

# Maryland Vapor Alliance

## HB 732 Favorable with Amendments

February 18, 2020

Honorable Anne Kaiser  
Chair  
Ways and Means Committee

Chair Kaiser and members of the committee,

The Maryland Vapor Alliance represents approximately 200 brick-and-mortar vapor shops across Maryland. We are small businesses and defined in statute as vape shop vendors meaning 70% or more of our retail sales are derived from vapor products and accessories such as hardware and liquids. For almost all of our shops, this number is closer to 90% - 100%.

We have helped thousands of Maryland tobacco users transition to vapor products through the use of “open systems” that allow the user to control the amount of nicotine intake. This allows the adult user to decrease their nicotine intake over time. What our members sell differs significantly from the products sold in gas stations, convenience stores and pharmacies. The primary product sold by these retailers are “closed systems” with a fixed amount of nicotine. The fixed amount is up to 20x the amount of nicotine per milliliter in an open system. Additionally, the high-nicotine products sold by these shops are traditionally owned by “big tobacco.” JUUL is an example of these products and are not a staple of our shops.

We have included an attachment of one year of compliance data for the sale of ENDS/E-Liquids to minors compiled by the FDA for Maryland. You will see almost every product sold to minors is a high nicotine, closed system product and none of the offenses occurred at a shop classified as a vape shop vendor.

Should this legislation pass as drafted, vapor shop vendors will go out of business. Pennsylvania instituted a 40% wholesale tax and more than 100 shops closed. Montgomery County passed a 30% wholesale tax and one-fifth of the shops in the county closed. The only businesses that will survive an 86% wholesale tax on vapor products are the ones selling to underage individuals that sell high-nicotine, big tobacco products.

**The Maryland Vapor Alliance proposes doubling the point-of-sale tax from 6% to 12%. This will ensure adults that use open system vapor products will continue to have access to these products.**

Matt Milby  
Vice President, Maryland Vapor Alliance  
443-421-8669

# The Truth About Flavors: Myth vs. Reality

## Science Proves Flavors Help Adult Smokers Quit

Published peer-reviewed research has shown that the flavors in vapor products are essential to helping adult smokers quit and are not the reason that youth vape.

- ✓ Contrary to the popular narrative, adults of all ages like many categories of flavors – including fruit, sweet, and cool flavors ([Zare, et al., 2018](#); [Harrell, et al., 2017b](#); [Bonhomme, et al., 2016](#); [Berg, 2016](#); [Bowler, et al., 2017](#); and [Krishnan-Sarin, et al., 2014](#)).
- ✓ In the journal **Addictive Behavior**, concluded that flavored vapor was directly related to a reduced amount of smoking amongst adults. ([Buu, et al. 2018](#))
- ✓ In **Substance Use & Misuse**, Professor Chen from the **University of Maryland Department of Public Health** concluded that users of **non-tobacco and non-menthol** flavors were significantly more likely to have quit smoking. ([Chen, et al. 2018](#))
- ✓ As smokers transition from combustible cigarettes to vapor products, they first tend to use tobacco and menthol-flavored e-liquids, but eventually transition to non-tobacco flavors as their dependency on combustible cigarettes decreases ([Farsalinos, et al., 2013b](#); [Truman, et al., 2018](#); [Adriaens, et al., 2017](#); [Simmons, et al., 2016](#)).
- ✓ As smokers wean themselves off of cigarettes with vapor products, they move toward non-tobacco flavored products to avoid the taste associated with tobacco flavors that they believe may cause them to relapse into smoking. ([Farsalinos, et al., 2013b](#); [Simmons, et al., 2016](#)).
- ✓ Studies conclude that flavors do not significantly increase youth interest in trying vapor products **and** that flavors are not in the top reasons why youth may experiment. ([Pepper, et al., 2016](#); [Pepper, et al., 2013](#)).

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### Bottom Line:

Making it harder for adults to access flavored vapor products will only hinder their attempts to quit and ensure that they smoke longer.

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National  
Center for  
Biotechnology  
Information



# The Truth About Vaping: Myth vs. Reality

## E-Cigarettes Are An Effective Smoking Cessation Tool



The NEW ENGLAND  
JOURNAL of MEDICINE

In February 2019 the **New England Journal of Medicine** published the study, "A Randomized Trial of E-Cigarettes versus Nicotine-Replacement Therapy" which found:

- ✓ *E-cigarettes are far more effective at helping smokers quit than FDA-approved therapies such as the nicotine gum, lozenges and patches*
- ✓ *18% of e-cigarettes users were smoke-free after 1 year*
- ✓ *The e-cigarette group reported greater declines in the incidence of cough and phlegm production*

### The New York Times

"The study...found that **e-cigarettes were nearly twice as effective as conventional nicotine replacement products, like patches and gum, for quitting smoking.**"

*E-Cigarettes Are Effective at Helping Smokers Quit, a Study Shows. 1/30/2019.*

As ENDS products have increased in use, the number of cigarette smokers have dropped dramatically:



*The Centers for Disease Control reports that the number of U.S. smokers dropped from 20.6% in 2009 to only 15.5% as of 2016*

## E-Cigarettes Are Safer than Combustible Cigarettes & Save Lives

In 2015, 2016, 2017 and 2018, the United Kingdom's Health Agency England and the **Royal College of Physicians** each conducted a full review of all vapor research and concluded that *vapor products are at least 95% safer than combustible cigarettes*. The UK National Health Service now *promotes e-cigarettes as a means to quit smoking*.



Public Health  
England

In the U.S., the **National Academies of Sciences Engineering and Medicine** conducted its own review of all the research and concluded in 2018:

- ✓ *"There is **conclusive evidence** that completely substituting e-cigarettes for combustible tobacco cigarettes **reduces users' exposure to numerous toxicants and carcinogens present in combustible tobacco cigarettes.**"*
- ✓ *"There is **substantial evidence** that completely switching from regular use of combustible tobacco cigarettes to e-cigarettes results in **reduced short-term adverse health outcomes in several organ systems.**"*
- ✓ *"The evidence about harm reduction suggests that **across a range of studies and outcomes, e-cigarettes pose less risk to an individual than combustible tobacco cigarettes.**"*

The National  
Academies of

SCIENCES  
ENGINEERING  
MEDICINE



GEORGETOWN UNIVERSITY  
Georgetown University Medical Center

**Georgetown University Medical Center** published its study declaring that if we could encourage people to switch from traditional cigarettes to e-cigarettes we **would prevent up to 6.6 million premature deaths annually in the U.S.**

# The Truth About Vapor: THC Products

## Unregulated and Black Market THC Products Appear to Be Causing Recent Illness & Hospitalizations

The U.S. Food & Drug Administration and the Centers For Disease Control and Prevention, along with state Departments of Public Health, released statements warning consumers to avoid tetrahydrocannabinol (THC)-containing vaping products.

- ✓ *Samples tested by the FDA as part of the ongoing investigation have been identified as products containing tetrahydrocannabinol (or THC, a psychoactive component of the marijuana plant) and further, most of those samples with THC tested also contained significant amounts of Vitamin E acetate. Vitamin E acetate is a substance present in topical consumer products or dietary supplements, but data are limited about its effects after inhalation.*

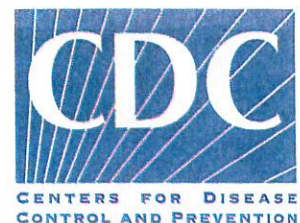


- ✓ *While the FDA does not have enough data presently to conclude that Vitamin E acetate is the cause of the lung injury in these cases, the agency believes it is prudent to avoid inhaling this substance. Because consumers cannot be sure whether any THC vaping products may contain Vitamin E acetate, consumers are urged to avoid buying vaping products on the street, and to refrain from using THC oil or modifying/adding any substances to products purchased in stores.*
- ✓ *The FDA encourages consumers to avoid buying vaping products of any kind on the street, and to refrain from using THC oil or modifying/adding any substances to products purchased in stores.*



*“Laboratory test results showed very high levels of vitamin E acetate in nearly all cannabis-containing samples analyzed by the Wadsworth Center as part of this investigation. At least one vitamin E acetate containing vape product has been linked to each patient who submitted a product for testing. Vitamin E acetate is not an approved additive for New York State Medical Marijuana Program-authorized vape products and was not seen in the nicotine-based products that were tested. As a result, vitamin E acetate is now a key focus of the Department's investigation of potential causes of vaping-associated pulmonary illnesses.”*

- ✓ *Anyone who uses e-cigarette products should not buy these products off the street (e.g., e-cigarette products with THC, other cannabinoids) and should not modify e-cigarette products or add any substances to these products that are not intended by the manufacturer.*



# The Truth About Vapor & THC: Myth vs. Reality

## Vapor Products, Flavors, and Unregulated THC

- ✓ *VTA members manufacture and sell nicotine vapor products that millions are using to stop smoking. These products are not designed for THC.*
- ✓ *Nicotine-containing vapor products have been on the market in the United States for over 10 years.*
- ✓ *Unlike THC products, vapor products are heavily regulated by FDA and our ingredients have remained unchanged for the past 3 years – long before these recent incidents.*
- ✓ *Former FDA Commissioner Dr. Scott Gottlieb has said he believes the illnesses may be connected to black market manufacturers because the established vapor industry companies have not made changes to their products. Gottlieb stated, “It’s not like the major manufacturers have suddenly changed their ingredients. It’s probably something new that has been introduced into the market by an illegal manufacturer.”*
- ✓ *Roughly 80-90% of the now 380 (down from 450) recent reported illnesses have been linked to use of THC products. (It is possible that patients, especially if they are younger, are underreporting their use of these illegal THC products.)*
- ✓ *The NY Department of Health identified the most prominent theory for the specific cause of these mysterious illnesses is the inhalation of Vitamin E acetate oil which can be used to thin out THC wax for consumption. Many of the patients in recent hospitalizations have had symptoms connected with lipoid pneumonia which is caused by the inhalation of oils. The oil creates a coating on the lungs, preventing them from working properly.*
- ✓ *VTA has encouraged officials to thoroughly investigate the circumstances which might have led to each reported hospitalization and we are eager to use our expertise to help solve this public health problem. (VTA Statement, August 25, 2019)*
- ✓ *FDA issued a simple and clear statement regarding the illnesses on September 9<sup>th</sup>: Stop vaping THC. FDA did not tell consumers to stop vaping nicotine.*
- ✓ *Banning flavored nicotine products will do nothing to address a black market THC problem that seems to be caused by the inhalation of Vitamin E oil. Rather, it will only lead to a much larger black market.*

# Health Risks of E-cigarettes

E-cigarettes are still fairly new, and more research is needed over a longer period of time to know what the long-term effects may be.

So far, research has found that using e-cigarette products is likely to be significantly less harmful than smoking regular cigarettes. This is mostly because e-cigarettes do not burn tobacco, a process that produces an estimated 7,000 chemicals, including at least 70 chemicals that cause cancer. But e-cigarettes do contain nicotine, which comes from tobacco and is very addictive.

While the possible long-term health effects of e-cigarettes aren't yet clear, there have been recent reports of serious lung disease in some people using e-cigarettes or other vaping devices. Symptoms have included:

- Cough, trouble breathing, or chest pain
- Nausea, vomiting, or diarrhea
- Fatigue, fever, or weight loss

Some cases have been severe enough to require hospitalization, and several people have died from their illness. However, it's not yet clear exactly how widespread these cases are, or if they all have the same cause. There are a huge number of different vaping devices on the market, and an even larger number of different chemicals (in the form of e-juice) that can be used in them, including ones that users sometimes add themselves. At this time, the main thing these cases have in common is that the people used e-cigarettes or other vaping devices. The US Centers for Disease Control and Prevention (CDC), the Food and Drug Administration (FDA), and several state health departments are looking into these cases to try to figure out what else they might have in common. For the latest information on this topic, see this notice from the CDC ([https://www.cdc.gov/tobacco/basic\\_information/e-cigarettes/severe-lung-disease.html](https://www.cdc.gov/tobacco/basic_information/e-cigarettes/severe-lung-disease.html)).

You can learn about answers to other questions about e-cigarettes in What Do We Know About E-cigarettes? (<https://www.cancer.org/cancer/cancer-causes/tobacco-and-cancer/e-cigarettes.html>)

Written by      References



The American Cancer Society medical and editorial content team  
(</cancer/acs-medical-content-and-news-staff.html>)

Our team is made up of doctors and oncology certified nurses with deep knowledge of cancer care as well as journalists, editors, and translators with extensive experience in medical writing.

Last Medical Review: November 15, 2018 | Last Revised: September 9, 2019

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OCE\_Inspection\_Search\_Report

Compliance Check Inspections of Tobacco Product Retailers Through 10/31/19 - Search Results									
You searched for:									
State is MD									
Product Type Purchased by Minor is: ENDS / E-liquid									
Decision Date: 01/01/2013 through 10/31/2019									
Minor Involved: Yes									
Sale to Minor: Yes									
Retailer Name	City	State	Zip	Minor Involved	Sale to Minor	Product Type	Brand	Inspection Date	Inspection Result
7-ELEVEN	ABERDEEN	MD	21001	Yes	Yes	ENDS / E-liquid	JUUL	07/16/2018	Warning Letter Issued
NORTHSIDE LIQUORS	ABERDEEN	MD	21001	Yes	Yes	ENDS	blu	See Complaint	Civil Money Penalty
NORTHSIDE LIQUORS	ABERDEEN	MD	21001	Yes	Yes	ENDS	blu	08/25/2016	Warning Letter Issued
FUSION MART GROCERY STORE	ABINGDON	MD	21009	Yes	Yes	ENDS / E-liquid	JUUL	09/16/2019	Warning Letter Issued
TOBACCO REPUBLIC	ACCOKEEK	MD	20607	Yes	Yes	ENDS / E-liquid	JUUL	06/07/2019	Warning Letter Issued
WEIS MARKETS 276	ACCOKEEK	MD	20607	Yes	Yes	ENDS / E-liquid	blu	09/21/2018	Warning Letter Issued
VAPE N TOBACCO	ANNAPOLIS	MD	21409	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
7-ELEVEN	ANNAPOLIS	MD	21409	Yes	Yes	ENDS / E-liquid	JUUL	01/04/2019	Warning Letter Issued
LIBERTY QUIKMART	ANNAPOLIS	MD	21401	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
C-MART	ANNAPOLIS	MD	21401	Yes	Yes	ENDS / E-liquid	JUUL	07/10/2018	Warning Letter Issued
LIBERTY	ANNAPOLIS	MD	21401	Yes	Yes	ENDS / E-liquid	blu	04/11/2018	Warning Letter Issued
VAPE N TOBACCO	ANNAPOLIS	MD	21409	Yes	Yes	ENDS	blu	12/18/2017	Warning Letter Issued
SUNOCO / APLUS	ARNOLD	MD	21012	Yes	Yes	ENDS / E-liquid	JUUL	10/17/2018	Warning Letter Issued
NEWSSTAND / FABER SHOPS 1211	BALTIMORE	MD	21201	Yes	Yes	ENDS / E-liquid	JUUL	10/02/2019	Warning Letter Issued
EXXON / TIGER MART	BALTIMORE	MD	21244	Yes	Yes	ENDS / E-liquid	JUUL	10/04/2019	Warning Letter Issued
TOBACCO STOP	BALTIMORE	MD	21201	Yes	Yes	ENDS / E-liquid	blu	10/02/2019	Warning Letter Issued
7-ELEVEN 23860	BALTIMORE	MD	21231	Yes	Yes	ENDS / E-liquid	JUUL	08/28/2019	Warning Letter Issued
MARATHON	BALTIMORE	MD	21224	Yes	Yes	ENDS / E-liquid	JUUL	09/19/2019	Warning Letter Issued
CROWN	BALTIMORE	MD	21218	Yes	Yes	ENDS / E-liquid	Other	08/29/2019	Warning Letter Issued
LUCKY'S DELI AND MARKET	BALTIMORE	MD	21230	Yes	Yes	ENDS / E-liquid	blu	08/28/2019	Warning Letter Issued
7-ELEVEN 34280	BALTIMORE	MD	21230	Yes	Yes	ENDS / E-liquid	JUUL	08/28/2019	Warning Letter Issued
ANN'S GROCERY	BALTIMORE	MD	21231	Yes	Yes	ENDS / E-liquid	JUUL	08/22/2019	Warning Letter Issued
HANOVER LIQUOR	BALTIMORE	MD	21230	Yes	Yes	ENDS / E-liquid	JUUL	08/28/2019	Warning Letter Issued
BP	BALTIMORE	MD	21212	Yes	Yes	ENDS / E-liquid	JUUL	07/30/2019	Warning Letter Issued
ROYAL FARMS	BALTIMORE	MD	21212	Yes	Yes	ENDS / E-liquid	JUUL	07/30/2019	Warning Letter Issued
MORAVIA BP	BALTIMORE	MD	21206	Yes	Yes	ENDS / E-liquid	JUUL	06/07/2019	Warning Letter Issued
7-ELEVEN 25816	BALTIMORE	MD	21214	Yes	Yes	ENDS / E-liquid	JUUL	05/03/2019	Warning Letter Issued
EXXON / TIGER MART	BALTIMORE	MD	21210	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
7-ELEVEN 27456E	BALTIMORE	MD	21206	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
MONOPOLY GROCERY & TOBACCO	BALTIMORE	MD	21201	Yes	Yes	ENDS / E-liquid	JUUL	03/29/2019	Warning Letter Issued
WALGREENS #5623	BALTIMORE	MD	21215	Yes	Yes	ENDS / E-liquid	JUUL	01/11/2019	Warning Letter Issued
BP / SNACK SHOP	BALTIMORE	MD	21215	Yes	Yes	ENDS / E-liquid	JUUL	01/11/2019	Warning Letter Issued
TOBACCO MALL	BALTIMORE	MD	21234	Yes	Yes	ENDS / E-liquid	JUUL	01/05/2019	Warning Letter Issued
7-ELEVEN	BALTIMORE	MD	21222	Yes	Yes	ENDS / E-liquid	JUUL	09/22/2018	Warning Letter Issued
EXXON / TIGER MART	BALTIMORE	MD	21210	Yes	Yes	ENDS / E-liquid	JUUL	08/07/2018	Warning Letter Issued
7-ELEVEN 27456 C	BALTIMORE	MD	21206	Yes	Yes	ENDS / E-liquid	JUUL	06/21/2018	Warning Letter Issued
7-ELEVEN	BALTIMORE	MD	21206	Yes	Yes	ENDS / E-liquid	JUUL	06/21/2018	Warning Letter Issued
INNER HARBOR EXXON / CIRCLE K	BALTIMORE	MD	21230	Yes	Yes	ENDS / E-liquid	MarkTen	04/25/2018	Warning Letter Issued
U.S. GAS	BALTIMORE	MD	21230	Yes	Yes	ENDS	blu	See Complaint	Civil Money Penalty
BP	BALTIMORE	MD	21222	Yes	Yes	ENDS	blu	01/11/2017	Warning Letter Issued
QUICK MART DAIRY STORE	BALTIMORE	MD	21222	Yes	Yes	ENDS	blu	01/11/2017	Warning Letter Issued
EAGLE	BALTIMORE	MD	21214	Yes	Yes	ENDS	blu	09/22/2016	Warning Letter Issued
CROWN	BALTIMORE	MD	21228	Yes	Yes	ENDS	blu	09/14/2016	Warning Letter Issued
ROYAL FARM	BALTIMORE	MD	21212	Yes	Yes	ENDS	blu	09/20/2016	Warning Letter Issued
U.S. GAS	BALTIMORE	MD	21230	Yes	Yes	ENDS	blu	08/25/2016	Warning Letter Issued
BP	BELCAMP	MD	21017	Yes	Yes	ENDS	Vuse	See Complaint	Civil Money Penalty
ALL-IN ONE	BELCAMP	MD	21017	Yes	Yes	ENDS	Vuse	08/08/2016	Warning Letter Issued



EXXON	BELTSVILLE	MD	20705	Yes	Yes	ENDS / E-liquid	JUUL	04/08/2019	Warning Letter Issued
SHELL	BELTSVILLE	MD	20705	Yes	Yes	ENDS / E-liquid	JUUL	04/08/2019	Warning Letter Issued
EXXON / TIGER MART	BELTSVILLE	MD	20705	Yes	Yes	ENDS / E-liquid	blu	02/14/2019	Warning Letter Issued
SHELL	BERWYN HEIGHTS	MD	20740	Yes	Yes	ENDS / E-liquid	JUUL	09/05/2019	Warning Letter Issued
US FUEL	BERWYN HEIGHTS	MD	20740	Yes	Yes	ENDS / E-liquid	JUUL	12/13/2018	Warning Letter Issued
7-ELEVEN 28840	BETHESDA	MD	20816	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
BT NEWSTAND	BETHESDA	MD	20814	Yes	Yes	ENDS / E-liquid	blu	03/06/2019	Warning Letter Issued
EXXON	BETHESDA	MD	20814	Yes	Yes	ENDS / E-liquid	JUUL	03/05/2019	Warning Letter Issued
7-ELEVEN	BETHESDA	MD	20816	Yes	Yes	ENDS / E-liquid	JUUL	10/23/2018	Warning Letter Issued
7-ELEVEN 33215	BETHESDA	MD	20814	Yes	Yes	ENDS / E-liquid	JUUL	09/17/2018	Warning Letter Issued
MONTGOMERY MALL SHELL	BETHESDA	MD	20817	Yes	Yes	ENDS / E-liquid	JUUL	08/24/2018	Warning Letter Issued
EXXON / TIGER MART	BLADENSBURG	MD	20710	Yes	Yes	ENDS / E-liquid	JUUL	08/17/2018	Warning Letter Issued
THE MARKET AT AC AND T	BOONSBORO	MD	21713	Yes	Yes	ENDS / E-liquid	Vuse	12/04/2018	Warning Letter Issued
DISCOUNT CIGARETTES	BROOKLYN PARK	MD	21225	Yes	Yes	ENDS / E-liquid	blu	See Complaint	Civil Money Penalty
DISCOUNT CIGARETTES	BROOKLYN PARK	MD	21225	Yes	Yes	ENDS / E-liquid	blu	04/18/2018	Warning Letter Issued
EXXON / TIGER MART	CAMP SPRINGS	MD	20748	Yes	Yes	ENDS / E-liquid	JUUL	09/17/2019	Warning Letter Issued
DISCOUNT TOBACCO PALACE	CAPITOL HEIGHTS	MD	20743	Yes	Yes	ENDS / E-liquid	JUUL	04/02/2019	Warning Letter Issued
7-ELEVEN	CAPITOL HEIGHTS	MD	20743	Yes	Yes	ENDS / E-liquid	JUUL	01/31/2019	Warning Letter Issued
EXXON / TIGER MART	CAPITOL HEIGHTS	MD	20743	Yes	Yes	ENDS / E-liquid	JUUL	01/31/2019	Warning Letter Issued
CARROLL MART / CARROLL MOTOR FUELS	CATONSVILLE	MD	21228	Yes	Yes	ENDS / E-liquid	JUUL	03/13/2019	Warning Letter Issued
7-ELEVEN 11676B	CLINTON	MD	20735	Yes	Yes	ENDS / E-liquid	JUUL	10/11/2018	Warning Letter Issued
7-ELEVEN	CLINTON	MD	20735	Yes	Yes	ENDS / E-liquid	JUUL	09/19/2018	Warning Letter Issued
COVENTRY WAY EXXON	CLINTON	MD	20735	Yes	Yes	ENDS / E-liquid	JUUL	09/19/2018	Warning Letter Issued
7-ELEVEN	CLINTON	MD	20735	Yes	Yes	ENDS / E-liquid	JUUL	09/19/2018	Warning Letter Issued
7-ELEVEN	COLLEGE PARK	MD	20740	Yes	Yes	ENDS / E-liquid	JUUL	12/04/2018	Warning Letter Issued
7-ELEVEN 11664B	COLLEGE PARK	MD	20740	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
COLUMBIA CROSSING MOBIL	COLUMBIA	MD	21045	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
MOBIL	COLUMBIA	MD	21045	Yes	Yes	ENDS / E-liquid	blu	07/02/2018	Warning Letter Issued
LIBERTY GAS AND FOOD COURT	COLUMBIA	MD	21045	Yes	Yes	ENDS / E-liquid	Vuse	06/25/2018	Warning Letter Issued
SHELL / EXPRESS MART	COLUMBIA	MD	21045	Yes	Yes	ENDS / E-liquid	JUUL	06/25/2018	Warning Letter Issued
7-ELEVEN 11534	CROFTON	MD	21114	Yes	Yes	ENDS / E-liquid	JUUL	10/17/2018	Warning Letter Issued
SHEETZ	CUMBERLAND	MD	21502	Yes	Yes	ENDS / E-liquid	JUUL	08/15/2019	Warning Letter Issued
TOBACCO & GROCERY	DISTRICT HEIGHTS	MD	20747	Yes	Yes	ENDS / E-liquid	JUUL	04/02/2019	Warning Letter Issued
SHELL	DISTRICT HEIGHTS	MD	20747	Yes	Yes	ENDS / E-liquid	blu	11/24/2018	Warning Letter Issued
DISCOUNT CIGARETTES	DISTRICT HEIGHTS	MD	20747	Yes	Yes	ENDS / E-liquid	JUUL	09/12/2018	Warning Letter Issued
FASTOP / SHELL	DUNKIRK	MD	20754	Yes	Yes	ENDS / E-liquid	JUUL	03/26/2019	Warning Letter Issued
BP	DUNKIRK	MD	20754	Yes	Yes	ENDS / E-liquid	JUUL	10/18/2018	Warning Letter Issued
TIGER MART / EXXON	EDGEWOOD	MD	21040	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
TIGER MART / EXXON	EDGEWOOD	MD	21040	Yes	Yes	ENDS / E-liquid	JUUL	06/26/2018	Warning Letter Issued
ROYAL FARMS FRESH MARKET 174	ELDERSBURG	MD	21784	Yes	Yes	ENDS / E-liquid	Vuse	07/09/2018	Warning Letter Issued
WALGREENS	ELDERSBURG	MD	21784	Yes	Yes	ENDS	blu	09/08/2016	Warning Letter Issued
7-ELEVEN 21081 D	ELLCOTT CITY	MD	21042	Yes	Yes	ENDS / E-liquid	JUUL	02/07/2019	Warning Letter Issued
INTERNATIONAL FOOD MARKET	ELLCOTT CITY	MD	21043	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
INTERNATIONAL FOOD MARKET	ELLCOTT CITY	MD	21043	Yes	Yes	ENDS	blu	See Complaint	Civil Money Penalty
INTERNATIONAL FOOD MARKET	ELLCOTT CITY	MD	21043	Yes	Yes	ENDS	blu	See Complaint	Civil Money Penalty
INTERNATIONAL FOOD MARKET	ELLCOTT CITY	MD	21043	Yes	Yes	ENDS	blu	08/18/2016	Warning Letter Issued
SHELL/MARKET PLACE	ELLCOTT CITY	MD	21043	Yes	Yes	ENDS	blu	08/18/2016	Warning Letter Issued
7-ELEVEN 34747	FINKSBURG	MD	21048	Yes	Yes	ENDS / E-liquid	JUUL	07/08/2019	Warning Letter Issued
7-ELEVEN	FINKSBURG	MD	21048	Yes	Yes	ENDS / E-liquid	Vuse	08/16/2018	Warning Letter Issued
STOP-N-GO MART / CITGO	FINKSBURG	MD	21048	Yes	Yes	ENDS / E-liquid	JUUL	08/03/2018	Warning Letter Issued
FOOD LION 1442	FREDERICK	MD	21703	Yes	Yes	ENDS / E-liquid	Vuse	See Complaint	Civil Money Penalty
THE GREAT GREEN GOAT SMOKE SHOP	FREDERICK	MD	21702	Yes	Yes	ENDS / E-liquid	JUUL	08/14/2019	Warning Letter Issued
ROYAL FARMS 347	FREDERICK	MD	21702	Yes	Yes	ENDS / E-liquid	JUUL	06/11/2019	Warning Letter Issued
FOOD LION #1442	FREDERICK	MD	21703	Yes	Yes	ENDS / E-liquid	Vuse	02/19/2019	Warning Letter Issued
7-ELEVEN 39220	FREDERICK	MD	21702	Yes	Yes	ENDS / E-liquid	JUUL	02/19/2019	Warning Letter Issued
FOOD LION 1162	FREDERICK	MD	21702	Yes	Yes	ENDS / E-liquid	Vuse	See Complaint	Civil Money Penalty
7-ELEVEN 27643	FREDERICK	MD	21701	Yes	Yes	ENDS / E-liquid	JUUL	04/19/2018	Warning Letter Issued
SHELL / CAFE WASHINGTONIAN	GAITHERSBURG	MD	20878	Yes	Yes	ENDS / E-liquid	Vuse	06/13/2018	Warning Letter Issued
AIRPARK BP	GAITHERSBURG	MD	20879	Yes	Yes	ENDS / E-liquid	blu	See Complaint	Civil Money Penalty

LUCKIES STORE AND DELI	GLEN BURNIE	MD	21060	Yes	Yes	ENDS / E-liquid	JUUL	09/25/2019	Warning Letter Issued
CITGO / XPRESS MART	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	Other	05/06/2019	Warning Letter Issued
TOBACCO & GIFTS	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	blu	05/13/2019	Warning Letter Issued
TOBACCO STOP	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	JUUL	05/13/2019	Warning Letter Issued
ROYAL FARMS 16	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
FOOD LION 1543	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	blu	See Complaint	Civil Money Penalty
WALGREENS 7554	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
ROYAL FARMS 16	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	JUUL	09/17/2018	Warning Letter Issued
WALGREENS 7554	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	JUUL	09/17/2018	Warning Letter Issued
EXXON / TIGER MART	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	JUUL	09/13/2018	Warning Letter Issued
FOOD LION 1543	GLEN BURNIE	MD	21061	Yes	Yes	ENDS / E-liquid	Vuse	04/11/2018	Warning Letter Issued
7-ELEVEN 11655	GLENARDEN	MD	20706	Yes	Yes	ENDS / E-liquid	JUUL	11/01/2018	Warning Letter Issued
EXXON	GRANTSVILLE	MD	21536	Yes	Yes	ENDS / E-liquid	Vuse	02/25/2019	Warning Letter Issued
SHELL / FOOD MART	GREENBELT	MD	20770	Yes	Yes	ENDS / E-liquid	JUUL	04/09/2019	Warning Letter Issued
LOVE'S TRAVEL STOP	HAGERSTOWN	MD	21742	Yes	Yes	ENDS / E-liquid	JUUL	05/07/2019	Warning Letter Issued
PILOT TRAVEL CENTER	HAGERSTOWN	MD	21740	Yes	Yes	ENDS / E-liquid	JUUL	04/30/2019	Warning Letter Issued
AC&T / THE MARKET AT AC&T	HAGERSTOWN	MD	21740	Yes	Yes	ENDS / E-liquid	Vuse	12/06/2018	Warning Letter Issued
2 & 4 LIQUORS	HUNTINGTOWN	MD	20639	Yes	Yes	ENDS / E-liquid	JUUL	07/27/2019	Warning Letter Issued
SUNOCO	HYATTSVILLE	MD	20782	Yes	Yes	ENDS / E-liquid	JUUL	12/14/2018	Warning Letter Issued
MOBIL / SNACK SHOP	HYATTSVILLE	MD	20784	Yes	Yes	ENDS / E-liquid	JUUL	11/07/2018	Warning Letter Issued
7-ELEVEN	JARRETTSVILLE	MD	21084	Yes	Yes	ENDS / E-liquid	JUUL	04/18/2019	Warning Letter Issued
CF CARROLL MOTOR FUELS / CARROLL MART	JARRETTSVILLE	MD	21084	Yes	Yes	ENDS / E-liquid	JUUL	04/18/2019	Warning Letter Issued
SHEETZ 316	JOPPA	MD	21085	Yes	Yes	ENDS / E-liquid	Vuse	08/22/2018	Warning Letter Issued
ROYAL FARMS	JOPPA	MD	21085	Yes	Yes	ENDS / E-liquid	blu	08/22/2018	Warning Letter Issued
WALGREENS 10063	LA PLATA	MD	20646	Yes	Yes	ENDS / E-liquid	blu	08/20/2018	Warning Letter Issued
GULF	LAMHAM	MD	20706	Yes	Yes	ENDS / E-liquid	JUUL	04/09/2019	Warning Letter Issued
CITGO	LANHAM	MD	20784	Yes	Yes	ENDS / E-liquid	blu	01/25/2019	Warning Letter Issued
W EXPRESS	LANHAM	MD	20706	Yes	Yes	ENDS / E-liquid	JUUL	11/01/2018	Warning Letter Issued
SHELL / SNACK SHOP	LANHAM	MD	20706	Yes	Yes	ENDS / E-liquid	Vuse	06/14/2018	Warning Letter Issued
EXXON / TIGER MART	LAUREL	MD	20707	Yes	Yes	ENDS / E-liquid	JUUL	08/05/2019	Warning Letter Issued
7-ELEVEN 32390	LAUREL	MD	20724	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
FOOD LION 2566	LAUREL	MD	20708	Yes	Yes	ENDS / E-liquid	blu	See Complaint	Civil Money Penalty
TOBACCO STOP	LAUREL	MD	20724	Yes	Yes	ENDS / E-liquid	JUUL	05/20/2019	Warning Letter Issued
7-ELEVEN 32390	LAUREL	MD	20724	Yes	Yes	ENDS / E-liquid	JUUL	01/30/2019	Warning Letter Issued
CORK 'N BOTTLE LIQUOR	LAUREL	MD	20707	Yes	Yes	ENDS / E-liquid	JUUL	01/30/2019	Warning Letter Issued
FOOD LION 2566	LAUREL	MD	20708	Yes	Yes	ENDS / E-liquid	blu	09/10/2018	Warning Letter Issued
7-ELEVEN	LAUREL	MD	20707	Yes	Yes	ENDS / E-liquid	Vuse	04/19/2018	Warning Letter Issued
BP	LAUREL	MD	20707	Yes	Yes	ENDS	blu	08/13/2016	Warning Letter Issued
SHELL	LAUREL	MD	20707	Yes	Yes	ENDS	blu	08/13/2016	Warning Letter Issued
ST. JAMES DELI AND SPIRITS	LEXINGTON PARK	MD	20653	Yes	Yes	ENDS / E-liquid	JUUL	07/16/2018	Warning Letter Issued
NURSERY ROAD LIQUORS	LINTHICUM	MD	21090	Yes	Yes	ENDS	blu	04/20/2017	Warning Letter Issued
MIMI'S STATION	LUSBY	MD	20657	Yes	Yes	ENDS / E-liquid	JUUL	08/28/2019	Warning Letter Issued
BP	LUTHERVILLE TIMON	MD	21093	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
BP	LUTHERVILLE-TIMON	MD	21093	Yes	Yes	ENDS / E-liquid	blu	07/23/2018	Warning Letter Issued
EXXON / TIGER MART	MIDDLE RIVER	MD	21220	Yes	Yes	ENDS / E-liquid	JUUL	09/12/2019	Warning Letter Issued
ROYAL FARMS STORE #47	MIDDLE RIVER	MD	21220	Yes	Yes	ENDS / E-liquid	JUUL	05/14/2019	Warning Letter Issued
ROYAL FARM STORE 66	MIDDLE RIVER	MD	21220	Yes	Yes	ENDS / E-liquid	JUUL	05/14/2019	Warning Letter Issued
DC MINI MART AND DELI	MT RAINIER	MD	20712	Yes	Yes	ENDS / E-liquid	JUUL	09/07/2018	Warning Letter Issued
SUNOCO / APLUS	MYERSVILLE	MD	21773	Yes	Yes	ENDS / E-liquid	JUUL	09/12/2019	Warning Letter Issued
SHELL / FOOD MART	NEW CARROLLTON	MD	20784	Yes	Yes	ENDS / E-liquid	JUUL	12/20/2018	Warning Letter Issued
EXXON / TIGER MART	OWINGS MILLS	MD	21117	Yes	Yes	ENDS / E-liquid	blu	11/14/2018	Warning Letter Issued
DISCOUNT MART 24/7	OXON HILL	MD	20745	Yes	Yes	ENDS / E-liquid	JUUL	07/12/2019	Warning Letter Issued
MGM AND COMPANY	OXON HILL	MD	20745	Yes	Yes	ENDS / E-liquid	JUUL	07/11/2019	Warning Letter Issued
ZIP IN MART	OXON HILL	MD	20745	Yes	Yes	ENDS / E-liquid	JUUL	11/08/2018	Warning Letter Issued
SHOCKERS	PARKVILLE	MD	21234	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
7-ELEVEN	PASADENA	MD	21122	Yes	Yes	ENDS / E-liquid	JUUL	07/18/2018	Warning Letter Issued
EXXON	PERRYVILLE	MD	21903	Yes	Yes	ENDS / E-liquid	JUUL	08/23/2019	Warning Letter Issued
CROWN EXPRESS MART	POOLESVILLE	MD	20837	Yes	Yes	ENDS / E-liquid	JUUL	02/12/2019	Warning Letter Issued
WAWA 591	PRINCE FREDERICK	MD	20678	Yes	Yes	ENDS / E-liquid	JUUL	07/25/2018	Warning Letter Issued

CARROLL MOTOR FUELS / CARROLL MARKET	RANDALLSTOWN	MD	21133	Yes	Yes	ENDS / E-liquid	JUUL	09/26/2019	Warning Letter Issued
7-ELEVEN 23702	RANDALLSTOWN	MD	21133	Yes	Yes	ENDS / E-liquid	blu	See Complaint	Civil Money Penalty
WALGREENS 6265	RANDALLSTOWN	MD	21133	Yes	Yes	ENDS / E-liquid	blu	07/27/2018	Warning Letter Issued
7-ELEVEN	RANDALLSTOWN	MD	21133	Yes	Yes	ENDS / E-liquid	blu	07/27/2018	Warning Letter Issued
ONE STOP CONVENIENCE AND DELI	REISTERSTOWN	MD	21136	Yes	Yes	ENDS / E-liquid	blu	09/18/2019	Warning Letter Issued
ONE FLIGHT UP	REISTERSTOWN	MD	21136	Yes	Yes	ENDS / E-liquid	JUUL	06/26/2019	Warning Letter Issued
ROYAL FARMS STORE #34	REISTERSTOWN	MD	21136	Yes	Yes	ENDS / E-liquid	JUUL	04/22/2019	Warning Letter Issued
EXXON	ROCKVILLE	MD	20852	Yes	Yes	ENDS / E-liquid	JUUL	08/20/2019	Warning Letter Issued
MOBIL / SNACK SHOP	ROCKVILLE	MD	20853	Yes	Yes	ENDS / E-liquid	Vuse	01/28/2019	Warning Letter Issued
FOOD LION 1211	SALISBURY	MD	21801	Yes	Yes	ENDS / E-liquid	blu	08/05/2019	Warning Letter Issued
ROYAL FARMS 127	SALISBURY	MD	21801	Yes	Yes	ENDS / E-liquid	JUUL	08/05/2019	Warning Letter Issued
7-ELEVEN	SEABROOK	MD	20706	Yes	Yes	ENDS / E-liquid	JUUL	11/14/2018	Warning Letter Issued
WOODMOOR SHELL	SILVER SPRING	MD	20901	Yes	Yes	ENDS / E-liquid	JUUL	09/26/2019	Warning Letter Issued
29 CONVENIENCE MART	SILVER SPRING	MD	20901	Yes	Yes	ENDS / E-liquid	JUUL	04/06/2019	Warning Letter Issued
EXXON / TIGER MART	SILVER SPRING	MD	20906	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
7-ELEVEN	SILVER SPRING	MD	20901	Yes	Yes	ENDS / E-liquid	blu	01/26/2019	Warning Letter Issued
FREESTATE	SILVER SPRING	MD	20902	Yes	Yes	ENDS / E-liquid	blu	12/10/2018	Warning Letter Issued
SHELL	SILVER SPRING	MD	20901	Yes	Yes	ENDS / E-liquid	JUUL	10/29/2018	Warning Letter Issued
EXXON	SILVER SPRING	MD	20910	Yes	Yes	ENDS / E-liquid	blu	10/25/2018	Warning Letter Issued
VIERS MILL EXXON	SILVER SPRING	MD	20906	Yes	Yes	ENDS / E-liquid	JUUL	10/02/2018	Warning Letter Issued
SUNOCO / WASHINGTONIAN	SILVER SPRING	MD	20903	Yes	Yes	ENDS / E-liquid	blu	09/14/2018	Warning Letter Issued
HIGH'S	SMITHSBURG	MD	21783	Yes	Yes	ENDS / E-liquid	JUUL	08/08/2019	Warning Letter Issued
CITGO / FASTOP	SOLOMONS	MD	20688	Yes	Yes	ENDS / E-liquid	blu	09/15/2018	Warning Letter Issued
GULF / FRIENDLY FOOD STORE	STEVENSVILLE	MD	21666	Yes	Yes	ENDS / E-liquid	JUUL	10/19/2018	Warning Letter Issued
VALERO / SHORE STOP	STEVENSVILLE	MD	21666	Yes	Yes	ENDS / E-liquid	Vuse	06/20/2018	Warning Letter Issued
SUNOCO / CORNER MART	STEVENSVILLE	MD	21666	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
EXXON	SUITLAND	MD	20746	Yes	Yes	ENDS / E-liquid	blu	06/17/2019	Warning Letter Issued
ANDREWS SHELL SERVICE	SUITLAND	MD	20746	Yes	Yes	ENDS / E-liquid	JUUL	11/13/2018	Warning Letter Issued
EXXON / TIGER MART	SYKESVILLE	MD	21784	Yes	Yes	ENDS / E-liquid	Vuse	07/09/2018	Warning Letter Issued
SUNOCO	TAKOMA PARK	MD	20912	Yes	Yes	ENDS / E-liquid	JUUL	10/29/2018	Warning Letter Issued
FOOD LION 950	TANEYTOWN	MD	21787	Yes	Yes	ENDS / E-liquid	Vuse	06/12/2018	Warning Letter Issued
24 HR TOBACCO AND GROCERY	TEMPLE HILLS	MD	20748	Yes	Yes	ENDS / E-liquid	JUUL	06/19/2019	Warning Letter Issued
DISCOUNT TOBACCO	TEMPLE HILLS	MD	20748	Yes	Yes	ENDS / E-liquid	JUUL	06/14/2019	Warning Letter Issued
TOBACCO AND WIRELESS	TEMPLE HILLS	MD	20748	Yes	Yes	ENDS / E-liquid	JUUL	06/14/2019	Warning Letter Issued
7-ELEVEN	THURMONT	MD	21788	Yes	Yes	ENDS / E-liquid	JUUL	05/14/2019	Warning Letter Issued
LOCH RAVEN LIQUORS	TOWSON	MD	21286	Yes	Yes	ENDS / E-liquid	JUUL	06/28/2019	Warning Letter Issued
GLI SMOKER'S CHOICE	TOWSON	MD	21204	Yes	Yes	ENDS / E-liquid	JUUL	08/20/2019	Warning Letter Issued
RAS AND NATTY	TOWSON	MD	21204	Yes	Yes	ENDS / E-liquid	JUUL	08/20/2019	Warning Letter Issued
SHELL / CORNER MART	TOWSON	MD	21204	Yes	Yes	ENDS / E-liquid	JUUL	05/01/2019	Warning Letter Issued
MARLBORO VILLAGE EXXON	UPPER MARLBORO	MD	20772	Yes	Yes	ENDS / E-liquid	JUUL	See Complaint	Civil Money Penalty
SHELL / DASH IN	UPPER MARLBORO	MD	20772	Yes	Yes	ENDS / E-liquid	blu	02/21/2019	Warning Letter Issued
EXXON/VILLAGE SHOP	UPPER MARLBORO	MD	20772	Yes	Yes	ENDS / E-liquid	JUUL	02/21/2019	Warning Letter Issued
SHELL / DASH IN	WALDORF	MD	20601	Yes	Yes	ENDS / E-liquid	blu	01/17/2019	Warning Letter Issued
7-ELEVEN	WALDORF	MD	20602	Yes	Yes	ENDS / E-liquid	blu	08/15/2018	Warning Letter Issued
LIBERTY FOOD SHOP	WESTMINSTER	MD	21157	Yes	Yes	ENDS / E-liquid	JUUL	07/15/2019	Warning Letter Issued
SUNOCO/ FOOD MART	WESTMINSTER	MD	21157	Yes	Yes	ENDS / E-liquid	JUUL	07/11/2019	Warning Letter Issued
HIGH'S 20	WESTMINSTER	MD	21157	Yes	Yes	ENDS / E-liquid	JUUL	06/18/2018	Warning Letter Issued
FOOD MART/SUNOCO	WESTMINSTER	MD	21157	Yes	Yes	ENDS	blu	08/26/2016	Warning Letter Issued
FREESTATE	WHEATON	MD	20902	Yes	Yes	ENDS / E-liquid	blu	See Complaint	Civil Money Penalty
JIMMIE'S PADDOCK LIQUORS	WHITE PLAINS	MD	20695	Yes	Yes	ENDS / E-liquid	JUUL	09/10/2019	Warning Letter Issued
CF CARROLL / CARROLL MART	WINDSOR MILL	MD	21244	Yes	Yes	ENDS / E-liquid	JUUL	04/22/2019	Warning Letter Issued