

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARGARET PETERSON, individually and on behalf
of all others similarly situated Case No. 1:25-cv-00234-KBF

Plaintiff,

v.

CLASS ACTION COMPLAINT

LUCKY STRIKE TOBACCO COMPANY, JURY TRIAL DEMANDED

Defendant.

CLASS ACTION COMPLAINT FOR DAMAGES

TO THE HONORABLE JUDGES OF THIS COURT:

Plaintiff Margaret Peterson, individually and on behalf of all others
similarly situated, brings this class action against Lucky Strike
Tobacco Company for damages arising from decades of deceptive
marketing practices regarding the health risks of cigarette smoking.

PARTIES

1. Plaintiff Margaret Peterson is a 67-year-old resident of Queens,
New York, who smoked Lucky Strike cigarettes from 1975 to 2010
and was diagnosed with lung cancer in 2023.
2. Defendant Lucky Strike Tobacco Company is a Delaware
corporation with principal place of business in Richmond, Virginia.

CLASS ALLEGATIONS

3. This action is brought as a class action under Fed. R. Civ. P. 23
on behalf of: All persons who smoked Lucky Strike cigarettes for
at least one year between 1970 and 2010 and subsequently
developed lung cancer, emphysema, or other smoking-related diseases.

FACTUAL ALLEGATIONS

4. From 1970 through 2010, Lucky Strike engaged in a campaign
of deception regarding the health risks of cigarette smoking.
5. Internal company documents reveal Lucky Strike knew of the
addictive nature of nicotine and carcinogenic properties of
cigarettes decades before public disclosure.
6. Lucky Strike marketed cigarettes as "safe" and "toasted"
to remove harmful substances, despite knowing these claims
were false and misleading.