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116. See generally, 1994 SGR, pp. 133-137, 141-145 and studies cited therein.

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121. "Wall Street Journal," October 19, 1989, at p. B1.

122. Memorandum from J.P. McMahon, Division Manager, RJR Sales Company, to Sales Reps, January 10, 1990.

123. "Wall Street Journal," May 3, 1990, at p. B1, col. 3.

124. Memorandum from R.G. Warlick, Division Manager, RJR Sales Company, to All Area Sales Representatives, Sales Representatives, and Chain Service Representatives, April 5, 1990.

125. 1994 SGR, pp. 70-71; 1978 NHIS reported that 2 percent of 18-19 year old smokers smoked Camels; Adult Use of Tobacco Survey (1986) 17-18 year olds—2.7 percent, (unpublished data); "Teenage Attitudes and Practices Survey," U.S. Public Health Service and U.S. Department of Education, 1989, reported in "Changes in the Cigarette Brand Preference of Adolescent Smokers, U.S. 1989-1993," in "MMWR," CDC, DHHS, vol. 43, No. 32, pp. 577-581, 1994.

126. John Benson worked on the Marlboro account for 30 years at the Leo Burnett advertising agency. This quote and the two other that follow are from a Marlboro oral history project on file at the Archives Center, National Museum of American History, Smithsonian Institution, Washington, D.C. The other quotes are from John Landry, who worked at Philip Morris for 30 years as a brand manager and senior vice president (vice president for marketing), and Rafael Arguelles, who was manager and marketing director of Massalin Particulares, an Argentinian tobacco company acquired by Philip Morris in 1964.

127. See IOM Report, p. 58; "Spit Tobacco and Youth," Office of Inspector General, December 1992, p. 3.

128. Freedman, A., "How a Tobacco Giant Doctors Snuff Brands to Boost Their 'Kick,'" *Wall Street Journal*, October 26, 1994, at p. A14.

129. *Id.*

130. *Id.*

131. Blum, A., "Using athletes to push tobacco to children/Snuff-dippin' cancer-lipped man," *New York State Journal of Medicine*, vol. 83, p. 1367, 1983.

132. Mintz, M., "Marketing Tobacco to Children," *The Nation*, vol. 252, No. 17, p. 577 (May 6, 1991).

133. Connolly, G.N., "Statement of the Coalition on Smoking or Health Before the House Energy and Commerce Committee, Subcommittee on Health and the Environment, November 29, 1994" amended December 5, 1994. See also "Wall Street Journal," October 26, 1994, at p. A1, col. 6 (describing different types of smokeless tobacco products and how underage users perceive them); and at p. A14, col. 1 (describing advertising campaigns by UST).

134. "Is the Youth Market Fair Game," *Advertising Age*, pp. M-16-17, January 31, 1983.

135. See generally, "Tobacco Issues (Part 2)" "Hearings Before the House Committee on Energy & Commerce," 101st Congress, Serial No. 101-126, 1989, 302-308 (testimony of S. Ward); 1994 SGR, p. 174; IOM Report, p. 115.

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