

March 16, 1999

Michael Barkow  
HALL DICKLER KENT FRIEDMAN & WOOD LLP  
909 Third Avenue  
New York, NY 10022-4731

**RE: St. Pauli Girl "Golf Gear Giveaway" and Premium Offer**

Dear Mr. Barkow:

**ISSUE:** This is in response to your inquiry of March 5, 1999 to Robert Kaskiel that was forwarded to this office March 10, 1999 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 accompanying point-of-sale materials) and determined that it comports with applicable liquor laws and regulations, specifically section 493(24) of the Liquor Code. [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.
- St. Pauli Girl website.

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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  
    Robert Kaskiel

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

LCB Advisory Opinion No. 99-093