U.S. Food & Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
www.fda.gov

October 12, 2018

NOT SUBSTANTIALLY EQUIVALENT

Joseph Anderson d/b/a Smokin Joes
ATTENTION: Marc Scheineson, Esq.
Alston & Bird, LLP
950 F Street, N.W.
Washington, D.C. 20004

FDA Submission Tracking Number (STN): MULTIPLE STNs, SEE APPENDIX A

Dear Mr. Scheineson:

The Food and Drug Administration (FDA) completed review of your Reports Preceding Introduction of Certain Substantially Equivalent Products into Interstate Commerce (SE Reports), submitted under section 905(j) of the Federal Food, Drug, and Cosmetic Act (FD&C Act), for the tobacco products specified in Appendix A.

Based on our review of your SE Reports, we find the new tobacco products are not substantially equivalent to the corresponding eligible predicate tobacco products specified in Appendix A.

We have described below our basis for this determination.

1. All of your SE Reports provide information about the tobacco and ingredients added to the tobacco in the new and predicate products, but limited information on the grades was provided. The information provided for the tobacco did not include sufficient detail to fully identify the composition of the new and predicate products. For example, we are unable to understand the meaning of the tobacco grades: (b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4) blend. Furthermore, (b) (4) is listed twice for the (b) (4)(b) (4)(b) (4) tobacco for the new product. It is not clear why one grade is listed twice within the same type of tobacco. We needed additional information that uniquely identifies the tobacco used in the new and predicate products to understand the composition of the tobacco and other ingredients used in the new and predicate products. You did not provide a detailed list uniquely identifying information for all non-tobacco ingredients (e.g., CAS #, grade/purity, function) and for all tobacco (e.g., tobacco grading system) needed to fully characterize the new and predicate products. If composition differences exist between the new and predicate products, you would also need to provide a rationale for each difference with evidence and a scientific discussion for why the differences do not cause the new product to raise different questions of public health.

2. All of your SE Reports list mainstream smoke yields of TNCO and three HPHCs (acetaldehyde, benzene and B[a]P) under ISO and CI smoking regimens. However, there are discrepancies between the data sets in the GLS Report and Exhibit A of your July 10, 2017 amendment. For example, in the GLS report, the nicotine level in mainstream smoke under the ISO and CI regimen is different than what is reported in Exhibit A. Explain the data discrepancies in your amendment and identify the correct data sets for FDA to determine whether the differences in HPHC yields do not cause the new products to raise different questions of public health.

3. All of your SE Reports contain some quantities of ingredients that require additional explanation. For example, the values of (b) (4)(b) (4)(b) (4)(b) (4)(b) (4) in seam adhesive are reported as (b) (4) mg/cigarette and (b) (4) mg/cigarette for the new and predicate products, respectively, and the quantities of (b) (4)(b) (4)(b) (4)(b) (4) (b) (4) in tipping adhesive are (b) (4) mg/cigarette for the new product. In addition, some quantities of ingredients are presented as shaded cells in the Excel sheets. The significance of the shaded cells is not evident. You needed to provide justification for reporting range quantities for these ingredients as well as the significance of the shaded cells.

4. All of your SE Reports provide (b) (4)(b) (4) information in the ingredient list of (b) (4) (b) (4) concentrate in the Excel spreadsheets in the amendment dated March 26, 2015; however, the ingredient appears twice with two different concentrations in the same list. You needed to explain the purpose of listing the ingredient twice and identify the correct concentration.

5. All of your SE Reports compared the HPHC data of the "present day predicate" to that of the new product. You state that the "present day predicate" was constructed with the same materials and components as all of the Smokin Joes products marketed on February 15, 2007. However, you did not submit documentation demonstrating that the remanufactured predicate product at present day reflects the grandfathered predicate product at the time of the original manufacture including a side by side comparison of the ingredients, tobacco blends, and product design parameters. You needed to confirm whether there are any differences between the "present day predicate" and grandfathered predicate product. If differences exist in the product composition and design parameters between the "present day predicate" and grandfathered predicate products, you would need to provide detailed information of the differences for FDA to determine whether the "present day predicate" are reflective of the grandfathered predicate product. For example, if there is a difference in tobacco grade, provide information on the tobacco grades and grading system.

6. All of your SE Reports include data comparing the quantities of HPHCs in the new and remanufactured predicate products. However, your SE Report lacks detailed information of methods (b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4), which is necessary to fully evaluate the data. You needed to provide the following information about the HPHC testing so that we can fully evaluate the HPHC data:

    a. Reference product datasets (e.g., 1R6F)
    b. Quantitative test protocols and method used
    c. A summary of the results for all testing performed

7. All of your SE Reports list ingredient quantities as percentages for casings, top flavors, plug wraps, cold glue, hot melt, printing materials, and blue monogram ink but do not specify the original units of the numerator and denominator, or define the denominator (e.g., per cigarette, per gram). In order for FDA to fully understand the composition of the new and predicate products and make a determination of substantial equivalence, you needed to provide ingredient quantities as mass per unit of use (e.g., mg/cigarette).

8. All of your SE Reports provide information on the design parameters for the new and predicate products. However, your SE Report does not include all of the design parameters needed to fully characterize the new and predicate products. In order to adequately characterize the products, key design parameters need to be compared. Therefore, you needed to provide the

actual (not approximate) target specification and upper and lower range limits for *all* of the following cigarette design parameters for the new and predicate products, as indicated:

a. Tobacco moisture (%)
b. Filter pressure drop (mm H_20)
c. Filter ventilation (%)
d. Cigarette draw resistance (mm H_2O)
e. Filter denier per filament (DPF)
f. Filter total denier (g/9000 m)
g. Filter length (mm) [target specification for new product of SE0002988 only and range limits for all the new and predicate products]

In addition, you needed to provide the upper and lower range limits for *all* of the following cigarette design parameters for the new and predicate products, as indicated:

h. Cigarette paper band porosity (CU) [new product only]
i. Cigarette diameter (mm) [predicate product only]

For each of the above parameters, you needed to provide the necessary data on a per unit of product basis (e.g., filter length should be reported in mm per cigarette). If a design parameter is not applicable (e.g., band porosity if the cigarette paper does not contain bands), you needed to state as such and provide a scientific rationale.

If a difference exists between the new and predicate products, you would need to provide a rationale for each difference in the target specification and range limits with evidence and a scientific discussion for why the difference does not cause the new product to raise different questions of public health.

9. All of your SE Reports include design parameter specifications but do not include data confirming that specifications are met. You needed to provide the test data (i.e., measured values of design parameters), including test protocols, quantitative acceptance criteria, data sets, and a summary of the results for *all* of the following cigarette design parameters for the new and predicate product unless otherwise indicated:

a. Puff count
b. Cigarette draw resistance (mm H_2O)
c. Tobacco filler mass (mg)
d. Tobacco moisture (%)
e. Cigarette paper base paper basis weight (g/m^2)
f. Cigarette paper base paper porosity (CU)
g. Cigarette paper band porosity (CU)
h. Denier per filament (DPF)
i. Total denier (g/9000 m)
j. Filter ventilation (%)
k. Filter density (g/cm^3)
l. Filter pressure drop (mm H_2O)

For each of the above parameters, you needed to provide the data on a per unit of product basis (e.g., filter pressure drop should be reported in mm per cigarette). If a design parameter is not

applicable (e.g., band porosity if the cigarette paper does not contain bands), you needed to state as such and provide a scientific rationale.

Certificates of analysis from the material supplier may have satisfied this issue. If you chose to address this issue by providing certificates of analysis for any of the parameters listed above, the certificates of analysis needed to include a target specification; quantitative acceptance criteria; parameter units; test data average value; and either the standard deviation of the test data or the minimum and maximum values of the test data. Additionally, for the design parameters listed above that were tested according to national or international standards, you needed to identify the standards and state what deviations, if any, from the standards occurred.

10. SE0002985, SE0002986, SE0002988, SE0002990, SE0002991, and SE0002993 – SE0002997 indicate that you may employ the use of multiple materials for cigarette paper for material supply security. However, it is unclear whether you use multiple materials for cigarette base paper, filter tow, plug wrap, tipping paper, inks, and seam adhesives for the new and predicate products, based on the material ingredients information provided in your SE Report. You needed to clarify the materials for which multiple interchangeable materials are used in the new and predicate products. In accordance with section 910(a)(1)(B) of the FD&C Act, each product modification, including use of an alternate material, constitutes a new tobacco product. A material is an alternate material if, for example, it has any difference in composition (e.g., ingredients, additives, and biological organisms). Each identified new and predicate product must consist of a single combination of cigarette base paper, filter tow, plug wrap, tipping paper, inks, and seam adhesive materials. Based on the components which you confirm employ the use of multiple interchangeable materials, you needed to identify the following:

    a. Every unique material combination in the predicate product that you are comparing to the new product.
    b. Every unique material combination in the new tobacco product. Each specific combination of materials will be considered a single new tobacco product and evaluated individually.

    You needed to provide the list of ingredients and ingredient quantities for each identified material in each new and predicate product. Additionally, you needed to provide the target specifications and upper and lower range limits for *all* of the following design parameters for each material in the new and predicate products:

    c. Cigarette base paper basis weight
    d. Cigarette base paper porosity
    e. Cigarette draw resistance

    You also needed to provide the test data (i.e., measured values of design parameters), including test protocols, quantitative acceptance criteria, data sets, and a summary of the results for *all* of the following design parameters for each material in the new and predicate products:

    f. Cigarette base paper basis weight
    g. Cigarette base paper porosity
    h. Cigarette draw resistance

    Certificates of analysis from the material supplier may have satisfied this issue. If you chose to address this issue by providing certificate of analysis for any of the parameters listed above, the

certificate of analysis needed to include target specification; quantitative acceptance criteria; parameter units; test data average value; and either the standard deviation of the test data or the minimum and maximum values of the test data.

Refer to the Preliminary Finding letter issued by FDA on March 5, 2018, which provided instructions/options on some approaches that could be used to address this issue.

11. SE0002985, SE0002986, SE0002988, SE0002990, SE0002991, and SE0002993 – SE0002997 provide contradictory design parameter information between the original submission and the corresponding Excel spreadsheet of the March 26, 2015 amendment regarding the overall cigarette length, overall cigarette diameter, and filter length. This prevents the complete product characterization of the design parameters. You needed to clearly state the correct target specification for the overall cigarette length, overall cigarette diameter, and filter length.

12. SE0002985, SE0002986, SE0002988, SE0002990, SE0002991, and SE0002993 – SE0002997 provide inconsistent information regarding the new and predicate product cigarette paper base paper porosity. In the original submissions, you use "g" as the unit of measure for the cigarette paper base paper porosity. This is not a recognized porosity unit of measure. You needed to report the cigarette paper base paper porosity using the porosity unit of measure of CORESTA Units (CU).

13. SE0002985, SE0002986, SE0002988, SE0002990, SE0002991, and SE0002993 – SE0002997 provide the new product "Band Porosity (CU)/Band Diffusion (cm/s)" target specifications in the March 26, 2015 amendment using "cm/s" as the unit of measure. Based on the data label, this implies that you reported the cigarette paper band diffusion. Diffusivity and porosity are not interchangeable. Furthermore, you provided the new product cigarette paper band porosity using "g" as the unit of measure. This is not a recognized porosity unit of measure. You needed to report the correct cigarette paper band porosity using the unit of measure of CORESTA Units (CU).

14. SE0002985, SE0002986, SE0002988, SE0002990, SE0002991, and SE0002993 – SE0002997 provides the filter ventilation target specifications in the original submission as <1%. This is not an exact value and prevents the complete characterization of the new and predicate products. Furthermore, in the March 26, 2015 amendment, you report the "Tip Ventilation Rate" for the new and predicate products. It is unclear if "Tip Ventilation Rate" is intended to represent filter ventilation. You needed to clarify the use of "Tip Ventilation Rate" and, if it is intended to represent filter ventilation, and provide the exact target specifications for filter ventilation for the new and predicate products.

15. SE0002985, SE0002986, SE0002988, SE0002990, SE0002991, and SE0002993 – SE0002997 include different tipping paper length values in your March 26, 2015 amendment than, those in the original SE Report. It is unclear if the values reported in the original submission or the values reported in the amendment are the correct tipping paper lengths. Additionally, if you intended to report the tipping paper "width" as the "length" in the March 26, 2015 amendment, there are discrepancies between the tipping paper length target values provided in the March 26, 2015 amendment and the original submission for the predicate product. You needed to provide the tipping paper length target specifications for the new and predicate products.

16. All of your SE Reports include information on the tobacco filler mass and tobacco rod density of the new and predicate products. However, you did not adequately characterize either design

parameter. For the tobacco filler mass of the new product and the tobacco rod density of the predicate product, you state that the data provided is "based on data from scientific consultant's physical analysis of samples of the product." Thus, the target specifications and upper and lower range limits provided reflect a sample of the actual manufacturing outcome, rather than the target and range limits of the manufacturing process. Furthermore, the reported predicate product filler mass target specifications are approximations. An exact target specification is needed in order to accurately compare the new and predicate products and determine if the new product raises different questions of public health. You needed to provide the exact target specification and upper and lower range limits for the tobacco filler mass (mg) and tobacco rod density (g/cm^3) for the new and predicate products.

17. All of your SE Reports contain incomplete band spacing and band width information for the new product. You provide a data label which lists both design parameters; however, only one target specification and one set of upper and lower range limits is provided. It is unclear which design parameter is associated with the data. You needed to identify the target specification and upper and lower range limits for both the band spacing and band width of the new product.

18. All of your SE Reports contain inconsistent information regarding the filter design parameters. You provide denier information for the new and predicate products (labeled as "Total Denier / Denier per Filament") indicating that the total denier is (b) (4), and the denier per filament is (b) (4). Because total denier is the mass of 9000 m of tow, this value is typically in the thousands. It is unclear which values are the correct denier values. You needed to clarify the discrepancy and provide the target specification and upper and lower range limits for the new and predicate products for total denier and total denier per filament.

19. All of your SE Reports include information for the filter density of the new and predicate products. However, the upper and lower range limits for the predicate products require additional clarification as the lower range limit could not be a negative value. In addition, your March 10, 2017 Amendment states that Exhibit B- 2 provides a (b) (4)(b) (4) tow certificate of analyses but this exhibit lacks filter density information. You needed to confirm the predicate product target specifications and upper and lower range limits and report the correct value as needed, as the lower range limit cannot result in a negative value. Additionally, if a difference exists between the new and predicate product target specifications or upper and lower range limits you needed to provide justification for the difference and a scientific rationale for why the difference does not cause the new product to raise different questions of public health.

20. SE0002987, SE000298, and SE0002997 indicate that there are differences in numerous filter design parameter specifications. Some of these differences have the potential to cause the new product to raise different questions of public health, while others do not. The combination of the differences in the filter design parameters (i.e., filter denier per filament, filter density, filter pressure drop, filter length) may impact smoke constituent yields of the new product. Therefore, you needed to provide scientific evidence and rationale to demonstrate that the combination of differences to the filter design parameters do not cause the new product to raise different questions of public health. Specifically, the following differences were noted which an explication is needed to why these differences do not cause the new product to raise different questions of public health:

    a. SE0002987, SE0002988, and SE0002997: the filter pressure drop of the new product decreased 11% which also exhibit CO and nicotine levels increases. Also for SE0002988, the tar level is higher in the new product.

b. SE0002987 and SE0002997: the filter length of the new product decreased by 20% in the new products which also exhibit CO and nicotine increases.
c. SE0002987 and SE0002997: the filter pressure drop and filter length decreased in the new products which also exhibit CO and nicotine increases.

21. All of your SE Reports provide average values for puff count for the new and predicate products, but do not provide test protocols or data sets for the new and predicate products for puff count. You needed to provide complete test data in order to fully characterize the new and predicate products. Additionally, you needed to provide the test protocol and data sets for puff count for the new and predicate products and scientific evidence and rationale for why any differences in the puff count does not cause the new product to raise different questions of public health.

22. SE0002985, SE0002986, SE0002987, SE0002988, SE0002990, SE0002991, and SE0002997 indicate apparent increases in the following HPHCs:

- SE0002985 and SE0002986: CO (ISO: 15%) and B[a]P (ISO: 30%; CI: 23%)
- SE0002987 and SE0002988: CO (ISO: 20%; CI: 42%), acetaldehyde (CI: 32%), benzene (CI: 30%), and B[a]P (ISO: 49%; CI: 32%)
- SE0002990 and SE0002991: B[a]P (CI: 14%)
- SE0002997: CO (ISO: 27%), benzene (CI: 10%) and B[a]P (ISO: 53%; CI: 27%)

These apparent increases in HPHC levels may reflect the overall consequences of the differences in characteristics between the new and predicate products, such as changes in tobacco blends, cigarette papers, adhesives, and flavor ingredients. These apparent increases in smoke yields of these HPHCs in the new product as compared to the predicate product could result in increased HPHC exposures for users of the new product. The apparent increased HPHCs include carcinogens (B[a]P), cardiovascular toxicants (CO), and reproductive and developmental toxicants (CO). You needed to provide scientific evidence that the increase in these HPHCs do not cause the new product to raise different questions of public health.

23. All of your SE Reports identify a number of ingredients such as (b) (4)(b) (4)(b) (4)(b) (4) (b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4)(b) (4) among others that are added or increased in the new product as compared to the predicate product. Some of these ingredients have been associated with adverse respiratory tract effects following inhalation exposures, consumers may be exposed to these ingredients through inhalation. The justifications by (b) (4) have been considered but found inadequately supported by the information provided. For example, no specific discussion is provided to explain the relevance and applicability of the information in the referenced studies to the specific differences in characteristics between the new and predicate products. In addition, tobacco products do not meet the definition of food provided in 21 U.S.C. 201(f), the Federal Food, Drugs and Cosmetic Act and GRAS information is based on oral exposure data, whereas exposure to cigarette smoke is through inhalation. Further, the referenced studies usually tested a battery of constituents in combination rather than testing each component independently, and these combinations were not the same as the combinations used in the new and predicate products in the SE Reports. You needed to provide scientific evidence to explain why the additions or increases of these ingredients do not cause the new products to raise different questions of public health.

You did not provide sufficient information to support a finding of substantial equivalence; therefore, we are issuing an order finding that these new tobacco products are not substantially equivalent to an appropriate predicate tobacco product. Upon issuance of this order, your tobacco products are

misbranded under section 903(a)(6) of the FD&C Act and adulterated under section 902(6)(A) of the FD&C Act. Failure to comply with the FD&C Act may result in FDA taking regulatory action without further notice. These actions may include, but are not limited to, civil money penalties, seizure, and/or injunction.

Additionally, FDA requests that within 15 days of this letter you submit a plan detailing the steps you plan to take to ensure that these misbranded and adulterated products are not further distributed, imported, sold, marketed, or promoted in the United States by others. Your plan should include information sufficient to distinguish these misbranded and adulterated products from legally marketed tobacco products, including, but not limited to lot numbers, manufacturing codes, and manufacturing dates. The plan should also include a list of your direct accounts, and contain their contact information. Submit your plan to the address below with a cover letter that includes the following text in the subject line:

> COMPLIANCE PLAN for SE0002985, SE0002986, SE0002987, SE0002988, SE0002990, SE0002991, SE0002993, SE0002994, SE0002995, SE0002996, SE0002997.

FDA will post product identifying information on a list of tobacco products that are adulterated and misbranded due to an NSE order, available to the public at https://www.fda.gov/TobaccoProducts/Labeling/TobaccoProductReviewEvaluation/ucm371765.htm.

We remind you that you are required to update your listing information in June and December of each year under section 905(i)(3) of the FD&C Act. As part of this listing update, under section 905(i)(3)(B) of the FD&C Act, you must provide information on the date of discontinuance and product identity for any product you discontinue.

If you wish to request supervisory review of this decision under 21 CFR 10.75, please submit the request via the CTP Portal (http://www.fda.gov/TobaccoProducts/GuidanceComplianceRegulatoryInformation/Manufacturing/ucm515047.htm)[1] using eSubmitter (http://www.fda.gov/ForIndustry/FDAeSubmitter), or mail it to:

> Food and Drug Administration
> Center for Tobacco Products
> Document Control Center (DCC)
> Building 71, Room G335
> 10903 New Hampshire Avenue
> Silver Spring, MD 20993-0002

The CTP Portal and FDA Electronic Submission Gateway (ESG) are generally available 24 hours a day, seven days a week; if the upload is successful, submissions are considered received by DCC on the day of upload. Submissions delivered to DCC by courier or physical mail will be considered timely if received during delivery hours on or before the due date (see http://www.fda.gov/tobaccoproducts/aboutctp/contactus/default.htm); if the due date falls on a weekend or holiday the delivery must be received on or before the preceding business day. We are unable to accept regulatory submissions by e-mail.

We ask that your request be sent as a single submission with a cover letter that includes the following text in your subject line: **REQUEST FOR SUPERVISORY REVIEW for SE0002985, SE0002986, SE0002987, SE0002988, SE0002990, SE0002991, SE0002993, SE0002994, SE0002995, SE0002996, SE0002997.** In

[1] The FDA's Electronic Submission Gateway (ESG) is still available as an alternative to the CTP Portal.

addition, we ask you to identify each basis for the request and include all information on which you wish your request to be based; it may not contain any new data or analysis that was not part of your SE Report.

To legally market the new products described in this application, they must comply with the requirements in section 910(a)(2)(A) of the FD&C Act.

See the following website for additional information on these three pathways: https://www.fda.gov/TobaccoProducts/Labeling/TobaccoProductReviewEvaluation/default.htm.

If you have any questions, please contact Jaime Golwalla, Regulatory Health Project Manager, at (301) 796 - 2878 or Jaime.Golwalla@fda.hhs.gov.

Sincerely,

Digitally signed by Matthew R. Holman -S
Date: 2018.10.12 09:59:13 -04'00'

Matthew R. Holman, Ph.D.
Director
Office of Science
Center for Tobacco Products

Appendix A

List of new tobacco products that FDA has determined are not substantially equivalent when compared to its predicate tobacco product.

Common Attributes of SE Reports	
Date of Submission:	March 21, 2011
Date of Receipt:	March 22, 2011
Product Manufacturer:	Joseph Anderson d/b/a Smokin Joes
Product Category:	Cigarettes
Product Sub-Category:	Combusted, Filtered
New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002985
Product Name:[2]	Smokin Joes Blue 100 Size Box Fire Safe
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Ultra Light 100's Box
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	99 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

[2] Brand/sub-brand or other commercial name used in commercial distribution.

[3] The applicant submitted the circumference which allowed for a calculation of diameter.

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002986
Product Name:[2]	Smokin Joes Blue 100 Size Soft Pack Fire Safe
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Ultra Light 100's Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	Not provided
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002987
Product Name:[2]	Smokin Joes Blue King Size Box Fire Safe
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	84 mm
Diameter:[3]	7.8 mm
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Ultra Light King Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	84 mm
Diameter:[3]	8.23 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002988
Product Name:[2]	Smokin Joes Blue King Size Soft Pack Fire Safe
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	84 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Ultra Light King Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	84 mm
Diameter:[3]	8.23 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002990
Product Name:[2]	Smokin Joes Gold 100 Size Box Fire Safe
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Light 100's Box
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	99 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002991
Product Name:[2]	Smokin Joes Gold 100 Size Soft Pack Fire Safe
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Light 100's Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	None
Length:	99 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002993
Product Name:[2]	Smokin Joes Menthol 100 Size Box Fire Safe
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Menthol 100's Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002994
Product Name:[2]	Smokin Joes Menthol 100 Size Soft Pack Fire Safe
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Menthol 100's Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002995
Product Name:[2]	Smokin Joes Menthol Gold 100 Size Box Fire Safe
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Menthol Light 100's Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002996
Product Name:[2]	Smokin Joes Menthol Gold 100 Size Soft Pack Fire Safe
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Menthol Light 100's Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	99 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered

New Tobacco Product Specific Attributes	
Submission Tracking Number:	SE0002997
Product Name:[2]	Smokin Joes Menthol Gold King Size Box Fire Safe
Package Type:	Box
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	84 mm
Diameter:	Not provided
Ventilation:	Not provided
Predicate Tobacco Product Specific Attributes	
Product Name:[2]	Smokin Joes Menthol Light King Soft Pack
Package Type:	Soft Pack
Package Quantity:	20 cigarettes
Characterizing Flavor:	Menthol
Length:	84 mm
Diameter:[3]	7.91 mm
Ventilation:	Not provided
Eligibility Status:	Grandfathered