

Integrating Technology and Nature

SmartScience
LABORATORIES, INC.
2327 Destiny Way
Odessa FL 33556
727-375-5911
fax: 727-375-9062
www.jointflex.com

February 17, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RECEIVED
FEB 17 10 20 AM '03
MAR -6 P1:49
BY:

RE: Label Claims/Disclaimers

SmartScience Reference No. FF-025

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

FireFighter™

DIETARY INGREDIENTS

Orange (Citrus Sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene

STATEMENTS

The statement listed below will be preceded by a qualifying statement as to the product's use such as: 1) for the prevention of meal induced heartburn, or 2) for effective relief of discrete, episodic, occasional symptoms of heartburn, or 3) to relieve heartburn symptoms and for relief of acid indigestion and sour stomach, or 4) for relief of occasional heartburn, acid indigestion and upset stomach, or 5) provides relief from occasional heartburn and acid indigestion.

For relief of occasional heartburn and acid indigestion.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 17 Feb 03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

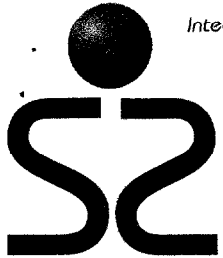
Sincerely,

Gene C. Weitz, President & CEO

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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-022

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

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Orange oil is non-acidic, safe and is well tolerated when taken orally.

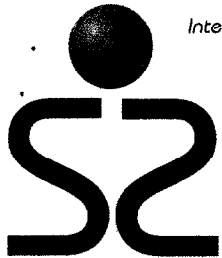
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 17 Feb 03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-021

Dear Sir/Madam:

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All Natural Alternative to Conventional Occasional Heartburn Remedies.

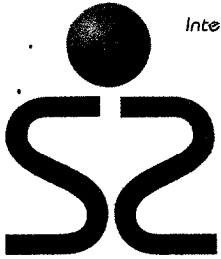
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Pamela S. Lombardi, QA Manager

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Sincerely,

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President & CEO



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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-005

Dear Sir/Madam:

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All natural, patent-pending ingredient provides lasting relief from occasional heartburn.

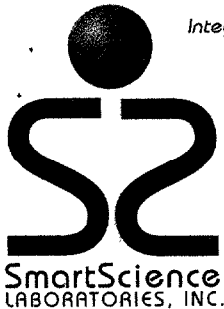
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Gene C. Wertz, President & CEO



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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-003

Dear Sir/Madam:

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DIETARY INGREDIENTS

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Dietary Supplement to relieve occasional heartburn, acid indigestion, & upset stomach.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 17Feb03
Pamela S. Lombardi, QA Manager

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Sincerely,

Gene C. Weitz, President & CEO



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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-002

Dear Sir/Madam:

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PRODUCT NAME

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DIETARY INGREDIENTS

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STATEMENTS

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In a laboratory study, researchers found that orange peel extract exerts a spasmo-genic activity and the spasmogenic activity was associated with the levels of d-limonene in the extract.

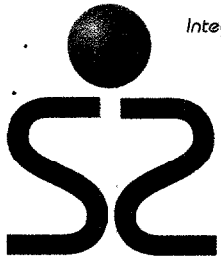
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By: Pamela S. Lombardi 17Feb03
Pamela S. Lombardi, QA Manager

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Sincerely,

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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-004

Dear Sir/Madam:

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Will not reduce mineral absorption or inhibit protein digestion.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 18 Feb 03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO

FEB 21 2003
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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-012

Dear Sir/Madam:

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Does not neutralize stomach acids or stop their production.

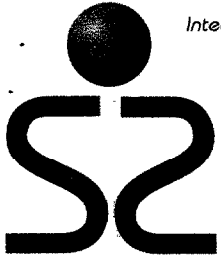
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-013

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Its all natural, patented ingredient provides lasting relief, plus it does not adversely affect your normal digestive process.

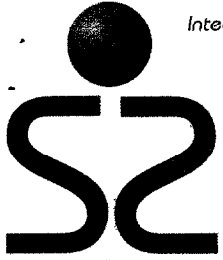
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

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Pamela S. Lombardi, QA Manager

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RE: Label Claims/Disclaimers

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Provides effective relief from occasional heartburn while allowing your body to digest food normally and absorb the nutrients nature intended.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 18 Feb 03
Pamela S. Lombardi, QA Manager

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Sincerely,

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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-015

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Provides relief from occasional heartburn while not interfering with normal digestion.

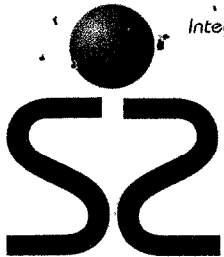
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By: Pamela S. Lombardi 18 Feb 03
Pamela S. Lombardi, QA Manager

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Sincerely,

Gene C. Weitz, President & CEO

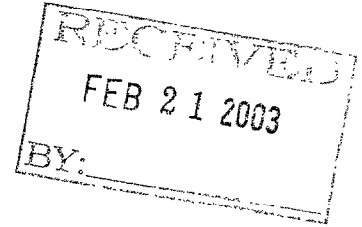


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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-017

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Provides sustained relief from occasional heartburn and acid indigestion for up to six months.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 19 Feb 03
Pamela S. Lombardi, QA Manager

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Sincerely,

Gene C. Weitz, President & CEO

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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-001

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10 pills, 20 days for effective relief of occasional heartburn and relief that lasts for up to six months.

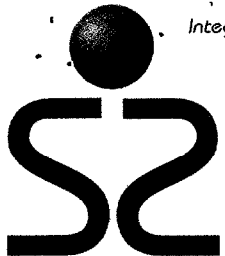
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RE: Label Claims/Disclaimer

SmartScience Reference No. FF-018

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Provides effective relief of occasional heartburn and acid indigestion and relief lasts up to six months.

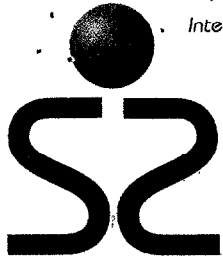
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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-016

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This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

FireFighter™

DIETARY INGREDIENTS

Orange (Citrus Sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene

STATEMENTS

The statement listed below will be preceded by a qualifying statement as to the product's use such as: 1) for the prevention of meal induced heartburn, or 2) for effective relief of discrete, episodic, occasional symptoms of heartburn, or 3) to relieve heartburn symptoms and for relief of acid indigestion and sour stomach, or 4) for relief of occasional heartburn, acid indigestion and upset stomach, or 5) provides relief from occasional heartburn and acid indigestion.

Provides lasting relief from occasional heartburn and acid indigestion for up to six months.

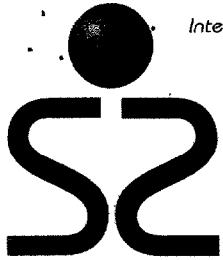
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 19 Feb 03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



Integrating Technology and Nature

SmartScience
LABORATORIES, INC.
2327 Destiny Way
Odessa FL 33556
727-375-5911
fax: 727-375-9062
www.jointfflex.com

February 19, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE: Label Claims/Disclaimers

SmartScience Reference No. FF-023

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

FireFighter™

DIETARY INGREDIENTS

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STATEMENTS

The statement listed below will be preceded by a qualifying statement as to the product's use such as: 1) for the prevention of meal induced heartburn, or 2) for effective relief of discrete, episodic, occasional symptoms of heartburn, or 3) to relieve heartburn symptoms and for relief of acid indigestion and sour stomach, or 4) for relief of occasional heartburn, acid indigestion and upset stomach, or 5) provides relief from occasional heartburn and acid indigestion.

Provides lasting relief.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 19Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



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February 20, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE: Label Claims/Disclaimers

SmartScience Reference No. FF-011

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

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DIETARY INGREDIENTS

Orange (Citrus Sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene

STATEMENTS

The statement listed below will be preceded by a qualifying statement as to the product's use such as: 1) for the prevention of meal induced heartburn, or 2) for effective relief of discrete, episodic, occasional symptoms of heartburn, or 3) to relieve heartburn symptoms and for relief of acid indigestion and sour stomach, or 4) for relief of occasional heartburn, acid indigestion and upset stomach, or 5) provides relief from occasional heartburn and acid indigestion.

Does not interfere with normal digestion.

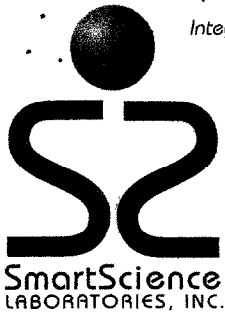
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 20Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



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February 20, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-006

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

FireFighter™

DIETARY INGREDIENTS

Orange (Citrus Sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene

STATEMENTS

The statement listed below will be preceded by a qualifying statement as to the product's use such as: 1) for the prevention of meal induced heartburn, or 2) for effective relief of discrete, episodic, occasional symptoms of heartburn, or 3) to relieve heartburn symptoms and for relief of acid indigestion and sour stomach, or 4) for relief of occasional heartburn, acid indigestion and upset stomach, or 5) provides relief from occasional heartburn and acid indigestion.

Does not interfere with protein digestion or mineral absorption.

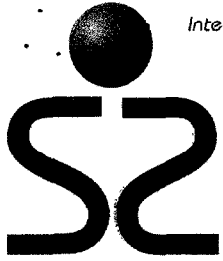
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 20 Feb 03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weisz, President & CEO



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February 20, 2003

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Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-010

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

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PRODUCT NAME

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DIETARY INGREDIENTS

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STATEMENTS

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Reduces the surface tension of the liquid contents in the stomach, decreasing the potential for the highly acidic stomach fluid to splash up into the esophagus.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 20Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



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February 20, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-009

Dear Sir/Madam:

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PRODUCT NAME

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DIETARY INGREDIENTS

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Supports healthy peristalsis, moving food through the stomach effectively and efficiently.

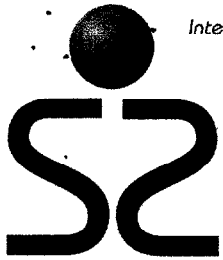
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 20 Feb 03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



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February 20, 2003

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RE: Label Claims/Disclaimer

SmartScience Reference No. FF-008

Dear Sir/Madam:

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Does not disrupt stomach acids allowing proper digestion.

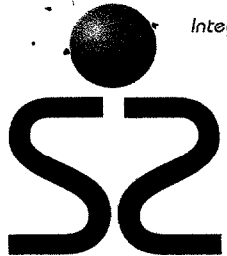
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 20Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



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February 20, 2003

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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-007

Dear Sir/Madam:

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STATEMENTS

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Does not shut down acid production nor adversely affect acid-producing cells.

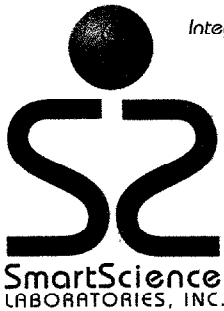
I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 20Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO

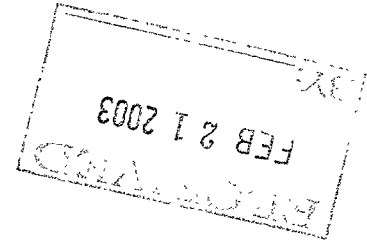


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February 21, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835



RE: Label Claims/Disclaimers

SmartScience Reference No. FF-026

Dear Sir/Madam:

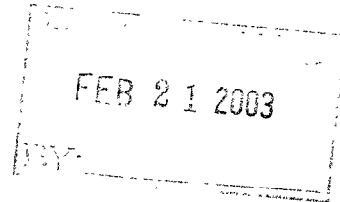
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COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

FireFighter™



DIETARY INGREDIENTS

Orange (Citrus Sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene

STATEMENTS

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Maximum relief of occasional heartburn is obtained by taking one softgel capsule every other day for 20 days until all 10 capsules are taken.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 21Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO

83471



Integrating Technology and Nature

SmartScience
LABORATORIES, INC.
2327 Destiny Way
Odessa FL 33556
727-375-5911
fax: 727-375-9062
www.jointflex.com

February 21, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE: Label Claims/Disclaimers

SmartScience Reference No. FF-019

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

FireFighter™

DIETARY INGREDIENTS

Orange (Citrus Sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene

STATEMENTS

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Effectiveness improves over time.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 21Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



Integrating Technology and Nature

February 21, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

RE: Label Claims/Disclaimers

SmartScience Reference No. FF-020

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

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PRODUCT NAME

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DIETARY INGREDIENTS

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Prevents the onset of occasional heartburn for up to six months.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi - 21Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO



Integrating Technology and Nature

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February 21, 2003

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
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RE: Label Claims/Disclaimers

SmartScience Reference No. FF-024

Dear Sir/Madam:

This letter is to notify you that SmartScience Laboratories, Inc., at 2327 Destiny Way, Odessa, Florida 33556 is a manufacturer and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

COMPANY

SmartScience Laboratories, Inc.

PRODUCT NAME

FireFighter™

DIETARY INGREDIENTS

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STATEMENTS

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Relief lasts up to six months.

I certify that the information contained in this notice is complete and accurate and that SmartScience Laboratories, Inc. has substantiation that the statements are truthful and not misleading.

By: Pamela S. Lombardi 21Feb03
Pamela S. Lombardi, QA Manager

If you have any questions, please contact me at 727-375-5911 x204.

Sincerely,

Gene C. Weitz, President & CEO