

February 25, 2016

Capricia Borrero  
Coupon Specialist  
Insight Resource Group  
**VIA E-MAIL**

**RE: Mail-in Rebate Promotions**

Dear Ms. Borrero:

ISSUE: This correspondence is in response to your e-mail of February 16, 2016, wherein you request legal review of a pair of proposed mail-in rebate promotions to be conducted in Pennsylvania by your client, The Hess Collection.

According to the sample coupons you provided, the first promotion offers consumers a rebate of \$2.00 on the purchase of a 750ml bottle of any Hess Select wine; the second offers a \$2.00 rebate on the purchase of a 750ml bottle of any Artezin Zinfandel wine. To receive either rebate, consumers must mail an original cash register receipt with the price of the qualifying product circled, along with a completed rebate form including the product UPC code to the specified address. The offers are valid from April 1 through June 30, 2016, and are limited to adults of legal drinking age.

OPINION: This office has reviewed the proposed 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. 16-052