

July 26, 2013

Beer Institute
122 C Street, N.W., Suite 350
Washington, DC 20001-2150
202-737-2337

To Whom It May Concern:

I am writing to make a formal complaint about Coors Brewing Company's current advertising campaign for Coors Light beer cross-promoting Twentieth Century Fox's PG-13 Rated movie *The Wolverine*. A staff attorney at the Federal Trade Commission suggested a formal complaint be submitted to your self-regulatory body after the campaign was brought to the staff attorney's attention. We hope that you will take prompt action as the campaign blatantly violates key provisions of your self-regulatory code that are intended to protect against underage drinking.

The Wolverine is rated PG-13 and is based on a popular comic book character. The movie is a live action film that brings to life the cartoon characters from the comic book series X-Men and The Wolverine. *The Wolverine* (2013) is the second movie exclusively based on the Wolverine character. The first Wolverine movie also received a PG-13 rating. Coors Brewing Company created a Wolverine-themed television advertisement called the "Mutant Can," a still ad depicting a shredded Coors Light can (a reference to the Wolverine's superpower--metal claws that come out of his hands), and both Coors and *The Wolverine* movie have been cross-promoting Coors Light beer and the film on their respective Facebook pages (see attached). It appears they are in compliance with Facebook's age-gating requirements but it is well-known that large numbers of Facebook users lie about their age.

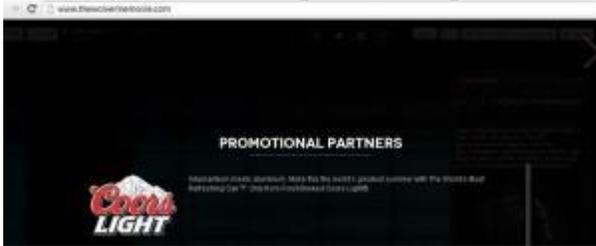
Your organization's advertising code expressly addresses the use of cartoon characters (Rule 3(a)) and the audience composition of entertainment featuring alcohol advertising and cross-promotion (Rule 3(c)). *The Wolverine* movie is based upon a popular comic book character that is traditionally depicted in cartoon form. *The Wolverine* is to be released today July 26, 2013. The audience composition is unknown at this point but the movie's target demographic reportedly is 18 to 25 year olds—an age range that includes large numbers of viewers who are not of legal drinking age. The PG-13 rating means that countless younger teens will attend the film in theaters and view the film at home after its theatrical run.

Coors Brewing Company has shown a total disregard for your self-regulatory code and has done so in the past when it cross-promoted the PG-13 rated film Scary Movie 3 (2003). It is hard to understand how, in light of your self-regulatory code, a national campaign of this magnitude that so blatantly features a comic book character with unequivocal youth appeal went forward in the first place. We hope your organization will take steps to sanction Coors Light and to ensure that this does not happen again.

Sincerely,
Cara Wilking
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Public Health Advocacy Institute
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ATTACHMENTS

Coors Light is listed as a promotional partner on the official The Wolverine movie website:



Stills from the Coors Light “Mutant Can” television commercial:



Still advertisement cross-promoting Coors Light Beer and *The Wolverine* movie:

