketed as prescription products."

[14] In describing the meaning of the OTC designation, the HPUS states that it is "the potency at or above which a drug may be offered for sale for internal use without a prescription." Thus, "if OTC=6X, the drug may be offered for over the counter sale at 6X, 12X, 6C; however, 1X through 5X and 1C through 2C would be available only with a prescription." (Exhibit E).

Although other potentially significant issues surrounding marketing of NICOWater as a homeopathic product may arise as additional information becomes available, there is no question that QT5 cannot market NICOWater as an OTC homeopathic formula since it contains too great a concentration of nicotine.[15] Yet, based on QT5's own statements, that is precisely what it intends to do. For example, in its February 27, 2003, press release, QT5 stated that its "product strategy is to utilize contract bottling companies for manufacture and distribution to all major markets including: retail, pharmacy, convenience stores, airports, restaurants, and bars." In its earlier SEC disclosure, the company indicated that it "intends to sell and distribute NicoWater to adults over the age of 18, wherever cigarettes are sold to provide an alternative to smoking." QT5 has also indicated that it will launch NICOWater during the second quarter of 2003. And, in anticipation of that launch, QT5 reports that it has "developed an aggressive marketing and advertising campaign" and has "assembled a world-class sales and marketing team" that is tapping into a "national and regional wholesale broker network." Clearly, FDA must promptly advise QT5 that it cannot market NICOWater in this manner.

Finally, on a broader point, QT5's attempt to characterize NICOWater as an OTC homeopathic product demonstrates the lengths that certain companies will go to avoid FDA regulation and enforcement action against products designed to deliver nicotine to consumers. In this sense, QT5's actions closely parallel those of Star Scientific, Inc. ("Star"), whose legal counsel asserts that FDA does not have jurisdiction over Ariva™ since it purportedly is a smokeless tobacco product.[16] In fact, notwithstanding FDA's authority to regulate such products as drugs under the FDCA, both NICOWater and Ariva are traditional food products – water and candy – that are being used as vehicles for the delivery of an unapproved food additive. In the case of NICOWater, that unapproved additive is nicotine. For Ariva, it is tobacco. As GSK has repeatedly emphasized in the context of its citizen petition to regulate Ariva, FDA must take prompt enforcement

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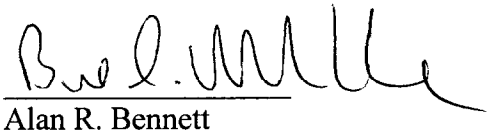
[15] QT5's patent governing nicotine beverages (Patent No. 6,268,386) allows claims for the use of nicotine or an alkaloid in a beverage (e.g., water, carbonated water, natural fruit juice) where the content of nicotine is between 0.0001% and 0.1%. Inasmuch as the lowest concentration of nicotine governed by the patent (1 ppm) exceeds the OTC maximum for a homeopathic nicotinum product (1 part per 100 million), QT5 can only market its patented product as a prescription homeopathic product. *See* U.S. Patent No. 6,268,386 (issued July 31, 2001) (Exhibit F).

[16] On March 10, 2003, QT5 announced that it had also established a "Medical and Regulatory Advisory Board" to "provide guidance and leadership for the development and introduction of a wide array of new products." This board includes an attorney from the law firm of McDermott, Will & Emery – the firm that represents Star on Ariva. *See* Press Release, QT 5, Inc., QT 5, Inc. Establishes Medical & Regulatory Advisory Board (Mar. 10, 2003) (Exhibit G).

action against such products either because they are unapproved drug products or adulterated foods. The agency is to be congratulated for doing so with nicotine lollipops and the "first" nicotine water product. It must now act quickly against Ariva and, once again, NICOWater.

Thank you for your consideration of these comments.

Sincerely,



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SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, DC 20549

Form 8-K

Current Report Pursuant to Section 13 or 15(d)
Of the Securities Exchange Act of 1934

Date of Report (Date of Earliest Event Reported) January 9, 2003

QT 5, Inc.
(Exact name of registrant as specified in its charter)

Delaware	0-25022	72-7148906
(State or other jurisdiction of Incorporation Or Organization)	(Commission File Number)	(I.R.S. Employer Identification No.)

5655 Lindero Canyon Road, Suite 120
Westlake Village, California 91362
(Address of principal executive offices) (Zip Code)

Registrant's telephone number, including area code (818) 338-1510

MoneyZone.com, Inc.
3260 North Hayden, Ste 209, Scottsdale, Arizona 85251
(Former name or former address, if changed since last report)

Special Note Regarding Forward-Looking Statements

The federal securities laws provide for a safe harbor for certain forward-looking statements. This safe harbor protects us from liability in a private action arising under either the Securities Act of 1933 or the Securities Exchange Act of 1934, as amended, for forward-looking statements that are identified as such and accompanied by meaningful cautionary statements, or are immaterial.

This report contains forward-looking statements that involve risks and

uncertainties, such as statements about our plans, objectives, expectations, assumptions, or future events. In some cases, you can identify forward-looking statements by terminology such as "anticipate," "estimate," "plan," "project," "predict," "potential," "continue," "ongoing," "expect," "believe," "intend," "may," "will," "should," "could," or the negative of these terms or other comparable technology. These statements involve estimates, assumptions, known and unknown risks, uncertainties and other factors that could cause actual results to differ materially from any future results, performances, or achievements expressed or implied by the forward-looking statements. Actual future results and trends may differ materially from those made in or suggested by any forward-looking statements due to a variety of factors, including for example, our ability to compete with other products in our space; the risk of unfavorable federal regulation; and the fact that our status as a development stage company makes our future unclear. Consequently, you should not place undue reliance on these forward-looking statements. We discuss many of these and other risks and uncertainties in greater detail under the section entitled, "Risk Factors That May Affect Future Result " in Item 1 and elsewhere in this Current Report on Form 8-K.

The forward-looking statements speak only as of the date on which they are made and, except as required by law, we undertake no obligation to update any forward-looking statement to reflect events or circumstances after the date on which the statement is made or to reflect the occurrence of unanticipated events. In addition, we cannot assess the impact of each factor on our business or the extent to which any factor, or combination of factors, may cause actual results to differ materially from those contained in any forward-looking statements.

Item 1. Change in Control of Registrant.

Effective January 9, 2003, pursuant to the terms of the Merger and Plan of Reorganization (the "Merger Agreement") between MoneyZone.com, Inc. ("MoneyZone"), and QuickTest 5, Inc. ("Quicktest") (the "Merger"), Quicktest merged with and into MoneyZone, the separate corporate existence of Quicktest ceased, and MoneyZone continued as the surviving entity and changed its name to "QT 5, Inc." and its symbol on the Over the Counter Bulletin Board to "QTFV" (the surviving entity shall hereinafter be referred to as "QT5" or the "Company").

MoneyZone had 600,000 shares of Common Stock issued and outstanding as of the year ended December 31, 2002. In connection with the Merger MoneyZone will issue an aggregate of 25,000,000 shares of its Common Stock (on a post forward split basis, see discussion below) to Quicktest shareholders resulting in the Company having 28,000,000 shares of Common Stock issued and immediately following the Merger and after taking into effect a five for one forward stock split.

As a result of the Merger, the shareholders of Quicktest acquired control of QT 5. The source of consideration used by the shareholders of Quicktest for the Merger were shares of common stock of Quicktest owned or held beneficially prior to the Merger that were acquired by the Registrant upon consummation of the Merger in exchange for the same number of similar securities issued by the Registrant.

Business.

Quicktest was formed in 1999 to develop, distribute and market In Vitro diagnostic tools and pharmaceutical products for the individual, home, and work environments. In April 2002, the Company acquired Patent No. 6,268,386 dated July 31, 2001 relating to a Nicotine Beverage (the "Nico Patent"). The Nico Patent, abstract states, among other things, that it covers "A liquid composition including a Nicotine or alkaloid having the same direction of activity, content between 0.0001% and 0.1%."

While the Company plans to continue its small device and pharmaceutical product development, since acquisition of the Nico Patent, the Company has focused its efforts on developing and marketing nicotine beverage products. Other than its nicotine beverage line of products, the Company has not developed nor does it have the right to market any other products; however, the Company is in negotiations to acquire certain intellectual property rights and their associated research and development efforts and FDA approvals on an HIV test kit, In Vetro drug test kit and a cardiac pulmonary test kit.

The Company's first nicotine beverage product is anticipated to be Nico(R)Water, a water based nicotine product. In addition to Nico Water, to date, Quicktest has been engaged in the research and development of proprietary programs for business and government use to educate and limit liability of employee drug use, sexual harassment and work place discrimination. The Company is in negotiations to acquire products in this area.

Products

Nico Water. The Company's first nicotine beverage product is Nico Water. Nico Water is an odorless and tasteless liquid based nicotine adult beverage to be consumed "when you want to smoke but can't or can smoke but shouldn't."

The Company intends to sell and distribute Nico Water to adults over the age of 18, wherever cigarettes are sold to provide an alternative to smoking. Unlike other nicotine products, Nico Water is suitable for sale and consumption in a wide venue of retail outlets (i.e. drug stores, markets, restaurants, airlines, and convenience stores). Nico Water is not currently available for sale. The Company is working with regulatory counsel to determine what requirements, if any, must be satisfied prior to marketing Nico Water in the U.S. and worldwide. See "Regulatory Matters" and "Risk Factors That May Affect Future Results and Market Price of Stock-Government Regulation."

Market for Nicotine Beverages. While there is no current market for Nicotine beverage products, there are approximately 47 million smokers in the U.S. alone who spend approximately $200 Billion annually on cigarettes. Management believes there is a significant worldwide market opportunity for products that contain nicotine in a convenient and inexpensive vehicle such as Nico Water.

The Know Now TM System. The Company has been conducting research and development efforts in the Know Now system of products and has been in negotiations to acquire rights to use certain products in this system. The Company intends to market the Know Now system to businesses and professionals to assist these entities with their human resource compliance as outlined by the Department of Transportation. When developed, the Company intends the Know Now system to include the following products:

1. QuickTest for drugs is a rapid immunochromatographic assay for the simultaneous qualitative detection of Cocaine, Marijuana, Morphine, P.C.P., Amphetamines and/ or their metabolites in urine. The Drug Cup

assay provides only the first step. A more specific alternate chemical method must be used in order to obtain a confirmed analytical result. Gas chromatography/mass spectrometry (GC/MC) is the preferred confirmatory method.

2. On Site, 10 minute H.I.V. type I and type II Test Kit for the U.S. professional and international over the counter market.

Competition.

While the Company is not aware of any direct competing nicotine beverage sold in the U.S., the Company's nicotine beverage products compete in the adult nutrasutical market which includes such products as Gatorade, Red Bull and Propel. All of the companies that market these products have greater resources than the Company. In addition, the Company competes with cigarettes as an alternative source of nicotine. Most of the companies that distribute cigarettes have much greater financial resources than the Company. In addition, these companies may exert indirect or political pressure against the introduction of nicotine water.

Regulatory Matters.

The manufacture, sale, promotion and marketing of the Company's current product, Nico Water TM, and future products are subject to regulation by the U.S. Food and Drug administration ("FDA") and similar government regulatory bodies in other countries. The Company is in the process of determining what regulatory requirements, if any, are required for it to market and sell the Nico Water product in the U.S. and worldwide, including possible drug listing and obtaining FDA approval prior to going to market; such listing and the FDA approval process could take years and be very costly if approval could even be obtained at all. Failure of the Company to comply with such a requirement could lead to an FDA enforcement action, which could include a warning letter, injunction and possible seizure of the Company's assets. On December 18, 2001, Tobacco Free Kids, The American Heart Association and ten other entities filed a petition with the FDA to regulate or stop the sale of Nico Water as a dietary supplement by a previous owner of the patent. The Petition asserted that nicotine water should be classified as a "drug" or in the alternative a food containing an unapproved additive under the federal Food, Drug and Cosmetic Act (the "Act"). The FDA determined that nicotine water, as marketed, was a "drug" under the Act and a "new drug" under Section 201(p) of the Act, because no person had shown that the product was generally recognized among qualified experts as safe and effective for its suggested uses. Under Section 505(a) and 301(d) of the Act, a new drug may not be introduced or delivered for introduction into interstate commerce unless an FDA approved New Drug Application is in effect for that drug. The Company believes that, as the Company intends to label and market Nico Water, it is not a new drug under the Act and the Company is currently conducting tests to determine that the product is safe and effective for its intended use; however, there can be no certainty that the FDA will not deem the product a new drug or that it is safe and effective for its intended use. See Risk Factors That May Affect Future Results and Market Price of Stock - Government Regulation.

Intellectual Property

We protect our intellectual property rights through a combination of trademark, copyright and trade secrets laws and through the domain name dispute resolution system. In order to limit access to and disclosure of our proprietary information, all of our employees have signed confidentiality and invention

assignment arrangements, and we enter into nondisclosure agreements with third parties. We cannot provide assurance that the steps we have taken to protect our intellectual property rights, however, will deter adequately infringement or misappropriation of those rights. Particularly given the international nature of the Internet, the rate of growth of the Internet and the ease of registering new domain names, we may not be able to detect unauthorized use of our intellectual property or take enforcement action.

The Company has registered the "Nico" service mark in the U.S. In addition, the Company has registered the domain name "www.nicowater.com" and various related domain names including "www.nicotinewater.com."

In April 2002, the Company acquired Patent No. 6,268,386, dated July 31, 2001, for nicotine beverages (the "Nico Patent") from the inventor, Marshall Anlauf Thompson, pursuant to the terms of that certain Agreement for the Assignment of Patent Rights dated April 7, 2002 (the "Patent Agreement"). In consideration thereof, the Company issued 133,000 shares of its Common Stock. In addition, Quicktest agreed to pay the original patent holder and related third parties royalties of $1.20 per case, quarterly, for every case sold (consisting of 24 bottles per case) of the Company's products which utilize the Nico Patent, for the remaining life of the patent. The royalty payments are due beginning on the first day of the calendar quarter commencing at such time as Quicktest distributes "First Distribution," as defined in the Patent Agreement, its first product to third-parties in which the Nico Patent is utilized, and every quarter thereafter during the term of the Nico Agreement (the life of the Nico Patent). If any payment due under the Patent Agreement is not received within sixty (60) days after the due date, the assignment shall be cancelled and terminated.

As a condition to the continuance of the Patent Agreement, the Company also agreed to the following performance goals: (1) during the first year, the Company must sell a minimum of 500,000 cases of the patented product, and (2) during any year thereafter for the duration of this agreement, the Company must sell a minimum of 1,000,000 cases of the patented product each year (the "Performance Goals"). In addition, the Company agreed, as a material condition of assignment, to provide sufficient funds and adequate personnel to market the product line of the Company in order to meet the Performance Goals. Failure of the Company to make the required royalty payments or meet the Performance Goals could result in the loss of the Nico Patent and materially harm the Company's prospects.

In June 2002, the Company and Thompson agreed to a prepayment of royalties in the amount of $150,000 through the issuance of 399,000 shares of its Common Stock.

Third parties may claim that we have infringed upon their patents or misappropriated or infringed on other proprietary rights. These claims and any resultant litigation could subject us to significant liability for damages. In addition, even if we prevail, the litigation could be time consuming and expensive to defend and could affect our business materially and adversely. Any claims or litigation from third parties may also result in limitations on our ability to use the service marks, trademarks, copyrights, trade secrets, patents, and other intellectual property subject to these claims or litigation, unless we enter into license agreements with the third parties. However, these agreements may be unavailable on commercially reasonable terms, or not available at all. In addition, these same costs and constraints apply to enforcing the Nico Patent, which may not be possible or practical. Further, the Nico Patent will not protect the Company's interests in foreign countries that do not recognize U.S. Patents.

Change of Control

The Registrant is not aware of any arrangements, the operation of which may at a subsequent date result in a change in control of the Registrant.

Management

As part of the Merger, the officers and directors of MoneyZone resigned and new management was appointed. See Item 5. Directors are elected for a period of one year and thereafter serve until the next annual meeting at which their successors are duly selected by the stockholders. Officers and other employees serve at the will of the Board Directors. The following sets forth the persons who serve as the directors of QT5.

Timothy J. Owens, 48, is the Founder and Chief Executive Officer of the Company since inception. From March 1994 to January 1999, Mr. Owens served as CEO of Job Services, Inc., a privately held company. Mr. Owens received his Masters of Science Degree in Finance from La Salle University, Louisiana. Mr. Owens' also received letters of academic excellence in engineering from President Gerald R. Ford and President James Carter in 1976 and 1978.

Steven Reder, 46, has been President and a member of the Board of Directors since January 2002. From February 1994 to January 2002, Mr. Reder was President, CEO and majority stockholder of Friends Industry, Inc., (dba Graphix Press) a specialty printer, packaging and point of purchase display company. Prior to Graphix Press, Mr. Reder was the CFO for Delta Lithograph Company, a Bertelsmann company.

Principal Stockholders

The following table sets forth information available to the Company, as of January 9, 2003, with respect to the beneficial ownership of the outstanding shares of the Company's Common Stock (on a post forward split basis) by (i) any holder of more than five percent (5%) of the outstanding shares; (ii) the Company's officers and directors; and (iii) the Company's officers and directors as a group (the table has been prepared based on information provided to the Company by each shareholder):

Name of Beneficial Owner	Shares of Common Stock Owned	Percentage (%) of Common Stock (4)
Steven Reder (1)	3,504,550	12.5
Timothy Owens (2)	5,358,570	19.1
Fred DeLuca (3)	3,399,480	12.1
Robert Pautsch	2,088,100	7.5
Federico Cabo	3,192,000	11.4
All officers and directors as a group (three (3) persons)	12,262,600	43.8

(1) Steven Reder is the President and Chief Financial Officer of the Company and a member of the Company's Board of Directors. The address for Mr. Reder is 5655 Lindero Canyon Road, Suite 120 Westlake Village, California 91362.

(2) Timothy Owens is the Chief Executive Officer of the Company and a member of the Company's Board of Directors. The address for Mr. Reder is 5655 Lindero Canyon Road, Suite 120 Westlake Village, California 91362.

(3) Fred DeLuca is the Secretary of the Company. The address for Mr. DeLuca is 5655 Lindero Canyon Road, Suite 120 Westlake Village, California 91362.

(4) The number of outstanding shares of common stock of the Company is based upon 28,000,000

Risk Factors That May Affect Future Results and Market Price of Stock

Set forth below and elsewhere in this Current Report on Form 8-K and in other documents we file with the Securities and Exchange Commission, are risks and uncertainties that could cause actual results to differ materially from the results contemplated by the forward-looking statements contained in this report.

Development Stage Company; Limited Operating History; Significant and Continuing Operating Losses; Accumulated Deficit. Since its inception, the Company has been engaged primarily in research and development and has had no revenues to date. Accordingly, the Company has a limited operating history and its operations are subject to all the risks inherent in a business enterprise with such a limited operating history, including limited capital, possible delays in the development and implementation of our business plan, uncertain markets, and the absence of an operating history. The likelihood that the Company will succeed must be considered in light of the problems, expenses, and delays frequently encountered in connection with the development of new businesses, as well as many other factors. The Company has not developed any customers to date and must rely upon potential customers that the Company's management may identify for generating revenues. There is no assurance that the Company will be able to develop successfully the business it intends to pursue, as described herein. We cannot be certain that our business will be successful or that we will generate significant revenues. Specifically, companies such as ours typically experience significant difficulties.

Significant Capital Requirements; Need for Additional Capital; Explanatory Paragraph in Accountant's Report. The Company's capital requirements have been and will continue to be significant. The Company has been dependent primarily on private placements of equity securities and indebtedness. Over the next 12 months, the Company intends to focus on increasing its marketing efforts and research and development for new proposed products. The Company anticipates, based on its current proposed growth plans and assumptions relating to its growth and operations, that the proceeds from the private placements, borrowings and planned revenues will not be sufficient to satisfy the Company's contemplated cash requirements for the next 12 months and that the Company will be required to raise additional funds immediately. In addition, in the event that the Company's plans change or its assumptions prove to be inaccurate (due to unanticipated expenses, delays, problems, or otherwise), the Company would be required to seek additional funding sooner than anticipated. Any such additional funding could be in the form of additional equity capital, debt or a combination thereof. Further, in the event that the Company receives a larger than anticipated number of purchase orders for its products, it may require resources substantially greater than those that are currently available to the Company. In such event the Company may be required to raise additional capital or to engage third parties (as to which there can be no assurance) to assist the Company in meeting such orders. The Company is currently pursuing several potential funding opportunities; however, the Company has no current commitments for additional funding. There can be no assurance that any of such opportunities will result in actual funding or that additional financing will be available to the Company when needed, on commercially reasonable terms, or at all. If the Company is unable to obtain additional financing if needed, it will likely be required to curtail its marketing and manufacturing plans and possibly cease its operations. Any additional equity financing may involve substantial dilution to the Company's then-existing shareholders. The Company's independent accountants have

included an explanatory paragraph in their report on the Company's financial statements set forth in the Company's Information Statement on Schedule 14C filed with the Securities and Exchange Commission on December 11, 2002, stating that because of the Company's losses, uncertainty about profitability and its need to raise additional funds among other factors, there is substantial doubt that the Company can continue as a going concern.

Government Regulation. The manufacture, sale, promotion and marketing of the Company's current product, Nico Water TM and future products are subject to regulation by the U.S. Food and Drug administration ("FDA") and similar government regulatory bodies in other countries. The Company is in the process of determining what regulatory requirements, if any, are required for it to market and sell the Nico Water product in the U.S. and worldwide, including possible drug listing and obtaining FDA approval prior to going to market; such listing and the FDA approval process could take years and be very costly, if approval could even be obtained at all. Failure of the Company to comply with such a requirement could lead to an FDA enforcement action which could include a Warning Letter, injunction and possible seizure of the Company's assets. On December 18, 2001, Tobacco Free Kids, The American Heart Association and ten other entities filed a petition with the FDA to stop the sale of Nico Water by a previous owner of the patent. The Petition asserted that nicotine water should be classified as a "drug" or in the alternative a food containing an unapproved additive under the federal Food, Drug and Cosmetic Act (the "Act"). The FDA determined that nicotine water, as marketed, was a "drug" under the Act and a "new drug" under Section 201(p) of the Act, because no person had shown that the product was generally recognized among qualified experts as safe and effective for its suggested uses. Under Section 505(a) and 301(d) of the Act, a new drug may not be introduced or delivered for introduction into interstate commerce unless an FDA approved New Drug Application is in effect for that drug. The Company believes that, as the Company intends to label and market Nico Water, it is not a new drug under the Act and the Company is currently conducting tests to determine that the product is safe and effective for its intended use; however, there can be no certainty that the FDA will not deem the product to be a new drug or that it is safe and effective for its intended use. In addition, the Over the Counter In Vitro Rapid Drug Testing Products are relatively new and may be subject to extensive future regulation, F.D.A., and/or state and federal government policy changes. Any one of these events may have a negative material impact on our business.

We May Never become Profitable. The Company has incurred net operating losses in each fiscal quarter since we have been in business. We expect to continue to experience losses until the time, if ever, when our current products are able to sell products sufficient to generate revenues adequate to support our operations.

Intellectual Property; loss of patent. Our success is dependent, in part, on the ability to protect the intellectual property rights associated with the Nico Water. In order to retain the rights to the Nico Patent, the Company must make certain loyalty payments and meet certain performance standards as set forth above. See "Intellectual Property." Should the Company fail to make these payments or meet the performance standards it could lose the rights to the Nico Patent and, therefore, its business could be materially adversely affected. See also "Need for Additional Capital" above. The inability to adequately protect such rights could have a material adverse effect on operations. The failure to adequately protect its proprietary products could have a material adverse effect on our business and results of operations.

No Assurance of Successful Product Development. The Company's ability to successfully develop any additional products is uncertain. The Company's research and development programs with respect to certain of its potential

products are at an early stage. Potential new products will require additional research, development, testing, regulatory approval and additional investment prior to their commercialization, which may not be successful. There can be no assurance that Quicktest's approach will result in the development of commercially successful products.

We may have problems hiring sufficient staff to operate our business. If we are able to expand our operations, we may need to hire additional staff. Finding quality and competent staff could be difficult. We will compete with other companies for qualified staff. In order to hire and retain staff, we will likely need to offer certain benefits, such as, medical benefits, 401K Plans and other retirement benefits. We have not made specific arrangements to offer such benefits and have not yet investigated the costs associated with providing such benefits. If we are not able to expand our operations, our ability to earn additional revenue will be harmed.

Risks Associated with Dependence on Third Party Manufacturing and Governmental Regulations. The Company intends to be engaged in the wholesale distribution of private labeled proprietary (patented) In Vitro products (regulated) to the general public via the retail over the counter market, the Internet, to government agencies and to the business and professional community through national distributors. As with any government-regulated products, there is substantial risk that the marketplace may not be receptive to the Company's products or services. Governmental regulations may change creating an adverse affect on one or more of our products, and the manufacturing processes that are governed by the government may become too restrictive to produce the product. We expect to incur substantial expenses as we continue to build out our automated national marketing infrastructure, our future product development and marketing activities and, if we are successful, to penetrate the national markets for our products. There can be no assurance that we will be able to market these services and products successfully or that any of the Company's future services and products based upon the consumer or business compliance with federal or state laws will be accepted in the marketplace. The costs of building out Quicktest's distribution channels, development and marketing efforts will be substantial and will be recorded and expensed as they are incurred, notwithstanding that the benefits, if any, from those marketing efforts (in the form of revenues) may not be reflected, if at all, until subsequent periods.

Competition. The Company's first product expected to go into the retail markets is the Company's nicotine beverage product, Nico Water. As of the date hereof the Company is unaware of any competitive nicotine beverage products marketed in the United States or Internationally. We also compete in the large and rapidly growing and extremely competitive market place against other companies involved in an In Vitro On Site Drug Testing, traditional Clinical Drug Testing, and other services, many of which have resources, both financial and other, far in excess of those Quicktest may possess or ever obtain. Many entities have exerted and continue to exert extensive research and development efforts, which have resulted in the introduction of a multitude of sophisticated, commercially marketable products and services. In view of the rapid changes taking place in our business, there is no assurance that its products or services will gain or retain commercial acceptance for a sufficient period to yield a profit commensurate with its cost of developing a national automated distribution system.

No Independent Market Survey for the Services. The Company has not undertaken an independent analysis or survey of the market for its products and services although information gathered and forecasts produced by various trade groups indicate the existence of a sizable potential market. Individuals,

businesses and government organizations are believed willing to expend large sums for the purchase of our products and services; however, there can be no assurance that The Company's products and services have the commercial potential to succeed in these target markets.

Risks of Investing In the Drug Testing Industry, Markets Uncertain. The Drug Testing industry is speculative and involves a high degree of risk. The success of the Company will depend on a number of factors over which we will have little or no control. Even if any of the Company's concepts are sound, there can be no assurance that it will succeed financially. Success in the Company's business is unpredictable and susceptible to change. The success of the Company may also be materially affected by the popularity of other products and companies offering similar goods and services as well as the state of the national economy. The Company operates in a rapidly evolving field that is likely to be affected by future product and service developments. Our ability to anticipate changes in products, markets, industry trends and to develop and introduce new and enhanced services on a timely basis will be a critical factor in its ability to grow and remain competitive. There can be no assurance that new services will be completed or that any new services can be marketed successfully. In addition, the anticipated development schedules for new or improved products are inherently difficult to predict and are subject to change as a result of shifting priorities in response to customer's requirements and competitors new product introductions. Moreover, we expect that it will devote substantial resources to the build out of the Company's infrastructure. The costs of those efforts will be expensed as they are incurred, notwithstanding that the benefits, if any, from the Company's product development efforts (in the form of increased revenues or decreased product costs) may not be reflected, if at all, until subsequent periods.

Dependence on Trademarks for Current and Future Markets. The market for certain of The Company's products and services will be, in part, dependent upon the goodwill engendered by our trademarks and trade names. Trademark protection will therefore be material to a portion of The Company's business. The Company has applied for federal trademark and trade name protection, relying on trademark law to protect brand names. The Company has applied for federally registered trademarks or trade names, and the failure to obtain trademark protection, or illegal use of any trademarks the Company may obtain, may have an adverse effect on the Company's business, financial condition and operating results.

We May Face Product Liability. Liability might result from claims made directly by consumers or by others selling our products. We presently carry product liability insurance in amounts that we believe to be adequate, but we can give no assurance that such insurance will remain available at a reasonable cost or that any insurance policy would offer coverage sufficient to meet any liability arising as a result of a claim. We can give no assurance that we will be able to obtain or maintain adequate insurance on reasonable terms or that, if obtained, such insurance will be sufficient to protect us against such potential liability or at a reasonable cost. The obligation to pay any product liability claim or a recall of a product could have a material adverse affect on our business, financial condition and future prospects.

Item 5. Other Events and Regulation FD Disclosure.

Effective January 9, 2003, MoneyZone effectuated a 5 for 1 forward split of its outstanding shares of Common Stock. Pursuant to the Forward Stock Split, the number of shares of our Common Stock issued and outstanding is

increased to a number that would be equal to the number of shares of our Common Stock issued and outstanding immediately prior to the effectiveness of the Forward Stock Split, multiplied by five. The actual number of authorized shares of our Common Stock would not be changed. The Forward Stock Split alone will increase the number of outstanding shares of Common Stock to approximately 28,000,000 shares (after the shares are issued in connection with the Merger). The forward stock split was effectuated prior to the effectiveness of the Merger.

The Board of Directors and holders of a majority of the outstanding Common Stock of the Company authorized and approved by written consent an amendment of the Certificate of Incorporation of the Company to increase the total amount of the Company's authorized Common Stock, from 25,000,000 shares to 100,000,000 shares. This increase was effectuated pursuant to an amendment to the Company's Certificate of Incorporation prior to the effectiveness of the Merger.

Pursuant to the terms of the Merger Agreement, effective January 9, 2003, MoneyZone.com, Inc. changed its name to QT 5, Inc. and changed its symbol on the Over the Counter Bulletin Board to "QTFV".

Upon the effectiveness of the Merger Fred DeLuca was named Secretary of the Company until the next annual meeting of shareholders.

Financing Transaction. On December 31, 2002, the Quicktest borrowed $150,000 and has agreed to borrow an additional $150,000 from NDMS Investments, L.P., or its designee ("Lender"), an unrelated party pursuant to the terms of that certain Issuance Agreement and Convertible Promissory Note (the "Note"). The Note is due on the earlier to occur of (i) April 30, 2003 or (ii) a financing in which Quicktest receives net proceeds of $1.5 million (the "Maturity Date"). The Note is convertible, at the election of the Lender, into 199,500 shares of Common Stock. In addition, in consideration of the Loan, Quicktest issued the Lender 133,000 shares of Common Stock (the "Note Shares"). In the event that the 30 day average closing price of the Company's Common Stock is $1.00 or lower at the one year anniversary of the Note (the "Trading Price"), the Lender shall receive additional shares such that the effective Note Shares are equal to the original loan divided by 70% of the Trading Price. Finally, the Lender received piggy back registration rights for the Shares and the shares issuable upon conversion of the Note. Quicktest reserved an additional 100,000 shares of Common Stock for issuance upon receipt of the second $150,000, of which Lender is not obligated to lend.

Item 6. Resignations of Registrant's Directors.

Pursuant to the terms of the Merger Agreement, effective January 23, 2003, John Iannetta and Halla Moran tendered their resignations as both officers and members of the board of directors. On January 6, 2003, Michael Kessler declined his appointment to serve as a member of the Company's board of directors.

Item 7. Financial Statements and Exhibits.

Exhibits

99.1	Agreement for the Assignment of Patent Rights
99.2	Amendment to Agreement for the Assignment of Patent Rights
99.3	Press Release dated January 9, 2003

Item 8. Change in Fiscal Year.

Pursuant to the Merger the Company changed its fiscal year end to June 30. The Company will file a Form 10-K for the year ended June 30, 2003.

Signature:

Pursuant to the requirements of the Securities Exchange Act of 1934, the Registrant has duly caused this report to be signed by the undersigned duly authorized.

QT 5, Inc.
(Registrant)

Date: January 24, 2003

/s/ Steven Reder

Steven Reder, President

B

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EXHIBIT 99.1

QT 5, INC. INTRODUCES NICOWATER(TM)

"THE WORLD'S FIRST NICOTINE BEVERAGE AS AN ALTERNATIVE TO SMOKING"

WESTLAKE VILLAGE, Calif.--(BUSINESS WIRE)--February 27, 2003-- QT 5, Inc. (OTCBB:QTFV) today announced plans to introduce the World's first patented nicotine beverage developed as an alternative to smoking. NICOWATER(TM) is a clear, colorless and odorless homeopathic nicotinum formula, which contains approximately 4mg of nicotine, and will be sold in 16.9 Fl. Oz. bottles. The product is designed to relieve the symptoms of tobacco cravings. NICOWATER(TM) is suitable for use in public places, including restaurants, airplanes and office buildings by smokers eliminating second hand smoke

QT 5, Inc. plans to launch NICOWATER(TM) during the second quarter of 2003. The company has developed an aggressive marketing and advertising campaign targeting smokers who want to smoke but can't, as well as smokers who can smoke but shouldn't. According to Steve Reder, president of QT 5, Inc., "Our product strategy is to utilize contract bottling companies for manufacture and distribution to all major markets including: retail, pharmacy, convenience stores, airports, restaurants and bars. We have also assembled a world-class sales and marketing team that will immediately tap into years of expertise and equity relationships with a national and regional wholesale broker network."

There are approximately 47 million smokers in the U.S., who spend approximately $200 billion annually on tobacco and tobacco related products. Management believes there is a significant market opportunity for tobacco alternative products that contain nicotine in a convenient, inexpensive medium such as NICOWATER(TM). Within the first 12 months of the initial product launch, QT 5, Inc. expects revenue to exceed $20 million, with tremendous upside potential related to contracts that are currently under negotiation. QT 5, Inc. anticipates operations from the sales of NICOWATER(TM) will be cash flow positive during the first 12 months.

About QT 5, Inc.

QT 5, Inc. (OTCBB: QTFV) was formed to be a developer, distributor, and marketer of Bio-Med testing and Nutraceutical Beverage products. QT 5, Inc. is continuing its clinical research and development of future products for lifestyle enhancements. QT 5, Inc. is headquarted in Westlake Village, California.

About NICOWATER(TM)

NICOWATER(TM), is a water based nicotine product to provide "Adult Smokers an Alternative to Smoking". This product is covered under a U.S. Patent. NICOWATER(TM) IS not intended for use as a smoking cessation product. The company believes that current labeling and materials are in full compliance with the marketing standards in which it intends to sell.

Forward-Looking Statements

Forward-looking statements in this press release are made pursuant to the safe harbor provisions of Section 21E of the Securities Exchange Act of 1934. Investors are cautioned that statements in this press release that are not strictly historical statements, including, without limitation, management's plans and objectives for future operations, and management's assessment of market factors, constitute forward-looking statements which involve risks and uncertainties. These risks and uncertainties include, without limitation, regulatory risks, the lack of acceptance of the Company's products by its customers and prospects, the inability to secure the necessary product sales and the inability to obtain necessary substantial additional capital to manufacture and market its product and otherwise implement its business plan and other risks detailed in QT 5's filings with the Securities and Exchange Commission, copies of which may be accessed through the SEC's Web site at http://www.sec.gov. In each case, actual results may differ materially from such forward-looking statements. QT 5 does not undertake to publicly update or revise its forward-looking statements, even if experience or future changes make it clear that any projected results (expressed or modified) will not be realized.

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C

NICOTINUM

6450 NINM

NAME IN CONTEMPORARY USE: Nicotine

CHEMICAL FORMULA AND MOLECULAR WEIGHT: $C_{10}H_{14}N_2$ 162.23

DESCRIPTION: A volatile alkaloid obtained from the dried leaves of *Nicotiana tabacum* and *N. rustica*, in which it occurs to the extent of 2 to 8%, combined with citric and malic acids. It is a colorless to pale yellow, oily liquid, with an acrid, burning taste, and developing an odor of pyridine. It is very hygroscopic, and turns brown on exposure to air or light. Its freezing point is -79° C., and the boiling point is about 247° C., with partial decomposition. Nicotine is miscible with water below 60° C.; it is very soluble in alcohol, chloroform, ether, petroleum ether, kerosene, and oils. It forms salts with almost any acid, and double salts with many metals and acids. Nicotine and its salts are highly toxic. LD_{50} orally in rats: approx. 50–60 mg/kg.

PREPARATION AND CLASSIFICATION:

Solution 1/100 in dispensing alcohol (Class B)
Trituration (Class G)

MEDICATION: OTC: 6X
Rx: 3X
HPN: 1X

D

Part per million calculation
1 oz = 29.5735 mL
1 mL = 1 gram
1 mL = 1000 milligrams

Oz	Total mL	Weight (g)	Weight (mg)	Weight (kg)
16.9	499.7922	499.79215	499792.15	0.49979215

If 4 mg is dissolved in 16.9 ozs.
then there is 4 mg/473176 mg
or 4 mg/0.473176 kg
ppm = part per million
ppm = 1 microgram/mL or
ppm = 1 microgram/g or
ppm = 1 mg/kg

therefore = 8.003327 ppm
in Nicotine Water

E

Table of Alcohol Strength, Manufacturing Class and Dispensing Potencies for Monographs recognized by the HPCUS

The following table has been compiled by the committees of the Homœopathic Pharmacopœia Convention of the United States to establish standards for the preparation and dispensing of official homeopathic drug products. The table lists 1,286 monographs that have been approved by the HPCUS Board of Directors and published in the HPUS Revision Service (HPRS). Products claiming to be official homeopathic drug products and/or bearing the appellation "HPUS" on their labels must be manufactured in accordance with the standards of the Homœopathic Pharmacopœia of the United States as referenced in the General Pharmacy and Good Manufacturing Practices sections, and as specified in their respective monographs. Such products must be labeled as OTC, External Use, or Rx products in accordance with the designations appearing in the table. These designations are defined as follows:

NAME

The official name for the homeopathic drug product.

LIQUID CLASS

The appropriate class reference in the General Pharmacy section of the HPRS under which the product should be prepared in liquid form, if such form is possible.

SOLID CLASS

The appropriate class reference in the General Pharmacy section of the HPRS under which the product should be prepared in solid form, if such form is possible.

ALCOHOL %

The finished product alcohol percentage for the liquid preparation of the official homeopathic tincture of the drug.

OTC

The potency at or above which a drug may be offered for sale for internal use without a prescription. Conversely, the potency below which a drug may not be offered for sale for internal use without a prescription. For example, if OTC=6X, the drug may be offered for over the counter sale at 6X, 12X, 6C, etc.; however, 1X through 5X and 1C through 2C would be available only with a prescription.

EXTERNAL USE

The potency at, or above which a drug may be offered for sale for "external use only" without a prescription. For purposes of this discussion, "External Use" means application in the eyes, ears or nose, or to a body surface other than in the mouth, rectum, vagina, urethra or other body orifice. External products are defined as: topical ointments, topical creams, topical gels, lotions, shampoos, topical cerates, topical sprays, topical powders, external use tinctures, lip balms, massage oils, and aqueous tinctures (essences). "Topical" means application for the purpose of producing a localized effect. Conversely, the potency below which a drug may not be offered for sale for "external use only" without a prescription. For example, if External Use = 3X, the drug may be offered for sale for "external use only" at 3X, 6X, etc.; however, 2X or 1X would be available for "external use only" with a prescription.

Rx

The potency at or above which a drug may only be offered for sale for internal use with a prescription; the Rx restriction would be valid up to the OTC potency noted for the drug in the table (see the explanation for "OTC" above). Conversely, the potency below which a drug may not be offered for sale to the public. For example, OTC=6X, Rx=2X, indicates that potencies 6X and above may be sold without a prescription, and the potencies 2X through 5X or 1C through 2C are restricted to sales with a prescription. Potencies below 2X, e.g., 1X, would be prohibited from being sold for consumption by the public.

HPN

"Homeopathic Pharmaceutical Necessity": The potency at or below which the drug may only be offered for sale to registered manufacturers for reprocessing or further potentization. HPN potencies are prohibited from sales for consumption by the public. For example, if OTC=6X, Rx=3X and HPN=2X, the following rule would apply: sales of potencies 6X and above (6X, 12X, 30X, 30C, etc.) may be sold without a prescription, the potencies 5X, 4X, and 3X (and their centesimal analogue 2C) may be sold with a prescription, and potencies 2X and lower (1C and 1X) may be sold only to other registered manufacturers for reprocessing or further potentization.

TINC.

A designation for *tincture*. It is used when the drug is used in tincture form from Class C or other appropriate classes.

N/A

Potency level data is not applicable for the particular drug. For example, OTC=1X, Rx=N/A, HPN=N/A indicates that all potencies above 1X are available for sales without a prescription. Consequently, the Rx and HPN potency limits are not applicable.

Note: The monograph table was completely revised as of December, 1998. Therefore, the table should always be consulted for the correct medication levels for monographs that were published *prior* to December, 1998. The publication date is shown in the lower right corner of each monograph page.

F

US006268386B1

(12) **United States Patent**
Thompson

(10) **Patent No.: US 6,268,386 B1**
(45) **Date of Patent: *Jul. 31, 2001**

(54) **NICOTINE BEVERAGE**

(76) Inventor: **Marshall Anlauf Thompson**, 1253 N. Modesto, Camarillo, CA (US) 93010

(*) Notice: This patent issued on a continued prosecution application filed under 37 CFR 1.53(d), and is subject to the twenty year patent term provisions of 35 U.S.C. 154(a)(2).

Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 56 days.

(21) Appl. No.: **09/104,225**

(22) Filed: **Jun. 25, 1998**

(51) **Int. Cl.**[7] **A61K 31/44**
(52) **U.S. Cl.** **514/343**; 514/810; 514/813
(58) **Field of Search** 514/343, 810, 514/813

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Primary Examiner—James H. Reamer
(74) *Attorney, Agent, or Firm*—Koppel & Jacobs

(57) **ABSTRACT**

A liquid composition including a Nicotine or alkaloid having the same direction of activity, content of between 0.0001% and 0.1% that can be consumed orally.

6 Claims, No Drawings

NICOTINE BEVERAGE

BACKGROUND

Tobacco which contains a natural nicotine content has a enormously large and devoted following. This dedication however carries the price of highly accelerated incident of negative health events. While it is the nicotine in tobacco that people seek it is not the nicotine that is the primary cause of negative health events. It is therefore reasoned that if a product could provide nicotine without the other ingredients of tobacco then the risk of negative health events would also diminish.

BRIEF SUMMARY AND OBJECTIVES OF INVENTION

It is insufficient for a safer nicotine product to be available to the public if the form is unacceptable to current tobacco users. Previous nicotine delivery patents have directed their efforts toward mimicking tobacco method of usage or variations of drug application techniques. The goal of this innovation is to introduce the nicotine by a delivery system which is already utilized by all people, the oral consummation of fluids. To be effective however the fluid must be such that is acceptable to its intended users, preferably one or more that are already established. The majority of consumable fluids available to the public have one of these three fluids as their primary ingredients, water, carbonated water or natural juice.

Therefore, the objective of this innovation is to form a liquid consisting of nicotine or alkaloid having the same direction of activity with one or any combination of water, carbonated water or natural juice and that the resulting composition could be consumed orally. Said composition may also include one or more ingredients to help make it more appealing to the public.

DESCRIPTION

Due to the wide variety of tobacco users any innovation with a goal of reaching this group will need to incorporate a large degree of flexibility into its formula. The first example of this is in the choice of delivery systems chosen for this concept. Water, carbonated water and natural juice cover the preponderance of consumable liquids currently available to the public, thereby making the availability of nicotine from a source other than tobacco as pleasing as possible.

With the delivery system ascertained the next variable is what is a reasonable quantity of nicotine or alkaloid having the same direction of activity, per serving and the size of that serving. To high a content per serving could result in negative health events and since the focus of this invention is to reduce negative health events all be it of a different nature, the goal is still the same. Also contributing to this variable is the taste of the resulting composition. Nicotine has a taste best compared to eating "pepper", to high a content would result in the public not willing to use this innovation and returning to tobacco use with it increased health risks. Similarly to low a content would not delivery the desired effects which could lead to a return to tobacco products. Therefore the most effective nicotine content level would be one similar normal intake of nicotine from tobacco products with a fluid amount sufficient to mask as much of the nicotine taste as reasonable.

The parameters of this invention are between 0.1% and 0.0001% of a liquid composition is made of nicotine or alkaloid having the same direction of activity. This allows the desired portion to meet the needs of the individual be it a serious desire to quell their need for nicotine or a more casual desire for a product that includes nicotine or nicotine like component. Tobacco users are an enormous and dynamic group and it is the flexibility of this concept as much as any component that will allow it to perform as planed.

What is claimed is:

1. A method of delivering nicotine or an alkaloid to an individual to reduce said individual's use of tobacco products comprising providing a beverage with a nicotine or alkaloid having similar physiological activity, the nicotine or alkaloid content being between 0.0001% and 0.1%.

2. A method of delivering nicotine or an alkaloid to an individual to reduce said individual's use of tobacco products comprising providing for oral delivery a liquid composition which includes between 0.0001% and 0.1% of the nicotine or alkaloid having similar physiological activity.

3. The liquid composition of claim **2** wherein the primary constituent of the beverage is water.

4. The liquid composition of claim **3** wherein the water is carbonated.

5. The liquid composition of claim **2** wherein the primary constituent of the liquid composition is a natural fruit juice.

6. The liquid composition of claim **2** wherein the nicotine or alkaloid is a non-naturally occurring material.

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QT 5, Inc. Establishes Medical & Regulatory Advisory Board

WESTLAKE VILLAGE, Calif.--March 10, 2003--QT 5, Inc. (OTCBB:QTFV) announced today that it has assembled a distinguished group of medical and legal professionals to provide guidance and leadership for the development and introduction of a wide array of new products. CEO, Timothy Owens said, "We are a company that is focused on the pioneering of leading edge lifestyle and healthcare products. Because much of what we are doing has never been done before, we have created this board and staffed it with individuals who are recognized and respected as leaders in their disciplines. Each one of these people has expressed tremendous enthusiasm for the potential of our products as well as a keen awareness of the challenges and opportunities that face us. As is evidenced in the following credentials, we are very fortunate to have them on our team."

DR. LEONARD MAKOWKA, MD. PHD. leads the QT 5 advisory board as Senior Medical Research Advisor. He is a distinguished clinical surgeon, transplantation surgeon and medical researcher and is recognized as one of the World's leading authorities in hepatic science (study relating to the liver). Dr. Makowka has retired from active practice of medicine and is pursuing investment strategies in healthcare and other technology areas. He has successfully served in numerous executive positions. From 1995 to 1997, Dr. Makowka was the Executive Director of the Comprehensive Liver Disease and Treatment Center and Director of the Liver Transplant Program at St. Vincent's Medical Center in Los Angeles, CA. Between 1989 and 1995, Dr. Makowka was the Chairman of the Department of Surgery and the Director of Transplantation Services at Cedars-Sinai Medical Center in Los Angeles, CA. He was also Professor of Surgery at the UCLA School of Medicine. Beginning in 1985, in Canada, until relocating to Los Angeles in 1989, Dr. Makowka trained under Dr. Thomas Starzl, the pioneer of liver transplantation, and was appointed Associated Professor in the Department of Surgery at the University of Pittsburgh. In 1982, Dr. Makowka began his residency at the University of Toronto, where in his final year he was appointed Chief Resident of Surgery. Dr. Makowka has performed hundreds of hepatobiliary and liver transplant procedures. Dr. Makowka received his M.D. degree from the University of Toronto Medical School in 1977, and Master of Science and Doctorate of Philosophy from the University of Toronto's Department of Pathology in 1979 and 1982. Dr. Makowka has published over 400 articles and chapters in both clinical and basic scientific research and continues to lecture worldwide.

DR. HOWARD WILNER, MD has joined the QT 5 Advisory Board as Senior Research Associate. He received his B.A. from Brooklyn College, and his M.D. from New York University School of Medicine. After Post Graduate Training in Internal Medicine, Nephrology, and Clinical Pharmacology and completion of Military Service, Dr. Wilner entered the private practice of medicine. He is Board Certified by the American Board of Internal Medicine as well as the Subspecialty Board of Nephrology. Dr. Wilner has had a distinguished career in medicine as both a Medical Executive and Practicing Physician. After serving as the Clinical Chief of Medicine at Cedars-Sinai Medical Center, he was the Executive Director of the Cedars-Sinai Comprehensive Cancer Center from 1988 through 1997. He remains on the Active Staff of the Hospital and in Private Practice.

DR. LEANDRA EVEN, N.D., A.P.H. will serve as Medical Research Advisor for the Company's Homeopathic products. She has a B.A. from Washington State University and a B.S. from Bastyr University. Her doctorate in naturopathic medicine is from the National College of Naturopathic Medicine, a four-year graduate school specializing in alternative medicine. She is licensed as a primary care physician in the state of Washington and as an Advanced Practitioner of Homeopathy in the state of Nevada. Dr. Even is a member of the Homeopathic Pharmacopoeia Convention of the United States (HPCUS), the American Association of Homeopathic Pharmacists (AAHP), and the Nevada Homeopathic and Integrative Medical Association (NHIMA).
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DR. MARCUS LAUX, ND will serve as a Medical Research Advisor in the areas of Nutritional Science. He will also serve as Senior Associate Medical Research spokesman for the NICOwater product line. He is a leading authority on science-based natural medicines. Dr. Laux is a licensed naturopathic physician with over a decade of private family practice. He received his doctorate from National College of Naturopathic Medicine, Ptd, OR, where he serves as a clinical professor. Dr. Laux is a leading authority on science-based natural medicines, teaching continuing education seminars internationally for medical doctors and pharmacists. He is former Chief Science Officer for Nutrition for Life, Inc., and currently serves on several scientific Advisory Boards including Phytopharmic Enzymatic Therapy, and Unigen Pharmacia.

DAVID L. ROSEN R.PH. J.D. has been retained as Medical Device and Product Compliance Review Counsel. He is a partner in the Health Law Department in McDermott, Will & Emery's Washington, D.C. office practicing primarily in the areas of health law and food and drug regulation. Prior to entering private practice, Mr. Rosen was employed at the F.D.A. for 14 years. While at the F.D.A., Mr. Rosen, who has a pharmacy degree, worked as a consumer safety officer with direct responsibility for evaluation and review of INDs, NDAs and ANDAs. Mr. Rosen earned a bachelor's degree from the School of Pharmacy of the University of Connecticut in 1978. He received his law degree from the Columbus School of Law of Catholic University of America in 1991. He is admitted to practice in Maryland and the District of Columbia.

WILLIAM OWEN will serve as QT 5's Government Contracts Consultant and Lobbyist. Mr. Owen first became involved in Washington lobbying for A&E in 1993 working with a national healthcare physicians' association to amend the Health Care Reform Bill of 1994. Mr. Owen, a former Tennessee State Senator, served a total of 12 years in the Tennessee General Assembly. During these years of public service, he was secretary of the Senate's Transportation Committee, vice chairman of the Education Committee, and vice chairman of the Majority Caucus. He was also an active member of the Southern Legislative Conference's Transportation Committee and the National Conference of State Legislature's Communications and Transportation Committee. Mr. Owen currently serves on the Democratic National Committee and the Tennessee State Democratic Executive Committee. He is vice chairman of the Finance Committee. For the past six years he has co-hosted and produced Democratic TeleVision, a monthly CATV program.

ABOUT QT 5, INC.
QT 5, Inc. (OTCBB:QTFV - News) was formed to be a developer, distributor, and marketer of Bio-Med testing and Nutraceutical Beverage products. QT 5, Inc. is continuing its clinical research and development of future products for lifestyle enhancements. QT 5, Inc. is headquartered in Westlake Village, California. For more information please visit: www.qt-5.com.

ABOUT NICOWATER
NICOWater(TM) is a water based nicotine product to provide "Adult Smokers an

Alternative to Smoking." This product is covered under a U.S. Patent. NICOWater(TM) is not intended for use as a smoking cessation product. The company believes that current labeling and materials are in full compliance with the marketing standards in which it intends to sell.
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FORWARD-LOOKING STATEMENTS
Forward-looking statements in this press release are made pursuant to the safe harbor provisions of Section 21E of the Securities Exchange Act of 1934. Investors are cautioned that statements in this press release that are not strictly historical statements, including, without limitation, management's plans and objectives for future operations, and management's assessment of market factors, constitute forward-looking statements which involve risks and uncertainties. These risks and uncertainties include, without limitation, regulatory risks, the lack of acceptance of the Company's products by its customers and prospects, the inability to secure the necessary product sales and the inability to obtain necessary substantial additional capital to manufacture and market its product and otherwise implement its business plan and other risks detailed in QT 5's filings with the Securities and Exchange Commission, copies of which may be accessed through the SEC's Web site at www.sec.gov. In each case, actual results may differ materially from such forward-looking statements. QT 5 does not undertake to publicly update or revise its forward-looking statements, even if experience or future changes make it clear that any projected results (expressed or modified) will not be realized.

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