

Demonstrative 14: Brown & Williamson’s Marketing Documents

U.S. Exhibit 17,568

Image or Issue	Exhibit Number	Bates Number	Document Title	Document Date	Quote
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 35,018	170052238-2240	Memo entitled “Conclusions”	February 21, 1973	This memo lists only conclusions on which B&W plans to take action. “At the present rate, a smoker in the 16-25 year age group will soon be three times as important to KOOL as a prospect in any other broad age category.” (at 2238-39) “KOOL’s stake in the 16-25 year old population segment is such that the value of this audience should be accurately weighted and reflected in current media programs. As a result, all magazines will be reviewed to see how efficiently they reach this group...” (at 2240)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 47,489	400229127-9148	Saturn Objective	No date, circa 1980s. Part of 400818174 from the mid-80s	Discussed experience as beginning smoker. (at 9134) Described experimental phase of smoking among 9-12 year olds. (at 9138) Noted the “adoption phase” for smoking was “14-16 years old - High School (Formative Years).” (at 9139)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 21,877	680116947-6968	Viceroy Agency Orientation Outline	Circa 1976	“Starters By Brand—Marlboro excels [sic] on obtaining starting smokers with 9% of its former user base falling into this group. Winston is second at 7% and VICEROY third with 6%.” (at 6950) Presents indices of cigarette consumption for those 16-25 years old. (at 6950) Target audiences include “Males 16-35 primarily.” (at 6959)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 53,869	670624932-5364	History and Key Trends in the U.S. Cigarette Market	October 1979	Reviews data on brand market share or consumption among those as young as 16. (at 5013-5015, 5061)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 21,925	109870521-0561	The Current Group R&D Projects	Circa 1985	“Overall BAT strategy will be market specific and multi-brand but within each market major effort behind one brand aimed at starters/young adults.” (at 0536)

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Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 25,429	670579884-9946	Untitled printout of data on "Starting Age of All Smokers on the Switching Study"	October 26, 1983	Shows that 37.15% of respondents reported starting to smoke before age 18. (at 9884)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 53,921	676019303-9393	KOOL: 1933-1980 – A Retrospective View of KOOL, Book I: The Text, Prepared by Cunningham & Walsh	November 10, 1980 Revised: 12/1/80	"Between 3 and 4 million post-war babies enter the smoking population annually starting in 1963, a new source of business." (at 9329) Television advertising during this period reached " ...two key growing opportunity segments: young people, particularly males, needing traditional rites of passage" and "Blacks, looking for menthol taste ..." (at 9331) "Kool's share of starters climbs to 12.0% in '75 vs. 7.0% in '70; 60% of starters are under 25 years in '75 ..." (at 9357)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 20,938	566627751-7824	Project Plus/Minus	May 7, 1982	"Serious smoking mainly starts in the 14-18 age range." (at 7753)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 69,097	673002083-2170	1985 Strategic Marketing Plan	1985	Information it has gathered about the desires of Marlboro smokers "may be a clue to the needs of starters." (at 2138)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 53,921	676019303-9393	KOOL: 1933-1980 – A Retrospective View of KOOL, Book I: The Text, Prepared by Cunningham & Walsh	November 10, 1980 Revised: 12/1/80	"If we accept that youth smoke primarily for image, and it was the attraction of this segment as well as black smokers, particularly males, that provided the main sources for the Brand's growth, then we can deduce that Kool's advertising provided these smokers with a relevant image, i.e., the menthol smoke for the kind of man they could emulate." (at 9341)

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Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 30,792	621079918-9921	Kool Isn’t Getting the Starters/236 – Memorandum from D.V. Cantrell to I.D. Macdonald, Brown & Williamson Marketing Vice President	February 17, 1987	The document begins: “This memo addresses the fact that Kool is no longer attracting new smokers (further referred to as ‘starters’) ...” (at 9118) “Menthol brands have been said to be good starter products because new smokers appear to know that menthol covers up some of the tobacco taste and they already know what menthol tastes like, vis-à-vis candy.” (at 9920)
Understanding of the need to market to adolescents or their intent to do so	U.S. Ex. 89,207	482312506-2565	1998-2000 Forecast Including Settlement & FET	July 10, 1997	This document forecasts cigarette sales for 1998 through 2000. Brown & Williamson analyzes sales among those under 21. The document shows that 5.5% of total industry sales are to those under 21.
Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex, 47,489	400229127-9148	Saturn Objective	Circa 1980s. Part of 400818174 from the mid-80s	Notes social acceptance [“avoid threats” “join crowd (avoid rejection)”] as factors in initial smoking. (at 9138) Also notes revolt against authority. (at 9138) Under “why” notes role models, fear of rejection, revolt, and rites of passage. (at 9139)
Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 21,681	102690336-0350	Structured Creativity Group Presentation by D. E. Creighton	June, 1984	“We must find a way to appeal to the young, who want to protest so that the product image, and the product will satisfy this part of the market.” (at 0338)

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Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 21,877	680116947-6968	Viceroy Agency Orientation Outline	1976	<p>Discussed “real or perceived benefits of smoking,” which include “symbol of maturity or independence,” “social icebreaker,” and “presentation of self in a favorable manner associated with the cigarette brand image.” (at 6952)</p> <p>Mandatories presented, including: “...advertising must give VICEROY a youthful, high quality look.” (at 6963)</p> <p>Marlboro’s executional elements and their connotations and benefits through imagery are listed. Executional elements of cowboys, horses, scenery, and lifestyle; their connotations include rugged individualism, masculinity, strength, simplicity, good health, comfort, satisfaction, and honesty. (at 6964)</p> <p>Benefits through imagery: “Marlboro is a rich, satisfying cigarette smoked by men who are strong, independent people whose lifestyles are equally rich and satisfying. Superiority is clearly implied.” (at 6964)</p> <p>Same things presented for Winston:</p> <p>Connotations: youthful (extreme), strong, contemporary, bold, aggressive. (at 6964)</p>
Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 20,939	566627826-7935	“Project 16” ENGLISH YOUTH	October 18, 1977	<p>“[D]esigned to ... learn everything there was to learn about how smoking beings [sic], how high school students feel about being smokers” (at 7839)</p> <p>“The adolescent seeks to display his new urge for independence with a symbol, and cigarettes are such a symbol since they are associated with adulthood and at the same time adults seek to deny them to the young. By deliberately flaunting out this denial, the adolescent proclaims his break with childhood, at least to his peers.” (at 7831-7832)</p> <p>“Around the age of 11 to 13, there is peer pressure exerted by smokers on non smokers that amounts to taunting and goading of the latter to get them to smoke.” (at 7831)</p>

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Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 21,530	109872505-2508	Key Areas - Product Innovation Over Next 10 Years for Long Term Development	August 28, 1979	“[T]ypical development path for a smoker, namely: Factors starting the habit: Curiosity, Parents...Image/peers.” (at 2505)
Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 53,869	670624932-5364	History and Key Trends in the U.S. Cigarette Market	October 1979	Analysis of Cigarette Brand Imagery begins on 5091. Imagery involves product imagery and user imagery (work role imagery, personality imagery, and physical appearance). (at 5093) Highest on “masculine brand” were Camel, and Marlboro. (at 5125) Marlboro highest on “a man who women find exciting.” (at 5126) Winston and Marlboro are equal with respect to “Is a solid, dependable person.” (at 5127) Virginia Slims has an image that includes “a woman who men find exciting,” and “enjoys getting excited about things.” (at 5133)
Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 20,938	566627751-7824	Project Plus/Minus	May 7, 1982	Extensive study of factors influencing youth (specifically teens) and adult smoking. Notes peer influences. Notes role of rebelliousness in starting. (at 7762) Other motivations noted: Peer pressure. (at 7766) To join or remain in a circle. (at 7766-7767) Image of being cool. (at 7768) An icebreaker in social situations. (at 7769) Relaxation. (at 7773)

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Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 67,705	210004059-4165			Category I (confidential)
Understanding of the themes and images likely to motivate adolescents to smoke their brands	U.S. Ex. 53,921	676019303-9393	KOOL: 1933-1980 – A Retrospective View of KOOL, Book I: The Text, Prepared by Cunningham & Walsh	November 10, 1980 Revised: 12/1/80	"If we accept that youth smoke primarily for image and it was the attraction of this segment as well as black smokers, particularly males, that provided the main sources for the Brand's growth, then we can deduce that Kool's advertising provided these smokers with a relevant image, i.e., the menthol smoke for the kind of man they could emulate." (at 9341)