



# Oregon

Kate Brown, Governor

Liquor Control Commission

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September 6, 2018

John Manfreda, Administrator  
Alcohol and Tobacco Tax and Trade Bureau  
1310 G Street, NW, Box 12  
Washington, DC 20005

RE: Request for Investigation of Copper Cane, LLC  
TTB Wine Producer and Blender Permit No. CA-W-21449

Dear Mr. Manfreda:

It has recently come to the Oregon Liquor Control Commission's attention that Copper Cane, LLC, a California winery, may not be in compliance with federal and Oregon wine labeling and advertising regulations. Copper Cane, LLC produces wines under the Elouan and Willametter brand names that list Oregon, or a specific American Viticultural Area (AVA) located within Oregon, on its labels.

The Commission has reason to believe that some wines labeled with an Oregon AVA were not fully finished in Oregon. The Commission has located at least three Certificate of Label Approvals (COLAs) referencing an Oregon AVA, but question whether Copper Cane, LLC met the requirements to label those wines with an Oregon AVA. The TTB ID Numbers for these COLAs are 16019001000291, 17215001000498, and 17215001000504.

The Commission is also concerned that many of Copper Cane, LLC's labels make reference to Oregon AVAs – specifically Willamette Valley, Umpqua Valley and Rogue Valley – but were not issued COLAs for those AVAs. Rather, the appellation of origin on these wines labels is Oregon. In addition, Copper Cane, LLC misrepresents the names and locations of these AVAs on its labels and advertising materials, including case packaging and advertising on Elouan's website.

The OLCC requests the TTB Trade Investigations Division, including the Market Compliance Office, initiate a compliance audit of Copper Cane wines, specifically the Elouan and Willametter brands. The OLCC also requests that the TTB Alcohol and Formulation Division evaluate Copper Cane's COLAs for the Elouan and Willametter brands to ensure compliance with federal regulations, and bring Copper Cane into compliance with those regulations if necessary.

The Commission takes preservation of its wine regions very seriously, which is why we are asking the TTB to swiftly investigate this matter. Please contact me if you require further information.

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Sincerely,



Paul Rosenbaum  
Chairman  
Oregon Liquor Control Commission



Steve Marks  
Executive Director  
Oregon Liquor Control Commission

Cc: Robert Angelo, Director, TTB Trade Investigations Division  
Janet Scalese, Director, TTB Alcohol Labeling and Formulation Division  
Jennifer Currin, Michael Harper, Matt Maletis, Marvin Révoal, and Pamela  
Weatherspoon, OLCC Commissioners