

SWISHER INTERNATIONAL, INC.



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January 9, 2012

Státní zemědělská a potravinářská inspekce
Ing. Jindřich Pokora
Květná 15
603 00 Brno
Czech Republic

Dear Sir or Madam:

Swisher International, Inc. ("Swisher") is an American corporation organized under the laws of Delaware which manufactures and distributes, among other things, cigars, which are manufactured primarily at Swisher's plant in Jacksonville, Florida. Most of Swisher's products are manufactured for sale in the United States but some are exported for sale in certain European nations.

In the Czech Republic, to Swisher's knowledge the only cigars manufactured by Swisher and sold within the reporting period are: King Edward Imperials, King Edward Specials, King Edward Specials Cherry, King Edward Specials Vanilla, King Edward Tip Cigarillos, King Edward Wood Tips Cherry, King Edward Wood Tips Original, and King Edward Wood Tips Vanilla. All of these products are manufactured by Swisher at its Jacksonville, Florida facility and exported to the Czech Republic. This letter and the documents attached hereto have been prepared by Swisher and are intended to comply with Paragraph 1 of Article 6 of the "Directive of the European Parliament and the Council 2001/37 regarding an approximation of the statutory, regulatory and administrative provisions of member states on the manufacture, presentation and sale of tobacco products," in accordance with local regulations.

Swisher recognizes that the deadline for filing the enclosed information is December 31st of each year. When compiling the annual reports for 2011, however, Swisher's sales records reflected no shipments to the Czech Republic during the course of the year, and no report was generated as a result. It was only very late in December that it was discovered that an order/shipment was in process which would *possibly* enter the country during the year/reporting period, and that a report would thus be required. The information was compiled and the reports prepared as quickly as possible thereafter, and it is Swisher's hope that, in light of the foregoing information, the reports submitted herewith will be accepted as timely and compliant with Swisher's reporting obligations.

The information provided herewith is presented in the spreadsheet format set

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forth in the document entitled "Reporting on tobacco products Practical Guide". In compliance with the requirements of that document, as well as Article 6.1 of Directive 2001/37, the complete Tobacco Product Information and Tobacco Ingredient Information for each of the brands referenced above is submitted in a sealed envelope, which information is subject to protection as confidential trade secrets as further discussed below. Additionally, separate spreadsheets are provided with this letter that present the ingredient information in the manner permitted to be made available to the general public.

Pursuant to the provisions of the aforementioned article 6.2 "in fine" of Directive 2001/37, regarding the local regulations, Swisher EXPRESSLY PETITIONS the Czech authorities that the information presented in the attached sealed envelope regarding the list of tobacco ingredients as well as the specific products constitute for Swisher a Commercial Secret of vital importance, as the information revealed constitutes all the components of such products, and the disclosure of this information by any means, in total or in part, could be used by third parties for the manufacture of similar or identical products with significant consequent damage that would be caused to Swisher, and that therefore the principle of prudence and legal protection should prevail absolutely, and Swisher reiterates once again hereby the vital importance to Swisher of the information which may be disclosed by any means through the Community Authority, a petition which is presented to the Czech Republic so that it might also be presented to the European Commission.

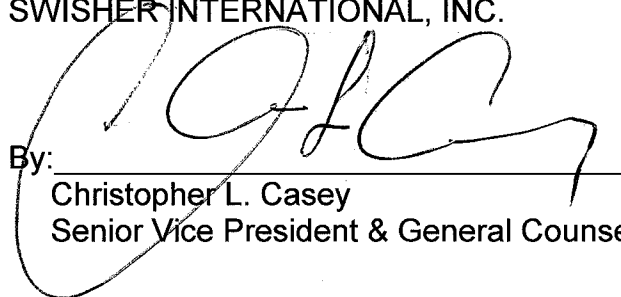
Finally, Swisher wishes to state expressly hereby the technical and material impossibility of presenting any toxicological data regarding Swisher cigars sold in the Czech Republic as these are not available due to the fact that Swisher does not have the technical facilities to analyze the toxicity of the same (by itself or through third parties) and due to the inexistence of homologated laboratories which can certify such data nor their possible addictive effects on health.

Please accept this letter along with the accompanying documents as duly prepared and in compliance with the annual reporting obligations of Swisher International, Inc.

Very truly yours,

SWISHER INTERNATIONAL, INC.

By:


Christopher L. Casey
Senior Vice President & General Counsel

Encl.