

March 5, 2014

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David Romine
Kalik Lewin
4720 Montgomery Lane, Suite 400
Bethesda, MD 20814
RE: Rodney Strong Mail-in Rebate

Dear Mr. Romine:

ISSUE: This correspondence is in response to your e-mail of February 24, 2014, in which you request approval on behalf of Rodney Strong Vineyards to conduct a mail-in rebate promotion in Pennsylvania.

The promotion offers an escalating rebate on 750ml bottles of any Rodney Strong wine. Specifically, consumers may receive two dollars (\$2.00) on the purchase of two (2) bottles, ten dollars (\$10.00) on the purchase of four (4) bottles, or twenty-four dollars (\$24.00) on the purchase of eight (8) bottles. To receive a rebate, consumers must mail to the designated address a completed rebate form along with an original receipt with the qualifying purchase(s) circled. The offer is valid for purchases made between March 1 and May 31, 2014, and is limited to adults of legal drinking age.

OPINION: This office has reviewed the proposed offer and has determined that it comports with applicable liquor laws and regulations, specifically subsection 493(24)(i) of the Liquor Code [47 P.S. § 4-493(24)(i)], and is acceptable for use in this Commonwealth.

Therefore, it would be permissible to conduct the promotion in the Commonwealth in reference to the area checked below:

- retail licensed premises.
- distributor licensed premises.
- both retail and distributor licensed premises.
- the Board's wine and spirits stores, subject to approval of the Bureau of Product Selection.
- other – Internet, text messaging.

THIS OPINION APPLIES ONLY TO THE FACTUAL SITUATION DESCRIBED HEREIN AND DOES NOT INSULATE THE LICENSEE OR OTHERS FROM CONSEQUENCES OF CONDUCT OCCURRING PRIOR TO ITS ISSUANCE. THE PROPRIETY OF THE PROPOSED CONDUCT HAS BEEN ADDRESSED ONLY UNDER THE LIQUOR CODE AND REGULATIONS. THE LAWS AND POLICIES ON WHICH THIS OPINION IS BASED ARE SUBJECT TO CHANGE BY THE LEGISLATURE OR THE PENNSYLVANIA LIQUOR CONTROL BOARD.

Very truly yours,

FAITH S. DIEHL
CHIEF COUNSEL

cc: Pennsylvania State Police, Bureau of Liquor Control Enforcement
James Short, Director of Marketing and Merchandising
Michelle Bonsick, Director, Bureau of Marketing Communications,
Branding & Design
Pamela Bernd, Product Selection

LCB Advisory Opinion No. 14-063