

December 19, 2014

David Romine
Alcohol Beverage Specialist
Kalik Lewin
5335 Wisconsin Avenue
Suite 440
Washington, DC 20015

RE: Instant Redeemable Coupon on Greeting Card

Dear Mr. Romine:

ISSUE: This correspondence is in response to your e-mail of December 2, 2014, in which you request legal review, on behalf of your client, the Michael Mondavi Company, of a promotion in Pennsylvania involving an instant redeemable coupon. According to the submitted material, the coupon will be in the form of a gift tag, and offer an instant redeemable coupon of one dollar (\$1.00) on the purchase of a greeting card.

OPINION: This office has reviewed the promotion and determined that it does not fall within the scope of the Liquor Code because it does not require a transaction or sale of liquor to be redeemed.

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.
- the Board's wine and spirits stores, subject to approval of the Bureau of Product Management.

X other – Internet, text messaging.

Should you have any further questions or concerns, please do not hesitate to again contact this office.

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
Pamela Bernd, Product Selection

LCB Advisory Opinion No. 14-616