

CONFIDENTIAL

October 4, 2019

VIA HAND DELIVERY AND ELECTRONIC MAIL

The Honorable Raja Krishnamoorthi
Chairman
Committee on Oversight and Reform
Subcommittee on Economic and Consumer Policy
United States House of Representatives
2157 Rayburn House Office Building
Washington, DC 20515

Re: Fourth Response to June 7, 2019 Letter to JUUL Labs, Inc.

Dear Chairman Krishnamoorthi:

We represent JUUL Labs, Inc. (“JLI” or the “Company”) and are writing in response to your letter, dated June 7, 2019 (“Letter”), requesting the production of certain documents and information in connection with the House Oversight and Reform Committee (“Committee”), Subcommittee on Economic and Consumer Policy’s (the “Subcommittee”) inquiry into youth e-cigarette usage.

As discussed with your staff, we are providing information as well as responsive, non-privileged documents on a rolling basis to the Subcommittee. In this, our fourth response, please find enclosed on an encrypted compact disc documents responsive to certain of the Requests in your Letter (“Requests”). We will provide the password to the encrypted disc to your staff under separate cover.

The accompanying documents and exhibits to this letter contain confidential, trade secret, and/or proprietary information. We have marked the documents “Confidential” and request that they not be disclosed beyond the Subcommittee or made public. We ask that you treat the accompanying documents as confidential committee records, afford them the maximum protection available to information provided to the Subcommittee, and that you inform us of any proposed use by the Subcommittee of the information contained therein and provide JLI with an opportunity to be heard prior to any such proposed use.

The information contained in this response is based on JLI’s best efforts undertaken within the timeframe provided and based on its understanding of the terms of the Letter. The representations made in this response are based on information reasonably available to the

The Hon. Raja Krishnamoorthi
Committee on Oversight and Reform
Subcommittee on Economic and
Consumer Policy
Page 2

CONFIDENTIAL

Company and may not reflect all existing relevant information. JLI reserves the opportunity to supplement information in this response and will do so as warranted by the identification of additional information. In providing information and materials responsive to the Letter, JLI does not waive any rights or legal options relating to the Subcommittee's inquiry.

* * *

Request 9:

All documents, including memoranda and communications, referring or relating to:

- (a) JUUL's decisions to label its product 5% strength and to use a measurement by weight instead of by volume;**
- (b) how and why JUUL decided to market products in the United States at the 5% nicotine level in the United States rather than other, lower nicotine levels;**
- (c) research and studies regarding the link between JUUL's nicotine formulation and Cmax and/or Tmax measurements; and**
- (d) JUUL's cigarette equivalency statements and disclosures, including whether JUUL considered how much of the nicotine in a combustible cigarette stays in a cigarette after smoking to make its equivalency determination;**

Response:

Please find at JLI-HOR-00176933 through JLI-HOR-00183665 documents responsive to this request.

* * *

The Hon. Raja Krishnamoorthi
Committee on Oversight and Reform
Subcommittee on Economic and
Consumer Policy
Page 3

CONFIDENTIAL

Please feel free to have your staff contact me with any questions concerning this response.

Sincerely,



Michael D. Bopp

Enclosure

cc: The Honorable Michael Cloud
Ranking Member
Committee on Oversight and Reform
Subcommittee on Economic and Consumer Policy