



Manipulating a Sacred Tradition

An Investigation of Commercial Tobacco Marketing & Sales Strategies on the Navajo Nation and other Native Tribes

This report documents the strategies used by commercial tobacco companies to manipulate and target Navajo and other Indian Nations' sacred use of tobacco in an attempt to increase the industry's bottom line. These corporate campaigns have resulted in increased Native commercial tobacco consumption and addiction. Indian Nations are sovereign communities and are not directly impacted by state and local smokefree laws and other state and local tobacco control measures. As such, the commercial tobacco industry has identified these communities as an untapped and unprotected opportunity to maximize profits beyond the limits of state-regulated jurisdictions. Additionally, commercial tobacco companies have sought to manipulate the sacred use of tobacco, improperly suggesting that commercial cigarette and smokeless tobacco products are retail substitutes for tobacco approved by elders for ceremonial use.

A variety of top-selling commercial cigarette manufacturers and smokeless tobacco companies are implicated by this report. Geographic areas analyzed in the report include Indian Nations in the Southwest United States, including the Navajo Nation and various other tribes in Arizona and New Mexico. Primary focus areas for the report include:

- (a) Exploiting an untapped market: commercial tobacco companies' rationale, strategies, and marketing tactics for using tribal casinos as a means to target Native Americans and gaming patrons;
- (b) Upping the tobacco industry bottom line: tobacco company pricing strategies intended to increase business at tribal tobacco outlets, including smokeless tobacco company marketing and free product giveaways at Indian rodeos, all the while sponsoring false economic information that tribal casino success is dependent on cigarette sales and indoor smoking; and
- (c) Engaging in cultural thievery and misrepresentation: tobacco company marketing that abuses Native American imagery and concepts and misleads consumers into thinking that their commercial products are "natural" and perhaps safer to smoke.

Manufacturers and Brands Highlighted in the Report

1. **Lorillard Tobacco Company**
manufacturer of *Newport, Kent, True, Old Gold, Maverick, Harley, and Style* brands
2. **Philip Morris**
manufacturer of *Marlboro, Winston, Basic, Benson & Hedges, Bristol, Cambridge, Merit, Parliament, and Virginia Slims* brands
3. **RJ Reynolds (now known as "Reynolds American")**
manufacturer of *Camel, Capri, Carlton, Doral, Dunhill, Eclipse, GPC, Kool, Legend, Misty, Monarch, Mustang, Pall Mall, Salem, Vantage, Viceroy, and Winston* brands
4. **Liggett Group, Inc.**
manufacturer of *Eve, Grand Prix, Kingsport, Pyramid, and Tourney* brands
5. **UST (and its subsidiary, U.S. Smokeless Tobacco Company)**
manufacturer of *Skoal, Copenhagen, Red Seal, and Husky* brands
6. **Santa Fe Natural Tobacco Company (now owned by Reynolds American)**
manufacturer of *Natural American Spirit* cigarette brand

Exploiting An Untapped Market

Commercial Tobacco Companies Use Casinos to Sell More Cigarettes

Commercial tobacco manufacturers have developed a long history of predatory behavior that seeks to capitalize on any and all opportunities to boost their own tobacco sales and to gain market share from their competitors.

Below are excerpts from a Lorillard Tobacco Company document (Bates numbers 94410376-94410449; document file viewable at: <http://legacy.library.ucsf.edu/tid/owq10e00>) that details a marketing analysis of tribal (commercial) tobacco retailers in Arizona, New Mexico, South Dakota, and North Dakota. The report identifies which factors allow some tribal tobacco retailers to perform better and sell more cigarettes compared to others. **Casinos are identified as a major factor which helps Lorillard Tobacco Company sell more cigarettes.**

Bates number 94410378

Indian Gaming Casinos, which also operate under Tribal, rather than State authority, are commonly near, adjacent to, or combined with the Cigarette Stores. These casinos can help support Cigarette store volumes by attracting large numbers of tourists, or residents to rural areas that would otherwise not be visited.

Bates number 94410379

Because of the price advantage over the general market, most all Indian stores have high weekly carton sales. Volumes of 5,000 to 10,000 cartons per week are usual. Seasonal peaks will take volumes to twice that number. This makes these individual stores special opportunities to create new business for the cigarette manufactures.

Bates number 94410382

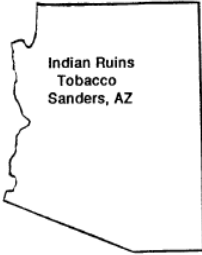
In Arizona, 31 Indian Cigarette stores account for over 14% of the total volume in the state.

Individual store volumes range from as low as 150 cartons per week to over 10,000. The average volume for an Arizona Indian Store is 1,500 cartons per week. Lorillard's current share of that volume is 6.0%, almost twice the general market share.

The most aggressive and profitable commercial tobacco companies track sales down to the level of individual retailers. In the documents seen here, Lorillard Tobacco Company is seeking to capitalize on population densities and high-volume cigarette sales environments created by casino operations. Other tobacco industry documents show evidence that manufacturers such as Lorillard maintain elaborate records of sales by cigarette retailers specifically on Arizona and New Mexico Indian reservation lands, including a detailed accounting of the following types of marketing data:

- (1) Total sales by tribe
- (2) Total sales by retail outlet
- (3) Total sales by brand name
- (4) Total competitors' sales
- (5) Total sales: packs vs. cartons
- (6) Total sales: full-price brands vs. discount brands
- (7) Point-of-sale info related to advertising and precise merchandise location on shelf
- (8) Alcohol sales info
- (9) Information about whether the tobacco retailer is located near a casino

Commercial tobacco companies collect this type of information because they are constantly adjusting their marketing strategies to sell more cigarettes on Indian reservation lands. As an example of retailer-level sales tracking, below is an analysis of a Navajo retailer that measures each of these data points (Bates number 94410396; viewable as part of the same file referenced above). The file below is from a Lorillard Tobacco Company document. Marketing and sales data of Lorillard's biggest competitors are also mentioned in this document: RJ Reynolds ("RJR" in the document below) and Philip Morris ("PM"). "CPW" refers to an industry measure of sales: cartons sold per week.

Bates number 94410396					
		TRIBE: Navajo		RESERVATION: Navajo	
INDUSTRY VOLUME: 2000 CPW		LORILLARD VOLUME: 120 CPW		% CARTON SALES: 90	
LORILLARD AVERAGE CARTON SALES PER WEEK:					
Harley	Style	Newport	Old Gold	Kent	True
5	N/A	40	20	35	20
LORILLARD PROMOTIONS:					
Old Gold Coupons		Newport Coupons		Harley Buy Down	
TYPE OF STORE – Walk in Service			CASINO – No		
PRIMARY CARTON SHELVING: R J Reynolds 48 Front Rows			PACKAGE SALES: NSS		
COMPETITIVE CARTON PLANS: RJR, PM, B&W & L&M					
LORILLARD CARTON PLANS: 4th Shelf 30 Rows					
LORILLARD PACKAGE PLANS: None					
CUSTOMER/DEMOGRAPHICS: Indian Ruins is located along Interstate 40, in Northern Arizona. Customers are mostly transient traffic and tourists.					
COMMENTS: Kents and Trues have been strong in the past in this interstate travel stop. This account is the Direct Account that supplies 5 other reservation stores in the area.					
RECOMMENDATIONS: Include Kent and True in a Coupon Carton promotion that would help restore some business lost to price value and couponed brands, as well as maintain our current Kent/True base.					
Develop in store POS that effectively communicates price points on Harley and Old Gold.					

Commercial Tobacco Companies Target Tribal Members Who Visit Gaming Venues In An Effort to Create More Addicted Customers

Tobacco companies target individual bingo operations across the country for increased cigarette sales. Gaming venues are used by commercial tobacco manufacturers to increase and sustain nicotine addiction among locals who patronize gaming operations such as bingo halls and casinos. These companies' strategies include free merchandise giveaways (cigarettes and tobacco company-branded merchandise), cross-promotions involving gaming venues and nearby tobacco retail outlets, and special offers for free admission to gaming venues.

Lorillard Tobacco Company has taken a particular interest in selling more cigarettes at Indian gaming venues. Below is a document (Bates number 93323274; from a file viewable at: <http://legacy.library.ucsf.edu/tid/hpf44a00>) in which Lorillard identifies "Indian Bingo" operations as the "most desirable targets for special events" (i.e., promotional/marketing opportunities for their commercial tobacco products) while noting "many of the Indian Halls sell tobacco products." The combination of gaming and tobacco retail outlets garner special attention as a means for Lorillard to sell more commercial tobacco. **Many tobacco industry documents indicate an interest in using gaming venues as opportunities to round up large numbers of new potential customers.**

Bates number 93323274

There are hundreds of bingo halls throughout the country both Indian and oharity. For the purpose of cigarette promotion we have chosen to concentrate on Indian Bingo halls for the following reasons.

Indian Bingo does not fall under the jurisdiction of the Gaming Commission or the Commission on Alcohol, Tobacco and Firearms. Whereas state agencies limit the hours and number of games many organizations may run in a given time period (often only two or three games per week) Indian gaming operations are unregulated and allowed to operate 24 hours per day seven days per week.

High stakes bingo was developed and established as an economic development vehicle for the tribes to further education, employment, health and welfare of tribal members, especially in compensating for a sharp reduction in federal aid. Federal Indian reservations were historically granted the special legal status of sovereign nations; therefore, they are not regulated by state laws which limit prize amounts in games of chance. It is not uncommon for Indian bingo halls to feature jackpots in excess of \$100,000 regular game "payouts" average fromm \$500 to \$5,000.

The size of the Indian games, the sophistication of their operations and the high stakes of the jackpots offer the most desirable targets for special events. In addition many of the Indian Halls sell tobacco products.

Sampling

A crew hired, trained and supervised by ANW will execute each event. Each crew will consist of 2 market managers and 3-5 sampler/assistants. Sampling will take place at the Kent booth. Casino areas will be covered by roaming samplers with sampling bags. To control multiple sampling, a ticket received as part of their entry packet would be redeemed for the sample. All sampling will be specified for smokers twenty-one years of age or older.

Estimated number to be sampled
one location:

Average hall size 1,500
1,500 X 85% sampled = 975 players sampled
500 x 65% = 325 Casino sampling

Total estimated sampled per event 1,300
Total estimated per location 5,200

The below document, Bates number 93323283 (from the same file referenced above), describes other marketing strategies employed by Lorillard Tobacco Company which allow tribal gaming patrons to bring in cigarette packs or cartons (even empty packs or cartons) or other proof-of-purchase type materials in exchange for free admission to the tribal gaming facility. **Addictive, habitual smoking is consequently rewarded with free entertainment and tobacco company-branded merchandise.**

PRODUCT SALES

- Bring in 3 packs of Kent and get free admission
- Buy 2 cartons at the smoke shop and get a free T-Shirt
- If no tobacco shop bring in two empty cartons and get a T-Shirt.

Upping the Tobacco Industry Bottom Line
Commercial Tobacco Companies Market Low-Cost Cigarettes to Tribal Retailers
in an Effort to Attract New Addicted Smokers

Commercial tobacco manufacturers implement highly competitive, cut-throat promotional strategies within the Navajo Nation aimed at undercutting their competitor's prices while luring low-income, price-sensitive individuals into commercial tobacco addiction. Some of these

promotional strategies involve selling cigarettes at \$5.00 per carton. Other strategies even rely on under-the-table payments as observed by Philip Morris' competitor RJ Reynolds.

The below RJ Reynolds document (Bates number 507839729; file viewable at: <http://legacy.library.ucsf.edu/tid/xcm14d00>) shows evidence of corporate competition for new Navajo commercial tobacco users. In the document, one RJ Reynolds corporate manager is seen complaining to another that Doral needs to cut their prices in order to stay competitive with Philip Morris' ("PM") "free product, coupons, and under the table payments..."

Bates number 507839729

By way of example, when PM introduced Bristol into the northeastern Arizona market, they provided six Indian smokeshops and a Beacon Oil truckstop with a combination of free product, coupons and under the table payments to discount Bristol to a retail selling price of \$4.99 per carton. By way of contrast, Doral with a \$3.00 coupon retailed at \$6.49 per carton. This introductory offer went on for a full three-month period.

Another problem we have encountered is highly unusual activities targeted to specific retail accounts by our competitors. By way of example, let me again use the northeastern Arizona market; specifically, six Indian smokeshops owned and operated by Armand Ortega, who is the owner of Indian Ruins Tobacco, our sole Indian direct account. Last spring, in these outlets, Liggett was using Eve coupons to discount the price of Pyramid by a further \$1.00 per carton to a retail selling price of \$5.49. Again, this is to be compared to Doral with a \$3.00 coupon retailing for \$6.49. This activity, which we first observed in April, is still going on today.

UST Develops Strategy to Give More Free Samples of Commercial Tobacco Products and Apply Peer Pressure to Young Persons

UST, makers of top-selling smokeless tobacco brands Skoal and Copenhagen, admits in their own company files that they employ "peer pressure" (Bates number 93323274; document viewable at: <http://legacy.library.ucsf.edu/tid/hmu11b00>) to hook more young persons on smokeless tobacco, which can be very high in nicotine content and is a known gateway drug for other tobacco use and addiction. The document below refers to "sampling" (i.e., free product giveaways) at the National Intercollegiate Rodeo Association ("NIRA") events in the western United States. Diné College in Tsaile, AZ and Navajo Technical College in Crownpoint, NM are two Navajo schools that serve as local chapters with participating schools for this rodeo association. Diné College (formerly "Navajo Community College") has traditionally hosted NIRA rodeo events (see document below, Bates number 3479094; file viewable at: <http://legacy.library.ucsf.edu/tid/jvh21b00>) where tobacco companies such as UST advertise and give out free samples of their smokeless tobacco products to younger persons who are easily persuaded by the user-friendly "starter" products, in this case products designed for first-time users under the SKOAL brand name.

EVENT NAME: NIRA Rodeo

DATE: September 1981 - June 1982

LOCATION: States West of Mississippi River

DESCRIPTION: Sponsorship of educational scholarship program for college rodeo athletes. \$102,300 awarded at the regional level and \$32,000 awarded at the National Finals. Scholarships are given to the colleges and universities in the winners names to be used exclusively for the education of participants in that schools rodeo program.

OBJECTIVES: To provide an introduction to our products through sampling and peer pressure at a grassroots level in one of our primary markets create brand awareness, reinforce brands to consumers, continue association with western lifestyle.

STRATEGIES: To sample college rodeo athletes and rodeo spectators at selected college rodeos; to utilize expertise of event operations personnel to gain free publicity for our products, the company and the college program through all available media surrounding college rodeos; to create peer pressure through the use of UST celebrity/spokesman where possible; to gain national recognition for the program, our products and associated lifestyle through production of a syndicated TV show of the National Finals Rodeo; to provide for a base to tie-in other related promotions, i.e. farm show exposition, civic "western" days", parades, mall promotions, etc. To provide a base for direct advertising to potential consumers through program ads, newspaper ads, banners, etc. To tie-in our college sampling reps and college programs where possible.

NATIONAL INTERCOLLEGIATE COLLEGE RODEO ASSOCIATION

Sponsor Brand: Copenhagen/Skoal

NUMBER OF EVENTS: 128

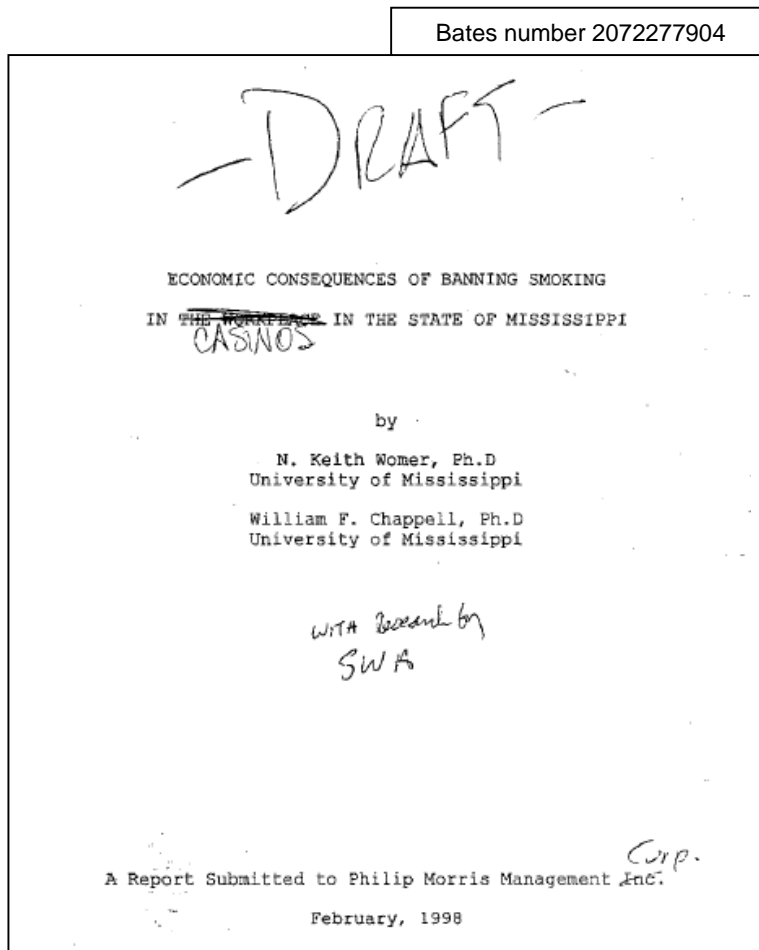
Products Sampled: SKOAL BANDITS, SKOAL LONG CUT TO COMPETITIVE USERS.

<u>REG.</u>	<u>DATE</u>	<u>TO</u>	<u>EVENT</u>	<u>LOCATION</u>	<u>CITY/STATE</u>
4	4/26	4/27	NIRA COLLEGE RODEO	Navajo Community College	Tsatile, AZ

Philip Morris Creates Bogus Economic Impact Studies That Say "NO" to Smokefree Air And "YES" To More Cigarette Sales

An important part of the tobacco industry's strategy to maintain commercial tobacco smoking and other tobacco use in public venues is to forecast economic failure for the business interests and regulatory authorities who seek to prohibit commercial tobacco use on-site. Commercial tobacco manufacturers have developed elaborate strategies to scare lawmakers and citizens into thinking that gaming enterprises will fail to thrive (or even go bankrupt!) without commercial tobacco use allowed throughout the venues. Along these same lines, Philip Morris and other

tobacco companies rely on faulty studies drafted by biased “scientists” (sometimes paid or otherwise compensated by the company itself) who then allow corporate sales executives to edit and control the contents of the economic impact studies. Excerpts from one such corrupted industry study of Mississippi casino operations, referenced as Bates numbers 2072277904 through 2072277988 (file viewable at: <http://legacy.library.ucsf.edu/tid/sxw79a00>) appear below. All hand-written edits of this study seen in the document below are courtesy of Philip Morris executives who controlled and changed the content of this study in an attempt to guide public policy on the issue of commercial tobacco use.



Philip Morris has funded numerous such studies in its long history of trying to create “smoke screens” intended confuse the public and policymakers. Philip Morris files document lists of such studies that Philip Morris funds, edits, publicizes, and delivers to lawmakers. One such list, now documented as Bates numbers 2065510719 – 2065510723, clearly shows how Philip Morris directed the Womer/Chappell (University of Mississippi researchers) study to gather and analyze data in a way that produces misleading results. The relevant file (Bates number 2065510721; file viewable at: <http://legacy.library.ucsf.edu/tid/teb73c00>) on the Womer/Chappell includes a notation of the Philip Morris budget codes used for payment of the study, etc.), evidencing this Philip Morris strategy to misinform the public regarding the true economic impact of commercial tobacco smoking restrictions.

NUMBER: 3

PROJECT: **Economic Consequences of Banning Smoking in the Workplace: Case Study of Casinos in Mississippi.** This project will examine the impact of an OSHA type smoking ban on the casino industry in the State of Mississippi. The study will use the same methodology as a similar analysis done in Nevada, but will supplement it with survey data of patrons in the gambling areas of Tunica County and Biloxi/Gulfport.

SECTOR: Casinos

AUTHOR: Dr. Keith Womer/Stella Walker Associates

TIMELINE: 4/1/97 - 9/1/97 Study done; not released till now - line legal; (hopefully in Nov).

BUDGET: WRA - OSHA Budget

**Engaging in Cultural Thievery and Misrepresentation
 Big Tobacco Uses Native American Imagery and Copies of Religious Artifacts
 to Sell More Tobacco**

Santa Fe Natural Tobacco Company (SFNT), manufacturer of Natural American Spirit brand cigarettes, is now owned by RJ Reynolds, operating under the current name of Reynolds American, Inc. Make no mistake about it: SFNT is, and has been for a very long time, a large-scale manufacturer of cancer-causing commercial cigarettes. Their "Indian" and "Natural" campaign (still largely in existence today) is a marketing gimmick intended to make people think that this tobacco company's commercially mass-produced cigarettes are somehow safer and therefore more enjoyable to smoke. The two SFNT document excerpts below (Bates numbers 504369484 and 504369487; file viewable at: <http://legacy.library.ucsf.edu/tid/jid75d00>) describe this marketing scheme for increasing sales by referring to their products as "Indian" and "Natural" and then promoting these (not) new products with branded t-shirts, baseball caps, and "an exclusive line of authentic reproductions of Native American pipes, snuff containers, tobacco pouches, and other natural tobacco implements..."

This unique combination of "Indian" and "Natural" gives us, and you, a solid competitive edge, creates intense media interest, and reinforces our basic message- The Smoke Speaks for Itself!

You'll find enclosed information and prices, including product samples and promotional literature. Check out the product, then give us a call. Contact either our Marketing Director Bob Wolf at 505-982-4257, or our Sales Representative Gene Cuthbertson at 213-854-4354.

Dont miss this one!

WD/cc

Sincerely,
 Bill Drake
 President-SFNT

50436 9484

We are presently planning production of T-Shirt, Baseball & Hardhat Caps, and other items to promote our line of Smoking Blends and Coyote Snuff. Please inquire for available dates and further product information.

We are introducing an exclusive line of authentic reproductions of Native American Pipes, Snuff Containers, Tobacco Pouches and other Natural Tobacco implements. Our estimated date of first production is 5/1/83. Please contact us for details.

Philip Morris Conducts Secret Lab Tests of Competitor's "Natural" American Spirit Cigarettes and Finds Undisclosed Artificial Additives

Philip Morris, as an industry leader who sells more cigarettes than any other brand, views smaller tobacco companies as threats to its bottom line. The "Indian" and "Natural" marketing campaign by Santa Fe Natural Tobacco Company (SFNT) was particularly upsetting to Philip Morris, who suspected Natural American Spirit brand cigarettes (manufactured by SFNT) contained harmful additives (undisclosed by SFNT) which can make commercial cigarettes more addictive and more harmful. Philip Morris conducted internal investigations and lab experiments to test for the presence of artificial chemicals and additives in American Spirit cigarettes. The results of these experiments were labeled "CONFIDENTIAL" in the Philip Morris memo below, excerpted from Bates numbers 2050901397 – 2050901397 (file viewable at: <http://legacy.library.ucsf.edu/tid/rjt06c00>).

Philip Morris USA Confidential

PHILIP MORRIS U. S. A.

INTER-OFFICE CORRESPONDENCE

Richmond, Virginia

To: Judy Smith

Date: November 14, 1984

From: Kai Lam and Barbu Demian

Subject: Analyses of "American Spirit" Cigarettes

Summary

Natural menthol is used in the manufacturing of "American Spirit" Mentholated cigarettes. It is not sure whether synthetic menthol is also applied. Trace amounts of several components which are not tobacco specific are found in the Regular test cigarettes, including acetophenone, toluic aldehyde, safanal, anethole and diosphenol. Results suggest that these components are additives in the Regular test cigarettes.

Introduction

Two cigarette samples from Santa Fe Natural Tobacco Company, Regular and Mentholated, were submitted for analyses. The objectives are to determine if only natural menthol and any additives were used in these two cigarettes.

Philip Morris USA Confidential

Similar GC/MS profiles were observed between the two test cigarettes, with the exception that more volatile components were detected in the profile of the Regular test cigarettes, especially in the retention window between 4 to 14 minutes (Figure 1 and 2). This might be caused by the high level of menthol in the Mentholated test cigarettes altering the retention pattern of more volatile components in the Mentholated sample by the CLSA procedure. This phenomena is confirmed by the similarity in headspace GC/FID profiles between the Regular and Mentholated test cigarettes.

In general components specific to tobacco, packaging materials and filter were found in both test cigarettes. Several components were also identified in the Regular cigarettes (Figure 3), including acetophenone, toluic aldehyde, safranal (2,6,6-trimethyl-1,3-cyclohexadien-1-carboxaldehyde), anethole and diosphenol (2-hydroxy-3-methyl-6-isopropyl-cyclohex-2-en-1-one). These components are not native tobacco components and their presence suggested that they were additives of the Regular cigarettes.

Indian Country Discusses Lawsuit Filed against Big Tobacco for Exploitation and Unfair Targeting of Native American Interests

The article below is an excerpt reprinted from an *Indian Country* news story as uncovered in the files of RJ Reynolds tobacco company (Bates numbers 531301245 – 531301246; file viewable at: <http://legacy.library.ucsf.edu/tid/hpu55a00>). Attorneys in Albuquerque, New Mexico, filed suit against Santa Fe Natural Tobacco Company, RJ Reynolds, and other commercial tobacco manufacturers for unfair and illegal marketing practices, manipulation of nicotine levels, and resultant damages to the health interests of 34 North American Indian Nations, including several pueblo tribes in New Mexico. The excerpt of the article appearing below highlights a couple of the more disturbing claims asserted by the lawsuit.

Santa Fe Natural Tobacco Co., for example, promotes its products through an advertising campaign that features "various legends of the origin of tobacco according to the Crow and Hidatsa tribes." The company relies on respect for the Pipe and tobacco to promote its carcinogenic products.

The company's promotional "legend" says that Starboy and Earthboy were Crow and Hidatsa warriors who divided into separate tribes and were prevented from becoming enemies through the power of tobacco and the Pipe.

"No matter how different our families become, we will never quarrel. Your father has given you tobacco and mine has given me the way of the Medicine Pipe. When we smoke together, your plant with my Pipe, our fathers will give us peace and freedom," the ad reads.

In another culturally exploitive advertisement, the RJ Reynolds Co. dressed up its now banished Joe Camel character in full regalia - including an eagle feather war bonnet, beaded buckskin shirt and bone breast-plate - for an ad that depicted Joe Camel socializing at the "Solomon and Geronimo Party." Other camels wearing eagle feathers are in the background.

Oglala Sioux President Harold Salway said he was highly insulted by the image of Joe Camel wearing the eagle feathers and a war bonnet traditionally worn by chiefs and leaders of Northern Plains tribes. Salway said eagle feathers should never be exploited or commercialized in advertising campaigns, especially those promoting harmful products.

Conclusion

These tobacco industry internal corporate documents demonstrate intent on the part of commercial tobacco companies to use, abuse, and defraud Indian Nations with respect to their health, their culture, and their financial independence. Many of these tobacco industry activities and misdeeds continue to occur today without regard to Native American interests or those of the public at-large. This investigative report is also intended to urge tribal policymakers and the general populous to be wary of information from undisclosed and unreliable sources. The most reliable source for health-related data regarding commercial tobacco use and secondhand smoke is the U.S. Surgeon General, and in particular, the most recent report entitled "The Health Consequences of Involuntary Exposure to Tobacco Smoke." This report is available on-line at: <http://www.surgeongeneral.gov/library/secondhandsmoke/>. Reliable and accurate economic impact studies of commercial tobacco control policy should always be *peer-reviewed* reports published in established scientific journals and should rely on official government data rather than hearsay reports and anecdotal information. The public health dangers posed by corporate tobacco marketing strategies in Indian Country documented by this report suggest a need for regulation of commercial tobacco products and their use in order to protect the health of present and future generations within Indian Nations. Comprehensive approaches utilizing best practices, including increases to tobacco taxes, smokefree policies, and commercial tobacco use prevention and cessation programming, can achieve significant reduction in commercial tobacco use by children and adults while protecting nonsmoking individuals from secondhand smoke. Sovereign tribal governments are able to customize these best practices for reducing commercial tobacco-related harms while protecting religious and ceremonial uses of tobacco important to cultural preservation in Indian Country.

Data Sources Used for This Report

The Legacy Tobacco Documents Library (LTDL) is a historical compilation of tobacco industry documents containing more than 9.7 million documents (50+ million pages) created by major tobacco companies related to their manufacturing, marketing, advertising, sales, and scientific research activities. Each document is stamped with a "Bates number" which is a unique identifier used in legal or technical proceedings to record and differentiate individual pages of a document file. The live document links included in the report above will allow the reader to view additional information about each document or file, including the particular legal case which produced the document or allowed for its discovery. Each of these tobacco industry documents may be retrieved and viewed in-full at: <http://legacy.library.ucsf.edu/>.