

June 6, 2016

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

**RE: Vitral Wine Escalating Mail-In Rebate**

Dear Ms. Borrero:

ISSUE: This correspondence is in response to your e-mail of May 23, 2016, wherein you request approval on behalf of Concha Y Toro Winery to conduct an escalating mail-in rebate promotion on Vitral Wine in Pennsylvania.

According to the bottle necker you have provided, the promotion offers consumers an escalating rebate on purchases on any 750ml bottle of Vitral Wine. Through the promotion, consumers can save \$3.00 by mail on the purchase of one bottle of Vitral Wine, \$9.00 by mail on the purchase of three bottles of Vitral Wine, or \$20.00 by mail on the purchase of six bottles of Vitral Wine. To redeem the rebate, consumers must mail the completed mail-in rebate offer form, along with the original register receipt, to the address specified on the form. Qualifying purchases must be on one register receipt. The rebate is available only to legal residents of certain states, including Pennsylvania, who are twenty-one years of age or older at the time of purchase to participate. The offer expires December 31, 2016.

OPINION: This office has reviewed the proposed rebate offer 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)(1), and is 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 Pennsylvania Liquor Control 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.

Sincerely,



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. 16-208