

May 4, 1998

Pam Frantz, Manager
Regulatory Affairs
JIM BEAM BRANDS CO.
510 Lake Cook Road
Deerfield, Illinois 60015-4964

RE: Windsor "Round Tripper" Sweepstakes

Dear Ms. Frantz:

ISSUE: This is in response to your inquiry of April 3, 1998 to this office in which you request an opinion as to the legality of conducting certain activities in Pennsylvania as described in the enclosed correspondence.

OPINION: This office has reviewed the proposed promotion and determined that it comports with applicable liquor laws and regulations, specifically Liquor Code Section 493(24). [47 P.S. §4-493(24)]. Therefore, it is permissible to conduct such event(s) in the Commonwealth on the areas checked below:

- retail licensed premises.
- distributor licensed premises.
- both retail and distributor licensed premises.
- wine & spirit shoppes, subject to approval of Bureau of Logistics.
- other. _____

Pam Frantz
May 4, 1998
Page Two

Please be advised that the final phase of this contest (i.e., home run competition at the baseball stadium) may not be held on retail licensed premises.

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,

FAITH S. DIEHL
CHIEF COUNSEL

cc: Bureau of Liquor Control Enforcement,
Pennsylvania State Police
J. Fred Hamilton
A. Connell
Margaret Kerwin
Clint Rose

Refer to: (717) 783-9454
FAX: (717) 787-8820

LCB Advisory Opinion No. 98-139