



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

Division of Advertising Practices

December 13, 2006

ORIGINAL

MEMORANDUM

TO: Public Records  
Office of the Secretary

FROM: Sallie Schools  
Division of Advertising Practices

SUBJECT: Rotational Health Warnings for Cigarettes  
File No. P854505



Please place the attached documents on the public record in the above-captioned matter.

1. November 29, 2004 letter from Clara E. Weaver, Liggett Group, Inc. to Diana Winterson-Russell.
2. January 1, 2005 letter from Mary K. Engle to Clara E. Weaver, Liggett Group, Inc.
3. December 15, 2004 letter from William H. Melton, Commonwealth Brands, Inc. to Mary K. Engle.
4. January 3, 2005 letter from Mary K. Engle to William H. Melton, Commonwealth Brands, Inc.
5. January 3, 2005 letter from Louis S. Carbone, Nat Sherman, to Diana Winterson-Russell.
6. January 3, 2005 letter from Mary K. Engle to Louis S. Carbone, Nat Sherman.
7. January 3, 2005 letter from Barry M. Boren, Esq. on behalf of Omor Corp. to Mary K. Engle.
8. January 5, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of Omor Corp.
9. January 3, 2005 letter from David A. Scott, Cheyenne International, LLC to Mary K. Engle.

10. January 5, 2005 letter from Mary K. Engle to David A. Scott, Cheyenne International, LLC.
11. January 3, 2005 letter from An Sik Kang, Global Trading, Inc. to Mary K. Engle.
12. January 5, 2005 letter from Mary K. Engle to An Sik Kang, Global Trading, Inc.
13. January 4, 2005 letter from Najib Boulos, Global Tobacco, Inc. to Mary K. Engle.
14. January 5, 2005 letter from Mary K. Engle to Najib Boulos, Global Tobacco, Inc.
15. January 4, 2005 letter from Chris Sutton, CLP, Inc. to Mary K. Engle.
16. January 5, 2005 letter from Mary K. Engle to Chris Sutton, CLP, Inc.
17. December 29, 2004 letter from Richard G. Saffire, D Cube LLC d/b/a Sovereign Tobacco Co. to Diana Winterson-Russell.
18. January 6, 2005 letter from Mary K. Engle to Richard G. Saffire, D Cube LLC d/b/a Sovereign Tobacco Co.
19. December 29, 2004 letter from Richard G. Saffire, Windward Tobacco, Inc. to Diana Winterson-Russell.
20. January 7, 2005 letter from Mary K. Engle to Richard G. Saffire, Windward Tobacco, Inc.
21. January 5, 2005 letter from Michael Schilken, Esq. on behalf of Four T Imports to Kathy Zownir.
22. January 7, 2005 letter from Mary K. Engle to Michael Schilken, Esq. on behalf of Four T Imports.
23. December 28, 2004 letter from Bhavani Parameswar, King Maker Marketing, Inc. to Sallie Schools.
24. January 11, 2005 letter from Mary K. Engle to Bhavani Parameswar, King Maker Marketing, Inc.

25. January 11, 2005 letter from Dustin Ramsey, Golden Eagle Tobacco to Mary K. Engle.
26. January 12, 2005 letter from Mary K. Engle to Dustin Ramsey, Golden Eagle Tobacco.
27. January 25, 2005 letter from Peter Bigley, Whitehall Exports, LLC to Mary K. Engle.
28. January 25, 2005 letter from Mary K. Engle to Peter Bigley, Whitehall Exports, LLC.
29. January 18, 2005 letter from Barry M. Boren, Esq. on behalf of Leader Tobacco Co. to Mary K. Engle.
30. January 31, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of Leader Tobacco Co.
31. January 26, 2005 letter from Barry M. Boren, Esq. on behalf of Optima Tobacco Corp. to Mary K. Engle.
32. January 31, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of Optima Tobacco Corp.
33. January 31, 2005 letter from Paro Astourian, Esq. on behalf of Lis Import Co. to Kathy Zownir.
34. February 3, 2005 letter from Mary K. Engle to Paro Astourian, Esq. on behalf of Lis Import Co.
35. February 1, 2005 letter from Gladys R. Navarro, Cage Investments, Inc. to Mary K. Engle.
36. February 3, 2005 letter from Mary K. Engle to Gladys R. Navarro, Cage Investments, Inc.
37. February 1, 2005 letter from Alex Van Kovn on behalf of Arevshat Import & Export to Kathy Zownir.
38. February 3, 2005 letter from Mary K. Engle to Alex Van Kovn on behalf of Arevshat Import & Export.
39. February 1, 2005 letter from Phyllis Saunders, P.S. Export Co., LLC to Mary K. Engle.
40. February 3, 2005 letter from Mary K. Engle to Phyllis Saunders, P.S. Export Co., LLC.

41. February 1, 2005 letter from Craig Koenigs, Esq. on behalf of European Cigarette Imports to Mary K. Engle.
42. February 3, 2005 letter from Mary K. Engle to Craig Koenigs, Esq. on behalf of European Cigarette Imports.
43. February 2, 2005 letter from Nathaniel K. Hsieh, Tritent International Corp. to Mary K. Engle.
44. February 3, 2005 letter from Mary K. Engle to Nathaniel K. Hsieh, Tritent International Corp.
45. January 12, 2005 letter from William J. McGowan, Esq. on behalf of Sandia Tobacco Manufacturers, Inc. to Mary K. Engle.
46. February 4, 2005 letter from Mary K. Engle to William J. McGowan, Esq. on behalf of Sandia Tobacco Manufacturers, Inc.
47. January 21, 2005 letter from Craig A. Koenigs on behalf of Liberty Brands to Mary K. Engle.
48. February 7, 2005 letter from Mary K. Engle to Craig A. Koenigs on behalf of Liberty Brands.
49. January 13, 2005 letter from Neal N. Beaton, Esq. on behalf of Japan Tobacco, Inc. to Mary K. Engle.
50. February 8, 2005 letter from Mary K. Engle to Neal N. Beaton, Esq. on behalf of Japan Tobacco, Inc.
51. February 4, 2005 letter from Andrew M. Parish, Esq. on behalf of Falcon of America, LLC to Mary K. Engle.
52. February 9, 2005 letter from Mary K. Engle to Andrew M. Parish, Esq. on behalf of Falcon of America, LLC.
53. January 14, 2005 letter from James A. Deer, Esq., Single Stick, Inc. to Sallie Schools.
54. February 10, 2005 letter from Mary K. Engle to James A. Deer, Esq., Single Stick, Inc.

55. January 21, 2005 letter from Silvia L. Bolatti, Esq. on behalf of Greenwing Corp. to Sallie Schools.
56. February 10, 2005 letter from Mary K. Engle to Silvia L. Bolatti, Esq. on behalf of Greenwing Corp.
57. February 9, 2005 letter from Karen Delaney, Smokin Joes, to Mary K. Engle.
58. February 15, 2005 letter from Mary K. Engle to Karen Delaney, Smokin Joes.
59. February 14, 2005 letter from Jennifer Li, Carolina Tobacco Co. to Mary K. Engle.
60. February 15, 2005 letter from Mary K. Engle to Jennifer Li, Carolina Tobacco Co.
61. February 15, 2005 letter from Mary K. Engle to Craig A. Koenigs on behalf of Liberty Brands.
62. February 15, 2005 letter from Everett W. Gee III, Esq., S&M Brands, Inc. to Mary K. Engle.
63. February 15, 2005 letter from Mary K. Engle to Everett W. Gee III, Esq., S&M Brands, Inc.
64. January 19, 2005 letter from Stephen J. Kuffler, Lane Limited to Mary K. Engle.
65. February 17, 2005 letter from Mary K. Engle to Stephen J. Kuffler, Lane Limited.
66. February 17, 2005 letter from George Michael Yokley, IDC of Kentucky, Inc. to FTC.
67. February 22, 2005 letter from Mary K. Engle to George Michael Yokley, IDC of Kentucky, Inc.
68. January 21, 2005 letter from C. Randall Nuckols, Esq. on behalf of Santa Fe Tobacco Company to Mary K. Engle.
69. March 2, 2005 letter from C. Randall Nuckols, Esq. on behalf of Santa Fe Tobacco Company to Sallie Schools.
70. March 3, 2005 letter from Mary K. Engle to C. Randall Nuckols, Esq. on behalf of Santa

Fe Tobacco Company.

71. March 11, 2005 letter from Craig Koenigs, Esq. on behalf of European Cigarette Imports to Mary K. Engle.
72. March 15, 2005 letter from Mary K. Engle to Craig Koenigs, Esq. on behalf of European Cigarette Imports.
73. March 8, 2005 letter from Barry M. Boren, Esq. on behalf of Omor Corp. to Mary K. Engle.
74. March 16, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of Omor Corp.
75. March 16, 2005 letter from Jonathan Furst, Kretek International to Michael Ostheimer.
76. March 21, 2005 letter from Mary K. Engle to Jonathan Furst, Kretek International.
77. March 16, 2005 letter from Robert M. Ammerman, Farmer's Tobacco Co. of Cynthiana to Mary K. Engle.
78. March 25, 2005 letter from Mary K. Engle to Robert M. Ammerman, Farmer's Tobacco Co. of Cynthiana.
79. March 28, 2005 letter from Munir Meghani to Mary K. Engle.
80. March 30, 2005 letter from Mary K. Engle to Munir Meghani.
81. February 10, 2005 letter (with August 25, 2004 letter attached) from Neal N. Beaton, Esq. on behalf of Japan Tobacco, Inc. to Sallie S. Schools.
82. February 28, 2005 letter from Neal N. Beaton, Esq. on behalf of Japan Tobacco, Inc. to Sallie S. Schools.
83. April 6, 2005 letter from Mary K. Engle to Neal N. Beaton, Esq. on behalf of Japan Tobacco, Inc.
84. March 30, 2005 letter from Nancyellen Keane, Esq., on behalf of Seneca-Cayuga Tobacco Company to Sallie Schools.

Public Records  
December 13, 2006  
Page 7

85. April 6, 2005 letter from Mary K. Engle to Nancyellen Keane, Esq., on behalf of Seneca-Cayuga Tobacco Company.
86. April 7, 2005 letter from Silvia Bilotti, Esq., on behalf of Rumba Candy & Tobacco to Sallie Schools.
87. April 14, 2005 letter from Mary K. Engle to Silvia Bilotti, Esq., on behalf of Rumba Candy & Tobacco.
88. April 12, 2005 letter from Lauren V. Perez on behalf of Trans Atlantic Link Corp. to Sallie Schools.
89. April 14, 2005 letter from Mary K. Engle to Lauren V. Perez on behalf of Trans Atlantic Link Corp.
90. March 29, 2005 letter from Veronica Vilarchao, Esq. on behalf of Dosal Tobacco Corp. to Mary K. Engle.
91. April 15, 2005 letter from Mary K. Engle to Veronica Vilarchao, Esq. on behalf of Dosal Tobacco Corp.
92. March 16, 2005 letter from Robert M. Ammerman, Farmer's Tobacco Co. of Cynthiana to Mary K. Engle.
93. April 18, 2005 letter from Mary K. Engle to Robert M. Ammerman, Farmer's Tobacco Co. of Cynthiana.
94. March 28, 2005 letter from Barry M. Boren, Esq. on behalf of YTC US, LLC to Mary K. Engle.
95. April 19, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of YTC US, LLC.
96. April 11, 2005 letter from Charles F. Fuller, Cherokee Tobacco Co., LLC to Sallie Schools.
97. April 19, 2005 letter from Mary K. Engle to Charles F. Fuller, Cherokee Tobacco Co., LLC.
98. April 18, 2005 letter from Marvin Ligon, Virginia Brands, LLC to Sallie Schools.

99. April 19, 2005 letter from Mary K. Engle to Marvin Ligon, Virginia Brands, LLC.
100. April 13, 2005 letter from Denis Faucher, ITL (USA) Limited to Sallie Schools.
101. April 20, 2005 letter from Mary K. Engle to Denis Faucher, ITL (USA) Limited.
102. April 19, 2005 letter from Barry M. Boren, Esq. on behalf of Tantus Tobacco LLC to Mary K. Engle.
103. April 20, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of Tantus Tobacco LLC.
104. April 18, 2005 letter from Craig A. Koenigs, Esq. on behalf of European Cigarette Imports, Inc. to Mary K. Engle.
105. April 21, 2005 letter from Mary K. Engle to Craig A. Koenigs, Esq. on behalf of European Cigarette Imports, Inc.
106. April 19, 2005 letter from Barry M. Boren, Esq. on behalf of Vibo, Inc. to Mary K. Engle.
107. April 26, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of Vibo, Inc.
108. April 18, 2005 letter from Josephine Godinez, Florida Tobacco Importers, Inc. to Mary K. Engle.
109. April 27, 2005 letter from Mary K. Engle to Josephine Godinez, Florida Tobacco Importers, Inc.
110. April 18, 2005 letter from Stephen M. Johnson, Esq. on behalf of Tabacalera del Este, S.A. to Mary K. Engle.
111. April 27, 2005 letter from Mary K. Engle to Stephen M. Johnson, Esq. on behalf of Tabacalera del Este, S.A.
112. April 18, 2005 letters (2) from S. B. Patel, Dhanraj Imports, Inc. to Diana Winterson-Russell.
113. April 27, 2005 letter from Mary K. Engle to S. B. Patel, Dhanraj Imports, Inc.

Public Records  
December 13, 2006  
Page 9

114. April 26, 2005 letter from Robert L. Ammerman, Farmer's Tobacco Co. of Cynthiana, Inc. to Mary K. Engle.
115. April 27, 2005 letter from Mary K. Engle to Robert L. Ammerman, Farmer's Tobacco Co. of Cynthiana, Inc.
116. May 9, 2005 letter from Steve Bruce, Southern Associated Services, Inc. to Sallie Schools.
117. May 11, 2005 letter from Mary K. Engle to Steve Bruce, Southern Associated Services, Inc.
118. April 19, 2005 letter from Richard G. Saffire, D Cube LLC d/b/a Sovereign Tobacco to Sallie Schools.
119. May 16, 2005 letter from Mary K. Engle to Richard G. Saffire, D Cube LLC d/b/a Sovereign Tobacco.
120. May 10, 2005 letter from Jonathan Furst, Kretek International, Inc. to Michael Ostheimer.
121. May 16, 2005 letter from Mary K. Engle to Jonathan Furst, Kretek International, Inc.
122. May 12, 2005 letter from Craig A. Koenigs, Esq. on behalf of Liberty Brands, LLC to Mary K. Engle.
123. May 16, 2005 letter from Mary K. Engle to Craig A. Koenigs, Esq. on behalf of Liberty Brands, LLC.
124. May 16, 2005 letter from Jeffrey Avo Uvezian, International Tobacco Partners, Ltd., to Mary K. Engle.
125. May 19, 2005 letter from Mary K. Engle to Jeffrey Avo Uvezian, International Tobacco Partners, Ltd.
126. April 29, 2005 letter from Karen Delaney, Smokin Joes, to Mary K. Engle.
127. May 31, 2005 letter from Mary K. Engle to Karen Delaney, Smokin Joes.
128. May 19, 2005 letter from Jeffrey Avo Uvezian, International Tobacco Partners, Ltd. to Mary K. Engle.

Public Records  
December 13, 2006  
Page 10

129. June 2, 2005 letter from Mary K. Engle to Jeffrey Avo Uvezian, International Tobacco Partners, Ltd.
130. May 31, 2005 letter from Jeffrey Avo Uvezian, International Tobacco Partners, Ltd. to Mary K. Engle.
131. June 2, 2005 letter from Mary K. Engle to Jeffrey Avo Uvezian, International Tobacco Partners, Ltd.
132. June 2, 2005 letter from Calvin A. Phelps, Renegade Tobacco Co. to Kathy Zownir.
133. June 2, 2005 letter from Mary K. Engle to Calvin A. Phelps, Renegade Tobacco Co.
134. June 2, 2005 letter from James F. Nooney, Jr., Nooney, Inc. to Sallie Schools.
135. June 9, 2005 letter from Mary K. Engle to James F. Nooney, Jr., Nooney, Inc.
136. June 2, 2005 letter from Sarah Dalrymple, Nationwide Tobacco, Inc. to Mary K. Engle.
137. June 10, 2005 letter from Mary K. Engle to Sarah Dalrymple, Nationwide Tobacco, Inc.
138. June 6, 2005 letter from Vicente Fernandez, L.A.B. Consulting, Inc. d/b/a Discount Brands to Mary K. Engle.
139. June 10, 2005 letter from Mary K. Engle to Vicente Fernandez, L.A.B. Consulting, Inc. d/b/a Discount Brands.
140. April 26, 2005 letter from Bradson Abrams, Wind River Tobacco Co. to Mary K. Engle.
141. June 13, 2005 letter from Mary K. Engle to Bradson Abrams, Wind River Tobacco Co.
142. June 8, 2005 letter from Barry M. Boren, Esq. on behalf of U.S. Flue-Cured Tobacco Growers, Inc. to Mary K. Engle.
143. June 14, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of U.S. Flue-Cured Tobacco Growers, Inc.
144. June 8, 2005 letter from Barry M. Boren, Esq. on behalf of U.S. Flue-Cured Tobacco Growers, Inc. to Mary K. Engle.

Public Records  
December 13, 2006  
Page 11

145. June 14, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of U.S. Flue-Cured Tobacco Growers, Inc.
146. June 8, 2005 letter from Barry M. Boren, Esq. on behalf of U.S. Flue-Cured Tobacco Growers, Inc. to Mary K. Engle.
147. June 14, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of U.S. Flue-Cured Tobacco Growers, Inc.
148. June 13, 2005 letter from Craig A. Koenigs, Esq. on behalf of European Cigarette Imports, Inc. to Mary K. Engle.
149. June 17, 2005 letter from Craig A. Koenigs, Esq. on behalf of European Cigarette Imports, Inc. to Mary K. Engle.
150. June 20, 2005 letter from Mary K. Engle to Craig A. Koenigs, Esq. on behalf of European Cigarette Imports, Inc.
151. June 14, 2005 letter from Bill Cleaver, Sirius Innovations, Inc. to Mary K. Engle.
152. June 20, 2005 letter from Mary K. Engle to Bill Cleaver, Sirius Innovations, Inc.
153. June 20, 2005 letter from Barry M. Boren, Esq. on behalf of Vibo Corp. to Mary K. Engle.
154. June 21, 2005 letter from Mary K. Engle to Barry M. Boren, Esq. on behalf of Vibo Corp.
155. May 13, 2005 letter from Craig A. Koenigs, Esq. on behalf of European Cigarette Imports, Inc. to Mary K. Engle.
156. June 23, 2005 letter from Mary K. Engle to Craig A. Koenigs, Esq. on behalf of European Cigarette Imports, Inc.
157. June 10, 2005 letter from Denis Faucher, ITL (USA) Limited, to Sallie Schools.
158. June 23, 2005 letter from Mary K. Engle to Denis Faucher, ITL (USA) Limited.