



To: Senate Judiciary Committee

From: Traci Genesen, Vice President and General Counsel

Date: February 20, 2019

Re: Opposition to Senate Bill 111

Wine Institute (WI) is a public policy organization representing almost 1,000 California wineries and associated businesses. Copper Cane is not a Wine Institute member. Wine Institute in no way represents Copper Cane or its views on this or any matter.

Thank you for the opportunity to submit written testimony in opposition to the inclusion of Unfair Trade Practices Act (UTPA) remedies in SB 111. WI strongly objects to subjecting a winery who fails to file the required statement of legal and tax compliance to UTPA remedies. WI believes that the hefty Oregon Liquor Control Commission (OLCC) civil penalty for failing to file as well as the other currently available penalties following an OLCC investigation are enough to encourage compliance. We believe that UTPA remedies, designed to punish bad actions causing harm to consumers, are inappropriate in the context of failing to file a form with an industry regulator. (See attached WI Testimony in Opposition to SB 591 for a more extensive discussion of WI's objections to UTPA remedies in the context of regulatory violations.)

SB 111 also provides greater regulation around the use of American Viticultural Areas (AVAs) located wholly or partially in Oregon. California wineries, like Oregon wineries, want to protect AVAs. Our views on how to do that may differ, but each state has an opportunity to determine what is best for the wine industry in that state. This is reflected in stricter standards contained in Oregon laws relating to AVAs that go beyond California and Federal law. And, it will be your choice to decide if those standards need to be made even stricter; however, the law requires a balance. Any law or regulation limiting the truthful, accurate and specific information that can be included on a wine label must not be more extensive than what is necessary to serve the government's legitimate interest in the matter. *Rubin v. Coors Brewing Co.*, 514 U.S. 476 (1995). A law or regulation that is more restrictive may be vulnerable to First Amendment Challenge.

When considering the policy decision relating to AVAs, we encourage you to review the wine labels attached to give some perspective on the current use of AVAs on labels from Oregon produced wines.

Thank you for considering Wine Institute's comments. We urge you to rethink the application of UTPA remedies in this context. If you have any questions, please do not hesitate to contact me.

Tracy Genesen

Vice President and General Counsel

425 Market Street, Suite #1000

San Francisco, CA 94105

Office 415-356-7531

tgenesen@wineinstitute.org www.wineinstitute.org





To: Senate Judiciary Committee
From: Tracy Genesen, Vice President and General Counsel
Date: February 20, 2019
Re: Opposition to SB 591

Wine Institute (WI) is a public policy organization representing almost 1,000 California wineries and associated businesses. Copper Cane is not a Wine Institute member. Wine Institute in no way represents Copper Cane or its views on this or any matter.

Thank you for the opportunity to submit written testimony in opposition to SB 591. We understand the Oregon wineries' frustration with the Federal Alcohol and Tobacco Tax and Trade Bureau (TTB) enforcement response to date regarding its complaints about Copper Cane's Elouan and Willametter Journal labels, as well as the length of time it takes for the Oregon Liquor Control Commission (OLCC) to complete an investigation and enforcement process. WI members, like Oregon wineries, are concerned about the current inconsistent and inadequate enforcement regarding information on wine labels. We are currently working with members and other wine industry groups to determine what TTB rule changes or clarifications could strengthen label compliance and enforcement. However, we strongly disagree that creating an Unfair Trade Practices Act (UTPA) option in this context will achieve greater enforcement around misleading or deceptive labels and branding. To the contrary, subjecting regulatory violations to UTPA remedies, including private rights of action, class actions, punitive damages, payment of attorneys' fees and costs is an overreaction designed to punish one winery for questionable actions but will have far reaching detrimental impacts on Oregon wineries as well as all wineries selling wine in Oregon.

- 1) Wine is already regulated by dedicated, competent Federal and State agencies. If there are issues within the industry, the proper place to address these are within the agencies, who employ experts knowledgeable about the complicated laws and rules surrounding alcohol beverages. It also takes specific knowledge and experience to make reasoned judgements when the laws are subjective, for example what is "misleading" in branding and labeling. This proposal would supplant the established regulatory and enforcement processes with enforcement through private right of action or class action. This will be costly and detrimental not only to Oregon wineries, but to the wine industry on a national scale.
- 2) WI has serious concerns about applying Oregon Unfair Trade Practices Act remedies to minimum standards of wine and labeling and branding violations. We strongly believe that such remedies will have the unintended side effect of creating yet another legal basis for consumer class action lawsuits against the industry. We have already seen such lawsuits in the case of Tito's Handmade Vodka and against BevMo! in relation to tasting notes and vintage reference on retail shelves. When UTPA remedies are available, plaintiffs' lawyers look for violations and bring suits because of the potential for an award of punitive damages, costs and fees. Being in the right would not relieve a winery of the expense and potential negative market impacts of having to

defend themselves from an unwarranted UTPA action. Often the purpose of bringing such actions is an attempt to get a settlement and fees, not necessarily prevailing on the merits of the case.

- 3) The Oregon Unfair Trade Practices Act is intended to protect consumers not an industry. These bills do not arise out concern for the consumer. They arise out of complaints about a competitor and the related success in the marketplace. There is no claim of harm to consumers. To utilize UTPA to address claims of unfair competition would be an unwarranted major expansion.

In a letter from the Oregon Wine Association to the Director of TTB dated December 12, 2018, the issues with Copper Cane were summarized as follows:

“Improper labeling potentially helped Copper Cane gain an unfair economic advantage over other members of the Oregon wine industry, who adhere to the stricter Oregon grape sourcing, varietal composition, and methods of manufacture standards as required by Oregon law, which is supported by 27 CFR 4.25(b)(1). Mislabeling wine produced in California with Oregon AVAs and other Oregon appellations of origin is likely helping the Elouan brand achieve the highest national retail scanned sales in the Oregon category for Pinot Noir at \$17 and above and Rose \$13 and above (Nielsen rankings 52 weeks ending 6/30/18). The Willamette Valley AVA and its sub-AVAs currently command retail price premiums of approximately 80% vs. wines labeled as Oregon. That pricing is driving a significant increase in Copper Cane’s total dollar volume which earns the brand additional merchandising support. Scanner sales show the Elouan brand is growing at 60% year over year compared to a category average of only 10%.

The approved label use-ups for mislabeled wine are also problematic for the Oregon wine industry because they allow for tremendous volumes of wine to be sold under improper labels, which harms the value of Oregon wine as a whole. For example, Elouan Pinot Noir 2017 (TTB ID 1817001000420) permits Copper Cane to sell off up to 72,957 cases of wine. At 2.378 gallons/case, this is 173,492 gallons of wine, much more wine that the vast majority of Oregon wineries produce in a single year. In the scope of the typically small producer Oregon wine industry, such sales can drown out Oregon wineries that follow the strict Oregon wine production, grape content, and labeling rules.”

The complaints are clearly not relating to harm to consumers, but instead harm to an industry. We believe it would be a misuse of the UTPA to apply its remedies in such circumstances.

In addition to opposing the UTPA remedies in SB 591, WI objects to the bill because its scope far exceeds the problem. It not only applies UTPA penalties to regulatory violations relating to wines produced in Oregon or produced outside of Oregon and labeled Oregon, it applies to **all wines sold** in Oregon. This subjects wineries from across the United States and around the world to the possibility of a law suit under the UTPA in Oregon. This provision is a magnet for creative plaintiffs’ attorneys to tie up wineries in protracted litigation based on common words and phrases used on wine labels that are vague and not defined in regulation, such as sustainably farmed, natural wine, biodynamic, reserve, private reserve, and proprietor’s blend. A plaintiffs’ lawyer could easily make a good faith argument that one of these terms is misleading, which likely overcome Rule 11 preventing frivolous lawsuit, and a winery would find themselves in a costly lawsuit and potentially a class action suit. It is also possible that other tiers of the industry, including wholesalers and retailers, could be sued based on common widely accepted, truthful phrases used in advertising and branding of wine. We implore you not to take this step which would have very negative impacts on the wine industry and market in Oregon.

Thank you for considering Wine Institute's comments. We urge you to rethink the application of UTPA remedies in this context. If you have any questions, please do not hesitate to contact me.



Tracy Genesen

Vice President and General Counsel

425 Market Street, Suite #1000

San Francisco, CA 94105

Office 415-356-7531

tgenesen@wineinstitute.org www.wineinstitute.org

FOR TTB USE ONLY			DEPARTMENT OF THE TREASURY ALCOHOL AND TOBACCO TAX AND TRADE BUREAU APPLICATION FOR AND CERTIFICATION/EXEMPTION OF LABEL/BOTTLE APPROVAL (See Instructions and Paperwork Reduction Act Notice on Back)
TTB ID 17314001000479			
1. REP. ID. NO. (If any)	CT 88	OR 38	

PART I - APPLICATION

2. PLANT REGISTRY/BASIC PERMIT/BREWER'S NO. (Required) BW-OR-168	3. SOURCE OF PRODUCT (Required) <input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Imported	8. NAME AND ADDRESS OF APPLICANT AS SHOWN ON PLANT REGISTRY, BASIC PERMIT OR BREWER'S NOTICE. INCLUDE APPROVED DBA OR TRADENAME IF USED ON LABEL (Required) KING ESTATE WINERY, KING ESTATE WINERY, LP 80854 TERRITORIAL HWY EUGENE OR 97405
4. SERIAL NUMBER (Required) 170024	5. TYPE OF PRODUCT (Required) <input checked="" type="checkbox"/> WINE <input type="checkbox"/> DISTILLED SPIRITS <input type="checkbox"/> MALT BEVERAGE	
6. BRAND NAME (Required) KING ESTATE	8a. MAILING ADDRESS, IF DIFFERENT	
7. FANCIFUL NAME (If any)		
9. FORMULA	10. GRAPE VARIETAL(S) (Wine Only) Grenache, Syrah, Mourvèdre	14. TYPE OF APPLICATION (Check applicable box(es)) a. <input checked="" type="checkbox"/> CERTIFICATE OF LABEL APPROVAL b. <input type="checkbox"/> CERTIFICATE OF EXEMPTION FROM LABEL APPROVAL "For sale in _____ only" (Fill in State abbreviation.) c. <input type="checkbox"/> DISTINCTIVE LIQUOR BOTTLE APPROVAL. TOTAL BOTTLE CAPACITY BEFORE CLOSURE _____ (Fill in amount) d. <input type="checkbox"/> RESUBMISSION AFTER REJECTION TTB ID. NO. _____
11. WINE APPELLATION (If on label) OREGON		
12. PHONE NUMBER (541) 942-9874	13. EMAIL ADDRESS	
15. SHOW ANY INFORMATION THAT IS BLOWN, BRANDED, OR EMBOSSED ON THE CONTAINER (e.g., net contents) ONLY IF IT DOES NOT APPEAR ON THE LABELS AFFIXED BELOW. ALSO, SHOW TRANSLATIONS OF FOREIGN LANGUAGE TEXT APPEARING ON LABELS. CORK: KING ESTATE, KE LOGO, KINGESTATE.COM; CAPSULE: KE LOGO, KING ESTATE, VINEYARD DESIGNATE		

PART II - APPLICANT'S CERTIFICATION

Under the penalties of perjury, I declare; that all statements appearing on this application are true and correct to the best of my knowledge and belief; and, that the representations on the labels attached to this form, including supplemental documents, truly and correctly represent the content of the containers to which these labels will be applied. I also certify that I have read, understood and complied with the conditions and instructions which are attached to an original TTB F 5100.31, Certificate/Exemption of Label/Bottle Approval.

16. DATE OF APPLICATION 11/10/2017	17. SIGNATURE OF APPLICANT OR AUTHORIZED AGENT (Application was e-filed)	18. PRINT NAME OF APPLICANT OR AUTHORIZED AGENT Lisa Frasier
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PART III - TTB CERTIFICATE

This certificate is issued subject to applicable laws, regulations and conditions as set forth in the instructions portion of this form.

19. DATE ISSUED	20. AUTHORIZED SIGNATURE, ALCOHOL AND TOBACCO TAX AND TRADE BUREAU
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11/21/2017

Shirley Gumbs

FOR TTB USE ONLY

QUALIFICATIONS

TTB has not reviewed this label for type size, characters per inch or contrasting background. The responsible industry member must continue to ensure that the mandatory information on the actual labels is displayed in the correct type size, number of characters per inch, and on a contrasting background in accordance with the TTB labeling regulations, 27 CFR parts 4, 5, 7, and 16, as applicable.

EXPIRATION DATE (if any)

STATUS

THE STATUS IS APPROVED.

CLASS/TYPE DESCRIPTION

DESSERT /PORT/SHERRY/(COOKING) WINE

AFFIX COMPLETE SET OF LABELS BELOW

Image Type:

Brand (front)

Actual Dimensions: 3 inches W X 3.75 inches H

2016 OREGON

GRENACHE 41%, SYRAH 42%, MOURVEDRE 17%

CRATER VIEW & SEVEN HILLS VINEYARDS

Wines made from the classic grape varieties found in France's Southern Rhone region, Grenache, Syrah and Mourvedre, are often referred to as a "GSM". This varietal combination is typically made from warm growing regions and delivers wines with jammy, dark fruit character and elegant complexity. We hope you enjoy this Oregon take on GSM, from a world-renowned Walla Walla vineyard, Seven Hills, and Rogue Valley's Crater View Vineyard.

PRODUCED AND BOTTLED BY
KING ESTATE WINERY
80854 TERRITORIAL HWY.
EUGENE, OREGON 97405

1-800-884-4441 | www.kingestate.com

CONTAINS SULFITES • 750ml | ALC. 14.5% BY VOL.

GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2) CONSUMPTION OF ALCOHOLIC BEVERAGES IMPAIRS YOUR ABILITY TO DRIVE A CAR OR OPERATE MACHINERY, AND MAY CAUSE HEALTH PROBLEMS.

Image Type:

Back

Actual Dimensions: 3 inches W X 3.75 inches H

King Estate

2016

CRATER VIEW 58%

SEVEN HILLS 42%

VINEYARD DESIGNATE

OREGON

APPELLATION

GRENACHE, SYRAH, MOURVEDRE

GRAPE VARIETY

ALC. 14.5% BY VOL

FOR TTB USE ONLY			DEPARTMENT OF THE TREASURY ALCOHOL AND TOBACCO TAX AND TRADE BUREAU APPLICATION FOR AND CERTIFICATION/EXEMPTION OF LABEL/BOTTLE APPROVAL (See Instructions and Paperwork Reduction Act Notice on Back)
TTB ID 17348001000950			
1. REP. ID. NO. (If any)	CT 88	OR 38	

PART I - APPLICATION

2. PLANT REGISTRY/BASIC PERMIT/BREWER'S NO. (Required) BWN-OR-21009	3. SOURCE OF PRODUCT (Required) <input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Imported	8. NAME AND ADDRESS OF APPLICANT AS SHOWN ON PLANT REGISTRY, BASIC PERMIT OR BREWER'S NOTICE. INCLUDE APPROVED DBA OR TRADENAME IF USED ON LABEL (Required) SOUTHEAST WINE COLLECTIVE, SEWC, LLC 2425 SE 35TH PL BLDG F PORTLAND OR 97202 GERSING CELLARS (Used on label)
4. SERIAL NUMBER (Required) 17GSPN	5. TYPE OF PRODUCT (Required) <input checked="" type="checkbox"/> WINE <input type="checkbox"/> DISTILLED SPIRITS <input type="checkbox"/> MALT BEVERAGE	
6. BRAND NAME (Required) GERSING CELLARS	8a. MAILING ADDRESS, IF DIFFERENT	
7. FANCIFUL NAME (If any) SEXTET		
9. FORMULA	10. GRAPE VARIETAL(S) (Wine Only) Pinot noir	14. TYPE OF APPLICATION (Check applicable box(es)) a. <input checked="" type="checkbox"/> CERTIFICATE OF LABEL APPROVAL b. <input type="checkbox"/> CERTIFICATE OF EXEMPTION FROM LABEL APPROVAL "For sale in _____ only" (Fill in State abbreviation.) c. <input type="checkbox"/> DISTINCTIVE LIQUOR BOTTLE APPROVAL. TOTAL BOTTLE CAPACITY BEFORE CLOSURE _____ (Fill in amount) d. <input type="checkbox"/> RESUBMISSION AFTER REJECTION TTB ID. NO. _____
11. WINE APPELLATION (If on label) WILLAMETTE VALLEY	12. PHONE NUMBER (503) 208-2061	13. EMAIL ADDRESS

15. SHOW ANY INFORMATION THAT IS BLOWN, BRANDED, OR EMBOSSED ON THE CONTAINER (e.g., net contents) ONLY IF IT DOES NOT APPEAR ON THE LABELS AFFIXED BELOW. ALSO, SHOW TRANSLATIONS OF FOREIGN LANGUAGE TEXT APPEARING ON LABELS.

PART II - APPLICANT'S CERTIFICATION

Under the penalties of perjury, I declare; that all statements appearing on this application are true and correct to the best of my knowledge and belief; and, that the representations on the labels attached to this form, including supplemental documents, truly and correctly represent the content of the containers to which these labels will be applied. I also certify that I have read, understood and complied with the conditions and instructions which are attached to an original TTB F 5100.31, Certificate/Exemption of Label/Bottle Approval.

16. DATE OF APPLICATION 12/14/2017	17. SIGNATURE OF APPLICANT OR AUTHORIZED AGENT (Application was e-filed)	18. PRINT NAME OF APPLICANT OR AUTHORIZED AGENT Thomas Monroe
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PART III - TTB CERTIFICATE

This certificate is issued subject to applicable laws, regulations and conditions as set forth in the instructions portion of this form.

19. DATE ISSUED	20. AUTHORIZED SIGNATURE, ALCOHOL AND TOBACCO TAX AND TRADE BUREAU
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12/18/2017



FOR TTB USE ONLY

QUALIFICATIONS

TTB has not reviewed this label for type size, characters per inch or contrasting background. The responsible industry member must continue to ensure that the mandatory information on the actual labels is displayed in the correct type size, number of characters per inch, and on a contrasting background in accordance with the TTB labeling regulations, 27 CFR parts 4, 5, 7, and 16, as applicable.

EXPIRATION DATE (if any)

STATUS

THE STATUS IS APPROVED.

CLASS/TYPE DESCRIPTION

DESSERT /PORT/SHERRY/(COOKING) WINE

AFFIX COMPLETE SET OF LABELS BELOW

Image Type:

Brand (front)

Actual Dimensions: 3 inches W X 4.25 inches H

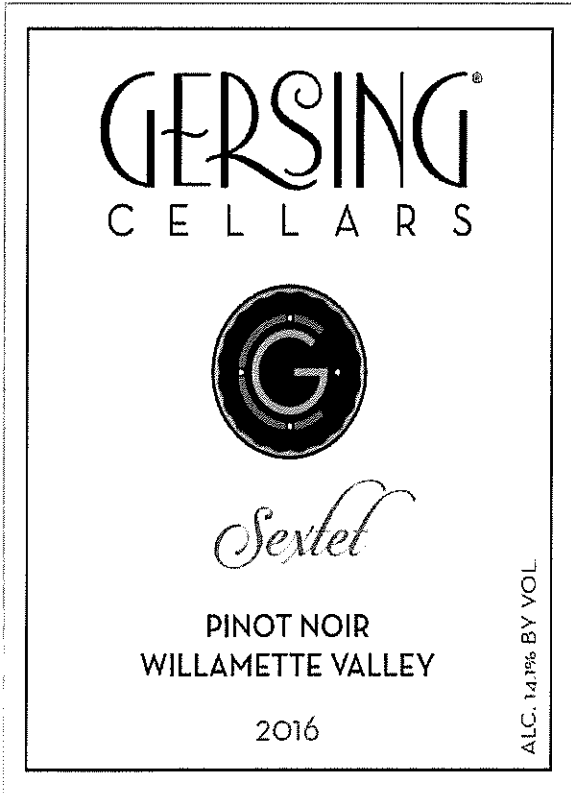


Image Type:

Back

Actual Dimensions: 3 inches W X 4.25 inches H

2016
SEXTET PINOT NOIR

Willamette Valley



This Pinot Noir is a blend of six select barrels from two vineyards: Madrona Hill Vineyard in the Chehalem Mountains AVA and Methven Family Vineyard in the Eola-Amity Hills AVA and is an homage to the great jazz sextets. We believe this wine, like those bands, is greater than the sum of its parts and has a style all its own.

CONTAINS SULFITES • 750 ML • ALC. 14.1% BY VOL.

PRODUCED & BOTTLED BY GERSING CELLARS
PORTLAND, OREGON • 97212 • 503.421.4642



GERSING
CELLARS

GERSINGCELLARS.COM

GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2) CONSUMPTION OF ALCOHOLIC BEVERAGES IMPAIRS YOUR ABILITY TO DRIVE A CAR OR OPERATE MACHINERY, AND MAY CAUSE HEALTH PROBLEMS.

FOR TTB USE ONLY		DEPARTMENT OF THE TREASURY ALCOHOL AND TOBACCO TAX AND TRADE BUREAU APPLICATION FOR AND CERTIFICATION/EXEMPTION OF LABEL/BOTTLE APPROVAL (See Instructions and Paperwork Reduction Act Notice on Back)
TTB ID 18226001000309		
1. REP. ID. NO. (If any)	CT 80	

PART I - APPLICATION

2. PLANT REGISTRY/BASIC PERMIT/BREWER'S NO. (Required) BWN-OR-15126	3. SOURCE OF PRODUCT (Required) <input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Imported	8. NAME AND ADDRESS OF APPLICANT AS SHOWN ON PLANT REGISTRY, BASIC PERMIT OR BREWER'S NOTICE. INCLUDE APPROVED DBA OR TRADENAME IF USED ON LABEL (Required)
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4. SERIAL NUMBER (Required) 180030	5. TYPE OF PRODUCT (Required) <input checked="" type="checkbox"/> WINE <input type="checkbox"/> DISTILLED SPIRITS <input type="checkbox"/> MALT BEVERAGE	QUADY NORTH, QUADY NORTH WINERY, LLC 30 W STEWART AVE MEDFORD OR 97501 QUADY NORTH (Used on label)
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6. BRAND NAME (Required) QUADY NORTH	8a. MAILING ADDRESS, IF DIFFERENT
7. FANCIFUL NAME (If any) BOMBA	

9. FORMULA	10. GRAPE VARIETAL(S) (Wine Only) Grenache	14. TYPE OF APPLICATION (Check applicable box(es)) a. <input checked="" type="checkbox"/> CERTIFICATE OF LABEL APPROVAL b. <input type="checkbox"/> CERTIFICATE OF EXEMPTION FROM LABEL APPROVAL "For sale in _____ only" (Fill in State abbreviation.) c. <input type="checkbox"/> DISTINCTIVE LIQUOR BOTTLE APPROVAL. TOTAL BOTTLE CAPACITY BEFORE CLOSURE _____ (Fill in amount) d. <input type="checkbox"/> RESUBMISSION AFTER REJECTION TTB ID. NO. _____
11. WINE APPELLATION (If on label) ROGUE VALLEY, SOUTHERN OREGON		
12. PHONE NUMBER (541) 531-6235	13. EMAIL ADDRESS	

15. SHOW ANY INFORMATION THAT IS BLOWN, BRANDED, OR EMBOSSED ON THE CONTAINER (e.g., net contents) ONLY IF IT DOES NOT APPEAR ON THE LABELS AFFIXED BELOW. ALSO, SHOW TRANSLATIONS OF FOREIGN LANGUAGE TEXT APPEARING ON LABELS.

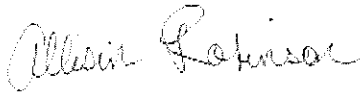
PART II - APPLICANT'S CERTIFICATION

Under the penalties of perjury, I declare; that all statements appearing on this application are true and correct to the best of my knowledge and belief; and, that the representations on the labels attached to this form, including supplemental documents, truly and correctly represent the content of the containers to which these labels will be applied. I also certify that I have read, understood and complied with the conditions and instructions which are attached to an original TTB F 5100.31, Certificate/Exemption of Label/Bottle Approval.

16. DATE OF APPLICATION 08/14/2018	17. SIGNATURE OF APPLICANT OR AUTHORIZED AGENT (Application was e-filed)	18. PRINT NAME OF APPLICANT OR AUTHORIZED AGENT HERB QUADY
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PART III - TTB CERTIFICATE

This certificate is issued subject to applicable laws, regulations and conditions as set forth in the instructions portion of this form.

19. DATE ISSUED 08/20/2018	20. AUTHORIZED SIGNATURE, ALCOHOL AND TOBACCO TAX AND TRADE BUREAU 
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FOR TTB USE ONLY

<p>QUALIFICATIONS TTB has not reviewed this label for type size, characters per inch or contrasting background. The responsible industry member must continue to ensure that the mandatory information on the actual labels is displayed in the correct type size, number of characters per inch, and on a contrasting background in accordance with the TTB labeling regulations, 27 CFR parts 4, 5, 7, and 16, as applicable.</p> <p>STATUS THE STATUS IS APPROVED.</p> <p>CLASS/TYPE DESCRIPTION TABLE RED WINE</p>	<p>EXPIRATION DATE (If any)</p>
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AFFIX COMPLETE SET OF LABELS BELOW

Image Type:

Brand (front) or keg collar

Actual Dimensions: 3.38 inches W X 3.5 inches H

2017 GRENACHE
13.5% ALC./VOL
ROGUE VALLEY, SOUTHERN OREGON

BOOM! PACKED WITH HIGHLY EXPLOSIVE NOTES OF CHERRY,
CURRANT AND RASPBERRY, THIS WINE IS A TICKING TIME
BOMB OF ABSOLUTE DELICIOUSNESS. BRIGHT, SOFT, LUSH,
BUT CAPABLE OF DELIVERING A PUNCH. ONCE THAT CORK IS
PULLED, WATCH OUT! IT WILL BE GONE BEFORE YOU KNOW IT.

AT QUADY NORTH, WE SPECIALIZE IN SMALL LOTS OF SINGLE
VINEYARD VIOGNIER, SYRAH AND CABERNET FRANC FROM
SELECT SITES IN SOUTHERN OREGON'S ROGUE AND
APPLEGATE VALLEYS.

PRODUCED & BOTTLED BY:
QUADY NORTH
MEDFORD, OREGON
WWW.QUADYNORTH.COM



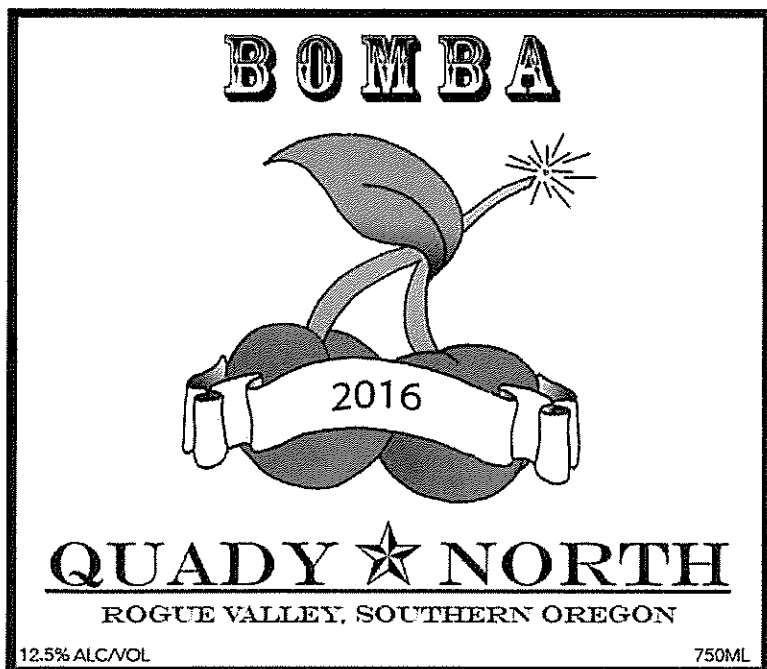
GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON
GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES
DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2)
CONSUMPTION OF ALCOHOLIC BEVERAGES IMPAIRS YOUR ABILITY
TO DRIVE A CAR OR OPERATE MACHINERY, AND MAY CAUSE HEALTH
PROBLEMS.

CONTAINS SULFITES

Image Type:

Back

Actual Dimensions: 3.88 inches W X 3.38 inches H



FOR TTB USE ONLY			DEPARTMENT OF THE TREASURY ALCOHOL AND TOBACCO TAX AND TRADE BUREAU APPLICATION FOR AND CERTIFICATION/EXEMPTION OF LABEL/BOTTLE APPROVAL (See Instructions and Paperwork Reduction Act Notice on Back)		
TTB ID 17045001000417					
1. REP. ID. NO. (If any)	CT 88	OR 38			

PART I - APPLICATION

2. PLANT REGISTRY/BASIC PERMIT/BREWER'S NO. (Required) BWN-OR-15051		3. SOURCE OF PRODUCT (Required) <input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Imported		8. NAME AND ADDRESS OF APPLICANT AS SHOWN ON PLANT REGISTRY, BASIC PERMIT OR BREWER'S NOTICE. INCLUDE APPROVED DBA OR TRADENAME IF USED ON LABEL (Required) METHVEN FAMILY VINEYARDS, METHVEN FAMILY VINEYARDS, LLC 11400 WESTLAND LN DAYTON OR 97114 HUNDRED SUNS WINE (Used on label)	
4. SERIAL NUMBER (Required) 17H5OE		5. TYPE OF PRODUCT (Required) <input checked="" type="checkbox"/> WINE <input type="checkbox"/> DISTILLED SPIRITS <input type="checkbox"/> MALT BEVERAGE			
6. BRAND NAME (Required) HUNDRED SUNS WINE			8a. MAILING ADDRESS, IF DIFFERENT		
7. FANCIFUL NAME (If any)					
9. FORMULA		10. GRAPE VARIETAL(S) (Wine Only) Pinot noir		14. TYPE OF APPLICATION (Check applicable box(es))	
11. WINE APPELLATION (If on label) WILLAMETTE VALLEY				a. <input checked="" type="checkbox"/> CERTIFICATE OF LABEL APPROVAL	
12. PHONE NUMBER (503) 593-4999		13. EMAIL ADDRESS		b. <input type="checkbox"/> CERTIFICATE OF EXEMPTION FROM LABEL APPROVAL "For sale in _____ only" (Fill in State abbreviation.)	
				c. <input type="checkbox"/> DISTINCTIVE LIQUOR BOTTLE APPROVAL. TOTAL BOTTLE CAPACITY BEFORE CLOSURE _____ (Fill in amount)	
				d. <input type="checkbox"/> RESUBMISSION AFTER REJECTION TTB ID. NO. _____	

15. SHOW ANY INFORMATION THAT IS BLOWN, BRANDED, OR EMBOSSED ON THE CONTAINER (e.g., net contents) ONLY IF IT DOES NOT APPEAR ON THE LABELS AFFIXED BELOW. ALSO, SHOW TRANSLATIONS OF FOREIGN LANGUAGE TEXT APPEARING ON LABELS.

PART II - APPLICANT'S CERTIFICATION

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16. DATE OF APPLICATION 02/14/2017	17. SIGNATURE OF APPLICANT OR AUTHORIZED AGENT (Application was e-filed)	18. PRINT NAME OF APPLICANT OR AUTHORIZED AGENT Greg McClellan
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PART III - TTB CERTIFICATE

This certificate is issued subject to applicable laws, regulations and conditions as set forth in the instructions portion of this form.

19. DATE ISSUED 03/03/2017	20. AUTHORIZED SIGNATURE, ALCOHOL AND TOBACCO TAX AND TRADE BUREAU
--------------------------------------	---

FOR TTB USE ONLY

QUALIFICATIONS

TTB has not reviewed this label for type size, characters per inch or contrasting background. The responsible industry member must continue to ensure that the mandatory information on the actual labels is displayed in the correct type size, number of characters per inch, and on a contrasting background in accordance with the TTB labeling regulations, 27 CFR parts 4, 5, 7, and 16, as applicable.

EXPIRATION DATE (if any)

STATUS

THE STATUS IS APPROVED.

CLASS/TYPE DESCRIPTION

DESSERT /PORT/SHERRY/(COOKING) WINE

AFFIX COMPLETE SET OF LABELS BELOW

Image Type:

Brand (front)

Actual Dimensions: 3 inches W X 3 inches H


<p>HUNDRED SUNS OLD EIGHT CUT PINOT NOIR WILLAMETTE VALLEY</p>		 2015
<p><u>Old Eight Cut:</u> A diamond cut dating back to the 1300s using simple tools and few cuts to enhance the natural brilliance of the stone without disguising its true nature.</p>	<p><u>Vineyards:</u> All the vineyards in this cuvée are planted on marine sedimentary soils and dry farmed using sustainable practices.</p>	
<p><u>Winemaking:</u> Fermented with native yeast 50% whole cluster Aged in neutral oak for 10 months</p>	<p>40% Flanerie Vineyard, Ribbon Ridge AVA 32% Sequitur Vineyard, Ribbon Ridge AVA 28% Jesse James Vineyard, Eola-Amity Hills AVA</p>	<p style="writing-mode: vertical-rl; transform: rotate(180deg);"> GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2) CONSUMPTION OF ALCOHOLIC BEVERAGES INCREASES YOUR RISK OF TO DRIVE A CAR OR OPERATE MACHINERY AND MAY CAUSE HEALTH PROBLEMS. </p>
<p>HUNDREDSUNSWINE.COM PRODUCED AND BOTTLED BY HUNDRED SUNS WINE LLC DAYTON, OREGON</p>		
14.4% Alc. by Vol.	750 ML	CONTAINS SULFITES

Image Type:

Back

Actual Dimensions: 4 inches W X 3.25 inches H

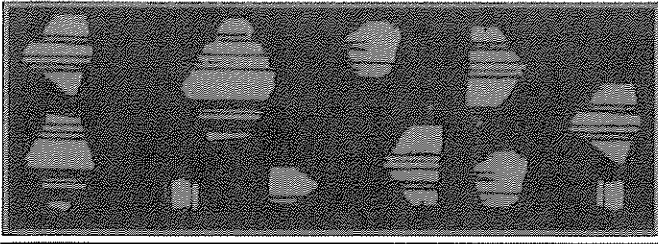
HUNDRED SUNS



Old Eight Cut

Pinot Noir

Willamette Valley - Oregon



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FOR TTB USE ONLY		DEPARTMENT OF THE TREASURY ALCOHOL AND TOBACCO TAX AND TRADE BUREAU APPLICATION FOR AND CERTIFICATION/EXEMPTION OF LABEL/BOTTLE APPROVAL (See Instructions and Paperwork Reduction Act Notice on Back)
TTB ID 18192001000566		
1. REP. ID. NO. <i>(If any)</i>	CT 80	

PART I - APPLICATION

2. PLANT REGISTRY/BASIC PERMIT/BREWER'S NO. <i>(Required)</i> BW-OR-264	3. SOURCE OF PRODUCT <i>(Required)</i> <input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Imported	8. NAME AND ADDRESS OF APPLICANT AS SHOWN ON PLANT REGISTRY, BASIC PERMIT OR BREWER'S NOTICE. INCLUDE APPROVED DBA OR TRADENAME IF USED ON LABEL <i>(Required)</i> WALNUT CITY WINEWORKS, WALNUT CITY WINEWORKS, INC. 475 NE 17TH ST MCMINNVILLE OR 97128
4. SERIAL NUMBER <i>(Required)</i> 180215	5. TYPE OF PRODUCT <i>(Required)</i> <input checked="" type="checkbox"/> WINE <input type="checkbox"/> DISTILLED SPIRITS <input type="checkbox"/> MALT BEVERAGE	

6. BRAND NAME <i>(Required)</i> TWO RIVERS	8a. MAILING ADDRESS, IF DIFFERENT
7. FANCIFUL NAME <i>(If any)</i>	

9. FORMULA	10. GRAPE VARIETAL(S) <i>(Wine Only)</i> Pinot noir	14. TYPE OF APPLICATION <i>(Check applicable box(es))</i> a. <input checked="" type="checkbox"/> CERTIFICATE OF LABEL APPROVAL b. <input type="checkbox"/> CERTIFICATE OF EXEMPTION FROM LABEL APPROVAL "For sale in _____ only" (Fill in State abbreviation.) c. <input type="checkbox"/> DISTINCTIVE LIQUOR BOTTLE APPROVAL. TOTAL BOTTLE CAPACITY BEFORE CLOSURE ____ _____ (Fill in amount) d. <input type="checkbox"/> RESUBMISSION AFTER REJECTION TTB ID. NO. _____
11. WINE APPELLATION <i>(If on label)</i> WILLAMETTE VALLEY		
12. PHONE NUMBER (503) 472-3215	13. EMAIL ADDRESS	

15. SHOW ANY INFORMATION THAT IS BLOWN, BRANDED, OR EMBOSSED ON THE CONTAINER (e.g., net contents) ONLY IF IT DOES NOT APPEAR ON THE LABELS AFFIXED BELOW. ALSO, SHOW TRANSLATIONS OF FOREIGN LANGUAGE TEXT APPEARING ON LABELS.

PART II - APPLICANT'S CERTIFICATION

Under the penalties of perjury, I declare; that all statements appearing on this application are true and correct to the best of my knowledge and belief; and, that the representations on the labels attached to this form, including supplemental documents, truly and correctly represent the content of the containers to which these labels will be applied. I also certify that I have read, understood and complied with the conditions and instructions which are attached to an original TTB F 5100.31, Certificate/Exemption of Label/Bottle Approval.

16. DATE OF APPLICATION 07/11/2018	17. SIGNATURE OF APPLICANT OR AUTHORIZED AGENT (Application was e-filed)	18. PRINT NAME OF APPLICANT OR AUTHORIZED AGENT JOHN GILPIN
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PART III - TTB CERTIFICATE

This certificate is issued subject to applicable laws, regulations and conditions as set forth in the instructions portion of this form.

19. DATE ISSUED 07/20/2018	20. AUTHORIZED SIGNATURE, ALCOHOL AND TOBACCO TAX AND TRADE BUREAU <i>Nicole Cardelora</i>
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FOR TTB USE ONLY

<p>QUALIFICATIONS TTB has not reviewed this label for type size, characters per inch or contrasting background. The responsible industry member must continue to ensure that the mandatory information on the actual labels is displayed in the correct type size, number of characters per inch, and on a contrasting background in accordance with the TTB labeling regulations, 27 CFR parts 4, 5, 7, and 16, as applicable.</p> <p>STATUS THE STATUS IS APPROVED.</p> <p>CLASS/TYPE DESCRIPTION TABLE RED WINE</p>	<p>EXPIRATION DATE (If any)</p>
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AFFIX COMPLETE SET OF LABELS BELOW

Image Type:

Brand (front) or keg collar
Actual Dimensions: 3.12 inches W X 3.12 inches H

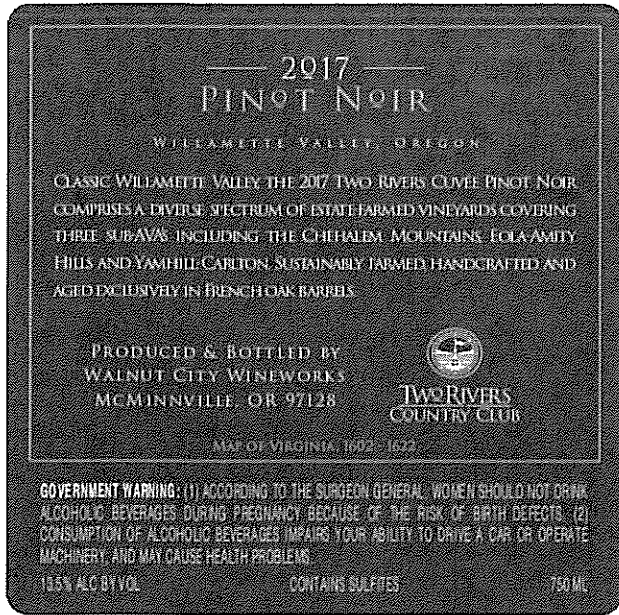


Image Type:

Back

Actual Dimensions: 3.12 inches W X 3.12 inches H



TTB F 5100.31 (06-2016) PREVIOUS EDITIONS ARE OBSOLETE

FOR TTB USE ONLY			DEPARTMENT OF THE TREASURY ALCOHOL AND TOBACCO TAX AND TRADE BUREAU APPLICATION FOR AND CERTIFICATION/EXEMPTION OF LABEL/BOTTLE APPROVAL (See Instructions and Paperwork Reduction Act Notice on Back)
TTB ID 18140001000108			
1. REP. ID. NO. (If any)	CT 80	OR 38	

PART I - APPLICATION

2. PLANT REGISTRY/BASIC PERMIT/BREWER'S NO. (Required) BWN-OR-21098	3. SOURCE OF PRODUCT (Required) <input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Imported	8. NAME AND ADDRESS OF APPLICANT AS SHOWN ON PLANT REGISTRY, BASIC PERMIT OR BREWER'S NOTICE. INCLUDE APPROVED DBA OR TRADENAME IF USED ON LABEL (Required) BLUEBIRD HILL CELLARS, BLUEBIRD HILL CELLARS LLC 25059 LARSON RD MONROE OR 97456 BLUEBIRD HILL CELLARS (Used on label)
4. SERIAL NUMBER (Required) 1816RB	5. TYPE OF PRODUCT (Required) <input checked="" type="checkbox"/> WINE <input type="checkbox"/> DISTILLED SPIRITS <input type="checkbox"/> MALT BEVERAGE	
6. BRAND NAME (Required) BLUEBIRD HILL CELLARS		8a. MAILING ADDRESS, IF DIFFERENT
7. FANCIFUL NAME (If any)		
9. FORMULA	10. GRAPE VARIETAL(S) (Wine Only) N/A	14. TYPE OF APPLICATION (Check applicable box(es)) a. <input checked="" type="checkbox"/> CERTIFICATE OF LABEL APPROVAL b. <input type="checkbox"/> CERTIFICATE OF EXEMPTION FROM LABEL APPROVAL "For sale in _____ only" (Fill in State abbreviation.) c. <input type="checkbox"/> DISTINCTIVE LIQUOR BOTTLE APPROVAL. TOTAL BOTTLE CAPACITY BEFORE CLOSURE _____ (Fill in amount) d. <input type="checkbox"/> RESUBMISSION AFTER REJECTION TTB ID. NO. _____
11. WINE APPELLATION (If on label) OREGON		
12. PHONE NUMBER (541) 424-2478	13. EMAIL ADDRESS	

15. SHOW ANY INFORMATION THAT IS BLOWN, BRANDED, OR EMBOSSED ON THE CONTAINER (e.g., net contents) ONLY IF IT DOES NOT APPEAR ON THE LABELS AFFIXED BELOW. ALSO, SHOW TRANSLATIONS OF FOREIGN LANGUAGE TEXT APPEARING ON LABELS.


PART II - APPLICANT'S CERTIFICATION

Under the penalties of perjury, I declare; that all statements appearing on this application are true and correct to the best of my knowledge and belief; and, that the representations on the labels attached to this form, including supplemental documents, truly and correctly represent the content of the containers to which these labels will be applied. I also certify that I have read, understood and complied with the conditions and instructions which are attached to an original TTB F 5100.31, Certificate/Exemption of Label/Bottle Approval.

16. DATE OF APPLICATION 05/20/2018	17. SIGNATURE OF APPLICANT OR AUTHORIZED AGENT (Application was e-filed)	18. PRINT NAME OF APPLICANT OR AUTHORIZED AGENT Sue Shay
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PART III - TTB CERTIFICATE

This certificate is issued subject to applicable laws, regulations and conditions as set forth in the instructions portion of this form.

19. DATE ISSUED 06/01/2018	20. AUTHORIZED SIGNATURE, ALCOHOL AND TOBACCO TAX AND TRADE BUREAU 
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FOR TTB USE ONLY

QUALIFICATIONS

TTB has not reviewed this label for type size, characters per inch or contrasting background. The responsible industry member must continue to ensure that the mandatory information on the actual labels is displayed in the correct type size, number of characters per inch, and on a contrasting background in accordance with the TTB labeling regulations, 27 CFR parts 4, 5, 7, and 16, as applicable.

EXPIRATION DATE (if any)

STATUS

THE STATUS IS APPROVED.

CLASS/TYPE DESCRIPTION

TABLE RED WINE

AFFIX COMPLETE SET OF LABELS BELOW

Image Type:

Brand (front)

Actual Dimensions: 4 inches W X 3.38 inches H



Image Type:

Back

Actual Dimensions: 4 inches W X 3.38 inches H

Nestled on a hilltop in the foothills of the Willamette Valley Coastal Range, Bluebird Hill Cellars creates hand-crafted wines reflecting the superlative quality of grapes grown in our region. Our wines are produced in small lots, and carefully shepherded from fruit to bottle to deliver food-friendly wines to be appreciated in all settings. This bottle of wine can be the perfect companion to a casual picnic, dinners with good friends, and your finest dining occasions.

Neil & Sue Shay
PROPRIETORS

PRODUCED AND BOTTLED BY
BLUEBIRD HILL CELLARS, MONROE, OR
bluebirdhillcellars.wine

GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2) CONSUMPTION OF ALCOHOLIC BEVERAGES IMPAIRS YOUR ABILITY TO DRIVE A CAR OR OPERATE MACHINERY, AND MAY CAUSE HEALTH PROBLEMS.

ALC. 13.3% BY VOL.
CONTAINS SULFITES 750ML

