

IN THE COURT OF COMMON PLEAS
DELAWARE COUNTY, OHIO

CLERK OF COURTS
DELAWARE COUNTY, OHIO
COMMON PLEAS COURT
FILED

2024 JUL -9 AM 9:38

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STATE OF OHIO ex rel.
ATTORNEY GENERAL
DAVE YOST
30 E. Broad St., 14th Floor
Columbus, Ohio 43215

Case No:

Judge: David M. Gormley

Plaintiff,

v.

CENTRAL TOBACCO AND STUFF, INC.
d/b/a CENTRAL TOBACCO
650 West Central Avenue
Delaware, Ohio 43015

COMPLAINT AND REQUEST FOR
DECLARATORY JUDGMENT,
INJUNCTIVE RELIEF, CIVIL
PENALTIES, AND OTHER
APPROPRIATE RELIEF

Defendant.

PREAMBLE

Electronic cigarettes, also known as “vapes,” cannot be legally sold in the United States without authorization by the Food and Drug Administration (FDA). Although thousands of products are available in the domestic marketplace, the FDA has only approved 27 products. Unauthorized vapes are being distributed and sold illegally in Ohio. An e-cigarette is a battery-powered device that uses an “e-liquid” that usually contains nicotine derived from tobacco, as well

as other flavorings and ingredients, and which is heated to create an aerosol that is inhaled. Some e-cigarettes may look like conventional combusted cigarettes, cigars or pipes. Other products may resemble pens or USB flash drives. Larger devices and products may have reusable parts and can be recharged or filled and refilled with e-liquids that are packaged and sold separately or they may be disposable and only used once.¹ While often manufactured outside the United States, many of the products contain representations that their sale is “only allowed in the United States.” These products pose a public health threat to our communities, putting our citizens, including our youth, at risk for addiction, breathing problems, and other harms.

As the chief law enforcement officer for the state, the Ohio Attorney General exercises the state’s police and regulatory powers and has a duty to safeguard vulnerable populations and protect Ohio families, including safeguarding the health of its residents. One of the greatest threats to the health and welfare of our children is the epidemic of vape use. Vapes are the most used tobacco product among middle and high school students in the United States.² In 2023, 2.1 million (7.7%) students across the country currently used vapes. This group includes 550,000 (4.6%) middle school students and 1.56 million (10.0%) high school students.³ In Ohio, the prevalence of vape use among students is 9.0% for middle school students and 20% for high school students.⁴

Vapes are a threat to the health of Ohio children. The nicotine in vapes harms adolescent brain development. It can affect attention, learning, mood, and impulse control.⁵ Some of the chemicals found in vape aerosols, particularly the reactive aldehydes formaldehyde and acrolein,

¹ See <https://www.fda.gov/tobacco-products/products-ingredients-components/e-cigarettes-vapes-and-other-electronic-nicotine-delivery-systems-ends>

² Birdsey J, Cornelius M, Jamal A, et al. Tobacco product use among U.S. middle and high school students—National Youth Tobacco Survey, 2023. MMWR Morb Mortal Wkly Rep. 2023;72:1173–1182.

³ <https://www.cdc.gov/tobacco/e-cigarettes/youth.html>

⁴ ODH Tobacco Use Among Youth in Ohio, 2021.

⁵ U.S. Department of Health and Human Services. E-cigarette Use Among Youth and Young Adults: A Report of the Surgeon General. Centers for Disease Control and Prevention; 2016.

are DNA-reactive, and formaldehyde has been shown to cause cancer in animals exposed via inhalation and is considered to be a “known human carcinogen” by the Environmental Protection Agency and the International Agency for Research on Cancer.⁶

JURISDICTION AND VENUE

1. Plaintiff, State of Ohio, by and through its counsel, the Attorney General of Ohio, Dave Yost, having reasonable cause to believe that violations of Ohio’s consumer protection laws have occurred, brings this action in the public interest and on behalf of the State of Ohio under the authority vested in him by the Consumer Sales Practices Act, (“CSPA”) R.C. 1345.01 *et seq.*
2. The actions of Central Tobacco and Stuff Inc., d/b/a Central Tobacco, hereinafter described have occurred in Delaware County in the State of Ohio and, as set forth below, are in violation of the CSPA, R.C. 1345.01 *et seq.*, and its Substantive Rules, O.A.C. 109:4-3-01 *et seq.*
3. Jurisdiction over the subject matter of this action lies with this Court pursuant to R.C. 1345.04 of the CSPA.
4. This Court has venue to hear this case pursuant to Ohio Civ. R. 3(C)(3) in that Delaware County is the county where Defendant conducted the activity that gave rise to this claim for relief.

⁶ National Academies of Sciences, Engineering, and Medicine; Health and Medicine Division; Board on Population Health and Public Health Practice; Committee on the Review of the Health Effects of Electronic Nicotine Delivery Systems; Eaton DL, Kwan LY, Stratton K, editors. Washington (DC): National Academies Press (US); 2018 Jan 23.

DEFENDANT

5. Defendant Central Tobacco and Stuff Inc., d/b/a Central Tobacco (“Central Tobacco”) is an Ohio corporation with its principal place of business located at 650 West Central Avenue, Delaware, Ohio 43015.
6. Dempsey Middle School is just over half-mile away and Rutherford B. Hayes High School is a little over one mile away from Defendant’s place of business.
7. Defendant is a “supplier,” as Defendant engages in the business of effecting “consumer transactions” by soliciting, offering, and selling disposable electronic nicotine delivery systems, commonly known as vapes, to individuals in Delaware County for purposes that are primarily for personal, family, or household use, as those terms are defined by R.C. 1345.01(A), (C), and (D).

STATEMENT OF FACTS

8. Defendant is, and has been at all relevant times, engaged in the business of soliciting, offering, and selling, *inter alia*, unauthorized and illegal vapes to consumers.
9. Under federal law no new tobacco product – including e-cigarettes containing synthetic nicotine or nicotine derived from tobacco – is lawful for sale in the United States without first having received pre-market authorization by the FDA⁷.
10. The FDA has only authorized 27 e-cigarette products, which include only tobacco and menthol-flavored vapes⁸.

⁷ See Federal Food, Drug and Cosmetic Act (“FD&C Act”), 21 U.S.C. § 387j.

⁸ Prior to June 21, 2024, the FDA had only authorized 23 e-cigarettes to be sold in the United States. All 23 e-cigarettes were tobacco flavored. On June 21, 2024, the FDA authorized the sale of four additional menthol-flavored products, bringing the authorized products list to 27. See [FDA Authorizes Marketing of Four Menthol-Flavored E-Cigarette Products After Extensive Scientific Review | FDA](#)

11. Any vapes not authorized by the FDA are illegal to sell in the United States, including in Ohio. This includes alle non-menthol-flavored and non-tobacco-flavored vapes sold by Defendant Central Tobacco.
12. On April 5, 2024, Plaintiff sent a letter to Central Tobacco, advising it that if it was selling any vapes other than those products authorized by the FDA, such products were illegal, and may constitute an unfair and deceptive practice under the Ohio Consumer Sales Practices Act, which could be subject to enforcement action. (April 5, 2024 letter, Exhibit 1).
13. Specifically, the letter noted that the AGO would aggressively pursue all available remedies against any person or business involved in the advertising, sale or distribution of these illegal products. (Id.).
14. Defendant did not respond to Plaintiff's letter.
15. The letter was not returned to Plaintiff as undeliverable.
16. Despite Plaintiff's April 5th warning letter, Defendant Central Tobacco continued to offer for sale and sell illegal vapes.
17. On May 23, 2024, Consumer Protection Section Investigator Kelly Amabile, operating in an undercover capacity at the direction of the Ohio Attorney General's Office, went to Defendant Central Tobacco, located at 650 West Central Avenue, Delaware, Ohio 43015, for the purpose of purchasing disposable vapes. (Affidavit of Investigator Amabile, Exhibit 2).
18. On May 23, 2024, Defendant offered for sale numerous flavored vapes, including products labeled as Lost Mary OS5000 and Breeze Smoke.

19. While at Defendant Central Tobacco, Investigator Amabile purchased two disposable vapes, for a total of \$32.40. (Id. at ¶6, ¶7 & ¶8).
20. The two products were labeled as Lost Mary OS5000 and Breeze Smoke. (Id. at ¶6 & ¶7).
21. On May 23, 2024, the Lost Mary OS5000 product was offered for sale in a Blueberry Raspberry Gami flavor. (Id. at ¶6).
22. The Lost Mary OS5000 product contained the following notice on the back: “Sale Only Allowed in the United States.” (Id. at ¶6 Exhibit A).
23. Despite the representation that sale of the Lost Mary OS5000 is “Only Allowed in the United States,” Lost Mary OS5000 in Blueberry Raspberry Gami or any flavor other than tobacco or menthol - is not allowed to be sold in the United States, including in Ohio.
24. On May 23, 2024, the Breeze Smoke product was offered for sale in a Strawmelon flavor (Id. at ¶7).
25. The Breeze Smoke product contained an image of an American flag on the back followed by the notice: “Sale Only Allowed in the United States.” (Id. at ¶7 Exhibit B).
26. Despite the representation that sale of the Breeze Smoke is “only allowed in the United States,” Breeze Smoke - in Strawmelon or any flavor other than tobacco or menthol - is not allowed to be sold in the United States, including in Ohio.

PLAINTIFF’S CAUSE OF ACTION:

VIOLATIONS OF THE CONSUMER SALES PRACTICES ACT

COUNT I

UNFAIR OR DECEPTIVE ACTS OR PRACTICES

27. Plaintiff incorporates by reference, as if fully rewritten herein, the allegations set forth in each of the previous paragraphs of this Complaint.

28. Defendant Central Tobacco has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), by offering for sale and selling illegal vapes.
29. Defendant Central Tobacco has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), by failing to clearly and conspicuously disclose that the products it offers for sale are not legal to be sold in the United States or in Ohio.
30. Defendant Central Tobacco has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A) and (B)(1), by representing the vapes it offers for sale and sells have sponsorship or approval that they do not have. Specifically, while the vapes Defendant Central Tobacco sells contain a notice that "Sale Only Allowed in the United States," such products are not authorized to be sold in the United States.
31. Defendant Central Tobacco has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A) and (B)(4), by representing that the vapes it offers for sale and sells are available to consumers for reasons that do not exist. Specifically, while the vapes Defendant Central Tobacco sells contain a notice that "Sale only allowed in the United States," such products are not authorized to be sold in the United States and should not be available to consumers.
32. Such acts or practices have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 et seq. Defendant Central Tobacco has committed said violations after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3).

COUNT II

UNCONSCIONABLE ACTS OR PRACTICES

33. Plaintiff incorporates by reference, as if fully rewritten herein, the allegations set forth in each of the previous paragraphs of this Complaint.

34. Defendant Central Tobacco has committed unconscionable acts or practices in violation of the CSPA, R.C. 1345.03(A), by offering for sale and selling illegal vapes.
35. Defendant Central Tobacco has committed unconscionable acts or practices in violation of the CSPA, R.C. 1345.03(A) and (B)(1), by knowingly taking advantage of the inability of consumers to reasonably protect their interests as prospective consumers do not know that the products Defendant offered for sale and sold were not authorized or legal to be sold in the United States, including in Ohio, especially given that the products touted “Sale Only Allowed in the United States.”
36. Such acts or practices have been previously determined by Ohio courts to violate the CSPA, R.C. 1345.01 et seq. Defendant Central Tobacco has committed said violations after such decisions were available for public inspection pursuant to R.C. 1345.05(A)(3).

COUNT III

EXCLUSIONS AND LIMITATIONS IN ADVERTISEMENTS

37. Plaintiff incorporates by reference, as if fully rewritten herein, the allegations set forth in each of the previous paragraphs of this Complaint.
38. Defendant Central Tobacco has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), and the Exclusions and Limitations in Advertisements Rule, Ohio Admin. Code 109:4-3-02(A)(1), by failing to clearly and conspicuously disclose certain material exclusions related to vapes it offers for sale and sells. Specifically, while the vapes Defendant Central Tobacco sold contained a notice that “Sale Only Allowed in the United States,” Defendant failed to disclose that the products were not legal to be sold in the United States.

COUNT IV

SUBSTANTIATION OF CLAIMS IN ADVERTISING

39. Plaintiff incorporates by reference, as if fully rewritten herein, the allegations set forth in each of the previous paragraphs of this Complaint.

40. Defendant Central Tobacco has committed unfair or deceptive acts or practices in violation of the CSPA, R.C. 1345.02(A), and the Substantiation of Claims in Advertising Rule, Ohio Admin. Code 109:4-3-10(A), by making representations which would cause a reasonable consumer to believe such statements were true, without having in its possession, or relying upon, a reasonable basis in fact such as factual, objective, quantifiable, clinical, or scientific data or other competent and reliable evidence which substantiates such legality representations. Specifically, Defendant Central Tobacco offered for sale and sold vapes which contained a representation that “Sale Only Allowed in the United States” without possessing or relying upon a reasonable basis in fact that such representations were true. To the contrary, Plaintiff’s April 5, 2024, letter to Defendant Central Tobacco informed Defendant that selling such flavored vapes was illegal.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

- A. ISSUE A DECLARATORY JUDGMENT that each act or practice described herein violates the CSPA, R.C. 1345.01 *et seq.*, and its Substantive Rules, OAC 109:4-3-01 *et seq.* in the manner set forth in the Complaint.
- B. ISSUE A PERMANENT INJUNCTION enjoining Defendant Central Tobacco, its owners, agents, employees, successors or assigns, and all persons acting in concert and participation with it, directly or indirectly, through any corporate device, partnership, or other association, under these or any other names, from engaging in the acts and practices of which Plaintiff

complains and from further violating the CSPA, R.C. 1345.01 *et seq.*, and its Substantive Rules, OAC 109:4-3-01 *et seq.*

- C. ISSUE A PERMANENT INJUNCTION enjoining Defendant Central Tobacco from engaging in business as a supplier in any consumer transaction in the State of Ohio until such time as Defendant has satisfied all monetary obligations ordered by this Court, and any other Court in Ohio in connection with a consumer transaction.
- D. ISSUE A PERMANENT INJUNCTION enjoining Defendant Central Tobacco from offering for sale or selling illegal disposable electronic nicotine delivery systems, commonly known as vaping products.
- E. ASSESS, FINE and IMPOSE upon Defendant Central Tobacco a civil penalty of up to \$25,000.00 for each separate and appropriate violation of the CSPA described herein, pursuant to R.C. 1345.07(D).
- F. GRANT Plaintiff its costs incurred in bringing this action, including but not limited to, the cost of collecting on any judgment awarded.
- G. ORDER Defendant Central Tobacco to pay all court costs associated with this matter.
- H. GRANT such other relief as the court deems to be just, equitable, and appropriate.

Respectfully submitted,
DAVE YOST
Attorney General



DREW A. SMITH (0070188)
Senior Assistant Attorney General
Consumer Protection Section
State Office Building, 11th Floor
615 West Superior Avenue
Cleveland, OH 44113-1899
(216) 787-5743 (Direct)
(877) 584-2050 (Fax)
Drew.Smith@Ohio.AGO.gov



DAVE YOST

OHIO ATTORNEY GENERAL

April 5, 2024

VIA REGULAR MAIL

CENTRAL TOBACCO
650 WEST CENTRAL AVENUE
DELAWARE, OH 43015

RE: Unauthorized E-Cigarettes and Vaping Products

Dear Ohio Business Owner:

The Attorney General's Office ("AGO") is aware that there may be unauthorized and illegal electronic cigarettes ("e-cigarettes") and other vaping products containing nicotine being distributed and sold in Ohio. Specifically, my office is aware that such products, in kid-friendly flavors, are inundating Ohio communities and putting Ohio's youth at risk. Due to the unauthorized nature of these products, we cannot substantiate what ingredients they contain.

Under federal law no new tobacco product – including e-cigarettes containing synthetic nicotine or nicotine derived from tobacco – is lawful for sale in the United States without first having received pre-market authorization by the Food and Drug Administration ("FDA"). See Federal Food, Drug and Cosmetic Act ("FD&C Act"), 21 U.S.C. § 387j. To date, only 23 e-cigarettes have been authorized by the FDA to be sold in the United States. See Addendum A for a list of authorized devices. Further, FDA has not authorized any flavors other than tobacco flavored.

Any e-cigarettes or vaping products not on this list have not been authorized by the FDA, potentially making such products adulterated and misbranded and illegal under Sections 902 and 903 of the FD&C Act. See 21 U.S.C. § 387b(6)(A) and § 387c(a)(6). Businesses that sell or distribute such unauthorized products are subject to enforcement action and penalties by the FDA, including monetary penalties and no-tobacco-sale orders. Additionally, holding out these products for sale without FDA authorization may constitute an unfair and deceptive practice under the Ohio Consumer Sales Practices Act, R.C. 1345.02(A)(2).

We know that despite FDA regulations, many Ohio businesses may be selling these illegal e-cigarettes and devices. The purpose of this letter is to put you on notice and ask that you help ensure such unauthorized and illegal products are not sold in our state.

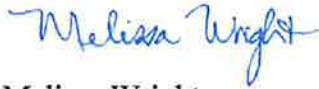
In addition to any enforcement actions and penalties the FDA may pursue, the AGO will aggressively pursue all available remedies against any person or business involved in the sale or distribution of these illegal products.

These illegal products pose a public health threat to our communities, putting our citizens, including our youth, at risk for addiction, breathing problems, and other harms. These unauthorized products may contain additional dangerous ingredients not listed on the packaging.

As such, I ask your business to fully comply with existing state and federal laws and put an end to the distribution and sale of these unauthorized and illegal products.

If you have any questions regarding this matter or if you have any information regarding persons or businesses that may be selling these unauthorized and illegal e-cigarettes and vaping products, please contact my office at Vaping@OhioAGO.gov. Thank you for your cooperation.

Sincerely,



Melissa Wright
Section Chief, Consumer Protection

Addendum A

E-Cigarettes Authorized by the FDA

As of Jan. 2024, these are the only e-cigarettes authorized to be sold in the U.S.



Manufacturer	Product Name
Logic Technology Development LLC	Logic Regular Cartridge/Capsule Package
	Logic Vapeleaf Cartridge/Capsule Package
	Logic Vapeleaf Tobacco Vapor System
	Logic Pro Tobacco e-Liquid Package
	Logic Pro Capsule Tank System (1)
	Logic Pro Capsule Tank System (2)
	Logic Power Tobacco e-Liquid Package
	Logic Power Rechargeable Kit
NJOY LLC	NJOY DAILY Rich Tobacco 4.5%
	NJOY DAILY EXTRA Rich Tobacco 6%
	NJOY ACE Device
	NJOY ACE POD Classic Tobacco 2.4%
	NJOY ACE POD Classic Tobacco 5%
	NJOY ACE POD Rich Tobacco 5%
R.J. Reynolds Vapor Company	Vuse Vibe Power Unit (1)
	Vuse Vibe Tank Original 3.0%
	Vuse Vibe Power Unit (2)
	Vuse Ciro Power Unit (1)
	Vuse Ciro Cartridge Original 1.5%
	Vuse Ciro Power Unit (2)
	Vuse Solo Power Unit
	Vuse Replacement Cartridge Original 4.8% G1
	Vuse Replacement Cartridge Original 4.8% G2

For the most up-to-date list of authorized e-cigarettes, visit the [Premarket Tobacco Product Marketing Granted Orders webpage](#).

While these products are authorized to be sold in the U.S., it does not mean these products are safe nor are they "FDA approved." All tobacco products are harmful and potentially addictive. Those who do not use tobacco products shouldn't start.





2024.07.08 Investigator Affidavit.pdf

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E-Signature Summary

E-Signature 1: Kelly Amabile (KA)

July 08, 2024 07:15:12 -8:00 [3832E3940541] [64.128.48.50]
 Kelly.Amabile@OhioAGO.gov (Principal) (ID Verified)

E-Signature Notary: Joshua Richardson (JR)

July 08, 2024 07:15:12 -8:00 [09BB52E5434B] [64.128.48.50]
 Joshua.Richardson@OhioAGO.gov
 I, Joshua Richardson, did witness the participants named above electronically sign this document.



STATE OF OHIO

COUNTY OF FRANKLIN

)

) SS:

)

AFFIDAVIT OF

INVESTIGATOR KELLY AMABILE

AFFIDAVIT

I, Investigator Kelly Amabile, being first duly sworn according to law, depose and say that I am of full legal age, I have personal knowledge of the facts herein, and am competent to testify to the matter set forth. Further, I state that:

1. I am an Investigator with the Consumer Protection Section of the Ohio Attorney General's Office. In this position I am involved in a variety of investigations, some of which involve operating in an undercover capacity to gather information.
2. The Ohio Attorney General's Office received information that Central Tobacco & Stuff Inc, dba Central Tobacco, located at 650 West Central Avenue, Delaware, Ohio 43015, was selling illegal disposable electronic nicotine delivery systems, commonly known as vaping products.
3. Central Tobacco & Stuff Inc, dba Central Tobacco, is located 0.6 miles away from Dempsey Middle School and 1.3 miles away from Rutherford B. Hayes High School.
4. On May 23, 2024, operating in an undercover capacity and under the direction of the Ohio Attorney General's Office, I went to Central Tobacco & Stuff Inc, dba Central Tobacco for the purpose of purchasing nicotine vaping products.
5. On May 23, 2024, I entered Central Tobacco & Stuff Inc, dba Central Tobacco and observed that they carried multiple brands of vaping products with several flavored options available. I spoke with the employee and was told that he would give me a deal on my purchase if I bought two (2) items. I selected two (2) fruit flavored disposable nicotine vaping products to purchase.
6. I purchased a Lost Mary OS5000 Rechargeable/Disposable nicotine vape pen in the flavor Blueberry Raspberry Gami. A true and accurate copy of the Lost Mary vape pen is attached as Exhibit A.
7. I purchased a Breeze Smoke Disposable Pod device in the flavor StrawMelon. A true and accurate copy of the Breeze Smoke device is attached as Exhibit B.
8. The total cost of the two (2) items was \$32.40. I paid in cash and received a receipt. The receipt shows only one item purchased. A true and accurate copy of the receipt is attached as Exhibit C.

9. On June 4, 2024, I gave the items purchased and the receipt to Investigator Supervisor Sheila Laverty to be stored in an evidence room in the Ohio Attorney General's Office.

FURTHER AFFIANT SAYETH NAUGHT.

Kelly Amabile
Signed on 2024/07/08 07:12:42

KELLY AMABILE, AFFIANT

Sworn to and subscribed in my presence this 8th day of July 2024, in the City of
Columbus, County of Franklin, State of Ohio



Joshua Richardson
Notary Public

My commission expires 5/23/26

Notarial act performed by audio-visual communication



WARNING:

This product can expose you to nicotine, which is known to the state of California to cause birth defects or other reproductive harm.
For more information go to www.P65Warnings.ca.gov.

Keep away from children and pets. This product may cause reproductive harm and is not intended for pregnant women.

This product is not intended for use or sale to individuals under the legal age limit in their respective states.

PARAMETERS

Size: 48 × 26 × 82 mm
E-liquid Capacity: 10 ml
Nicotine Strength: 50 mg/ml
Battery Capacity: 650 mAh
Puffs: Up to 5000
Charging Port: Type-C

INGREDIENTS

Vegetable Glycerin, Propylene Glycol, Natural & Artificial Flavors, Nicotine

SALE ONLY ALLOWED IN THE UNITED STATES

WONDER LADIES LIMITED

Sea Meadow House, P.O. Box 116, Road Town, Tortola,
British Virgin Islands
www.lost-mary.com

MANUFACTURED BY:

GUANGDONG FUWO INTELLIGENT MANUFACTURING CO., LTD.

Room 301, Building 12, NO.5, Xinxia Road, Humen
Town, Dongguan City, Guangdong Province, China

FRIENDLY REMINDER:

Once opened, consume within 15 days.



Made in China

WARNING:
This product
contains nicotine.
Nicotine is an
addictive chemical.



BREEZE
—SMOKE.—
DISPOSABLE POD DEVICE

STRAWMELON

PRO EDITION

WARNING: This
product contains
nicotine. Nicotine is an
addictive chemical.

EXHIBIT

B

2000 Puffs per 1 disposable device

1 x 6 mL 5% Nicotine

Battery Capacity: 1000 mAh

Size: 27 mm x 14 mm x 104 mm

Weight: 44±1g

Directions: Remove the upper and lower silicone covers on the device.

Inhale through the mouthpiece for 1 second to receive 1 puff of the product. When not in use store the device at 60 F - 85 F.

Ingredients: Vegetable glycerin, propylene glycol, glycerol, flavor, benzoic acid, & nicotine.



WARNING:

This product can expose you to chemicals including nicotine, which is known to the state of California to cause cancer. For more information, go to www.p65warnings.ca.gov

NOT FOR SALE TO MINORS.

KEEP AWAY FROM CHILDREN & PETS

Distributed By:
Breeze Smoke, LLC
USA

Manufactured By:

Dongguan Shikai Technology Co., Ltd
No. 6, Shayong Road, Shajiao Community,
Humen Town, Dongguan City,
Guangdong Province, China (Mainland)

www.brezesmoke.com



Designed In USA, Manufactured In China
Sale only allowed in the United States

THANK YOU
FOR YOUR
VISIT

#046746 05/23/2024 11:36:57AM
01 CLERK01 000000

1# 30.00	\$30.00
DEPT. 01	
MOSE ST	\$30.00
TAX1	\$2.40

ITEMS 10	
***TOTAL	\$32.40
CASH	\$40.00
CHANGE	\$7.60

COME
SEE US
AGAIN

EXHIBIT

C