

November 13, 2014

Charity Garner
Polling Specialist
Arrowhead Promotion & Fulfillment Company
1105 S. E. Eight Street
Grand Rapids, Michigan 55744
RE: Corks for Coats

Dear Ms. Garner:

ISSUE: This correspondence is in response to your e-mail, which was forwarded to this office on October 14, 2014, wherein you request approval on behalf of the Middle Sister and Wine Sisterhood to conduct “Corks For Coats” in Pennsylvania.

According to the “Official Rules” that you provided with your e-mail, the promotion began on November 1, 2014 and will continue until January 15, 2015. Consumers are asked to either send in a cork from Middle Sister Wine or a cash register receipt to participate in the promotion.

For every cork or receipt received, one dollar (\$1.00) will go toward purchasing coats for those in need this holiday season. There will be no prizes awarded in this promotion.

OPINION: This office has reviewed the proposed promotion and has determined that it comports with applicable liquor laws and regulations, specifically subsection 493(24) of the Liquor Code [47 P.S. § 4-493(24)] and section 5.32(h) of the Board’s Regulations [40 Pa. Code § 5.32(h)].

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

_____ retail licensed premises.

_____ distributor licensed premises.

- _____ both retail and distributor licensed premises.
- X the Board's wine and spirits stores, subject to approval of the Bureau of Product Management.
- _____ 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
Dale Horst, Director of Marketing and Merchandising
Michelle Bonsick, Director, Bureau of Marketing Communications,
Branding & Design
Pamela Bernd, Product Selection

LCB Advisory Opinion No. 14-582