

November 4, 2015

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

RE: Instant Rebate Coupon Promotions

Dear Ms. Borrero:

ISSUE: This correspondence is in response to your e-mail of October 27, 2015, wherein you request approval to run six (6) different rebate promotions on Zonin USA wine products in Pennsylvania.

Through the first rebate promotion, consumers can save one dollar (\$1.00) instantly on the purchase of any one (1) seven hundred fifty milliliter (750ml) bottle of Feudo Principi Di Butera Wine. The rebate coupon must be redeemed at the time of purchase. The rebate promotion is scheduled to run from September 15, 2015 to September 16, 2016. The rebate offer is limited to adults of legal drinking age, and there is a limit of one (1) coupon per purchase.

Through the second rebate promotion, consumers can save one dollar (\$1.00) instantly on the purchase of any one (1) seven hundred fifty milliliter (750ml) bottle of Castello D'Albola Wine. The rebate coupon must be redeemed at the time of purchase. The rebate promotion is scheduled to run from September 15, 2015 to September 16, 2016. The rebate offer is limited to adults of legal drinking age, and there is a limit of one (1) coupon per purchase.

Through the third rebate promotion, consumers can save one dollar (\$1.00) instantly on the purchase of any one (1) seven hundred fifty milliliter (750ml) bottle of Masseria Altemura Wine. The rebate coupon must be redeemed at the time of purchase. The rebate promotion is scheduled to run from September 15, 2015 to September 16, 2016. The rebate offer is limited to adults of legal drinking age, and there is a limit of one (1) coupon per purchase.

Through the fourth rebate promotion, consumers can save one dollar (\$1.00) instantly on the purchase of any one (1) seven hundred fifty milliliter (750ml) bottle of Tenuta Ca'bolani Wine. The rebate coupon must be redeemed at the time of purchase. The rebate promotion is scheduled to run from September 15, 2015 to September 16, 2016. The rebate offer is limited to adults of legal drinking age, and there is a limit of one (1) coupon per purchase.

Through the fifth rebate promotion, consumers can save one dollar (\$1.00) instantly on the purchase of any one (1) seven hundred fifty milliliter (750ml) bottle of Albola Wine. The rebate coupon must be redeemed at the time of purchase. The rebate promotion is scheduled to run from September 15, 2015 to September 16, 2016. The rebate offer is limited to adults of legal drinking age, and there is a limit of one (1) coupon per purchase.

Through the sixth and final rebate promotion, consumers can save one dollar (\$1.00) instantly on the purchase of any one (1) seven hundred fifty milliliter (750ml) bottle of Zone Rosé Wine. The rebate coupon must be redeemed at the time of purchase. The rebate promotion is scheduled to run from September 15, 2015 to September 16, 2016. The rebate offer is limited to adults of legal drinking age, and there is a limit of one (1) coupon per purchase.

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

Therefore, it would be permissible to conduct the proposed rebate promotions 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,

RODRIGO J. DIAZ
EXECUTIVE DEPUTY CHIEF COUNSEL

cc: Pennsylvania State Police, Bureau of Liquor Control Enforcement
Dale Horst, Director of Marketing and Merchandising
Stacy Kriedeman, Director, Marketing Communications
Joseph Puhalla, Director, Bureau of Product Selection

LCB Advisory Opinion No. 15-458