



Founded 1911

Kenneth R. Baumbusch
President

PREMIUM ADVERTISING ASSOCIATION OF AMERICA INC.

420 Lexington Avenue/New York, N.Y. 10017/(212) 679-0524

Frank T. Dierson
Vice President & General Counsel

To Members:

Bulletin No. 40
June 19, 1976

Re: Cigarette Sweepstakes

Legal Bulletin 33 reported a Treasury Department ruling on this subject. In response to our request for further clarification we have received the following June 16 letter from Mr. Robert E. Daugherty, Chief, Rulings Branch, Bureau of Alcohol, Tobacco and Firearms:

"Dear Mr. Dierson:

This is in reply to your letter dated June 4, 1976, requesting confirmation of your understanding that our reply dated February 4, 1976, only referred to devices "in or attached to any package of tobacco products." Also, you ask us whether we have any prohibition against the non-package cigarette sweepstakes promotions being currently conducted.

You were correct in your assumption that our restrictions apply only to devices in or attached to any package of tobacco products.

The Bureau has no prohibition against the sweepstakes promotions provided none of the promotional material is contained in or attached to the package or carton or contingent upon the sale of a tobacco product.

"Sincerely yours, etc."

F. T. Dierson
General Counsel

85173191