

**Congress of the United States**  
Washington, DC 20510

October 9, 2018

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

Dear Administrator Manfreda:

The state of Oregon is known as a world-class wine region producing extraordinary wines from over 760 wineries and more than 1,140 vineyards growing 72 grape varieties. Oregon winemakers pride themselves on high quality grapes and wines and have earned a global reputation for exceptional quality. Oregon's wine community also prides itself on enacting labeling rules in 1977 through the Oregon Liquor Control Commission that hold its winemakers to higher varietal composition and sourcing requirements than are written into the Code of Federal Regulations.

We write today to express concerns about a California winery that may be misleading consumers using labels inferring that their wine originates from specific, federally-approved American Viticultural Areas (AVAs) in Oregon.

It has come to the attention of the Oregon Congressional delegation that Copper Cane LLC ("Copper Cane"), a California winery based in Rutherford advertises their "The Willametter Journal" and "Elouan" brand names as having appellations of origin in Oregon. However, it appears that Copper Cane purchases wine grapes and bulk wines produced in Oregon before vinifying and bottling them in California under these wine labels.

As you know, the federal government regulates the creation and use of AVAs which establish boundaries for wine regions. It appears that Copper Cane is using descriptive names and words on their "Elouan" and "Willametter" labels to mislead consumers into inferring that their wines are sourced from the Willamette Valley AVA or infer that they are sourced from a non-existent AVA. This has the appearance of willfully causing confusion as to the geographic origin of the wine and is a misuse of Oregon geographic terms.

We are concerned that "The Willametter Journal" specifically references "The Willamette region of Oregon's coastal range" and the "Territory of Oregon," neither of which are federally approved appellations of origin. Federal law expressly prohibits the use of "any statement that is false or untrue in any particular, or that, irrespective of falsity, directly, or by ambiguity,