



September 1, 2020

Scott A. Schleifstein  
Cohen Silverman Rowan LLP  
3 Grace Avenue, #108  
Great Neck, NY 11021  
on behalf of Diageo Beer Company  
**VIA E-MAIL**

**RE: Smirnoff Ice/Smirnoff Ice Smash/Smirnoff Seltzer “The Ultimate Fan” Sweepstakes**

Dear Mr. Schleifstein:

ISSUE: This correspondence is in response to your e-mail of August 6, 2020, in which you request legal review of a sweepstakes promotion to be conducted in Pennsylvania.

According to the official rules you provided, the “Smirnoff Ice/Smirnoff Ice Smash/Smirnoff Seltzer ‘The Ultimate Fan’ Sweepstakes” promotion was scheduled to begin on August 15, 2020, and runs until November 30, 2020. To participate in the sweepstakes, interested individuals may enter at <https://gameday.smirnoff.com> or by text message, as further detailed in the official rules.<sup>1</sup>

Two national grand prize winners will be randomly selected to receive a \$1,000.00 Fanatics® gift code. Twenty-five national runner-up prize winners will receive a \$100.00 Fanatics® gift code. Members of the U.S. Military living on bases, including those from Pennsylvania, are eligible to win a separate grand prize of a \$1,000.00 Fanatics® gift code and five runner-up winners will receive a \$100.00 Fanatics® gift code. The total approximate retail value of the potential prizes for Pennsylvania residents is \$6,000.00.<sup>2</sup> No purchase is necessary to enter the sweepstakes, and the sweepstakes is open only to residents who are at least twenty-

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<sup>1</sup> The official rules have been attached to this Advisory Opinion for your convenience.

<sup>2</sup> Your cover letter states that the value of prizes available to be won in Pennsylvania is \$4,500.00. However, this office did not come to the same conclusion based on a reading of the official rules.

one years of age at the time of entry. Your cover letter indicated that alcohol is not included in the prizes.

OPINION: Section 5.32(h) of the Pennsylvania Liquor Control Board's ("PLCB") Regulations states that a manufacturer, manufacturer's representatives, or licensee may sponsor sweepstakes promotions subject to the following conditions:

- i. No purchase is necessary to enter.
- ii. Entrants shall be twenty-one years of age or older.
- iii. Retail licensed premises may only be involved as pick-up or drop-off points for entry forms and not for the conducting of drawings or the awarding of prizes.
- iv. Alcoholic beverages may not be part of the prize.

40 Pa. Code § 5.32(h).

This office has reviewed the proposed sweepstakes promotion and determined that it comports with applicable liquor laws and regulations, specifically section 5.32(h) of the PLCB's Regulations, 40 Pa. Code § 5.32(h).

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 PLCB's Fine Wine & Good Spirits stores from the Bureau of Product Selection remains. The total cost of all POS advertising material relating to any one brand of any one manufacturer at any one time may not exceed \$300.00 on a retail licensed premises. 47 P.S. § 4-493(20)(i).

Therefore, it is permissible to conduct this promotion in the Commonwealth in reference to the areas checked below:

- retail licensed premises.
- distributor licensed premises.
- both retail and distributor licensed premises.

- The PLCB's Fine Wine & Good Spirits stores, subject to approval of the Bureau of Product Selection (POS only).
- 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  
CHIEF COUNSEL

cc: Pennsylvania State Police, Bureau of Liquor Control Enforcement

LCB Advisory Opinion No. 20-209

**SMIRNOFF ICE/SMIRNOFF ICE SMASH/SMIRNOFF SELTZER “THE  
ULTIMATE FAN” SWEEPSTAKES**

NO PURCHASE NECESSARY TO ENTER. A PURCHASE WILL NOT INCREASE YOUR CHANCES OF WINNING. OPEN ONLY TO LEGAL RESIDENTS OF THE UNITED STATES, WHO ARE 21 YEARS OF AGE OR OLDER. VOID WHERE PROHIBITED OR RESTRICTED BY LAW.

1. The Sweepstakes begins at or after 12:01 a.m. Eastern Time (ET) on August 15, 2020 and ends at 11:59:59 p.m. (ET) on November 30, 2020.
2. To enter:
  - a. Go to <https://gameday.smirnoff.com> (“Website”)\*, verify your age and provide all required information including your name, state, zip code and e-mail address to receive one (1) entry in the random drawing. You will be informed on-screen that your entry has been received. **There is a limit of one (1) entry per person.**
  - b. For a chance to receive additional entries, follow the on-screen instructions to play the interactive football game. You will be informed on-screen whether or not your football game play (i.e. field goal attempt) has been converted and is successful.
  - c. If you convert a field goal in the football game, you will receive one (1) additional entry in the random drawing. (If you do not convert a field goal, you will NOT receive an additional entry.)
  - d. You may play the football game up to three (3) times and thereby receive a maximum of three (3) additional entries.

\*You may instead receive a link to the mobile version of the Website by sending a text message with the word **TOUCHDOWN** from your handset addressed to **24272**. A link to the mobile version of the Website will be sent back to you (the user) via reply text message. Follow the above steps to enter the Sweepstakes and play the interactive football game on your mobile device. For the avoidance of doubt, sending text alone will NOT result in entry or access to the interactive football game.

By texting **TOUCHDOWN** to 24272, you agree you are of legal age to purchase beverage alcohol in the U.S. and to receive recurring marketing SMS and MMS messages, including text messages, using an automatic telephone dialing system from Diageo Beer Company USA. You also agree to these official rules. **Message & Data Rates May Apply.** Text STOP in reply to any message to stop receiving our messages. You may also text HELP to 24272 for more information. Consent is not a condition of any purchase.

3. Important Restrictions:

a. Internet access and valid e-mail address are required to participate. If utilizing the mobile

version of the Website (even if you do not send a text to receive link to mobile version of Website), wireless Internet access and other fees may apply. In all cases when using mobile Website, please consult your wireless service provider regarding your pricing plan. Not all cellular phone providers carry necessary service to enter via mobile website including but not limited to via text message. Wireless Internet access and text messaging service is not available in all areas.

b. All three (3) field goal attempts (i.e., football game plays) must be completed during the same Internet session. After effecting initial entry (as per Rule 2a), a person may play the football game up to three (3) times within an allotted time period.

c. All initial entries must be received and football game plays effected no later than 11:59:59 p.m. ET on November 30, 2020.

d. As per Rule 2, a person may accumulate up to four (4) entries in total; that is, the initial entry plus three (3) additional entries by converting field goals in the interactive football game. Any violation of the entry limit will automatically result in disqualification.

e. Any attempt to tamper with or defraud Sponsor and/or the independent third party judging agency (“Judges”) in conjunction with football game play (including but not limited: (1) to use of any device, artifice or other means to alter the actual result of a football game play; (2) playing the football game more than three [3] times; (3) taking more than the allotted time period in which to play the football game; (4) pausing and reactivating an online session; or any other form of cheating relative to playing the football game) will result in automatic disqualification from the Sweepstakes. In addition, the posting of tips or “hacks” as to more effective football game play without the prior written consent of an authorized representative of Sponsor is prohibited and will result in disqualification from the Sweepstakes. Sponsor further reserves the right to seek legal sanctions against any person determined by Sponsor and Judges to have been engaged in such activities (whether such attempted tampering/fraud was successful or not) as well as prohibiting such person from participating in future Diageo Beer Company USA promotions. See also Rule 7 below.

f. All communications made by Sponsor as to entry and results of football game play (that is, whether or not field goal attempt was converted/successful resulting in receipt of an additional entry) are not otherwise binding upon Sponsor. Notwithstanding any on-screen communications made by Sponsor as to the results of football game play, Sponsor reserves the right to modify the number of additional entries received by a given entrant (and, in extreme circumstances, disqualify the entrant from the Sweepstakes altogether) if Sponsor or Judges determine in their sole discretion that the communicated results of football game plays were affected by error and/or fraud. Sponsor in its sole discretion may – or may not – notify entrant that one or more of his/her entries have been voided and/or that he/she has been disqualified from the Sweepstakes. See also subsection (e) above.

g. Any prize will be awarded to the name corresponding to the e-mail address indicated on entry form.

h. Sponsor is not responsible for technical difficulties, telephone or cell phone service disruptions or other equipment or service issues which might affect the ability of a Website (or mobile Website) visitor to enter and/or play the interactive football game (including interruption, interference, irregularity or defect of any kind as to football game play and/or communication of the result of same); the ability of a person to receive a link to the mobile Website via text message; or the ability of the Sponsor to notify the winners. Sponsor assumes no responsibility for damaged, misdirected, illegible, garbled, corrupted, jumbled, inaccessible, interrupted or otherwise irregular entries/football game plays or other Sweepstakes materials, all of which are void. All entries as well as data as to the results of football game play become the property of the Sponsor and will not be returned.

Entrants' personal information will only be used for purposes of Sweepstakes administration unless an entrant expressly consents beforehand in writing to such other use by Sponsor. For more information, please review Diageo's Privacy & Cookie Notice at [https://footer.diageohorizon.com/dfs/assets/www.smirnoff.com/PrivacyPolicy\\_uen.html?locale=uen-us](https://footer.diageohorizon.com/dfs/assets/www.smirnoff.com/PrivacyPolicy_uen.html?locale=uen-us) as well as Diageo's Conditions of Use at [https://footer.diageohorizon.com/dfs/assets/www.smirnoff.com/www.smirnoff.com\\_uen-us\\_final\\_TnC.html](https://footer.diageohorizon.com/dfs/assets/www.smirnoff.com/www.smirnoff.com_uen-us_final_TnC.html). In the event of any discrepancy between the privacy policy and these Official Rules, the privacy policy shall control and govern; in the event of any discrepancy between the conditions of use and these Official Rules, the conditions of use shall control and govern.

#### 4. Prizes:

##### **NATIONAL PRIZES:**

**Grand Prize (2) - \$1000 Fanatics® gift code.**

**Runner-Up Prize (25) - \$100 Fanatics® gift code**

##### **REGION "A" PRIZES:**

Region "A" consists of the following states in their entirety: Alaska, Idaho, Minnesota, Montana, North Dakota, South Dakota, Wisconsin, Wyoming.

**Grand Prize (1) - \$1000 Fanatics® gift code.**

**Runner-Up Prize (8, 1 per State) - \$100 Fanatics® gift code.**

##### **REGION "B" PRIZES:**

Region "B" consists of the following states: Florida (only select zip codes in Florida, as per Exhibit A) and Mississippi (entire state).

**Grand Prize (1) - \$1000 Fanatics® gift code.**

**Runner-Up Prize (4, 2 per State\*) - \$100 Fanatics® gift code.**

**\*For Florida, State only includes zip codes included in Exhibit A.**

### **U.S. MILITARY REGION PRIZES**

Region consists of select zip codes for U.S. Military Bases in the following states as per **Exhibit B**: Alabama, Arkansas, Alaska, Arizona, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Mississippi, Missouri, Montana, Nebraska, Nevada, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, South Dakota, Texas, Utah, Washington State, Wisconsin, Virginia, Washington, DC.

**\*\*TO BE ELIGIBLE FOR U.S. MILITARY REGIONAL PRIZES, ONE MUST ALSO BE AN AUTHORIZED U.S. MILITARY SHOPPER (ACTIVE DUTY, RESERVE, RETIREE, AND/OR DEPENDENT).**

**Grand Prize (1) - \$1000 Fanatics® gift code.**

**Runner-Up Prize (5) - \$100 Fanatics® gift code.**

**Total Retail Value of All Prizes: \$9200.**

**Total Retail Value of Prizes Available to be Won in Florida: \$5700.**

Fanatics gift codes will be awarded in “e”/virtual form and can be redeemed for merchandise on [www.fanatics.com](http://www.fanatics.com) or [www.FansEdge.com](http://www.FansEdge.com). Terms and conditions apply to Fanatics gift code usage. (Some advertising materials may have referred to the prize as Fanatics® gift cards instead of Fanatics® gift codes; however, the prize is Fanatics® gift codes.)

**5. Winner Determination:** Winners will be determined via random drawing on or about December 3, 2020 by Judges, whose decisions will be final in all matters relating to this Sweepstakes. The National Prize random drawing will consist of all eligible entries received from legal U.S. residents regardless of their state of residence. The Region “A” Prize random drawing will consist of all eligible entries received from legal U.S. residents who reside in Region “A” as defined in Rule 4 above. The Region “B” Prize random drawing will consist of all eligible entries received from legal U.S. residents who reside in Region “B” as defined in Rule 4 above (for participating zip codes in Florida, see Exhibit A below.) The U.S. Military Region Prize random drawing will consist of all eligible entries received from legal U.S. residents who reside on U.S. Military Bases in the U.S. Military Region as defined in Rule 4 above (for participating zip codes of U.S. Military Bases in the listed states, see Exhibit B below.) Entrants who are legal U.S. residents of a Region “A,” Region “B,” or the U.S. Military Region will be entered in the corresponding Region Prize random drawing in addition to the National Prize random drawing. (The National Prize random drawing will take place prior to the Region Prize random drawings) Odds of winning a National Prize will be determined by the total number of eligible entries received from legal U.S. residents regardless of their state of residence. Odds of winning a Region “A” Prize will be determined by the total number of eligible entries received from legal U.S. residents in Region “A,” as defined in Rule 4. Odds of winning a Region “B” Prize will be

determined by the total number of eligible entries received from legal U.S. residents in Region “B,” as defined in Rule 4/Exhibit A. Odds of winning a U.S. Military Region Prize will be determined by the total number of eligible entries received from legal U.S. residents on U.S. Military Region as defined in Rule 4/Exhibit B.

**6. Winner Notification.** Winners will be notified by e-mail on or about December 7, 2020. Winners will be required to sign and return a Declaration of Eligibility, a Liability Release and a Publicity Release (where lawful) within five (5) days of notification or prize will be forfeited and may be awarded to another winner at Sponsor's sole discretion. If winner cannot be located or does not respond to attempt(s) to be notified within (5) days, prize will automatically be forfeited, and an alternate winner may be selected at Sponsor's sole discretion.

Winner agrees that an electronic signature/affirmation or facsimile version of the Declaration of Eligibility, a Liability Release and a Publicity Release (where lawful) shall have the same legal force and effect as a hand-signed document. Notwithstanding the foregoing, should Sponsor determine in its sole discretion that the electronically signed/affirmed/facsimile version of the Declaration/Release is not acceptable, Sponsor may condition award of prize on return of the actual hand-signed document.

Except where prohibited, acceptance of prize constitutes winner's consent to use of his/her name, likeness and biographical data for advertising and promotional purposes without additional compensation.

Prize information will be provided to winner upon proof of eligibility. Winner must furnish valid proof of age (for example, a driver's license, birth certificate or passport). A Declaration/Release must be provided to Judges before prize can be received. No prize will be awarded unless the Declaration/Release has been received by Judges.

**5. Eligibility:** This Sweepstakes is open only to legal U.S. residents, who are 21 years of age or older at the time of entry. Void where prohibited or restricted by law. Employees of the following entities and members of their families or households (whether related or not) are not eligible for participation under any circumstances: Diageo Beer Company USA, Fanatics, Inc., participating U.S. Military Base Exchanges and (as appropriate) their respective subsidiaries, owners, agencies, affiliates, printers, advertising and promotion agencies, alcohol beverage suppliers, importers, wholesalers, distributors or retailers. All federal, state and local laws apply.

**6. General Conditions:** Entry in the Sweepstakes constitutes an entrant's full and unconditional agreement to abide by and accept the terms and conditions of these Official Rules and the decisions of the Judges, which are final and binding in all respects. No substitution of prize or cash equivalent except at Sponsor's sole discretion. (The preceding excludes the redemption of the gift code prize for cash where required by applicable law.) **There is a limit of one (1) prize per family, household or address.** Prize is non-transferable, non-assignable except at the sole discretion of the Sponsor. All federal, state and local taxes on prize are winner's sole responsibility. By accepting prize, winner waives the right to assert as a cost of winning said prize, any and all costs of redemption or travel to redeem said prize and any and all liability that

might arise from redeeming or seeking to redeem said prize. Sponsor reserves the right to conduct a background check of any criminal records of prize winners. To the extent necessary and permitted by law, each prize winner shall authorize this background check. Sponsor reserves the right, at its sole discretion, to disqualify a prize winner based on the background check. Winner also accepts sole responsibility for any miscellaneous and unspecified costs relating to his/her participation in Sweepstakes, acceptance, use, misuse, or possession of prize.

Entrants hereby agree to indemnify and hold Sponsor, Fanatics, Inc., as well as Facebook, Inc./Instagram harmless from and against any third party claims, actions or proceedings of any kind and from any and all damages, liabilities, costs and expenses, including attorney fees and court costs, arising out of any breach or alleged breach of any of the warranties and representations set forth above. Sponsor makes no representation or warranty of any kind regarding prizes; the only warranties – if any – on the gift code prize are those of Fanatics, Inc. as the prize provider.

The value of the prize won by a participant under the sweepstakes may be taxable as income to its winner. Winner is solely responsible for any and all taxes and/or fees associated with the prize. National, Region “A,” Region “B,” and U.S. Military Region Grand Prize Winners will be issued an IRS Form W-9 with the Declaration of Eligibility, a Liability Release and a Publicity Release (where lawful) and a subsequent IRS Form 1099. Upon receipt of prize, the winner shall be required to comply with any and all applicable federal, state and local law, rules and regulations.

In consideration of his/her receipt of any prize, prize winner for himself or herself and his or her guest, heirs, personal representatives and assigns shall voluntarily and knowingly completely and forever release, waive and discharge Sponsor and all related parties, Fanatics, Inc., as well as Facebook, Inc./Instagram from and against any and every kind of claim, demand, injury, costs, attorney fees, right, liability or cause of action or other liabilities of whatever kind or nature, known or unknown, absolute or contingent, and whether or not fixed, which the prize winner ever had, now has or might in the future have arising in any way or related to this Sweepstakes, including, but not limited to, prize winner’s participation in the Sweepstakes; prize winner’s Sweepstakes entry; use of prize winner’s name, likeness, biographical information, signature, image or likeness; prize winner’s receipt, use or inability to use any prize or part thereof, including but not limited to injury or loss sustained in any travel related to the prize; financial claims; physical and/or emotional injury; and/or any other legal claim that may arise, whether under contract, tort, warranty or any other theory or claim.

Sponsor shall have the right, in its sole discretion, to abbreviate, modify, suspend, cancel or terminate the promotion at any time without notice or further obligation.

**7. Text Message Entry Conditions:** Sweepstakes is intended for participation in the United States only and shall be construed only according to United States law. Sponsor and its agencies are not responsible for SMS communications/text messages not received due to lost, failed, delayed or interrupted connections or miscommunications, or to other electronic malfunctions, delays, or errors of any kind in the transmission or receipt of SMS communications/text messages. Sponsor is not responsible for incorrect or inaccurate entry information, whether

caused by any human or technological error that may occur in the processing of SMS communications/text messages in this Sweepstakes. Any other attempted form of entry (or interactive football game play) not specified herein is prohibited; no automatic, programmed; robotic or similar means of entry/interactive football game play are permitted.

**8 Electronic Entries:** In the event of a dispute, online entries (including entries made on mobile Website; for the avoidance of doubt, “entries” includes both initial and additional entries) will be deemed made by the authorized account holder of the e-mail address submitted at time of participation. The authorized account holder is the natural person who is assigned to the e-mail address by an internet access provider, online service, or other organization that is responsible for assigning e-mail addresses. Sponsor and its agencies are not responsible for lost, late, damaged, illegible, misdirected, or incomplete entries; corrupted, jumbled, interrupted, irregular or defective football game plays or for entries/football game plays not received or properly recorded due to lost, failed, delayed or interrupted connections or miscommunications, or to other electronic malfunctions, delays, or errors of any kind in the transmission or receipt of entries. Sponsor is also not responsible for incorrect or inaccurate entry information or football game play activity or results, whether caused by users or by any human or technological error that may occur in the processing of entries/football game plays in this Sweepstakes. Sponsor reserves the right, in its sole discretion, to cancel or suspend all or a portion of the Sweepstakes, should viruses, bugs or other causes beyond control of the Sponsor corrupt the administration, security or proper operation of the Sweepstakes. The preceding includes but is not limited to the football game play portion of the Sweepstakes, whether due to unauthorized human intervention, fraud, virus/malware attack or other event beyond Sponsor’s control. **CAUTION: ANY ATTEMPT BY A PERSON TO DELIBERATELY DAMAGE ANY WEBSITE/MOBILE WEBSITE, UNDERMINE THE LEGITIMATE OPERATION OF THIS SWEEPSTAKES OR SEEK TO DEFRAUD SPONSOR OR JUDGES IN CONJUNCTION WITH THE IMPLEMENTATION OF THE SWEEPSTAKES IS A VIOLATION OF CRIMINAL AND CIVIL LAWS AND SHOULD SUCH AN ATTEMPT BE MADE, SPONSOR RESERVES THE RIGHT TO SEEK DAMAGES FROM ANY SUCH PERSON TO THE FULLEST EXTENT PERMITTED BY LAW.**

**9. Winners’ List:** For winners’ list, please send a self-addressed stamped envelope Ultimate Fan Sweepstakes Winners , P.O. Box 1008, Rocky Hill, CT 06067-1008. All requests for the winners’ list must be postmarked by December 30, 2020 and received by January 15, 2021.

Sponsor: Diageo Beer Company USA, New York, NY  
Smirnoff Smash Premium Flavored Malt Beverage, The Smirnoff Co., New York, NY. |  
SMIRNOFF ICE Premium Flavored Malt Beverage, The Smirnoff Co., New York, NY.

Please Drink Responsibly

This promotion is in no way sponsored, endorsed or administered by, or associated with, Facebook or Instagram.

This Sweepstakes is in no way sponsored, endorsed or associated with the U.S. Military (United States Armed Forces) or any agency of the United States government.

**Exhibit A**

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**Exhibit B**

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