



JUUL Labs

JUUL Labs Inc. is a San Francisco-based e-cigarette company whose product JUUL has been the focus of considerable media attention and critical commentary, mainly around its popularity among young consumers. JUUL is a flat e-cigarette which is designed to look like a USB key and is rechargeable in a USB port. It has two components: the battery system, and a prefilled nicotine liquid cartridge that serves as the mouthpiece and is called a 'JUUL pod'. The pods are available in various flavours, including 'golden tobacco', 'glacier mint', 'mango nectar', 'royal crème', 'apple orchard', and 'alpine berry'.

Background

Ploom, Pax Labs, and JUUL Labs

The e-cigarette company was founded in 2007 by entrepreneurs Adam Bowen and James Monsees and was previously known as PAX Labs Inc. (2015-2017) and Ploom Inc. (2007-2015). On 13 June 2017 the company became known as JUUL Labs Inc. In contrast to claims that JUUL Labs was an independent company spun off from PAX Labs, official documents filed with the Secretary of States for California and Delaware show that the company changed name only.

Staff: Past & Present

Kevin Burns was appointed the company's Chief Executive Officer in December 2017, succeeding Tyler Goldman. Burns had not previously worked in the tobacco or nicotine industry. A list of the company's leadership team can be accessed at JUUL Lab's website. None of its senior executives listed in 2019 appeared to have worked for tobacco companies in the past. A significant number of staff previously worked for industry regulators (see below 'Revolving Doors').

Memberships

- UK Vaping Industry Association (UKVIA) (from March 2019).
- Independent European Vape Alliance.
- The American Chamber of Commerce to the European Union.
- Up until August 2019, JUUL was also a member of the US-based Vapor Technology Association (VTA). JUUL reportedly left because of “policy differences” and the VTA filing a lawsuit against the Food and Drug Administration (FDA). This lawsuit sought to prevent the FDA from enforcing the May 2020 deadline for e-cigarette manufacturers to submit a premarket tobacco product application (PMTA) if they wanted to keep their e-cigarettes on the US market.

Consultancies

- United States (US): law firm Foley Hoag (which led Uruguay’s legal defence in the lawsuit Philip Morris vs the Government of Uruguay), S-3 Group, Empire Consulting and Sims Strategies. Chaka Burgess, of Empire Consulting Group, has in the past worked as a consultant with APCO Worldwide (which has a long history of working with the tobacco industry).
- United Kingdom (UK): PR firm Freuds (which has been responsible for Public Health England’s Stoptober campaign since 2012), and Hanover Communications.

Relationship with the tobacco industry

35% Altria-Owned

In December 2018 tobacco giant Altria acquired a 35% non-voting stake in JUUL Labs. JUUL Lab’s press statement alluded to the controversy and scepticism that the acquisition was expected to cause but stated that it believed that Altria’s investment would help the company to accelerate its “success switching adult smokers”.

Despite claiming that “JUUL will remain fully independent”, Altria has sought Federal Trade Commission (FTC) approval to convert its shares to ‘voting securities’ under the terms of its investment. Prior to Altria’s acquisition of JUUL Lab shares, the FTC had launched an investigation into JUUL Lab’s use of social media influencers and other marketing tactics that might appeal to children, and whether to seek damages. The FCT investigation was still ongoing in September 2019. Earlier, in April 2019, the FTC had sent a request to Altria for additional information on its investment in JUUL Labs.

If Altria’s FTC request is approved, the tobacco company will have the right to appoint one third of JUUL Lab’s Board of Directors.

In relation to its investment in JUUL Labs, Altria has also confirmed that:

- JUUL e-cigarettes will be sold alongside “Marlboro” and other Altria cigarette brands;
- JUUL pack inserts will be added to Altria cigarette products;
- the distribution of JUUL will widen as it will be supported by Altria’s logistics services; and
- Altria will support JUUL Labs in its engagement with the FDA and other authorities.

Criticism of Altria Connection

In April 2019 eleven US senators signed a letter addressed to JUUL Lab’s CEO Kevin Burns, expressing their indignation that JUUL Labs had teamed up with Altria. In the letter, the senators accused Altria of “a long and sordid history of spending billions to entice children to smoke through targeted campaigns that intentionally lie about the science and health effects from cigarettes”. They added:

“The corporate marriage between two companies that have been the most prolific at marketing highly addictive nicotine products to children is alarming from a public health standpoint and demonstrates, yet again, that JUUL is more interested in padding its profit margins than protecting our nation’s children”.

The tobacco investment in JUUL Labs was widely condemned by public health experts and advocates.

The New York Times reported that Washington-based public relations company Precision Strategies had ended its contract with JUUL Labs following Altria’s investment, although the PR firm declined to comment.

27% Owned by Japan Tobacco International (2010 - 2015)

Altria was not the first tobacco company to own shares in the e-cigarette company. In 2010, when JUUL Labs was still known as Ploom Inc, the company signed an agreement with Japan Tobacco International (JTI) which resulted in JTI owning a minority stake and obtaining exclusive rights to commercialise Ploom’s hybrid heated tobacco products outside the US. In February 2015 Ploom Inc and JTI ended their partnership; JTI acquired the intellectual property related to the Ploom products, and Ploom bought back JTI’s minority stake and rebranded to PAX Labs.

Sales strategy: from us to global

Challenging US Operating Environment

The JUUL e- cigarette, with an exceptionally high nicotine content of 59mg/ml, was first launched nationally in the US in 2015 and experienced an explosive growth from September 2017. Nielsen data show that JUUL grew from holding 32% of the US e-cigarette market in late 2017 to 70% by July 2018.

In April 2018 the FDA launched an investigation into JUUL Labs’ marketing practices. This culminated in JUUL Lab’s offices in San Francisco being raided by the FDA in September 2018, and the seizure of documents related to Juul’s sales and marketing activities.

The FDA investigation was followed by multiple other investigations into JUUL Lab’s marketing practices by state and federal authorities. This included investigations by the US Senate (April 2019) and the US House of Representatives’ Subcommittee on Economic and Consumer Policy (June 2019). In addition, numerous lawsuits have been filed by customers who claimed they had become addicted to JUUL, and in some cases, experienced severe health problems.

In August 2019 JUUL Lab’s market share was reported as having slightly slipped, down 0.3% to 71.4%, the first time that the company had lost market share since its explosive growth.

The increasingly challenging US regulatory environment has made international expansion an attractive, and perhaps even imperative, option for JUUL Labs. A search of the D&B Hoovers database in July 2019 found that JUUL Labs was the parent company of at least 19 international subsidiaries and holding companies, based in Belgium, Canada, France, Germany, Ireland, Israel, Italy, Netherlands, Poland, Portugal, Spain, South Korea, Switzerland, and the UK. At the time, the company did not actively sell its product in all these markets (see table below which details where and when JUUL Labs launched its product).

Year	Country (month)
2015	US (June)
2018	Israel (March), UK (July), Canada (August), Russia (Late 2018)
2019	Ireland, South Korea (May), Philippines, Ukraine (June), Indonesia (July), China (September)

Middle East

In March 2018, Israel was the first international country that JUUL Labs expanded to, offering the same high nicotine strength pods as those available on the US market (59mg of nicotine per pod). Concerned that the product posed a danger to health, Prime Minister and Minister of Health Benjamin Netanyahu issued a special bill in August 2018 that banned the sale and marketing of e-cigarettes with a nicotine content of 20mg, similar to EU restrictions on e-cigarette nicotine strength. In December 2018 the Israeli Parliament passed a further law which extended existing tobacco regulations to vaping devices.

Law firm Eitan Haezrachy & Co, on behalf of Juul Labs, filed two petitions with the Supreme Court of Israel against the Prime Minister's special decree and the full law, which included opinions from Professors Moti Ravid and Yehuda Adler (HaYeshua Medical Center) that "Juul-like devices" did not have the same risks as cigarettes regarding cancerous substances. JUUL Israel CEO Assaf Snir commented to the "The Jerusalem Post" that "JUUL will be sold in Israel- whether sooner or later".

The company has indicated that it plans to launch in other Middle Eastern countries in 2020.

Europe

JUUL is available in several countries in Europe, including the UK which the company considers an attractive market because "it has the world's 'most supportive government' when it comes to encouraging smokers to vape". The company followed a similar sales strategy in the UK as it had done in the US: first make the product available online and in vape retail stores, next start supplying the supermarket sector, then break into the convenience store market and petrol station stores. The gradual roll-out was supported with a 12-week national marketing campaign, which consisted of billboards showing testimonials of smokers that had switched to JUUL, and "local brand ambassador activity".

To comply with nicotine strength restrictions set out by the EU Tobacco Products Directive (TPD), JUUL Labs was forced to reduce its e-cigarette nicotine strength from 59mg/ml to 20mg/ml (the maximum strength allowed under the TPD). JUUL has said that the reduced nicotine strength will make it "less effective as an alternative to cigarettes for heavy smokers". This claim is not supported by European evidence which shows that e-cigarettes with a strength of 20mg/ml and lower were shown "to be effective for the majority of smokers in their cessation efforts" and that most British vapers "use less nicotine than the limit set in the new EU regulations".

Asia

From May 2019 JUUL was available in several Asian countries, including South Korea, Philippines, Indonesia, and China (online only). Its launch in the Philippines was supported by a JUUL Lab's organised stakeholder event at 20 June 2019. In Indonesia, JUUL Labs had

“sounded out government officials in Indonesia” months ahead of its launch, discussing e-cigarette tax with officials of the Ministry of Finance.

JUUL Labs has indicated that it intends to expand further into the Asia-Pacific region. Speaking to the “Nikkei Asian Review”, Ken Bishop, JUUL Lab’s Asia Pacific Vice President International Growth, said that “we essentially want to be available wherever tobacco is sold”. The company has been courting India since late 2018, when it created an India country team, ahead of its plans to create an Indian subsidiary. In December 2018 former Uber Head of Policy North India & Federal Affairs, Rachit Ranjan, was recruited to be its Senior Public Policy Strategist, and in January 2019 former Mastercard executive Rohan Mishra joined as JUUL Lab’s Head of Government Relations. Juul has also partnered with Indian Journal of Clinical Practice Group (IJCP), to help JUUL Labs “better understand the India market”. The editor in chief, Dr. K.K. Agarwal was previously a member of the ethics committee of the Medical Council of India and national president of the Indian Medical Association.

JUUL is already unofficially available online, in tobacco retailers and some convenience stores in India. However in August 2019 the Indian Health Ministry proposed a ban on the production and import of e-cigarettes, saying that it was necessary to prevent “an ‘epidemic’ among children and young adults”. Under the proposed legislation, those that breach the law would face penalties ranging from a fine to gaol terms.

Pacific

The company is looking to launch in New Zealand late 2019. And despite Australia banning the sale of e-cigarettes, the Australian “Financial Review” revealed that JUUL Labs had applied to secure several trademarks in Australia, including the company’s logo, JUUL pods, the word ‘juuling’, and the phrase ‘make the switch’. A JUUL Labs spokesperson denied that this move was related to a potential imminent launch in Australia: “The trademark applications associated with the company and brands of JUUL Labs are part of the normal business process to secure our brand identity and intellectual property rights”.

Africa

JUUL Labs’ EMEA (Europe Middle East and Africa) President Grant Winterton has said that the company hopes to launch its product in Africa in 2020 or 2021, adding that “There is no one who is not on our radar if you look forward next 4-5 years”.

Contraversial marketing and sales strategies

JUUL Labs has repeatedly made headlines for targeting its e-cigarettes at young people. Matt Meyers, president of health advocacy group Campaign for Tobacco-Free Kids, said:

“The Juul playbook is identical to what the tobacco industry has done for decades. They claim to care about public health, then they engaged in [social media] marketing whose primary appeal was to kids”.

Early Marketing Practices: “Patently Youth-Oriented”

In 2017, reports emerged that JUUL was popular with young students in the US. Researchers from Stanford University published a report in January 2019 that examined JUUL’s marketing campaign from its launch in 2015 to autumn 2018, looking at the company’s ads, emails and social media content. The authors concluded that JUUL’s campaign, in its first six months, was “patently youth-oriented” and appeared to mirror well-known tobacco industry tactics. This included launch events targeted at young people and free sampling at youth events such

as rock concerts. Thereafter the campaign turned more “muted”, but was widely distributed on social media channels like Instagram, which is known to be popular amongst youth. The social media campaign was “amplified by hashtag extensions” (which effectively mixes JUUL advertisements with postings from a wider variety of Instagram users) and “catalysed by compensated influencers and affiliates”. The use of influencers by companies is a type of paid promotion, where a popular person with a large social media following gets paid to promote a product, in this case JUUL.

Voluntary Marketing and Social Media Code

Presumably in an effort to avoid marketing and advertising restrictions, JUUL Labs has adopted a voluntary “Marketing and Social Media Code”. This strategy echoes tobacco companies’ past efforts to pre-empt formal regulation of its marketing activities.

The first copy of JUUL Lab’s code dates back to July 2018. The code has evolved over time, with a few notable changes between July 2018 and July 2019:

- **2018:** JUUL is a nicotine product intended for adults of legal purchase age
- **2019:** JUUL is a nicotine product intended for adult smokers of legal purchase age

- **2018:** JUUL is a switching product. JUUL products have not been approved by the Food and Drug Administration to diagnose, treat, cure, or prevent any disease
- **2019:** JUUL is a switching product. JUUL products are not intended to be used as cessation products, including for the cure or treatment of nicotine addiction (e.g. smoking cessation), relapse prevention, or relief of nicotine withdrawal symptoms.

- **2018:** Product sampling complies with all federal and state regulations.
- **2019:** Paid product sampling complies with all federal and state regulations

- **2018:** We use social media responsibly to ensure content is targeted to adult smokers, while limiting engagement by youth. In the U.S. we do not use social media to advertise or promote JUUL products, and messaging is limited to non-promotional communications
- **2019:** We do not share social media content that promotes excess use or inappropriate use of our product. We only share user generated social media content that does not feature underaged users.

The July 2019 version included a new principle: We always include nicotine warning messaging with all social media posts.

Pitched Inappropriately As Smoking Cessation Aid

Despite little independent evidence that JUUL is an effective smoking cessation aid, and in violation of JUUL Labs’ own marketing code which states that JUUL is not intended to be used as a smoking cessation product (see above), JUUL Labs reportedly pitched its product as a tool to quit smoking to US employers and insurers who want to help their staff quit smoking. According to CNBC News, JUUL Labs hired former Cardinal Health executive Douglas Roberts to head up a team of 17 staff to strike deals with “health plans, providers, self-insured employers and the public sector”. To date (September 2019) no announcements of such deals have been made.

In July 2019, retail magazine The Grocer reported that JUUL Labs had teamed up with a UK convenience store chain to offer smokers “a drop -in service to help them quit”. Rather than having a consultation with a trained health professional, smokers visiting the store

are assisted by a JUUL Labs employee who “offers information and support on making the switch from smoking to vaping, and informs smokers about the range of alternative products available to them”. Customers are offered discounted JUUL products, in a bid “to help transition smokers away from tobacco”. According to the company, the initiative prompted “a four-fold increase in vape sales”. This initiative comes after years of UK Government spending cuts to stop smoking support services, with at least one other vaping retailer launching new support services in its stores to fill in the gap.

Tracking its Users

In 2019 JUUL Labs launched a ‘pilot programme’ on the UK market for a JUUL product called C1. Using Bluetooth technology, the e-cigarette can be paired with an android phone via an app, and users can track their usage and lock and locate their JUUL C1 device. JUUL Labs is not the first company to exploit Bluetooth technology to collect e-cigarette usage data. Last year BAT’s launched the Vype iSwitch Maxx which incorporates similar technology, as does PMI’s IQOS.

JUUL Labs has argued that the Bluetooth technology is used to help consumers ‘tailor their vaping experience’ and told the BBC News in August 2019 that it “would not sell or share the information without users’ explicit permission”. But concerns have been raised that the data collected could be used for entirely different purposes, in particular maintain nicotine addiction. A study by Lempert and Glantz showed PMI for example, using the same technology to remind consumers when to re-order IQOS tobacco sticks, or notify them that they haven’t used their IQOS device yet.

Illegal sale of high strength JUUL product

In July 2019 Dutch newspaper De Volkskrant reported on the illegal sale of JUUL e-cigarettes of the 59 mg/ml nicotine strength variety in Amsterdam. At the time, JUUL Labs had not officially launched its product on the Dutch market. Retailers selling the product told the newspaper they had either imported it directly from the States or from China (‘it’s probably a reproduction’), with one claiming that the product sells so well that it now represents a quarter of their revenue. JUUL Labs told the newspaper it was aware of the illegal sales in the Netherland but denied involvement. The National Institute for Public Health and the Environment (RVIM), the research arm of the Dutch Ministry of Health, said it was concerned about the illegal supply and sales of JUUL in the Netherlands, and would start an investigation.

Lobbying and political donations

JUUL Labs lobbying budget is substantial and has significantly increased over time. In the US alone, the company spent US\$1,640,000 on lobbying in 2018, including \$870,000 to consultancies, such as Sims Strategies, W Strategies, KDCR Partners, S-3 Group, Insight Public Affairs, Empire Consulting Group, and Covington & Burling. In the first half of 2019, the company had already spent more than US\$1,900,000 on lobbying.

JUUL Labs has also donated money to members of Congress through its Employees Political Action Committee (PAC), which launched in March 2018. In the first half of 2019 the PAC donated nearly \$100,000; \$74,000 to Democrats and \$22,500 to Republicans.

In addition to lobbying federal decision makers, JUUL Labs lobbies at state level. According to Forbes, the company spent US\$3 million in a July 2019 campaign against the proposed

e-cigarette ban in the company's home city San Francisco. The funds appear to have supported the establishment of the Coalition for Reasonable Vaping Regulation, which was set up in May 2019 to fight San Francisco's proposed ban.

In Europe, JUUL Labs' UK subsidiary, JUUL Labs Ltd, has been registered with the European Lobbying Register since August 2018. Records submitted in July 2019 state that the company had two members of staff accredited to access the European Parliament, Peter Beckett (also Managing Director of Beckett Associates) and Eva Chitul, and that its 2018 EU lobbying budget was between EUR€100,000 and EUR€200,000.

Revolving doors

Since July 2018, JUUL has appointed or contracted key staff to strengthen its lobbying and legal team, many of whom have previously worked closely with US politicians and decision makers, or as political appointees:

- **Rebecca Propp** – appointed in June 2019 as the company's Communications Director. Previously, she served as Vice President Mike Pence's Director Media Affairs.
- **Johnny DeStefano** – contracted as an external consultant in May 2019. DeStefano previously oversaw staff recruitment for the Trump administration in 2017.
- **Martha Coakley** – joined in April 2019. Coakley most recently worked as a lobbyist for Foley Hoag where she worked on the JUUL account. From 2007 to 2015 she was the State Attorney General of Massachusetts. Coakley's appointment at JUUL Labs followed the announcement in July 2018 that her successor, Attorney General Maura Healey, had launched a State investigation into JUUL Labs and online JUUL vendors over concerns about the marketing and sale of JUUL to minors.
- **Gerald (Jerry) F. Masoudi** – appointed Chief Legal Officer in July 2018. From 2004 to 2009 Masoudi worked for the US Food and Drug Administration (FDA), where he "supervised agency litigation and advised the FDA's senior leadership on regulatory and enforcement matters". Masoudi's appointment came in the wake of a series of regulatory interventions to curb teenage use of Juul and other e-cigarettes, with FDA Commissioner Gottlieb later stating that "youth use of JUUL represents a significant proportion of the overall use of e-cigarette products by children". Also see Tobacco Tactics page 'E-Cigarettes: Altria'.

The Revolving Door is often used by the tobacco industry as a tactic to exercise influence on its regulatory environment. Recruiting staff with useful connections and a network that they can use to manage those events, can be beneficial for companies and give them undue access and influence. However this is a clear conflict of interest.

For other (non-JUUL related) examples, see Tobacco Tactics pages on Johan Gabrielsson, Michel Petite and Kate Marley.

JUUL and science

Tobacco companies have a long history of manipulating science, often using industry-funded studies to create doubt about the scientific consensus of the health impacts of tobacco and nicotine products, and to promote their own positions. JUUL Labs appears to have adopted similar tactics.

Promotional Corporate Science Website: JLI Science.com

Like BAT and PMI before it, Juul Labs set up an online portal to promote its scientific credentials and studies. Through JLI Science, JUUL Labs aims “to better understand the effects and impact vaping products have in the long term, while also discouraging new users, and to share those results with the scientific community”. The website contains a ‘research library’ and a section where third party researchers are invited to apply for funding for “studies with scientific and medical merit”.

The ‘research library’ contained 19 studies in September 2019, with the majority being non-peer reviewed posters published at tobacco industry-accessible conferences like the Society for Research on Nicotine and Tobacco Annual Meeting and the Global Forum on Nicotine, and the Altria-organised Tobacco Science Research Conference. Many of the studies in the ‘library’ suggest that vaping has a positive impact on public health.

Ten of the 19 studies were undertaken by Neil McKeganey’s research consultancy; Centre for Substance Use Research (CSUR). The UK-based CSUR previously has undertaken work for British American Tobacco and its subsidiary Nicoventures, Philip Morris International and Imperial Tobacco’s subsidiary Fontem Ventures. In 2018 CSUR was awarded nearly US\$100,000 by the PMI-funded Foundation for a Smoke-Free World, to set up a Centre of Excellence in Behaviour Research Related Smoking Cessation. See the Tobacco Tactics page: Foundation for a Smoke-Free Centres of Excellence. JUUL Labs also held research contracts with Enthalpy Analytical, Christchurch Clinical Studies Trust, Rose Research Center, Cliantha Research, Celerion Inc, and GfK Custom Research LLC.

Lack of Scientific Credibility

A 2019 study published in The Lancet, led by first author Tan, evaluated JUUL Labs-funded studies against the eight criteria developed by Cohen and colleagues to evaluate the potential impacts of tobacco industry sponsored research. Tan and colleagues found several weaknesses in the JUUL Labs studies which undermine their scientific credibility, including:

- Lack of transparency in the selection process of successful applications, with the selection criteria and expertise of reviewers not fully described;
- Unclear to what extent the researcher owns the data or has freedom to publish (irrespective of the findings);
- The research agenda is determined by the company;
- Lack of information on the governance team providing oversight;
- There are no stated conflicts of interest policies.

Based on the highlighted weaknesses, the authors urge caution and recommend scrutiny of studies funded by JUUL Labs, and how the findings might be used for lobbying and PR gains; by promoting research findings that are favourable to the company’s business interests.

Findings of its Paid-For Research Used to Influence E-cigarette Policy

In response to US President Trump’s plans to ban e-cigarette flavours in September 2019, The Times revealed that JUUL Labs had cited evidence from one of its own studies to argue that e-cigarette flavours should not be banned in the UK. JUUL Labs had already ceased the sale of most of its e-cigarette flavours in retail stores in the US, in November 2018 due to increased scrutiny by the FDA. The company is now opposing any potential move to ban e-cigarette flavours in the UK. Citing a paid-for study carried out by CSUR, JUUL Labs told The Times that the study found that “the use of non-tobacco flavours, such as mango and mint, increase the likelihood for smokers to move away from tobacco cigarettes by 30%”. A very

similar conclusion was reached by a non-peer reviewed study conducted by JUUL Labs own researchers which was presented in poster-format at the Global Forum on Nicotine on 14 June 2019 and is available at JLIscience.com.

Attempted to Recruit Tobacco Control Experts

In February 2019, a senior member of the Scientific Affairs team at Juul Labs EMA Region contacted a member of the tobacco control community offering support:

“As JUUL has an interest in the use of e-cigarettes, we are keen to build more scientific data around this particular use of smoking cessation & ENDS (electronic-nicotine delivery systems) especially within specific populations across different medical disciplines. This is an area that we believe needs more research & and is something that JUUL is committed to supporting. I am very interested in your research within tobacco control and we would be delighted to learn more about your work & possibly support any research ideas that you may have.”

At the time of publication, Tobacco Tactics was not aware of any similar approaches made elsewhere by the company.

TobaccoTactics resources

- **JUUL Labs:** FDA Investigation Timeline
- **Altria:** <https://tobaccotactics.org/index.php?title=Altria>
- **Japan Tobacco Group:** https://tobaccotactics.org/index.php?title=Japan_Tobacco_Group
- **E-Cigarettes:** Altria: [https://tobaccotactics.org/index.php?title=E-Cigarettes: Altria](https://tobaccotactics.org/index.php?title=E-Cigarettes:_Altria)

Relevant links

- **Truth Initiative:** <https://truthinitiative.org>
 - **what is juul?** 5 February 2018: <https://truthinitiative.org/news/what-is-juul>
- **Juul E-cigarettes:** Fueling a Youth Epidemic, Campaign for Tobacco-Free Kids, Industry Watch, 19 March 2019: <https://www.tobaccofreekids.org/what-we-do/industry-watch/e-cigarettes>
- **JUUL Labs:** <http://www.juul.com>

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