

October 4, 1999 Telephone: 717-783-9454
FAX: 717-787-8820

Scott A. Schleifstein

COHEN & SILVERMAN L.L.P.

360 Lexington Avenue

New York, NY 10017

RE: Labatt USA's Winter Rebate Offer

Dear Mr. Schleifstein:

ISSUE: This is in response to your inquiry of September 23, 1999, in which you request approval of certain point-of-sale items 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. Section 4-493(24)]. Therefore, it is permissible to conduct such event(s) in the Commonwealth on the areas checked below:

- retail licensed premises (restaurants, hotels
clubs, retail dispensers)
- .
- distributor licensed premises.
- both retail and distributor licensed premises.
- wine and spirits shoppes, subject to approval
of the Bureau of Logistics.
- other.

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: Pennsylvania State Police,
Bureau of Liquor Control Enforcement
Robert Kaskiel

LCB Advisory Opinion No. 99-329