

Thank you for joining us!

We will begin at the top of the hour. So you know:

- This is **Part I of our Six Part Series**
- Replays and Handouts will be available in Teachable
- Module I testing questions will follow this class; Certifications will be issued after final module



VapeMentors Presents

Vape Shop Certification

6-PART SERIES

Regulations

What is Vape Shop Certification?

- Vape Shop Certification is designed to create a minimum standard of knowledge and proficiency for vape shop employees and owners.
- The first uniform training program for vape shops.
- This class was developed with input from hundreds of attendees during our beta test series. It will be constantly updated based on the industry's needs



Legal Disclaimer

This information is not to be intended as legal advice and may not be used as legal advice. Legal advice must be tailored to the specific circumstances of each case. Every effort has been made to assure that this information is up to date as of the publication. It is not intended to be a full and exhaustive explanation of the law in any area, nor should it be used to replace the advice of your own legal counsel.

FDA Certification

The FDA is actively looking at shops with the intention of shutting down those that do not follow “best practices.”

FDA Certification

"retailers with an approved training program are subject to lower maximum penalties than retailers without such programs. Section 103(q)(2)(B) of the Tobacco Control Act defines “approved training program” as a training program that complies with standards developed by the FDA for such programs."

FDA Certification

At this time the FDA has not officially recognized this- or any class- as an “approved” training program.

We plan to be the first...



Record keeping

Keep records of everyone in your shop that takes this certification class

Keep a folder or binder with all the slides and certificates that are issued

**Our Instructor:
Phil Daman, Esq.**

Tel. 202.660.1447
Phillip.Daman@DamanLLP.com



- Phil Daman is an attorney and Managing Partner of Daman and Associates, LLP.
- He advises investors, technologists, manufacturers, distributors and retailers in the vapor industry.
- Phil also advises trade associations & served as the CEO, Chairman and President of the Board of Directors for The Smoke Free Alternatives Trade Association (SFATA) from 2012-2015.

Timeline



**Family Smoking
Prevention and Tobacco
Control Act (TCA)**



**FDA Regulations re:
Marketing/Sale/
Distribution of Cigarettes
& Smokeless Tobacco**



“Deeming Rule”
*Expanded FDA’s authority to
include all products meeting
statutory definition of “tobacco
product”, including
“components” and “parts”*

Definition of Retailer



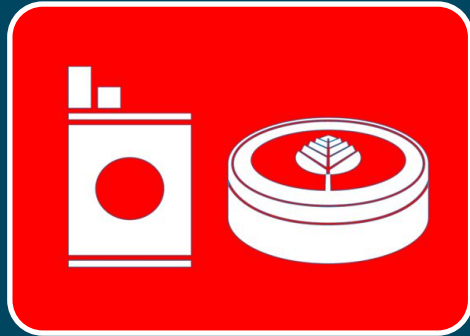
Person/entity that sells tobacco products to individuals for personal consumption



Includes brick & mortar and online retail

****Note: Vape shops that repack, label, import, mix or prepare e-liquids, or create or modify any ENDS products meet legal definition of “tobacco product manufacturer” and are therefore also subject to provisions of Federal Food Drug & Cosmetic (FD&C Act) re manufacturers***

Regulated Products



Pre-Deeming Rule Regulated Products

- Cigarettes
- Cigarette tobacco
- Roll-our-own tobacco
- Smokeless tobacco



Newly Regulated Products

- Electronic Nicotine Delivery Systems (ENDS) & E-Liquid
- Pipe tobacco
- Cigars
- Hookah/waterpipe tobacco
- Any other product that meets the definition of “tobacco product”

**And components, parts, and accessories*

Summary of Requirements That Apply to Vape Shop Retailers



No sales to minors (<18)
Must also follow state & local tobacco laws, even if more restrictive



No vending machines sales,
(unless in facility where no minors are permitted at any time)



Verification of DOB by photo ID for anyone under age of 27



Prohibition against selling new products, MRPTs, products with modified risk descriptors (e.g., “low,” “light,” or mild”) absent FDA order/”approval”

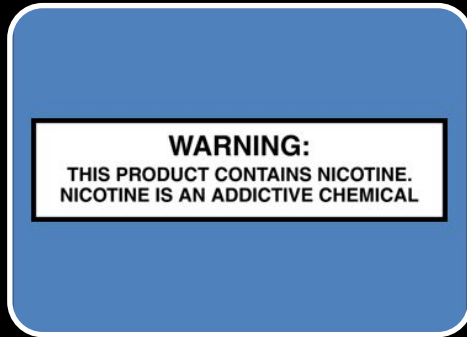


No free samples



Required nicotine warning on labels and advertising

Warnings - Retailer Responsibilities (eff. 8/10/18)



Packaging - Retailers will not be found in violation of warning statement requirements for packaging that:

Contains a health warning

Is supplied to retailer by manufacturer, importer, or distributor, who has required state, local, or TTB-issued license or permit (as applicable)

Is not materially altered by retailer



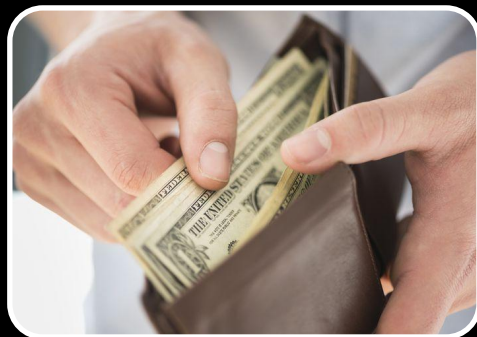
Advertising

*Warning statement requirements apply to retailer only if retailer is responsible for/directs creation of advertising, including required health warning. **This does not relieve retailer of liability if retailer displays advertisement that:** Does not contain a health warning, or contains a health warning that has been materially altered by retailer*

Sampling – Retailer Responsibilities



Free sample ban applies to all products that are subject to FDA authority, ***even if they are not made or derived from tobacco*** (e.g., components and parts)



Retailers must charge consumers money for products

Sampling (part II)

Promotional Activity	Permitted	NOT
Sale at less than full price, e.g., BOGO*	•	
Acceptance of coupons that allow purchase at discount**	•	
Membership/rewards programs that provide discounts (so long as subject to age/ID requirements and in context of sales transaction that requires monetary payment)	•	
Contests & games of chance, so long as (i) subject to age/ID requirements & (ii) in context of sales transaction that requires monetary payment***	•	
Business to business distribution of free samples, so long as (i) In a limited quantity, (i.e., no more than necessary to achieve legitimate business objective, such as awareness of and exposure to product for purposes of product or inventory selection), and (ii) part of genuine effort to sell /market product to receiving business.	•	
Distribution in exchange for providing contact information or signing up for a mailing list		•

* Other applicable laws, such as state and local laws, may restrict the price at which tobacco products may be sold and whether coupons may be redeemed

** Mail order redemption of coupons is prohibited (21 CFR§ 1140.16(c)(2)(i))

*** A variety of state and Federal laws restrict how these promotions may be held

FDA Authority to Inspect

2. NAME AND TITLE OF INDIVIDUAL		3. DATE
4. FIRM NAME		5. TIME AM PM
6. NUMBER AND STREET		
7. CITY AND STATE & ZIP CODE		8. PHONE # & AREA CODE
<p>Notice of Inspection is hereby given pursuant to Section 704(a)(1) of the Federal Food, Drug, and Cosmetic Act [21 U.S.C. 374(a)(1)].¹ Written request is hereby given to access and/or copy the records described below, pursuant to the Federal Food, Drug and Cosmetic Act, Section 414(a) [21 U.S.C. 350c]² and Title 21 Code of Federal Regulations, Section 1.341¹.</p>		
9. SIGNATURE (Food and Drug Administration Employees)		10. TYPE OR PRINT NAME AND TITLE (FDA Employees)
<p>Applicable portions of Sections 704 and 414 of the Federal Food, Drug and Cosmetic Act (21 U.S.C. 374 and 350c) and Title 21 of the Code of Federal Regulations, are quoted below:</p> <p>704. (b)(1)(1) The purposes of enforcement of this Act, officers or employees duly designated by the Secretary, upon presenting appropriate credentials and a written notice to the owner, operator, or agent in charge, are authorized (A) to enter, at reasonable times, any factory, warehouse, or establishment in which food, drugs, devices, or cosmetics are manufactured, processed, packed, or held, for introduction into interstate commerce or after such introduction, or to enter any vehicle being used to transport or hold such food, drug, device, or cosmetic in interstate commerce, and (B) to inspect, at reasonable times and within reasonable limits and in a reasonable manner, such factory, warehouse, establishment, or vehicle and all pertinent equipment, finished and unfinished materials, containers and labeling therein. In the case of any person (including farms and restaurants) who manufactures, processes, packs, transports, distributes, holds, or imports food, the inspection shall extend to all records and other information described in section 414, when the standard for records inspection under paragraph (1) or (2) of section 414(a) applies, subject to the limitations established in section 414(c); in the case of any factory, warehouse, establishment, or consulting laboratory in which prescription drugs, nonprescription drugs intended for human use, or restricted devices are manufactured, processed, packed, or held, the inspection shall extend to all things therein (including records, files, papers, processes, controls, and facilities) bearing on whether prescription drugs, nonprescription drugs intended for human use, or restricted devices which are adulterated or misbranded within the meaning of the Act, or which may not be manufactured, introduced into interstate commerce, or sold, or offered for sale by reason of any provision of this Act, have been or are being manufactured, processed, packed, transported, or held in any such place or otherwise bearing on violation of this Act. No inspection authorized by the preceding sentence or by paragraph (3) shall extend to financial data, sales data other than shipment data, pricing data, personnel data (other than data as to qualifications of technical and professional personnel performing functions subject to this Act), and research data (other than data relating to new drugs, antibiotic drugs, and devices and, subject to reporting and inspection under regulations lawfully issued pursuant to section 555) or (4), section 513, or 522(g), and data relating to other drugs or devices which in the case of a new drug would be subject to reporting or inspection under lawful regulations issued pursuant to section 555). A separate notice shall be given for each such inspection, but a notice shall not be required for each entry made during the period covered by the inspection.</p>		<p>article of food that the Secretary reasonably believes is likely to be affected in a similar manner, is adulterated and presents a threat of serious adverse health consequences or death to humans or animals, each person (including farms and restaurants) who manufactures, processes, packs, distributes, receives, holds, or imports such article shall, at the request of an officer or employee duly designated by the Secretary, permit such officer or employee, upon presentation of appropriate credentials and a written notice to such person, at reasonable times and within reasonable limits and in a reasonable manner, to have access to and copy all records relating to such article, and to any other article of food that the Secretary reasonably believes is likely to be affected in a similar manner, that are needed to assist the Secretary in determining whether the food is adulterated and presents a threat of serious adverse health consequences or death to humans or animals. (2) Use of or exposure to food of concern... if the Secretary believes that there is a reasonable probability that the use of or exposure to an article of food, and any other article of food that the Secretary reasonably believes is likely to be affected in a similar manner, will cause serious adverse health consequences or death to humans or animals, each person (including farms and restaurants) who manufactures, processes, packs, distributes, receives, holds, or imports such article shall, at the request of an officer or employee duly designated by the Secretary, permit such officer or employee, upon presentation of appropriate credentials and a written notice to such person, at reasonable times and within reasonable limits and in a reasonable manner, to have access to and copy all records relating to such article and to any other article of food that the Secretary reasonably believes is likely to be affected in a similar manner, that are needed to assist the Secretary in determining whether there is a reasonable probability that the use of or exposure to the food will cause serious adverse health consequences or death to humans or animals. (3) Application.—The requirement under paragraphs (1) and (2) applies to all records relating to the manufacture, processing, packing, distribution, receipt, holding, or preparation of such article maintained by or on behalf of such person in any format (including paper and electronic formats) and at any location.</p> <p>¹21 CFR 1.341. What are the record availability requirements? When FDA has a reasonable belief that an article of food is adulterated and presents a threat of serious adverse health consequences or death to humans or animals, any records and other information accessible to FDA under section 414 or 704(a) of the act (21 U.S.C. 350c and 374(a)) must be made readily available for inspection and photographing or other means of reproduction. Such records and other information must be made available as soon as possible, not to exceed 24 hours from the time of</p>

“Officers or employees...are authorized (A) to enter...any...establishment in which...tobacco products...are...held...for introduction...in interstate commerce...; and (B) to inspect...such establishment...all pertinent equipment, ...containers, and labeling therein.”

FDA Compliance Checks – Two (2) Types



1. Undercover Buy (UB) - to determine retailer's compliance with age and photo ID requirements

Without notice

Nature of inspection:

Minor (supervised by FDA inspectors) attempts to purchase tobacco products

Inspector collects evidence (e.g., photographs, written statements), records inspection results, & drafts reports and other documents describing observations



2. Advertising & Labeling (A&L) - to determine retailer's compliance with all other requirements

With notice

Inspectors will:

Introduce themselves

Ask for "most responsible person" present

Present retailer with Notice of Inspection (Form FDA 482)

UB and A&L inspections are usually performed on different days

Inspection Results

Compliance Check Inspections of Tobacco Product Retailers (through 04/30/2018)

FDA Home Tobacco Products Information about Compliance Check Inspections

Search Inspection Decisions

Retailer Name:

City:

State: Zip:

Decision Type:

Decision Date: To

Minor Involved: Sale to Minor:



Available on FDA's website
(http://www.accessdata.fda.gov/scripts/oc/inspections/oc_insp_searching.cfm)

Compliance Check Inspection Notice



Retailer will receive Compliance Check Inspection Notice shortly after inspection (if violation noted)

**NO ACTION
REQUIRED**

Retailer is NOT required to contact FDA after receiving this notice



FDA cannot release further details of open investigation until final decision is made

**WRONG
ADDRESS**

However, if there has been an error re retail address, contact FDA at phone # or email on CCIN

Potential FDA Advisory/Enforcement/Judicial Actions

Voluntary Compliance

Advisory - Warning Letter (WL)

1st time FDA finds violations during inspection it generally issues Warning Letter
Used to try to achieve prompt voluntary compliance



Enforcement

Civil Money Penalty
No-Tobacco-Sale Order



Judicial

Seizure
Injunction
Criminal Prosecution

Warning Letter - Content



Date of inspection; list of alleged violations and relevant laws



Statement that failure to correct violations may result in regulatory action w/o further notice

COUNTDOWN

15
DAYS

Request written response within 15 days

Response should identify and clarify any erroneous allegations and detail steps taken to correct violations and prevent future violations

What Should You Do Upon Receiving a Warning Letter?



Review carefully



Timely respond in writing

- *Explain steps taken to correct violations & prevent future violations*



Promptly correct any violations

What Will FDA Do Upon Receiving Your Response?



Send a reply to your letter



Conduct a follow-up Compliance Check Inspection **w/o notice**

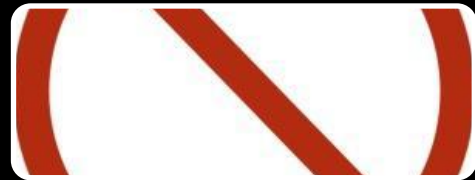


If FDA is not satisfied with your response or observes violations during a follow-up Inspection, you may be subject to **Civil Money Penalties**

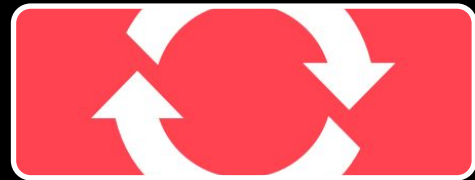
Civil Money Penalties (CMP)*

# of Violations	With Training Program	Without Training Program
1 st	\$0	\$250
2 nd w/in 12-mo	\$250	\$500
3 rd w/in a 24-mo	\$500	\$1,000
4 th w/in a 24-mo	\$2,000	
5 th w/in a 36-mo	\$5,000	
6 th /subsequent w/in 48-mo	\$10,000 as determined by the Secretary on a case-by-case basis	

No-Tobacco-Sale Order (NTSO)



NTSO is order prohibiting sale of tobacco products indefinitely or for specified duration



Imposed on retailer found to have committed “repeated violations”



“Repeated violations” = 5+ violations of particular requirements over 36-month period at particular location



Timeframes

1st violation: 30 days/ 2nd violation: 6 months
3rd violation: **PERMANENT**

Retailer Training Programs



TCA does not require retailers to implement retailer training programs



However, there are lower civil money penalties for retailers who have implemented a training program that complies with standards developed by FDA

Recommended Elements of Retailer Training Program – *1. Laws & Regulations*



Applicable Laws and Penalties

- Sale and distribution/ Youth access
- Advertising/promotion/ Penalties for violation



Retailers should inform employees that one way to prevent significant adverse consequences of tobacco use is to prevent youth purchases



May choose examples/statistics other than what is recommended by FDA, but should incorporate specific examples/statistics related to health effects of youth tobacco use.

Recommended Elements of Retailer Training Program – 2. Health Effects of Youth Tobacco Use

FDA recommends that retailers describe negative health effects of youth tobacco use, e.g., Congressional Findings in TCA, Surgeon General's Reports, etc.



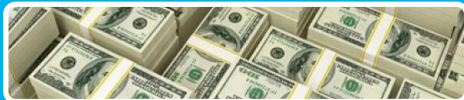
Tobacco use is foremost preventable cause of premature death in US



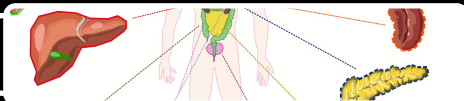
Causes 480,000+ deaths in US/yr



Approximately 8.6 million Americans have chronic illnesses related to smoking



Smoking costs US \$193 billion/yr (health care costs and lost productivity from premature death)



Cigarette smoking harms nearly every organ in body



Smoking is known to cause many serious diseases, including multiple cancers (lung, kidney, bladder, acute myeloid leukemia, mouth and throat, larynx, esophagus, stomach, pancreas, cervix); chronic lung disease; heart attacks; stroke; aortic aneurysm; pneumonia; reduced lung function in infants, adolescents, and adults; respiratory symptoms in children and adolescents; asthma-related symptoms; reduced fertility in women; pregnancy complications including premature birth, low birth weight; sudden infant death syndrome (SIDS); peptic ulcer disease; adverse surgical outcomes; osteoporosis and hip fractures in women; periodontal disease; and cataracts.

Recommended Elements of Retailer Training Program – 2. Health Effects of Youth Tobacco Use (con't)



Smokeless tobacco causes oral cancer, esophageal cancer, and pancreatic cancer.



Using smokeless tobacco may also cause heart disease, gum disease, oral lesions other than cancer, reduced sperm count, & pregnancy complications including premature birth & low birth weight.



Adverse health impact of smoking is not limited to adults - Smoking among children and adolescents causes their lungs to not fully develop and causes a premature and accelerated decline in lung function beginning in early adulthood. Smoking also causes respiratory symptoms and asthma-related symptoms in children and adolescents.



Cigarettes, smokeless tobacco, and covered tobacco products contain nicotine, an addictive chemical.



Data suggest that youth are particularly susceptible to becoming addicted to tobacco.



Virtually all new users of tobacco products are under the minimum legal age to purchase such products.

Recommended Elements of Retailer Training Program – 3. *Written Company Policy*



Retailers should adopt & enforce written policy covering:

- Sale and distribution, including youth access
- Advertising and promotion



Policy should be shared with all employees

- Verbally and in writing
- Acknowledged by employees
- Documented in training records

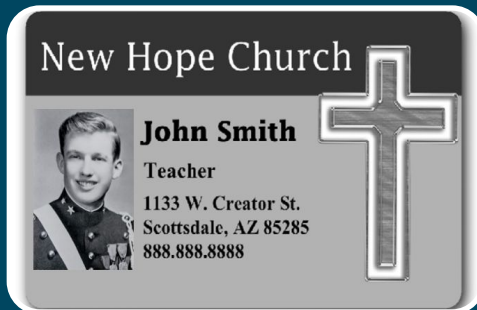
Recommended Elements of Retailer Training Program – 4. *Products Covered*



Should clearly define which products sold in retail establishment are considered to be covered under Tobacco Control Act and therefore subject to regulations prohibiting sale to individuals under age of 18

Recommended Elements of Retailer Training Program – *5. Age Verification Techniques*

Should clearly describe both Federal law and company policies on requiring identification, including age that triggers photographic ID verification and what constitutes acceptable forms of ID



Photographic ID Containing Date of Birth

- Permit only government-issued photographic ID containing date of birth (e.g., State-issued driver's license or ID card, military ID card, passport, or immigration card)
- Specify that ID cannot be expired
- Include appropriate measures to determine authenticity of ID
- Instruct employees to decline sale when customer has no photographic ID, the ID contains no date of birth, or ID has expired.



Importance of Closely Examining Photographic ID

- Should teach employees about need to closely examine photographic ID to ensure it establishes both:
- Person identified is of legal age to purchase and ID belongs to person presenting it
- Should instruct employees to decline a sale because of concerns about the authenticity of the photographic identification
- Should stress that many illegal sales are made to minors who produce IDs showing they are under legal age to purchase
- Studies have shown that illegal sales to minors frequently occur when retail employee fails to verify age of purchaser who has produced ID, especially when minor appears to be confident, produces a photographic ID without being asked, and appears to be over age of 18

Recommended Elements of Retailer Training Program – 5. Age Verification Techniques (con't)



How to Verify the Authenticity of Photographic Identification

Program content should include information on features of photographic ID that should be checked, including, but are not limited to examination of:

- Picture/physical characteristics listed on ID (such as height, weight, and eye color) to ensure that ID belongs to person who has presented it

- ID to ensure any required watermarks or State seals are present

- ID for visual clues to assist in determining whether it belongs to “of-age” or “underage” customer in States where photographic ID has different features for individuals under age 21 or under age 18 (i.e., vertical versus horizontal orientation or different font color on the date of birth).



Altered Photographic ID

Should discuss how to determine whether photographic ID might have been altered and what employee should do if ID appears to be altered

Should provide detailed information on signs of altered ID, which include, but are not limited to:

- Any sign of tampering

- Peeling lamination

- Smudged print

- Differences in font on date of birth or expiration date

Recommended Elements of Retailer Training Program – 5. Age Verification Techniques (con't)



Specific Age-Verifying Techniques

Should include detailed info re company-approved techniques designed to ensure that DOB on ID is read and clearly understood

Requiring employees to compare DOB on ID with calendar that displays most recent date that can be shown on the photographic identification in order for that person to purchase

Installing price scanners that are programmed so that when tobacco product is scanned, register displays message prompting employee either to request age identification and key in purchaser's DOB or to verify that purchaser is over age of 26

Requiring employees to scan all IDs through an electronic age verification device.



Insufficient Photographic Identification

Should inform employees of how and when they should ask for second piece of ID containing purchaser's date of birth and instruct employees to **decline sale** when ID does not appear to be authentic

Recommended Elements of Retailer Training Program – 6. Refusing Sales

Practical Guidance for Refusing Sales When Appropriate



FDA recommends training programs incorporate role-playing (e.g., practice sessions with retail employees playing roles as clerks and customers to simulate possible sales transactions) to ensure employees can effectively apply training information and perform tasks outlined in training program. Role-playing should address difficult situations and should assist employees in determining when/how to:

- Decline purchase attempts by minor made with written parental permission
- Decline to sell tobacco products to underage persons who are friends and acquaintances

Decline sale when:

- Customer has no photo ID; contains no DOB or has expired
- Photo ID does not appear to be authentic or shows customer to be underage

Resist customer pressure

Seek management assistance, when necessary



The Right to Refuse Sales When Acting in Good Faith

Should teach retail personnel that employees are **not required to make sale** if there is any question that doing so would violate law

Recommended Elements of Retailer Training Program – 7. Testing to Ensure Employees Have Knowledge Required



Should require employees to take written test

Use content/format/method determined by retailer to be appropriate

Cover Federal laws/regulations re sale and distribution, youth access, advertising and promotion



Each employee should attain score sufficient to demonstrate possession of knowledge necessary to comply with law



Should maintain records documenting that all individual employees have been trained, including:

Copy of test given to employees and correct answers

Record of test results for each employee, including employee's name, date(s) of testing, test given to employee (if the retailer has more than one test for such training), and employee's test score

Should determine format of records (e.g., paper, electronic)

Retain records for 4 years in order to be able to provide evidence of a training program during 48-month time period covered by civil money penalty

Recommended Elements of Retailer Training Program – *Training Frequency*



Current employees should be trained as soon as practical



New employees should be trained prior to selling tobacco products



Refresher training –

- All employees should receive refresher training, including, but not limited to, any necessary re-training, updates to company policies or law, testing, and roleplaying exercises
- Should be provided at least yearly and more frequently as needed
- Should consider requiring refresher training and testing for employees if retail employee is found selling tobacco products to persons under legal age

Recommended Elements of Retailer Training Program – *Training Methods*

Training may be delivered by any appropriate method, including, but not limited to:



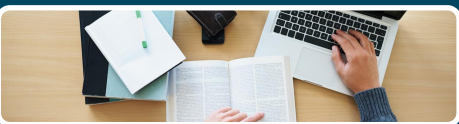
In-store training while on the job



Trainer in classroom setting



Via written materials provided to store personnel for self-study

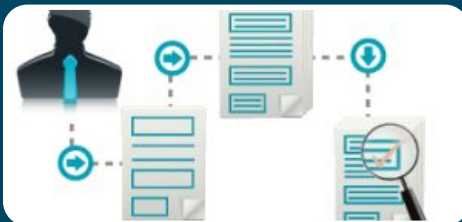


Via Web or other computer-based application

Recommended Elements of Retailer Training Program – *Training Program Review Following Violation*



Review and update training program and take appropriate corrective action after any violation



Document any modifications to training program



Retain records for 4 years

Recommended Elements of Retailer Training Program – *Hiring Practices*



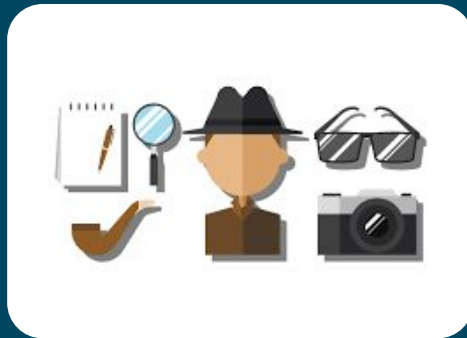
Consider requiring employees who sell tobacco products be at least 18 years of age

Studies have shown that employees *under age of 18* are more likely to sell tobacco to minors



Facilities that employ persons younger than 18 years of age must not have vending machines for sale tobacco products

Recommended Elements of Retailer Training Program – *Management Practices*



Consider internal compliance check program, aka “mystery shopper program” (taking into account any local laws)

- Perform at random and varying times of day and at least once every 6 months
- Immediately notify employees who fail and provide additional training



Review any in-store videotapes to ensure employees are complying with tobacco-related laws and store policies, specifically those relating to requesting and examining photo IDs from customers under the age of 27

Recommended Elements of Retailer Training Program – *Management Practices (con't)*



Consider establishing appropriate corrective measures for employee noncompliance (in compliance with state and local laws)



Document procedures and corrective actions for internal compliance program



Ensure management has vested interest in employee compliance by making compliance rate component of retail supervisor's performance reviews (if permitted by local law)

Recommended Elements of Retailer Training Program – Poster



FDA poster summarizes some of important regulations for selling tobacco in retail establishments



Suggested Placement - on walls/windows, near cash register, in your break room — wherever store employees can see it

**Our Instructor:
Phil Daman, Esq.**

**Tel. 202.660.1447
Phillip.Daman@DamanLLP.com**





VapeMentors Presents

Vape Shop Certification

6-PART SERIES

Why?

This Course Is Designed For...

- Vape Shop Owners
- Vape Shop Managers
- All employees

To Be Used As Training Material For New And Established Employees

Some Challenges Our Beta Attendees Shared:

“Because our employees have worked in the shop for several years it is difficult getting them to change old habits like being more careful about what we can and cannot say and carding everyone. Old habits DO die hard.”

“Getting all the stores together on training. Having everyone meet together to compare notes and get updates. We want to advertise on social media and we all now have guidelines given to us that we must abide by for advertising.”

Solutions Vape Shop Certification May Provide

- Uniformity in training on the *basics* of vape shops
- Saving you and your staff's time by offering training according to everyone's schedule
- Teaching an understanding of the fundamentals of this industry

What Beta Attendees Shared...

100% of the beta attendees think the training “hit the mark” ...

“I believe that everything was covered that any of my employees had questions on”

“I can't think of anything I would add. It was very informative, answered all my questions and was completed in a reasonable time frame.”

What Beta Attendees Shared...

“The content was awesome and the lawyer was great!” (Phil Daman)

“It will help me teach employees how they can be more customer friendly. I find that the few people I have employed young and old, don't understand the importance of good customer service.”

“You guys did great, really good information.”

“wouldn't delete anything.”

The Agenda

(I) Regulations: primarily for retailers and covers federal, plus tobacco laws

- Instructor: attorney Phil Daman, founding Executive Director of SFATA and highly recognized legal council in the vape industry

The Agenda

(IIa) Battery Safety and

(IIb) Liability and Risk Management...go hand in hand.
Proper safety should reduce liability, but insurance is required and prudent for all vape businesses

- Instructor: Jon Brower, Waldo Vapes
- Instructor: Sarkis Kaladzhyan, president CalCo Commercial Insurance, leaders in the industry

The Agenda

(III) Customer Service and Support: The vape industry should be appealing and inviting to anyone *regardless* of experience, sex, or age. Yet vape shops can be intimidating and off putting to many.

- Instructor: Molly Sylvester, Vapin' the 619

The Agenda

(IV) Advocacy: The “anything goes” mindset from the early years is gone. The “wild west” has been tamed to excess by the FDA at the federal level, many varied and inhibiting states guidelines, practices and taxation and local regulations that can have national consequences.

- Instructor: Alex Clark, CASAA
- Instructor: Stefan Didak, Not Blowing Smoke

The Agenda

(V) Social Media: Facebook, Instagram, Snapchat and many other platforms allow vape users and professionals to spread knowledge and sometime misinformation and drama to the masses. There can be negative consequences.

- Instructor (a): Stacy Marshall, partner, Keller and Heckman, LLP attorneys
- Instructor (b): Riley Legaspi, owner, SMPL Media, specializing in the vape space

The Agenda

(VI) Future Vape Trends: Many vape shops stay true to the cause of smoking cessation and avoid anything unrelated. Others have expanded into hemp products, CBD, glassware, kratom, and more. Which is the best strategy?

- Instructor: Norm Bour and panel

Special Offer

This class is \$197 until the end of module VI on July 26.

The price will increase to \$497

PRE-SALE
OPPORTUNITY

~~\$497~~

\$197



What Else Do You Recommend?

Email suggestions to:

Norm@VapeMentors.com



VapeMentors Presents

Vape Shop Certification

6-PART SERIES

Questions & Answers