

June 25, 1999

Toni L. Snoddy
Regulatory Legal Assistant
COORS BREWING COMPANY
311 10th Street, NH335
Golden, CO 80401

RE: Coors Light Starting Line Up Sweepstakes/Contest

Dear Ms. Snoddy:

ISSUE: This is in response to your inquiry of May 27, 1999 to Robert Kaskiel that was forwarded 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 accompanying point-of-sale materials) and determined that it comports with applicable liquor laws and regulations, specifically section 13.51 of the Board's regulations [40 Pa. Code Section 13.51], and Board Advisory Notice No. 14, a copy of which is attached. 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.
- Internet entry is permissible. The above-referenced promotion may not be conducted on retail licensed premises because section 5.32 of the Board's regulations [40 Pa. Code Section 5.32] prohibits a manufacturer from conducting a contest 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
Robert Kaskiel

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

Advisory Opinion No. 99-223