



September 16, 2020

Lori Guernon
Marketing Project Coordinator
Avid Marketing Group
100 Corporate Place, Suite 200
Rocky Hill, CT 06067
on behalf of Amstel USA
VIA E-MAIL

RE: Amstel Friendsgiving Mail-in Rebate [HEI1802914W]

Dear Ms. Guernon:

ISSUE: This correspondence is in response to your e-mail dated August 27, 2020, wherein you request approval to conduct a mail-in rebate promotion in Pennsylvania.

According to the terms and conditions you provided, consumers can save \$10.00 on the purchase of Thanksgiving and Friendsgiving favorites (\$30.00 minimum purchase required in order to receive the rebate). However, residents from Pennsylvania are exempted from purchasing alcohol in order to obtain the rebate. The rebate may be redeemed by sending the rebate offer form to the address provided. The rebate promotion is scheduled to begin on October 1, 2020, and ends on December 7, 2020. The rebate is open only to adults who are at least twenty-one years of age at the time of purchase. There is a limit of one rebate per individual, household, family or street address.

OPINION: Section 493(24)(i) of the Liquor Code generally prohibits licensees from offering anything of value to induce the purchase of alcoholic beverages. 47 P.S. § 4-493(24)(i). Although section 493(24)(i) provides an exception for manufacturers and agents of manufacturers to offer monetary rebates on purchases of wine and spirits through the Pennsylvania Liquor Control Board's ("PLCB") Fine Wine & Good Spirits stores or purchases of malt or brewed beverages through distributors and importing distributors, there is no exception allowing coupons offering discounts on non-alcoholic products. Therefore, if a promotion requires a consumer to purchase alcohol in order to receive a discount on a non-alcoholic product, it would be an unlawful inducement under section 493(24)(i). However, if no purchase

is required to obtain the rebate, then such a promotion is not subject to the Liquor Code's inducement prohibition.

In this case, the promotion makes clear to consumers that no alcohol purchase is necessary for Pennsylvania residents to obtain or access the rebate. Therefore, the promotion would not be prohibited under the Liquor Code because section 493(24)(i) would not apply.

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. 20-218

FILE INFO

FILENAME: AL201349.indd

DESCR: Standard Tear pad MIR

OFFER: Amstel Light \$10 MIR

CLIENT: Heineken - T.J. Keightley

SPECS

TRIM SIZE: 5" x 3"

BLEED: .125"

SAFETY: .1875"

DATE: 07/20/20

MECH BUILT @ 100%

COMP PRINTED @ 100%

PRINT FINAL @ 100%

100 Corporate Place

2nd Floor, Suite 200 • Rocky Hill, CT 06067

P 860.436.3004 • www.avidinc.com

COLORS (PRINTOUT NOT FOR COLOR MATCH)

4/1 PROCESS

SPECIAL INSTRUCTIONS

AMG CONTACT: Lacey Ridzon, 860.436.3004



**THE PERFECT
FRIENDSGIVING
TOAST**

SAVE \$10 BY MAIL

**WITH THE PURCHASE OF THANKSGIVING/
FRIENDSGIVING FAVORITES.**

MINIMUM PURCHASE OF \$30 REQUIRED.

SEE REVERSE SIDE FOR DETAILS.

MAIL-IN REBATE | OFFER VALID 10/01/2020 - 12/07/2020

MAIL-IN REBATE | OFFER VALID 10/01/2020 – 12/07/2020

1
COMPLETE

*Name (please print) _____ *Date of Birth _____ MM/DD/YY

*Street Address _____

*City, State, ZIP _____ Phone (including area code) _____

E-Mail Address _____ Retailer Name (where you obtained this offer) _____

I certify that I am 21 years of age or older and that the information provided herein is correct. Understand that providing false information is illegal and that incomplete forms and forms received without a signature will be void and not redeemed or returned. By signing, I acknowledge that I have read and understand the Terms and Conditions of this Rebate Offer printed below and that I have complied with them in full.

*Signature _____ Yes, I'd like to receive special offers and news about HEINEKEN USA Inc. products.

**Required Fields*

TERMS AND CONDITIONS OF REBATE OFFER: MUST BE A RESIDENT OF A VALID STATE AND AT LEAST 21 YEARS OF AGE OR OLDER AT TIME OF PURCHASE.

Offer valid in AR, HI, KY, MN, MO, NJ, NC, PA, VT & WV.

To receive up to \$10 through this mail-in rebate, you must purchase \$30 worth or more (excl. sales tax) of Thanksgiving and Friendsgiving favorites **WITHOUT PURCHASING ANY BEER.** Thanksgiving/Friendsgiving favorites exclude alcohol, lottery tickets, gas, tobacco, money orders, postage stamps, gift cards and prescription pharmacy purchases.

2
SEND

- This completed Official Mail-In Rebate Offer Form
- The cutout of the original UPC label for EACH qualifying product packaged with a UPC label
- The original cash register receipt(s) with EACH qualifying product price circled

3
MAIL TO

Inmar Rebate Center
Attn: Turkey Rebate NBPR
Program AL201349
P.O. BOX 426008
Del Rio, TX 78842-6008

REDEMPTION: Maximum of one (1) rebate per individual, household, family or street address. Photocopies of the cash register receipt(s), UPC label(s) or this Official Mail-In Rebate Form will not be accepted or returned (unless otherwise prohibited by law). Signature is required on Rebate Offer Form. Amstel USA reserves the right to confirm rebate recipient's identification and age. Tax remains the responsibility of the consumer. Offer may not be combined with any other offer. Offer not available to organizations or groups, or to employees of Amstel USA, its affiliated companies and agencies, licensed alcohol beverage suppliers, wholesalers, and retailers, or members of their immediate families or households. Amstel USA is not responsible for lost, misdirected, illegible, incomplete, erroneous, late, or postage-due rebate requests and reserves the right to reject any rebate submission that it determines, in its sole discretion, is not in full compliance with these Terms and Conditions. Fraudulent submissions may result in federal prosecution. We will only use your data in accordance with our Privacy Policy, which you can review at <https://heinekenusa.com/privacy-policy/>. By submitting this Rebate Offer Form, you hereby agree to Sponsor's collection and use of your personal information and acknowledge that you have read and accepted Sponsor's Privacy Policy. Allow 8-10 weeks for delivery of rebate check. Void where prohibited, taxed or restricted by law. Original cash register receipt(s) must be dated between 10/01/20 and 12/07/2020. All requests for a rebate must be postmarked no later than 12/22/2020 and received by 01/06/2021. Offer NOT redeemable in store. For questions or to check the status of your refund, please visit <https://inmarrebates.com>.

ENJOY AMSTEL® LIGHT RESPONSIBLY.
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AL201349



Please enter your information to continue

Must be 21 or older to participate

By clicking verify, I agree to the website

[Terms of Use](#) and acknowledge the [Privacy Policy](#).

Date of Birth

State



VERIFY

[Privacy Policy](#)

[Terms of Use](#)

ENJOY RESPONSIBLY.

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YOUR PRIVACY RIGHTS



SHOP.

ONE (1) fresh or frozen turkey or ham.†

†Minimum \$30 purchase of friendsgiving/ Thanksgiving favorites required. [Click here](#) for details.



SNAP.

a photo of your receipt*



EARN.SM

cash back via PayPal!

LET'S DO IT!

Having trouble? Contact us!

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*Receipts must be itemized (include product name, package size, and price). Credit card receipts are not valid. One receipt per image.

ENJOY RESPONSIBLY.

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SNAP

a pic of your receipt

In order to receive cash back,
please ensure the following:

1. One receipt per image
If your receipt is too long, click "Add Section"
2. Receipt is vertical in the image
(TOP TO BOTTOM)
3. Product, date and total are legible

TAP TO SNAP



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YOUR PRIVACY RIGHTS

Can you read the text? If you can't, we can't
either 😊 Tap retake to snap again!



RETAKE



ADD SECTION



NEXT

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GREAT!

Now we just need your email

EMAIL

Enter your email so we can send your money via PayPal. You must have a valid PayPal email address.

- By checking this box, I agree to the [Terms of this offer](#) and acknowledge the [Privacy Policy](#) of this website.*
- By checking this box, you represent that you are at least 21 years of age and agree to receive email communications from Heineken USA about products and offers that may be of interest to you



SUBMIT

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SUCCESS



Your submission has been received.
We will verify your purchase and send your
rebate via PayPal within 48 business hours.

Your PayPal rebate will be sent via email from
Avid Inc. once this is complete.



SHARE WITH YOUR FRIENDS



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HELLO!

**Your submission for Amstel® Light has been approved!
You should receive an email from PayPal shortly with
information about how to accept your payment of \$10.**

**ENJOY RESPONSIBLY.
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