

August 11, 2015

Capricia Borrero  
Coupon Specialist  
Insight Resource Group  
3 Altarinda Road, Suite 301  
Orinda, CA 94563

**RE: Two Oceans Wines Instant Rebate Coupon**

Dear Ms. Borrero:

ISSUE: This correspondence is in response to your e-mail of August 4, 2015, wherein you request approval, on behalf of Distell Group Limited, to run a rebate promotion on Two Ocean wines in Pennsylvania.

Through the promotion, consumers can save one dollar (\$1.00) instantly on the purchase of any one (1) seven hundred fifty milliliter (750ml) bottle of Two Oceans wines. The rebate coupon must be redeemed at the time of purchase. The rebate promotion expires on December 31, 2015. The rebate offer is limited to persons who are twenty-one (21) years of age or older, and there is a limit of one (1) coupon per person.

OPINION: This office has reviewed the proposed rebate promotion 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.

Please be advised that prior approval of malt or brewed beverages point-of-sale ("POS") material and retail licensed premises POS material is no longer required. However, the requirement for prior approval of POS material intended for use in the Pennsylvania Liquor Control Board's ("Board") Fine Wine & Good Spirits stores from the Bureau of Product Selection remains. The total cost of all POS advertising material relating to any one (1) brand of any one (1) manufacturer at any one (1) time may not exceed three hundred dollars (\$300.00) on a retail licensed premises. [47 P.S. § 4-493(20)(i)].

Therefore, it is permissible to conduct the proposed rebate 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  
Dale Horst, Director of Marketing and Merchandising  
Joseph Puhalla, Director, Bureau of Product Selection

LCB Advisory Opinion No. 15-337