

VLN™ Cigarettes:

Labels, Labeling, and Advertising



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1. Introduction

22nd Century Group (the Company) is providing this plan for the purpose of describing the Company's proposed advertising relating to VLN™ cigarettes in support of the Company's Modified Risk Tobacco Product (MRTP) application. The Company uses the brand name VLN™ for both its proprietary Very Low Nicotine Content (VLNC) tobacco and its MRTP candidate cigarettes.

This plan includes descriptions of the Company's proposed advertising, copies of draft promotional material, and a library of images to be used with potential future promotional efforts.

As VLN™ cigarettes are currently not on the market (pending approval of the relevant PMT and MRTP applications), there are no current advertisements to discuss or report. Accordingly, all of the below advertising samples are proposed and in draft form.

2. Responsible Advertising

22nd Century Group's proposed advertising for VLN™ cigarettes targets adult cigarette smokers. Instead of relying upon self-verification, our proposed branded website, VLNcigarettes.com, will be age-gated to visitors 18 years or older (or legal age to purchase cigarettes) through the use of a third-party validation process¹. For reference, VLNcigarettes.net, VLNcigarettes.org, VLNcigarettes.us, and VLNcigarettes.co will all "point to" VLNcigarettes.com.

Similarly, our proposed print and digital advertising will only appear in publications with readership of at least 85% age 18 or older. Our social media platform is limited to platforms where the feed is age-gated by the provider to 18 years or older. Our proposed emails and direct mail will only go to verified recipients age 18 or older.

¹In the event that the federal legal age of smoking is changed, the age verification will be changed to align with the new federal law.

3. MRTP Claim and Voluntary Warning

All of 22nd Century Group's proposed advertising communications are based on the following statements as found in the MRTP application. The Company's advertising will also feature descriptive statements such as "Real Tobacco."

Claim: *95% less nicotine; Helps reduce your nicotine consumption*

Body Text: *VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption.*

Voluntary Warning: *Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.*

All pack labels and marketing material will abide by the FCLAA.

4. Advertising Media (descriptions)

a. Branded Website

The proposed VLNcigarettes.com website is the primary destination for smokers to learn about VLN™ cigarettes. This website is third-party age-verified with access limited to cigarette smokers age 18 or older. Many of the proposed marketing materials will direct recipients to our website for additional information.

Upon first visiting VLNcigarettes.com, smokers will arrive at a "landing" page and will be required to register for an account (or sign in if already registered) before gaining access to the main body of the website. The registration process will initiate our third-party age-verification system. A third party will compare personal information provided by the person seeking to gain access to VLNcigarettes.com against public records, databases and other data sources to independently verify the age of the smoker. After successful verification and assignment of a User ID and Password, smokers will login and arrive at the primary "home" page. Example pages of our proposed website are included below.

Website Home Page:



The mockup of the VLN website home page features a dark background with a large image of a man smoking. The main headline reads "VLN Real Tobacco... 95% Less Nicotine". Below this, there are two cigarette packs: one labeled "95% LESS NICOTINE" and "MENTHOL VLN". The text "Helps reduce your nicotine consumption" is prominently displayed, followed by the Surgeon General's warning: "Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death." At the bottom, there are six navigation buttons: "About us", "Real Tobacco", "Our Science", "Our Products", "Our Testing", and "Find a store". The footer includes the copyright notice "© 22nd Century Group, Inc." and links to "Home", "Privacy", "Disclaimer", and "Contact". A separate box on the right side of the footer contains the Surgeon General's warning: "SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide."

Website “About Us” page:


VLN

Home
▶ **About Us**
Real Tobacco
Our Science
Our Products
Our Testing
Find a Store
Contact Us


About Us

22nd Century Group, Inc., a New York-based plant biotechnology company that is dedicated to reducing smokers' nicotine consumption, manufactures VLN™ cigarettes at our manufacturing facility in North Carolina. 22nd Century uses the brand name VLN™ for both its proprietary very low nicotine content tobacco and its MRTP cigarettes.

22nd Century's technology and plant breeding expertise allow us to control the level of nicotine in the tobacco plant. As a result of 22nd Century's unique technology, we are able to grow tobacco and make cigarettes **with 95% less nicotine** than conventional cigarettes.



22nd Century Group, Inc.



Learn more about 22nd Century here: www.xxiicentury.com

About us

Real Tobacco

Our Science

Our Products

Our Testing

Find a Store

Contact Us

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SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

Website “Real Tobacco” page:

VLN

[Home](#)
[About Us](#)
[Real Tobacco](#)
[Our Science](#)
[Our Products](#)
[Our Testing](#)
[Find a Store](#)
[Contact Us](#)

Real Tobacco



As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – **at least 95% less nicotine** compared to conventional cigarettes.

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine



Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Natural American Spirit Yellow Mellow King	18.9mg
Newport Menthol Green	14.8mg
Marlboro Red 100	12.8mg
Camel Full Flavor Filter King	12.2mg
Marlboro Gold 100	11.9mg

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.



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SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

Website “Our Science” page:

VLN

Home

About Us

Real Tobacco

Our Science

Our Products

Our Testing

Find a Store

Contact Us

Our Science

22nd Century's VLN™ cigarettes feature the same nicotine content as the lowest nicotine style of the Company's SPECTRUM® research cigarettes. 22nd Century's SPECTRUM® research cigarettes were developed in collaboration with the FDA and other U.S. federal government agencies to provide independent scientists with the products necessary to investigate the potential public health benefits of reduced-nicotine content cigarettes. Since 2011, 22nd Century has produced and delivered tens of millions of the Company's Very Low Nicotine Content (VLNC) SPECTRUM® research cigarettes for use in dozens of clinical studies funded by more than \$125 million from agencies of the United States federal government.

22nd Century's Modified Risk Tobacco Product (MRTTP) application to the FDA for VLN™ cigarettes references dozens of independent studies that utilized SPECTRUM® research cigarettes. Of particular note are the six-week, 840-participant study by Donny, *et al.* published in the *New England Journal of Medicine* in October 2015, and the twenty-week, 1,250-participant study by Hatsukami, *et al.* published in the *Journal of the American Medical Association (JAMA)* in September 2018. Conducted by world-renowned scientists, these independent studies were of significant enough size to demonstrate important – and statistically significant – results.



For more information about the science behind our extraordinary VLN™ technology, please visit our corporate website at: www.xxiicentury.com/studies



About us



Real Tobacco



Our Science



Our Products



Our Testing



Find a Store



Contact Us

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SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

Website “Our Products” page:

VLN

Home

About Us

Real Tobacco

Our Science

Our Products

Our Testing

Find a Store

Contact Us

Our Products

VLN™ cigarettes are sold in traditional cigarette packaging and are currently available in both Menthol King and Non-menthol King brand styles.

22nd Century produces VLN™ cigarettes in the same manner as conventional cigarettes, using materials, ingredients, and processes well-established in the cigarette industry. VLN™ cigarettes are designed just like conventional cigarettes. The only difference between VLN™ and conventional cigarettes is that VLN™ cigarettes contain VLN™ tobacco.

Diagram of a VLN™ cigarette:

VLN™ cigarettes are used like conventional cigarettes; there are no unique or special instructions for VLN™ cigarette use.

95% LESS NICOTINE
Helps reduce your nicotine consumption

VLN

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

MENTHOL

VLN

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

About us

Real Tobacco

Our Science

Our Products

Our Testing

Find a Store

Contact Us

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SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

Website “Our Testing” page:

VLN

[Home](#)
[About Us](#)
[Real Tobacco](#)
[Our Science](#)
[Our Products](#)
[Our Testing](#)
[Find a Store](#)
[Contact Us](#)

Our Testing

VLN™ cigarettes are substantially lower in nicotine content than any other cigarettes currently available to smokers in the United States. VLN™ cigarettes contain an average of just 0.27mg of nicotine*.


Without exception, VLN™ cigarettes contain at least 95% less nicotine than the top 100 cigarette brands in the United States. The top 100 brands represented 87% of all cigarettes sold in the U.S. through convenience stores. A survey of the top 100 cigarette brands in the U.S. showed that, on average, conventional cigarettes contained 12.0 mg of nicotine per cigarette. **Figure 3 (below)**** shows the nicotine content in VLN™ cigarettes compared to the nicotine content of the top 100 cigarette brands in the U.S.

95% less nicotine - helps reduce your nicotine consumption.


Nicotine is addictive. Less nicotine does NOT mean safer.
All cigarettes can cause disease and death.

*VLN cigarettes contain 0.27 +/- 0.1mg nicotine

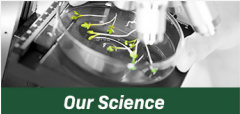
****Figure 3 to be inserted - “Nicotine in Cigarette” - see Appendix A**




About us




Real Tobacco



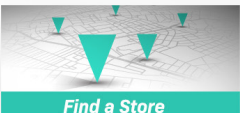
Our Science



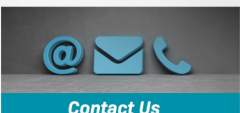
Our Products



Our Testing



Find a Store



Contact Us

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SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

b. Print

22nd Century's print marketing materials are designed to appeal to cigarette smokers age 18 and older. The Company's print advertising will appear only in publications where the readership is at least 85% at or over the age of 18. See Appendix B for the Company's proposed print advertising.

c. Digital Ads

Our proposed digital advertising is targeted to cigarette smokers age 18 or older. It will appear only in on-line platforms where the readership is at least 85% at or over the age of 18. Due to size limitations, on-line advertising may not always include all three elements of our communication (claim, body text, and voluntary warning). See Appendix B for the Company's proposed digital advertising. These communications will direct smokers to VLNcigarettes.com where readers will find additional information, including the claim, complete body text, and voluntary warning.

d. Direct Mail

Our marketing plans include proposed direct mail campaigns. The Company will limit direct mail materials to age-verified recipients, age 18 or over. The proposed direct mail pieces will direct smokers to VLNcigarettes.com for more information. Direct mail pieces will include a toll-free number in the event that a consumer wishes to stop receiving communications from the Company. See Appendix B for a proposed direct mail piece.

e. Email

22nd Century's direct marketing policies are designed to appeal to cigarette smokers age 18 and older. 22nd Century's email communications will include an opt-out link in the event that a smoker wishes to stop receiving email communications from the Company. See Appendix B for a proposed email campaign.

f. Social Media

22nd Century's proposed social media advertising will be available on platforms in which membership can be restricted to adults age 18 or older (e.g. Facebook). Only those who subscribe to 22nd Century's page on the relevant platform will see the Company's social media posts. The Company's social media posts will link to VLNcigarettes.com where smokers will find more information about VLN™ cigarettes.

Due to size restrictions, the Company's social media posts may not always contain all three elements of the claim, body text, and voluntary warning. Social media posts will direct smokers to VLNcigarettes.com to learn more and to read our claim, body text, and voluntary warning. See Appendix B for proposed social media posts.

g. Brochure/Handout

For in-person communications regarding VLN™ cigarettes, 22nd Century has designed a proposed VLN™ brochure. The brochure will highlight VLN™ product attributes and describe how the Company grows the tobacco that is used in VLN™ cigarettes. The Company will limit distribution of the VLN™ brochure to cigarette smokers age 18 or older. The VLN™ brochure will direct smokers to VLNcigarettes.com to learn more about the product. See Appendix B for a proposed brochure.

h. Point-of-Sale (POS)

For in-store communications regarding VLN™ cigarettes, 22nd Century has designed a number of proposed VLN™ point-of-sale (POS) pieces. Only for display at stores that sell tobacco products, these materials will confer to smokers the claim and voluntary warning messages proposed for VLN™ cigarettes. These advertisements will direct smokers to the Company's website at VLNcigarettes.com for additional information about VLN™ cigarettes. See Appendix B for proposed point-of-sale pieces.

i. Earned Media

Though it is difficult to predict the frequency or the content, 22nd Century expects some level of "earned media" (i.e. news stories) to result should the FDA grant the Company a marketing order for VLN™ cigarettes. Accordingly, authorized 22nd Century representatives may interact with, and answer questions posed by, members of the press. Information provided by 22nd Century representatives will remain consistent with the related MRTP marketing order and with tobacco labeling laws in general.

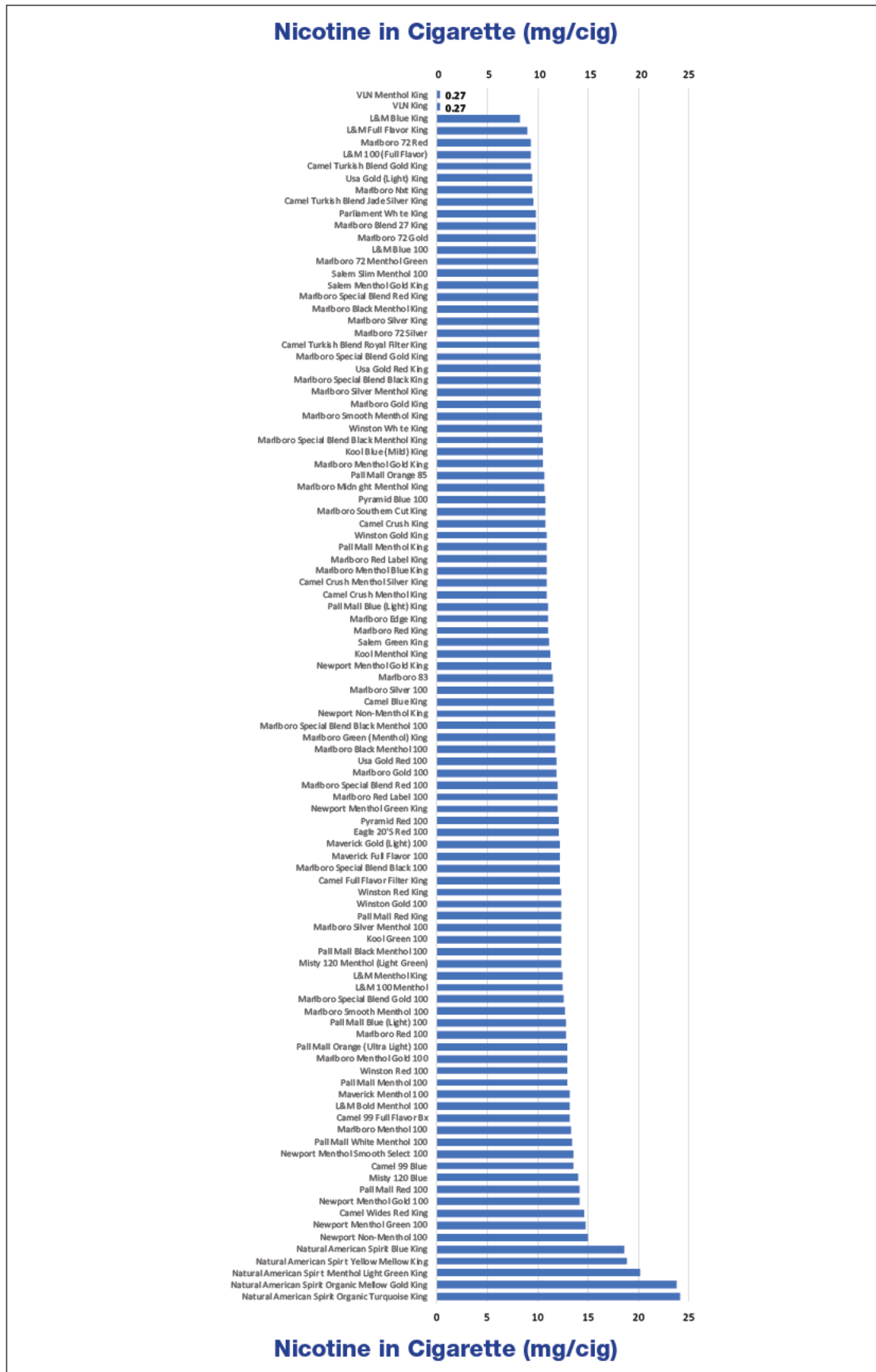
5. Image Library

22nd Century will use the attached image library, Attachment A, to revise and freshen VLN™ advertising over time. The library is representative, though not exhaustive, of images that the Company will use in future advertising.

APPENDIX A

APPENDIX A

*Figure 3 - "Our Testing" web page



APPENDIX B

APPENDIX B

STYLE 1

b. Print Ad Examples:

NICOTINE IS ADDICTIVE...
But now, smokers can choose VLN™



95% LESS NICOTINE
REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette, *but greatly reduces your nicotine consumption.*

For the nearest retailer, visit vlncigarettes.com/stores
or call: 800-225-1838 ext. 221

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

IF YOU SMOKE, CONSIDER VLN™

95% LESS NICOTINE

MADE WITH REAL TOBACCO, VLN™ SMELLS, BURNS, AND TASTES LIKE A CONVENTIONAL CIGARETTE, BUT GREATLY REDUCES YOUR NICOTINE CONSUMPTION

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

VLN

For the nearest retailer, visit vlncigarettes.com/stores
or call: 800-225-1838 ext. 221

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

IF YOU SMOKE, CONSIDER VLN™

95% LESS NICOTINE

MADE WITH REAL TOBACCO, VLN™ SMELLS, BURNS, AND TASTES LIKE A CONVENTIONAL CIGARETTE, BUT GREATLY REDUCES YOUR NICOTINE CONSUMPTION

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

VLN

For the nearest retailer, visit vlncigarettes.com/stores
or call: 800-225-1838 ext. 221

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

95% LESS NICOTINE



Nicotine is addictive...
But now smokers have a choice.

Made with real tobacco, VLN™ smells, burns, and tastes like a conventional cigarette, *but greatly reduces your nicotine consumption.*

For the nearest retailer, visit vlncigarettes.com/stores
or call: 800-225-1838 ext. 221

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

c. Digital Ads Example - Click-through links point to vncigarettes.com. Rotating frame progression, 300x300 pixels:



Frame 1



Frame 2

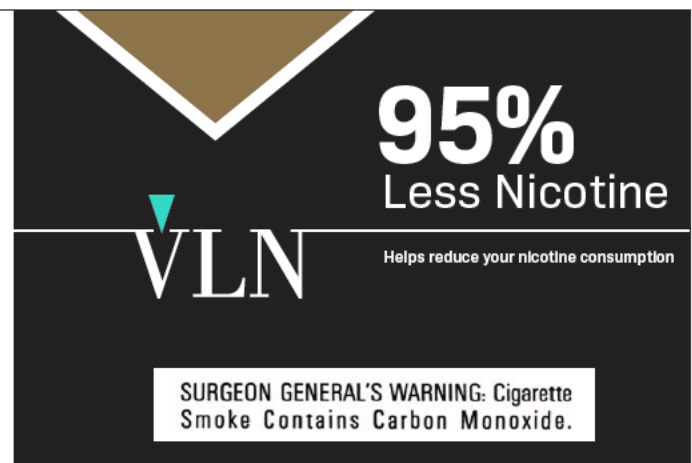


Frame 3



Frame 4

d. Direct Mail Example - outside (top), inside (bottom):



REAL TOBACCO

As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least **95% less nicotine** compared to conventional cigarettes.

Learn more at vncigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

NIKOTINE IN CIGARETTE (mg/dtg)

Cigarette Brand	Nicotine (mg/dtg)
VLN™	0.27mg
Brand A	18.9mg
Brand B	14.8mg
Brand C	12.8mg
Brand D	12.3mg
Brand E	11.9mg

VLN™ is a trademark of 22nd Century Group, Inc. All other trademarks, service marks, logos and/or product names are the property of their respective owners.

e. Email Example:

VLN

95% Less Nicotine

**Helps reduce your
nicotine consumption**

As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine* than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

NICOTINE IN CIGARETTE (mg/dg)

Cigarette Brand	Nicotine (mg/dg)
VLN™	0.27mg
Red and Blue Lights by 11 Yellow No. 8 & 9	18.9mg
Newport Hard Red Cigarettes	14.8mg
Marlboro Red 100	12.8mg
Grand Full Flavor Filter King	12.2mg
Marlboro Gold 100	11.9mg

95% LESS NICOTINE

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Learn more at vlncigarettes.com

**SURGEON GENERAL'S WARNING: Cigarette
Smoke Contains Carbon Monoxide.**

f. Social Media Examples. Click-through links point to vlncigarettes.com:

95% LESS NICOTINE

If you smoke, consider VLN™

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Learn more at vlncigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

95% Less Nicotine

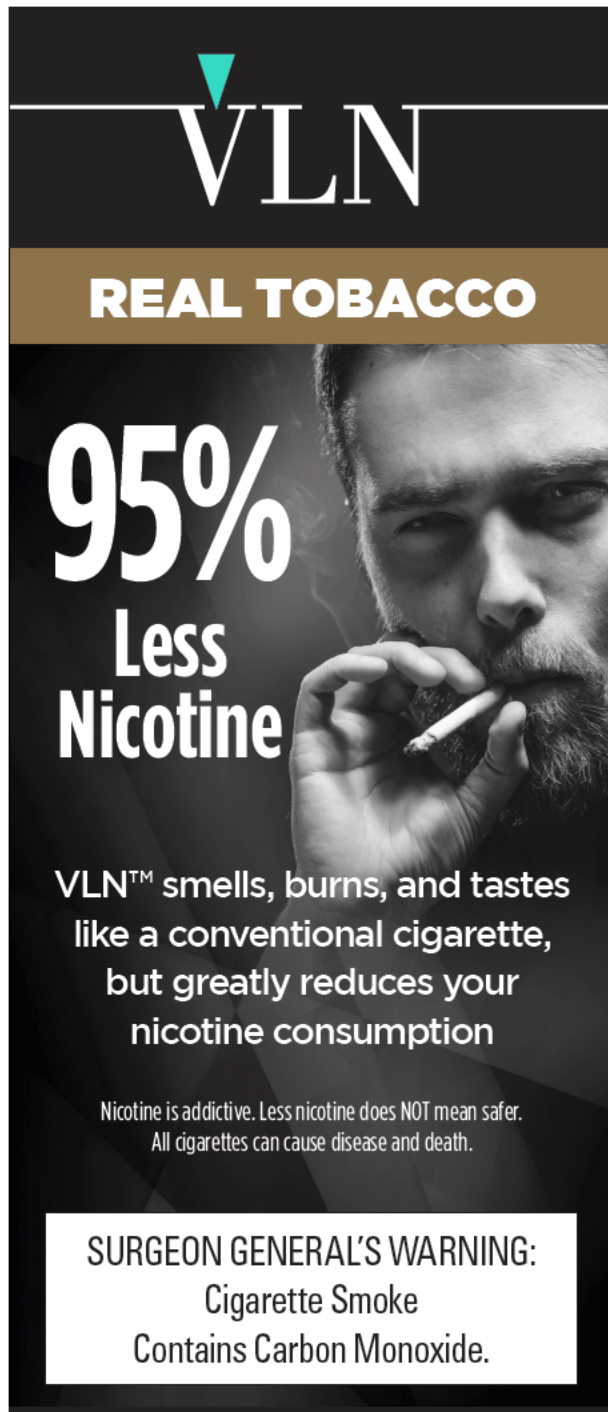
VLN

Learn more at vlncigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

g. Brochure Example - front (left), back (right):



VLN

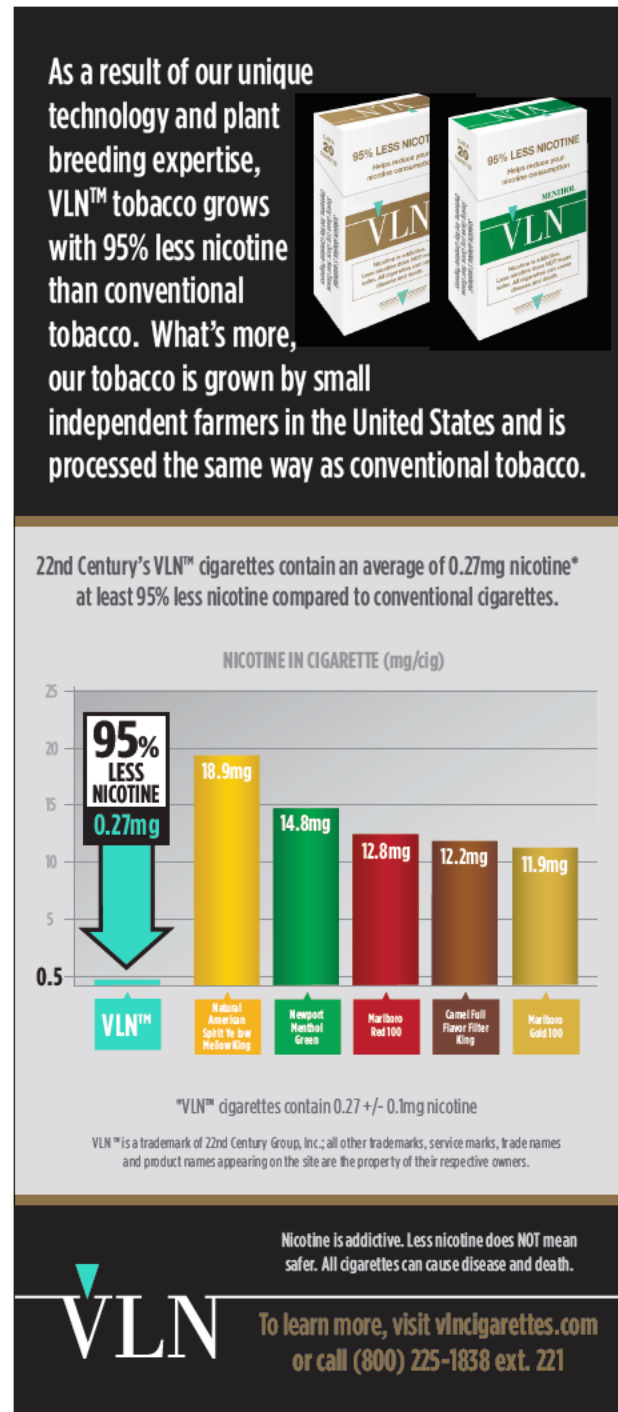
REAL TOBACCO

**95%
Less
Nicotine**

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.



As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)

Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Natural American Spirit 16 Low Yellow King	18.9mg
Newport Menthol Green	14.8mg
Marlboro Red 100	12.8mg
Camel Full Flavor Filter King	12.2mg
Marlboro Gold 100	11.9mg

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

VLN

To learn more, visit vlncigarettes.com or call (800) 225-1838 ext. 221

h. Point-of-Sale (small window cling/sticker - 5" x 7"):



h. Point-of-Sale (shelf talker - 12" x 5.5")

Top flap folds and is placed under product on shelf to hold sign in place:



h. Point-of-Sale (hanging price sign - 18" x 12"):

95% LESS NICOTINE

Helps reduce your nicotine consumption

MADE WITH REAL TOBACCO, VLN™ SMELLS,
BURNS, AND TASTES LIKE A CONVENTIONAL CIGARETTE,
BUT GREATLY REDUCES YOUR NICOTINE CONSUMPTION

INSERT PRICE HERE

vlncigarettes.com

95% LESS NICOTINE
Helps reduce your nicotine consumption

MENTHOL

VLN

Nicotine is addictive.
Less nicotine does NOT mean
safer. All cigarettes can cause
disease and death.

Nicotine is addictive.
Less nicotine does NOT mean
safer. All cigarettes can cause
disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

h. Point-of-Sale (large window cling/poster - 12" x 18"):

**95%
LESS NICOTINE**

*Helps reduce
your nicotine
consumption*

Learn more at vlncigarettes.com
or call (800) 225-1838 ext. 221

95% LESS NICOTINE
Helps reduce your
nicotine consumption

MENTHOL

VLN

Nicotine is addictive.
Less nicotine does NOT mean
safer. All cigarettes can cause
disease and death.

**MADE WITH REAL TOBACCO, VLN™ SMELLS, BURNS, AND
TASTES LIKE A CONVENTIONAL CIGARETTE, BUT GREATLY
REDUCES YOUR NICOTINE CONSUMPTION**

**SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.**

Nicotine is addictive.
Less nicotine does NOT mean
safer. All cigarettes can
cause disease and death.

h. Point-of-Sale (shelf danglers):



APPENDIX B

STYLE 2

b. Print Ad Examples:

Switch to
VLN



95% Less Nicotine
REAL TOBACCO


VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

Learn more at vlncigarettes.com or call: 800-225-1838 ext. 221

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

Switch to
VLN



95% Less Nicotine
REAL TOBACCO!

VLN™ smells, burns, and tastes like a conventional cigarette but greatly reduces your nicotine consumption

Learn more at vlncigarettes.com or call: 800-225-1838 ext. 221

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

Switch to
VLN



95% Less Nicotine
REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette but greatly reduces your nicotine consumption

Learn more at vlncigarettes.com or call: 800-225-1838 ext. 221

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

Switch to
VLN



95% Less Nicotine
REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette but greatly reduces your nicotine consumption

Learn more at vlncigarettes.com or call: 800-225-1838 ext. 221

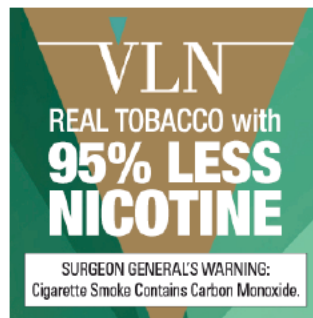
Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

c. Digital Ads Example - Click-through links point to vncigarettes.com. Rotating frame progression, 300x300 pixels:



Frame 1



Frame 2



Frame 3



Frame 4

d. Direct Mail Example - outside (top), inside (bottom):

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

Learn more at vncigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

*VLN™ cigarettes contain 0.27 mg nicotine online

NICOTINE IN CIGARETTE (mg/cig)

Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Leading Brand A	18.9mg
Leading Brand B	14.8mg
Leading Brand C	12.8mg
Leading Brand D	12.2mg
Leading Brand E	11.9mg

VLN™ is a trademark of 22nd Century Group, Inc. All other trademarks, service marks, trade names, and product names are the property of their respective owners.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

Mr. John T. Smith
123 Anywhere Street
United States, US 12345

Mr. John T. Smith
123 Anywhere Street
United States, US 12345

e. Email Example:

Switch to

VLN

95% LESS NICOTINE
Helps reduce your nicotine consumption

MENTHOL
95% LESS NICOTINE
Helps reduce your nicotine consumption

95% Less Nicotine

REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

REAL TOBACCO

As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine* than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)

Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Natural American Spirit	18.9mg
Harvest Moon	14.8mg
Purboro 1 of 10	12.8mg
Grand Pall	12.2mg
Purboro Gold	11.9mg

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

[Click here to learn more at vlncigarettes.com](http://vlncigarettes.com)

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

f. Social Media Examples. Click-through links point to vlncigarettes.com:

REAL TOBACCO

Switch to

VLN

95% Less Nicotine

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

Switch to

VLN

95% Less Nicotine

REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

g. Brochure Example - front (left), back (right):

Switch to

VLN



**95%
Less Nicotine
REAL TOBACCO**

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

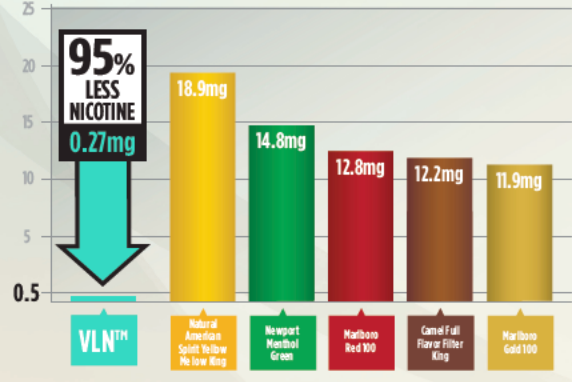
SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

REAL TOBACCO

As a result of our unique technology and plant expertise, VLN™ tobacco contains 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)



Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Natural American Spirit, Natural No Tar King	18.9mg
Newport Menthol Green	14.8mg
Marlboro Red 100	12.8mg
Camel Full Flavor Filter King	12.2mg
Marlboro Gold 100	11.9mg

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

To learn more, visit
vncigarettes.com

APPENDIX B

STYLE 3

b. Print Ad Examples:



MAKE THE SWITCH to

95%
Less Nicotine

REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

For the nearest retailer, visit vln-cigarettes.com/stores or call: 800-225-1838 ext. 221



Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.



95%
Less Nicotine

Helps reduce your nicotine consumption

REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

For the nearest retailer, visit vln-cigarettes.com/stores or call: 800-225-1838 ext. 221



Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide.

c. Digital Ads Example - Click-through links point to vncigarettes.com. Rotating frame progression, 300x300 pixels:



Frame 1



Frame 2

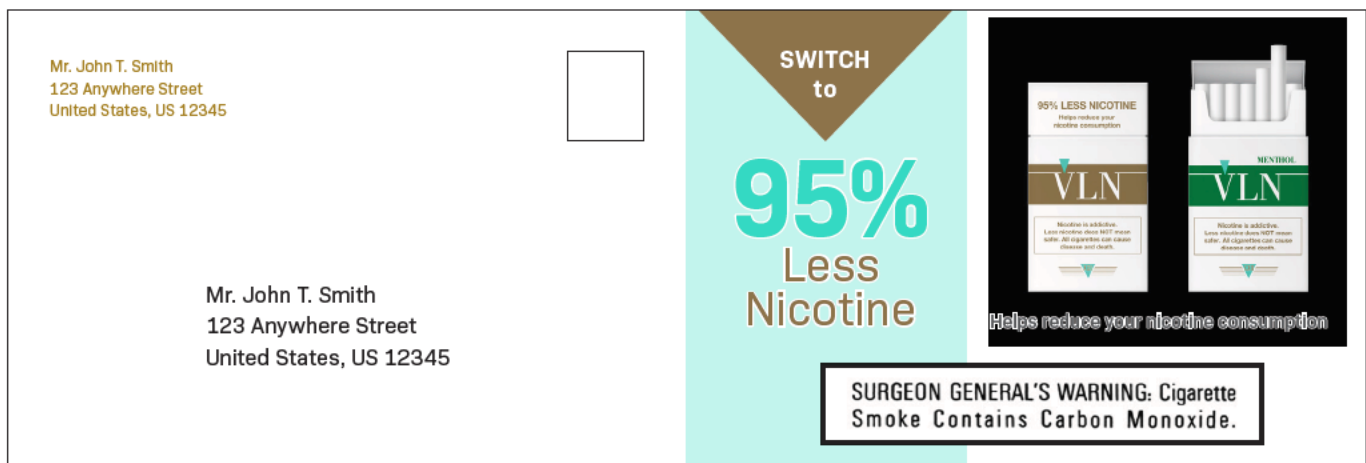


Frame 3



Frame 4

d. Direct Mail Example - outside (top), inside (bottom):



VLN REAL TOBACCO

As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

Learn more at vncigarettes.com
or call (800) 225-1838 ext. 221

**SURGEON GENERAL'S WARNING: Cigarette
Smoke Contains Carbon Monoxide.**

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

*VLN™ cigarettes contain 0.27 +/- 0.01mg nicotine

NICOTINE IN CIGARETTE (mg/cig)

Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Full Flavor Conventional Cigarette	13.9mg
Light Conventional Cigarette	14.8mg
Medium Conventional Cigarette	12.8mg
Conceded Conventional Cigarette	12.2mg
Ultra Light Conventional Cigarette	11.9mg

VLN™ is a trademark of 22nd Century Group, Inc. all other trademarks service marks trade names and/or product names are the property of their respective owners.

e. Email Example:

Switch to

95%

Less Nicotine

**Helps reduce your
nicotine consumption**

**REAL
TOBACCO**

As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine* than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)

Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Red Bull American Spirit	18.9mg
Newport Menthol	14.8mg
Marlboro Red	12.8mg
Gold Bull	12.2mg
Marlboro Gold	11.9mg

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

[Click here to learn more at vlncigarettes.com](http://vlncigarettes.com)

**SURGEON GENERAL'S WARNING: Cigarette
Smoke Contains Carbon Monoxide.**

f. Social Media Examples. Click-through links point to vlncigarettes.com:

**REAL
TOBACCO**



Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

Switch to
95%
Less Nicotine

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Learn more at
vlncigarettes.com

**SURGEON GENERAL'S WARNING: Cigarette
Smoke Contains Carbon Monoxide.**

Switch to
95%
Less Nicotine

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption



Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

VLN
vlncigarettes.com

**SURGEON GENERAL'S WARNING: Cigarette
Smoke Contains Carbon Monoxide.**

g. Brochure Example - front (left), back (right):

MAKE THE SWITCH

95%

Less Nicotine



REAL TOBACCO

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Nicotine is addictive. Less nicotine does NOT mean safer.
All cigarettes can cause disease and death.

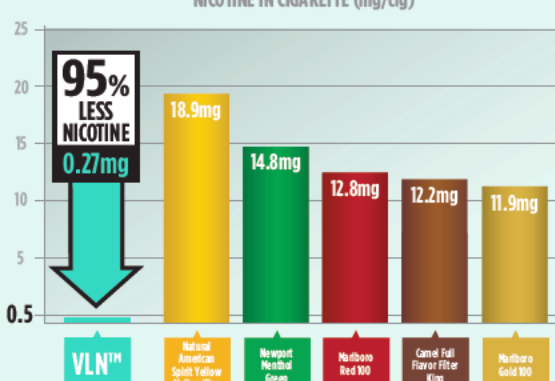
SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

VLN

As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)



Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27
Natural American Spirit Yellow	18.9
Newport Menthol Green	14.8
Marlboro Red	12.8
Camel Full Flavor Filter King	12.2
Marlboro Gold	11.9

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

To learn more, visit
vln-cigarettes.com

APPENDIX B

STYLE 4

b. Print Ad Examples:



MAKE THE SWITCH
to
95%
LESS NICOTINE

95% LESS NICOTINE
Helps reduce your nicotine consumption.

95% LESS NICOTINE
Helps reduce your nicotine consumption.

Made with **real tobacco**, VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption.

For the nearest retailer, visit vln-cigarettes.com/stores or call: 800-225-1838 ext. 221

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide



Now you can enjoy
REAL TOBACCO
when YOU want to.

95% LESS NICOTINE
Helps reduce your nicotine consumption.

95% LESS NICOTINE
Helps reduce your nicotine consumption.

Made with **real tobacco**, VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption.

For the nearest retailer, visit vln-cigarettes.com/stores or call: 800-225-1838 ext. 221

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide

c. Digital Ads Example - Click-through links point to vncigarettes.com. Rotating frame progression, 300x300 pixels:



Frame 1



Frame 2

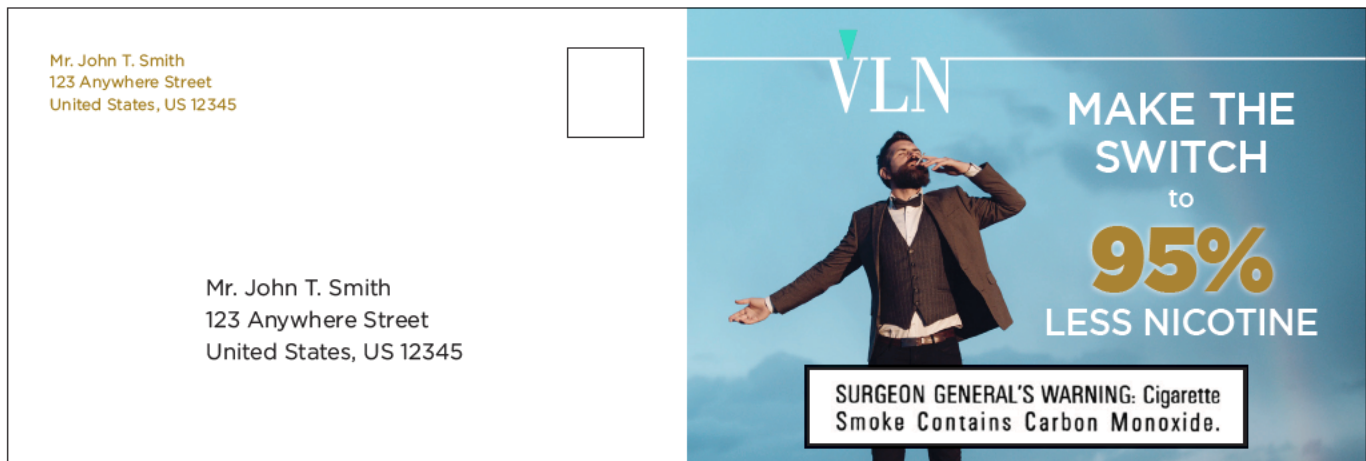


Frame 3



Frame 4

d. Direct Mail Example - outside (top), inside (bottom):



e. Email Example:

REAL TOBACCO

95% LESS NICOTINE




**Helps reduce your
nicotine consumption**

As a result of our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine* than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)



Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Winston American	18.9mg
Newport Menthol Green	14.8mg
Marlboro Red 100	12.8mg
Camel & Filter 100	12.2mg
Marlboro Gold 100	11.9mg

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.



**Nicotine is addictive. Less nicotine does NOT mean safer.
All cigarettes can cause disease and death.**

[Click here to learn more at
vncigarettes.com](http://vncigarettes.com)

**SURGEON GENERAL'S WARNING: Cigarette
Smoke Contains Carbon Monoxide.**

f. Social Media Examples. Click-through links point to vlncigarettes.com:



If you smoke, consider VLN™

95% LESS NICOTINE


VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Learn more at vlncigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

The advertisement features a silhouette of a person smoking a cigarette against a warm, orange sunset background. To the right, two packs of VLN cigarettes are displayed: one labeled '95% LESS NICOTINE' and the other 'MENTHOL'. Both packs include the VLN logo and a warning about nicotine addiction.



MAKE THE SWITCH to

95% Less Nicotine

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

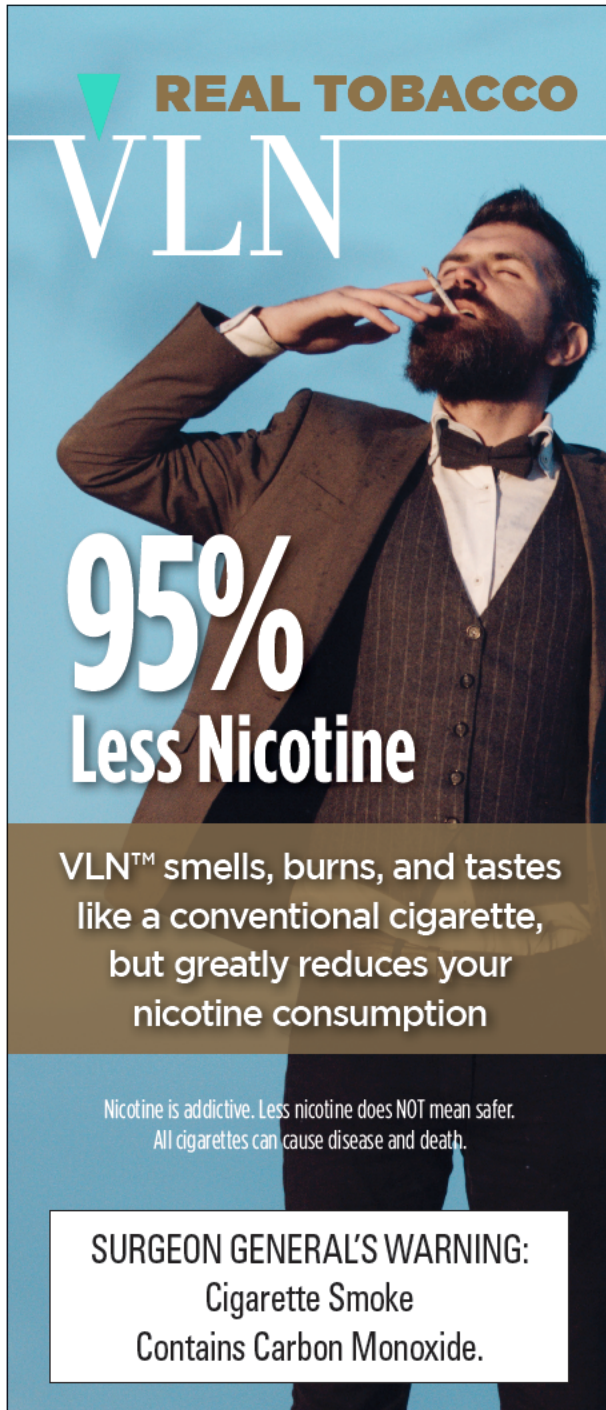
Learn more at vlncigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

The advertisement features a man in a brown suit and bow tie smoking a cigarette against a clear blue sky. In the bottom left corner, two packs of VLN cigarettes are shown: one labeled '95% LESS NICOTINE' and the other 'MENTHOL'. Both packs include the VLN logo and a warning about nicotine addiction.

g. Brochure Example - front (left), back (right):



REAL TOBACCO

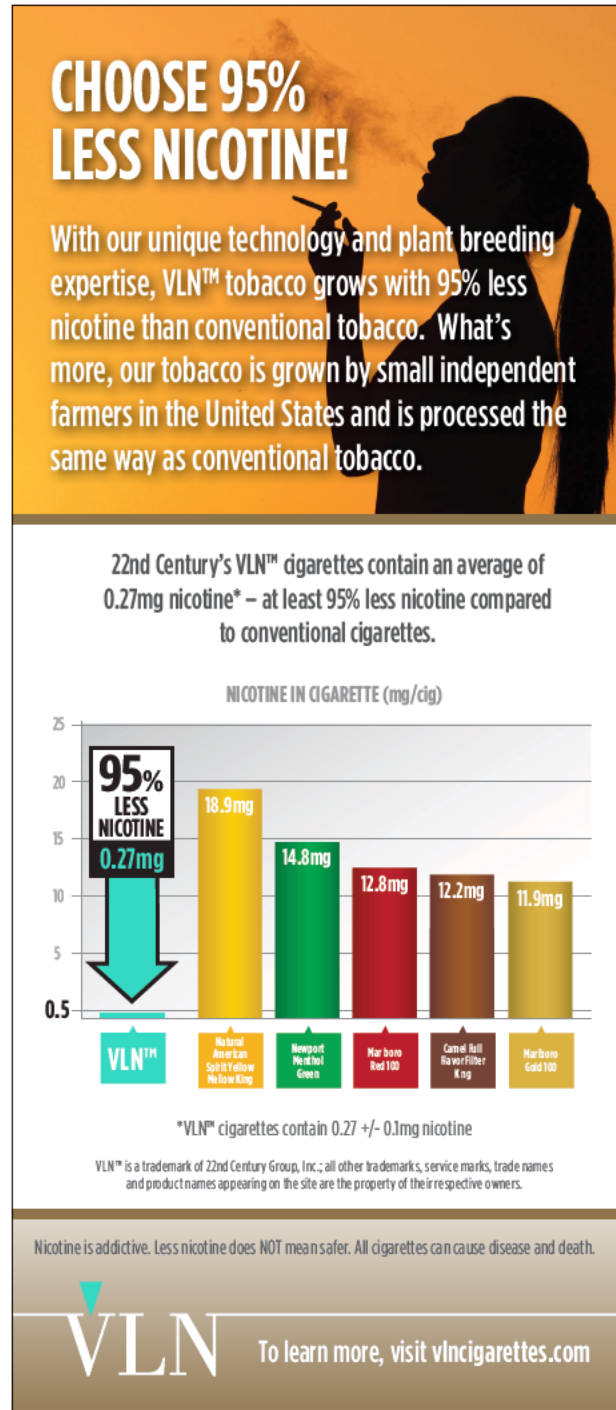
VLN

**95%
Less Nicotine**

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.



**CHOOSE 95%
LESS NICOTINE!**

With our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)

Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Natural American Spirit Yellow New King	18.9mg
Newport Next Red Green	14.8mg
Marlboro Red 100	12.8mg
Camel Ball Hard Filter King	12.2mg
Marlboro Gold 100	11.9mg

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

VLN To learn more, visit vlncigarettes.com

APPENDIX B

STYLE 5

b. Print Ad Examples:

IF YOU SMOKE, CONSIDER VLN™



95%
LESS
NICOTINE

Made with real tobacco, VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption.

For the nearest retailer, visit vincigarettes.com/stores or call: 800-225-1838 ext. 221



Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide

IF YOU SMOKE, CONSIDER VLN™



95%
LESS
NICOTINE

Made with real tobacco, VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption.

For the nearest retailer, visit vincigarettes.com/stores or call: 800-225-1838 ext. 221



Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke Contains Carbon Monoxide

c. Digital Ads Example - Click-through links point to vncigarettes.com. Rotating frame progression, 300x300 pixels:



Frame 1



Frame 2

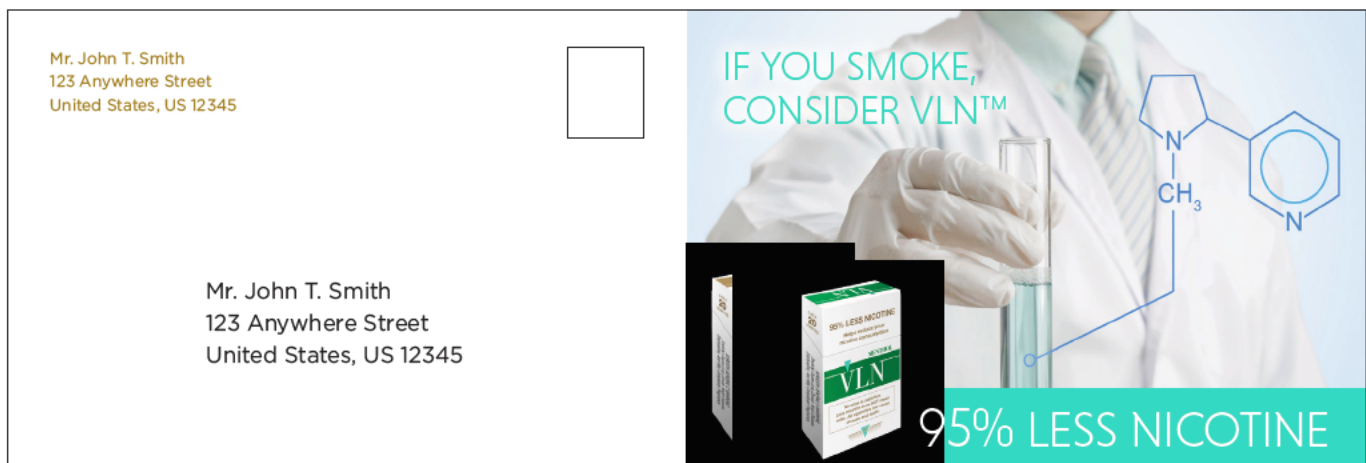


Frame 3



Frame 4

d. Direct Mail Example - outside (top), inside (bottom):



e. Email Example:



Switch to
95%
Less Nicotine

Helps reduce your nicotine consumption

With our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine* than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

NICOTINE IN CIGARETTE (mg/cig)

Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Natural American Spirit Yellow Ribbon King	18.9mg
Wingspread Menthol Green	14.8mg
Marlboro Red 100	12.8mg
Camelsoft Filter King	12.2mg
Hardcore Gold 100	11.9mg

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Click here to learn more at vlncigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

f. Social Media Examples. Click-through links point to vln-cigarettes.com:

IF YOU SMOKE, CONSIDER VLN™

95% LESS NICOTINE!

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Learn more at vln-cigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

The advertisement features a scientist in a white lab coat and gloves holding a test tube with blue liquid. To the right is a chemical structure of nicotine. Below the scientist are two packs of VLN cigarettes, one labeled 'MENTHOL' and the other '95% LESS NICOTINE'. The background is a mix of brown, teal, and light blue.

IF YOU SMOKE, CONSIDER VLN™

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

Learn more at vln-cigarettes.com

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

The advertisement features a close-up of hands holding a broken cigarette. To the right are two packs of VLN cigarettes, one labeled 'MENTHOL' and the other '95% LESS NICOTINE'. The background is a mix of brown, teal, and light blue.

g. Brochure Example - front (left), back (right):

IF YOU SMOKE,
CONSIDER VLN™



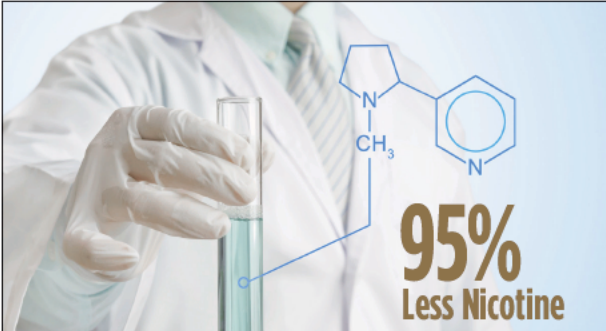
95% Less Nicotine

VLN™ smells, burns, and tastes like a conventional cigarette, but greatly reduces your nicotine consumption

VLN

Nicotine is addictive. Less nicotine does NOT mean safer.
All cigarettes can cause disease and death.

SURGEON GENERAL'S WARNING:
Cigarette Smoke
Contains Carbon Monoxide.

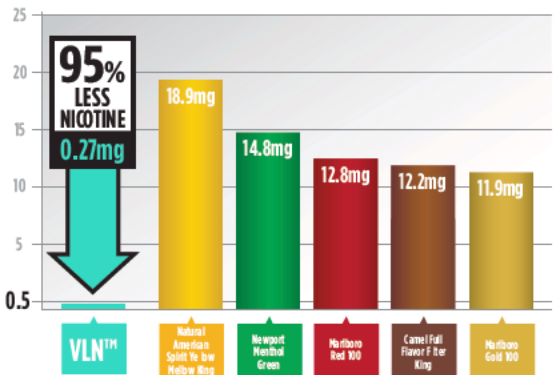


95% Less Nicotine

With our unique technology and plant breeding expertise, VLN™ tobacco grows with 95% less nicotine than conventional tobacco. What's more, our tobacco is grown by small independent farmers in the United States and is processed the same way as conventional tobacco.

22nd Century's VLN™ cigarettes contain an average of 0.27mg nicotine* – at least 95% less nicotine compared to conventional cigarettes.

NICOTINE IN CIGARETTE (mg/cig)



Cigarette Brand	Nicotine (mg/cig)
VLN™	0.27mg
Natural American Spirit 100s	18.9mg
Newport Menthol Green	14.8mg
Marlboro Red 100	12.8mg
Camel Full Flavor Filter King	12.2mg
Marlboro Gold 100	11.9mg

*VLN™ cigarettes contain 0.27 +/- 0.1mg nicotine

VLN™ is a trademark of 22nd Century Group, Inc.; all other trademarks, service marks, trade names and product names appearing on the site are the property of their respective owners.

Nicotine is addictive. Less nicotine does NOT mean safer. All cigarettes can cause disease and death.

VLN To learn more, visit vlncigarettes.com