

Lorillard

MEMORANDUM

September 25, 1979

TO: Messrs. J. R. Ave
A. J. Bass
R. H. Orcutt

FROM: Ronald S. Goldbrenner

RE: Guidelines to Laws and Regulations Affecting
Advertising and Promotional Activities

This memo sets forth the Law Department's opinion in connection with various Lorillard advertising and promotional activities and federal, state and local laws and regulations. We have organized this memo according to the main categories of inquiries we receive:

1. Sampling
2. Chance Promotions (Sweepstakes)
3. Games of Skill (Contests)
4. Couponing
5. Consumer Giveaways
6. Self-Liquidators
7. Use of the word "Free"
8. Use of the word "New"

These guidelines are subject to change and proposed promotions should always be reviewed by the Law Department before implementation. THESE GUIDELINES SHOULD NOT BE VIEWED AS A SUBSTITUTE FOR LEGAL ADVICE.

The information supplied is current as of this date. However, it is very important that we continue to hear from the field with respect to current implementation of these laws. The Sales Department has endeavored to provide us with a continuing flow of information with respect to these matters.

This is the latest set of memos dealing with these subjects and REPLACES the memo entitled "Various Promotional Activities"

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