

February 9, 2016

Jocelyn Aaron  
Administrative Assistant  
Breakthru Beverage Pennsylvania  
**VIA E-MAIL**

**RE: Riunite Instant Rebates**

Dear Ms. Aaron:

ISSUE: This correspondence is in response to your e-mail of January 27, 2016, wherein you request legal review of a pair of proposed instant rebate coupons to be offered in Pennsylvania by the manufacturer of Riunite Wines.

According to the samples you provided, the first coupon offers consumers a rebate of \$2.00 on the purchase of a 1.5L bottle of Riunite Wine. The second coupon offers consumers a rebate of \$1.00 on the purchase of a 750ml bottle of Riunite Wine. Both offers are valid from March 1 through April 30, 2016, and are limited to adults of legal drinking age.

OPINION: This office has reviewed the rebate offers 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 rebate promotions in the Commonwealth in reference to the area 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 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  
CHIEF COUNSEL

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

LCB Advisory Opinion No. 16-012