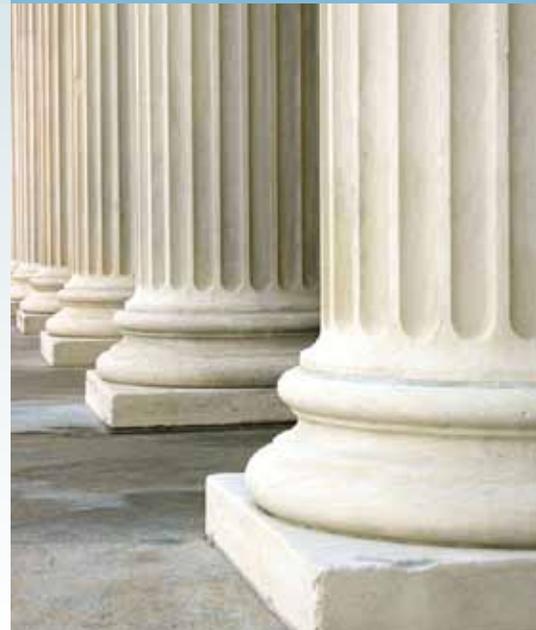




Legal Update



New Publications from the Tobacco Control Legal Consortium

We're pleased to announce several new law and policy-related publications for the tobacco control and public health communities. Two of these publications are described below, several others are described later in this newsletter, and all of them are available on the Public Health Law Center's website at www.publichealthlawcenter.org.

Regulating Tobacco Products Based on Pack Size

Although the Food and Drug Administration requires that cigarettes be sold in packs of at least twenty, non-cigarette tobacco products are not included in this regulation, leaving products such as cigars, snuff, chew, and dissolvables to be sold at cheaper and more tempting prices. The results are predictable; while cigarette use is generally going down, the use of other tobacco products remains high. The Tobacco Control Legal Consortium's new publication, [Regulating Tobacco Products Based on Pack Size](#), describes policy options that states or localities could consider to place restrictions on the sale of tobacco products that do not meet minimum pack size requirements. It also describes possible policy benefits and elements (such as taxation and minimum price restrictions), and includes examples of sales regulations and legislation, as well as additional background resources.

» [Read Regulating Tobacco Products Based on Pack Size.](#)

Raising the Minimum Legal Sale Age for Tobacco and Related Products

The Consortium's second new publication provides information for state and local policymakers, advocates, and others who are considering raising

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the minimum legal sale age for tobacco and related products as a tobacco control strategy. All U.S. states have laws prohibiting retailers from selling tobacco products to minors. In most states, the minimum legal sale age for tobacco products is eighteen, but a few states and counties have raised it to nineteen, and recently a number of state legislatures have considered bills that would raise the minimum legal sales age to twenty-one. [Raising the Minimum Legal Sale Age for Tobacco and Related Products](#) describes the benefits of this approach, explores policy considerations, such as the need to understand the larger state or local landscape, discusses possible legal challenges, and includes select legislation, policies, and helpful resources.

» [Read *Raising the Minimum Legal Sale Age for Tobacco and Related Products*.](#)

As always, we hope you find our publications a useful and informative resource in your work as a tobacco control and public health professional. We also welcome any feedback you may have about our publications and your suggestions on other tobacco and public health law-related topics you would like us to address.

» [Browse our other publications and resources on issues ranging from smoking regulation to tobacco sales practices.](#)

Consortium Launches New FDA Tobacco Project

The Tobacco Control Legal Consortium is pleased to announce the launch of a new initiative to mobilize members of the public health community to engage in the federal regulatory process. The [2009 Family Smoking Prevention and Tobacco Control Act](#) gave the [U.S. Food and Drug Administration](#) authority to protect public health by regulating tobacco products for the first time. The ultimate success of the law will depend on an active and engaged public health community that is willing to support the FDA with the best evidence and input available. A strong public health presence will support and encourage the FDA to adopt bold regulations that will withstand legal challenges from the tobacco industry.

Watch for the Consortium's email alerts when there are opportunities to engage with the FDA to strengthen regulations and guidance documents. We are also developing an FDA Tobacco Action Center on our website to provide information about the FDA tobacco regulatory process and how to get involved. For more information, please contact Joelle Lester at (651) 695-7603 or joelle.lester@wmitchell.edu.

» [For guidance, compliance and regulatory news on federal tobacco regulation, visit the FDA website.](#)



Consortium Offers Webinar on “Telling the Public Health Story to the FDA” May 1, 2012, 12—1:30 p.m. (Central Standard Time)

The Consortium is offering a webinar on how to interact directly with the U.S. Food and Drug Administration's Center for Tobacco Products to help the agency advance public health. Consortium attorneys will provide an interactive tour of the agency's website, describe the kind of information the agency will find most helpful in advancing tobacco regulation, and discuss the process for submitting comments to the FDA.

[Click here for log-in information.](#)

Litigation Updates

Appeals Court Hears Oral Arguments in Cigarette Graphic Warning Regulation Case

On April 10, the U.S. Court of Appeals for the D.C. Circuit heard oral arguments in the government’s appeal of two federal district court rulings blocking the U.S. government from requiring tobacco manufacturers to place certain large graphic warning labels on cigarette packages and advertising. In June 2011, the U.S. Food and Drug Administration released nine new graphic warning labels to meet its obligations under the 2009 [Family Smoking Prevention and Tobacco Control Act](#). Under existing federal regulations, the warning label requirement was scheduled to take effect September 2012.

On November 7, 2011, U.S. District Judge Richard Leon sided with the five tobacco company plaintiffs, who joined in a lawsuit last August to oppose the FDA’s warning label requirements on First Amendment grounds. The judge [granted the plaintiffs’ motion](#) for a preliminary injunction putting the requirements on hold until there was a final judgment on the merits of the claims. Then, on February 29, 2012, Judge Leon ruled that the FDA requirement violated the First Amendment by unconstitutionally compelling speech, and granted the plaintiffs’ Motion for Summary Judgment. The oral arguments on April 10 addressed the FDA’s appeals of both of Judge Leon’s opinions. It is possible that regardless of the outcome at the U.S. Court of Appeals, this case could be appealed to the U.S. Supreme Court.

- » [Read key rulings and filings in *R.J. Reynolds Tobacco Company v. FDA*.](#)
- » [Read the amicus brief filed by the Consortium and other public health partners.](#)

Sixth Circuit Court of Appeals Upholds Key Cigarette Warning Label Provisions

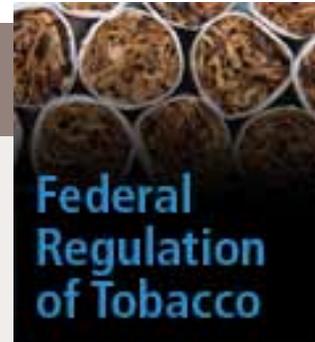
Meanwhile, on March 19, 2012, in a separate case, the U.S. Court of Appeals for the Sixth Circuit upheld most provisions of the cigarette warning label requirement under the [Family Smoking Prevention and Tobacco Control Act](#). The Tobacco Control Act requires graphic and textual warnings that convey the factual health risks of smoking so consumers have truthful information as they make decisions about purchasing and using tobacco products. The industry plaintiffs in this case challenged the law’s graphic warning requirement generally, rather than any specific graphic warning required by the FDA. The court ruled that the law requiring the FDA to mandate graphic warnings is reasonably related to the government’s interest in preventing consumer deception and consistent with the First Amendment.

- » [Read the decision in *Discount Tobacco City & Lottery, Inc. v. USA*.](#)
- » [Read the amicus brief filed by the Consortium and other public health partners.](#)

CDC’s Graphic Image Ad Campaign Prompts Huge Increase in Quitline Calls

On a related note, the Centers for Disease Control and Prevention recently reported that after the first week of its 12-week \$54 million ad campaign showing graphic images of diseased smokers, more than 30,000 people called a toll-free number to help them stop smoking — the biggest call volume ever seen in the seven-year history of the federally sponsored quitline (1-800-Quit-NOW), and twice as many as in the previous week. The number of hits to [www.smokefree.gov](#), the government’s website offering quit assistance, also surged, more than tripling from 20,000 to 66,000.

- » [Read more.](#)



New Publications on Tobacco Use and Cessation in Corrections Populations

This feature presents news and resources from the Tobacco Control Legal Consortium's parent organization, the Public Health Law Center at William Mitchell College of Law.

The Public Health Law Center recently released a set of publications that explain state and local tobacco control policy options for adult and juvenile offenders in state and local jails and prisons. Recent studies estimate that between 70 and 80 percent of all inmates in U.S. prisons and jails smoke or use tobacco products — up to four times the national average. As a result, a significantly large number



of inmate deaths are linked directly to tobacco use, with the vast majority of deaths caused by heart disease and lung cancer. Given the disproportionate number of inmates who use tobacco, smoking has a significant impact on current and future health care costs, both in the corrections system and in the public sector.

On a related note, a high number of juvenile offenders — youth detained or incarcerated in the juvenile justice system — use tobacco. Because these high-risk adolescents typically struggle with a host of other socioeconomic, psychological and mental issues — including high substance abuse — their nicotine addiction may be viewed as less a priority than other more immediate challenges. Yet, given the devastating health care

impact of tobacco-related illness, effective policies that focus on tobacco prevention and cessation in juvenile placements could help many of these adolescents break the cycle of nicotine addiction.

The following Public Health Law Center publications were written under a grant from the Minnesota Department of Health, and are available on our website at www.publichealthlawcenter.org.

- [Tobacco Behind Bars: Policy Options for the Adult Correctional Population](#) (2012). A policy brief that examines the current state of tobacco control policies in local and state prisons and jails in the U.S., health care costs of tobacco use among the correctional population, regulatory challenges with correctional tobacco- and smoke-free policies, and policy options and opportunities.
- [Tobacco in Adult Correctional Facilities: A Policy Overview](#) (2012). Fact sheet summary of policy brief.
- [Tobacco and Juvenile Offenders: Breaking the Cycle](#) (2012). A policy brief that examines the current state of tobacco control policies in juvenile residential correctional facilities and detention centers, the prevalence of tobacco use among juvenile offenders, challenges with tobacco cessation services in the juvenile justice system, and policy options and opportunities.
- [Tobacco in Juvenile Justice Facilities: A Policy Overview](#) (2012). Fact sheet summary of policy brief.



Ask A Lawyer

Q “We understand that tobacco companies often pay retailers money to sell tobacco products at a discount, and do other things to help push sales of the companies’ products. Is there a way to get information about how much the industry is spending on these kinds of activities in our state?”

A The [Federal Trade Commission](#) (FTC) collects national advertising and promotion expense data from the major cigarette manufacturers and periodically issues reports about its findings. The FTC is able to collect this information through its powers under the FTC Act ([15 U.S.C. § § 41-58](#) (2006)), which include the authority to require companies to answer questions about their business practices and then to publish reports about what it learns, with aggregated information. The [latest FTC report](#) on cigarette manufacturers was issued in 2011, and was based on 2007 and 2008 data. (There’s a separate [report](#) on the smaller smokeless tobacco industry.) This report revealed that in 2008, the cigarette manufacturers spent just over 81 percent (equal to \$8.10 billion) of their advertising and promotion expenditures on payments to retailers and wholesalers designed to make cigarettes cheaper for consumers, and to buy retailer cooperation in preferred product placements and promotion for their brands. The vast majority of these payments, which are known as “promotional allowances,” went to retailers to enable them to offer discounts on cigarette prices (\$7.17 billion). Out of the remaining amount, another \$481.5 million was paid to retailers as incentives to promote increased sales or to obtain preferred shelving spaces in stores; and an additional \$448.5 million was paid to wholesalers for volume rebates, incentive payments, and services related to retail promotions.

These retailer and wholesaler incentive payments are a key part of the tobacco marketing and distribution process. They have been linked to significant increases in promotional activity in stores. Also, it is [well documented](#) that price is one of the most powerful factors affecting tobacco use for all tobacco users, and [youth](#) in particular. That the industry is spending so much money on payments that are designed to result in discounted cigarette prices is of keen interest to many cities and states. Yet, aside from the FTC report and the occasional study focusing on a specific community, state and local governments have little, if any, access to information about how much the industry is spending on price discounting and promotional allowances within their borders.

One way for a local or state government to shed a little light on these activities would be to pass a law requiring tobacco retailers, wholesalers, and distributors to report the payments received from tobacco companies, similar to how some states have required pharmaceutical companies to report marketing payments made to health care providers in their states. This kind of law is sometimes referred to



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Public Health Law Center

If you have a question about a tobacco law-related issue that you'd like us to address in this column, or a topic you'd like us to cover in future publications, please send us an e-mail at tobaccolaw@wmitchell.edu. Thank you!

This Legal Update feature showcases individuals and organizations with distinguished records of accomplishments in public health law.

Kathleen Hoke Dachille: A National Leader in Public Health Law

It's easy to see why Kathleen Dachille is a leader in the U.S. tobacco control law community. She's a natural force: brilliant, indefatigable, and passionate about public health law and policy. Not only has she served for ten years as Director of the Legal Resource Center for Tobacco Regulation, Litigation and Advocacy at the University of Maryland School of Law, but she was a founding member of the Tobacco Control Legal Consortium and the National Task Force on Smoke-Free Housing. As Director of Maryland's tobacco law center, Kathleen worked tirelessly to help pass Maryland's Clean Indoor Air Act. For years, she provided legal support to local jurisdictions whose smoke-free ordinances were legally challenged all the way up to Maryland's highest court. She also

provided ongoing legal technical assistance to the tobacco control advocates and state legislators who worked for eight years to pass the law. Finally, once [Maryland's Clean Indoor Air Act](#) took effect in February 2008, Kathleen helped (and continues to help) the Department of Health and Mental Hygiene with legal questions related to implementation and enforcement.

In addition to her state tobacco control work, including assistance on Maryland's Community Transformation Grant, Kathleen has been a key player on the national tobacco control scene, often working in collaboration with the Consortium. She has drafted amicus curiae briefs supporting tobacco control in significant litigation, such as [Rowe v. New Hampshire Motor Transport](#) (which

she submitted to the U.S. Supreme Court at both the certiorari and merits phases) and [Altria Group, Inc. v. Good](#) (also filed at the Supreme Court). She publishes often in law and public health journals, is a frequent presenter at state and national conferences, and serves in a leadership role in close to a dozen professional and service organizations. In 2004, for example, she was appointed a Special Assistant Attorney General to participate in tobacco-



Kathleen Hoke Dachille, J.D.

Court Rules Worcester's Broad Tobacco Ad Restriction is Invalid

related working groups of the National Association of Attorneys General — a position she has held for the last eight years.

After graduating with highest honors from the University of Maryland School of Law, and serving eight years with the Office of the Attorney General of Maryland, Kathleen joined the faculty of the University of Maryland School of Law in 2002. As an associate professor, Kathleen teaches clinics in public health law, tobacco control law, and legislative policy, where students are often given opportunities to research and prepare legal documents, such as draft legislation or amicus briefs, on current timely issues in public health law and policy. Kathleen's passion for public health policy is contagious: four of her former law students now work for the U.S. Food and Drug Administration's Center for Tobacco Products.

In her spare time, Kathleen serves as Director of the Network for Public Health Law, Eastern Region, where she provides a national constituency of public health officials and professionals with legal technical assistance on a broad array of public health issues — focusing in particular on injury prevention, environmental health and food safety. The Network, funded by the Robert Wood Johnson Foundation, works collaboratively with four other regional offices and the National Coordinating Center at the Public Health Law Center.

Looking back over her twenty years as a lawyer, Kathleen cites her decade of tobacco control work as giving her the foundation she needed to build and expand her public health law career. She describes it as a “launching pad” — an apt term given her rapid rise as a national public health law leader.

- » [Read more about the Legal Resource Center for Tobacco Regulation, Litigation and Advocacy at the University of Maryland School of Law.](#)
- » [Read more about the Network for Public Health Law.](#)

A federal judge recently struck down a provision of a local [ordinance](#) that prohibited all outdoor tobacco advertising within the City of Worcester, Massachusetts. The ordinance, which was approved in May 2011, but had not been enforced, prohibited stores in Worcester from advertising tobacco product brands on signs visible from the street. Stores could only advertise that they sold tobacco products. City officials supporting the policy [pointed out](#) that cigarette promotions contribute to a high incidence of tobacco use in Worcester, where 23.7 percent of adults smoke, compared with 16.1 percent statewide.

Soon after the City Council adopted the ordinance, tobacco companies filed suit, claiming it violated their First Amendment rights to free speech and that it would impede their ability to market their products within the city. In a 23-page decision, U.S. District Court Douglas P. Woodlock agreed with the plaintiffs, ruling that the ordinance was unconstitutional. “The broad sweep of the ordinance suggests that the [city] did not consider how to tailor the restrictions so as not to unduly burden the plaintiff's free speech rights and the rights of adults to truthful information about tobacco products.” Worcester officials have not yet decided whether they will appeal the decision.

- » [Read the opinion in *National Association of Tobacco Outlets v. City of Worcester*.](#)

Public Health Groups Disappointed with WTO Ruling Against Clove Cigarettes

On April 4, 2012, the Appellate Body of the World Trade Organization (WTO) ruled that the U.S. prohibition against the production and sale of clove cigarettes violates trade obligations because it discriminates against an imported product. The WTO ruling took issue with the [2009 Family Smoking Prevention and Tobacco Control Act](#) that gave the FDA power to regulate the tobacco industry and [prohibited the manufacture and sale of cigarettes with characterizing flavors such as clove, cinnamon or cherry](#), but not menthol. Indonesia, the world's leading producer of clove cigarettes, challenged the law in 2010 after losing access to a market it argued was worth \$15 million a year. Indonesia argued the law unfairly favors U.S.-based menthol-cigarette makers. An earlier WTO decision agreed with Indonesia on the discrimination charge, while acknowledging that the law's aim of discouraging young people from smoking was legitimate. Many public health groups have expressed disappointment with the WTO ruling. Once the WTO's Dispute Settlement Body accepts the appeal decision within the next 30 days, the U.S. will need to come up with a plan to comply with the ruling or face the threat of retaliation by Indonesia.

» [Read a summary of the WTO panel and appellate body proceedings in the dispute between the U.S. and Indonesia regarding the production and sale of clove cigarettes.](#)



Australia High Court Hears Tobacco Plain-Pack Challenge

On April 17, 2011, the High Court of Australia heard oral arguments in a tobacco industry challenge to an Australian law prohibiting the display of tobacco companies' logos, labels and trademarks. Australia is the first country in the world to prohibit logos on cigarette packages. The law, which is slated to take effect in December, requires cigarettes to be sold in dark brown packages, using the same font for all brands and with no company logos. It was passed, in part, to reduce the appeal of tobacco products to consumers, particularly young people, and to increase the effectiveness of mandated health warnings.

British American Tobacco PLC, Philip Morris International Inc. and Imperial Tobacco Group PLC claim that the plain packaging legislation results in acquisition of property without proper compensation and that the law is unconstitutional. Like the U.S. Constitution, the Australian Constitution recognizes the government's right to acquire private property for public purposes, but requires the original owners to receive compensation. The plaintiffs argue that the plain packaging requirement "sterilizes" their intellectual property rights, and enables the Commonwealth to assume control "over a substantial aspect of the plaintiffs' property, business, goodwill and reputation."

The controversy over Australia's unprecedented plain packaging litigation is attracting international attention. As the [World Health Organization](#) recently noted, the Australian legislation sets "a new global standard for the control of a product that accounts for nearly 6 million deaths each year."

» [Read the filings and pleadings in *British American Tobacco Australia Ltd. v. the Commonwealth of Australia*. S389/2011](#)

2012 County Health Rankings & Roadmaps

The newly released 2012 County Health Rankings program is a user-friendly tool that measures the mortality and morbidity of residents in U.S. counties in all 50 states based on key factors that influence health, including health behaviors (such as tobacco use, alcohol use, diet and exercise), education rates, income levels, and access to healthy foods and medical care. The accompanying Roadmaps to Health program provides communities with effective policies and programs that help address key factors that influence health. The programs were developed by the Robert Wood Johnson Foundation in collaboration with the University of Wisconsin Population Health Institute.

» [View the County Health Ranking & Roadmaps programs.](#)

Public Health Law Policy Change Webinar Series

The Public Health Law Center offers monthly webinars on significant and timely topics in public health topics, such as tobacco control strategies and regulation. To check out our upcoming webinars, or to access archived recordings of our past webinars, visit our website at <http://www.publichealthlawcenter.org/webinars>.

Visiting Attorney — Public Health Law Practice

The Network for Public Health Law and the Robert Wood Johnson Foundation are seeking applicants for five Visiting Attorneys — Public Health Law Practice appointments. These are full-time, salaried one-year appointments with benefits. The five recipients will be located at five host sites across the country under the supervision of renowned public health legal experts. The Visiting Attorney appointment is a post-J.D. experience designed to develop skills and competencies in practice-based public health law that will advance participating attorneys' public health law careers and prepare them for employment within local, state, federal or tribal public health organizations. The application deadline is May 1, 2012, 3 p.m. (EST).

» [Read more information.](#)

Ask A Lawyer

Cont. from page 5

as a “sunshine” law. Depending on a jurisdiction’s existing tobacco control laws, this kind of law could be implemented at either the state or local level. For example, if a state has a cigarette minimum pricing law, reporting or sunshine provisions might be an appropriate addition to that law because the vast majority of promotional allowance payments are related to price discounts. Alternatively, reporting requirements could be incorporated into a jurisdiction’s tobacco licensing law or youth access law. The sunshine law could require that the reported information be publicly available. Or, if necessary, it could provide some confidentiality protections, depending on the circumstances and the jurisdiction’s existing data practices laws.

To our knowledge, this kind of sunshine law has yet to be passed by a jurisdiction in the U.S. The tobacco industry frequently challenges tobacco control laws in court, and a novel approach that relates to a practice that is important to the industry seems particularly likely to draw a challenge, regardless of the actual legal merits of the situation. Because

of this, policymakers and advocates considering sunshine laws should consult with local legal counsel early on about their goals and possible approaches for achieving them in their jurisdictions, both to get input and promote buy-in.

The Consortium has an introductory [fact sheet](#) on tobacco product price promotions that provides additional background information. In addition, the Consortium recently released a new [Tips & Tools](#) guide that could be a useful starting point for communities interested in learning more about sunshine laws. This new publication discusses some of the anticipated benefits of sunshine laws, lays out key elements for inclusion, and explains some legal issues and considerations related to these laws. For more information on this and other tobacco control-related topics, please don’t hesitate to contact us at (651) 290-7506 or visit our website at www.publichealthlawcenter.org.

» [Read *Sunshine Laws: Requiring Reporting of Tobacco Industry Price Discounting and Promotional Allowance Payments to Retailers and Wholesalers.*](#)

A PROMISE National Conference: Reclaiming the Health of our Tribal Nations

On May 2-3, 2012, the Inter Tribal Council of Michigan, Inc. will hold a national tribal forum for networking and sharing best and promising practices for improving the health of American Indian and Alaska Native communities. The PROMISE National Conference will be held in Tempe, Arizona. The target audience is tribal leaders; tribal health agency staff; Native American community agencies; staff from federal, state, and local public health agencies; and academic institutions.

» [Visit the event website for conference and registration information.](#)

World No Tobacco Day

The World Health Organization (WHO) selected “tobacco industry interference” as the theme of the 2012 World No Tobacco Day, which will take place May 31, 2012. WHO is focusing this day, and throughout the year, on the need to expose and counter the tobacco industry’s increasingly aggressive attempts to undermine the WHO Framework Convention on Tobacco Control.

» [Learn more about World No Tobacco Day.](#)

NALBOH’s 20th Annual Conference

The National Association of Local Boards of Health will hold its 20th annual conference August 9-10, 2012, in Atlanta, Georgia. The focus of this year’s conference is “Celebrating Achievement, Shaping the Future.”

» [Visit the event website for conference and registration information.](#)

National Conference on Tobacco or Health

The 2012 National Conference on Tobacco or Health will be held August 15-17, 2012, in Kansas City, Missouri. The Conference convenes close to 3,000 national and regional public health leaders to strategize, learn about, and implement best practices and policies to reduce tobacco use.

» [Visit the event website for conference and registration information.](#)

NACCHO’s Annual Conference: Navigating the Currents

The National Association of County and City Health Officials will hold its national conference July 11 -13, 2012, in Los Angeles, California. The conference theme is “Navigating the Currents: Positioning the Local Health Departments for the Future.”

» [Visit the event website for conference and registration information.](#)



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Michigan
[Smoke-Free Environments Law Project](#)

Minnesota
[Public Health Law Center](#)

New Jersey
[Tobacco Control Policy and Legal
Resource Center/New Jersey GASP](#)

New York
[Center for Public Health and
Tobacco Policy](#)

Disclaimer: While we make every effort to ensure the information in this newsletter is accurate and complete, the Tobacco Control Legal Consortium is unable to guarantee this information. Material is provided for informational purposes and is not intended as legal advice. We encourage readers with questions to consult an attorney familiar with the laws of their jurisdictions.

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