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11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA

13 AARON DUMAS and EUGENE)
BUNER, on Behalf of Themselves)
14 and All Others Similarly)
15 Situated,)

16 Plaintiffs,)

17 v.)

18 DIAGEO PLC and DIAGEO-)
19 GUINNESS USA INC.,)

20 Defendants.)

Case No. **'15CV1681 BTM BLM**

CLASS ACTION

COMPLAINT

DEMAND FOR JURY TRIAL

1 Plaintiffs Aaron Dumas and Eugene Buner ("Plaintiffs") file this Class
 2 Action Complaint on behalf of themselves and all others similarly situated
 3 against Diageo plc ("Diageo") and Diageo-Guinness USA Inc. ("DGUSA" and
 4 collectively with Diageo, "Defendants"), and as grounds state:

5 **I. INTRODUCTION**

6 1. This is a class action on behalf of consumers of Red Stripe[®] beer¹
 7 who have been deceived that Red Stripe, a historically Jamaican beer, is
 8 manufactured in and imported from Jamaica to the United States. Defendants
 9 have committed unfair and deceptive practices and have been unjustly enriched by
 10 marketing and selling beer in a way that misleads consumers into believing that
 11 Red Stripe is still imported from Jamaica. In particular, Red Stripe's packaging
 12 claims that it is a "Jamaican Style Lager," that contains "The Taste of Jamaica,"
 13 and the packaging contains the distinctive logo of Desnoes and Geddes Limited
 14 ("D&G"), a Jamaican brewery. In addition, on Red Stripe bottles, Defendants
 15 write that "For Over 80 years... Red Stripe[®] has embodied the spirit, rhythm and
 16 pulse of Jamaica and its people."² Further, Red Stripe is sold at substantially
 17 higher prices than those of domestic beer, despite the fact that the beer is brewed
 18 in the United States with domestic ingredients.

19 **II. JURISDICTION AND VENUE**

20 2. This Court has jurisdiction over this action pursuant to the Class
 21 Action Fairness Act of 2005, 28 U.S.C. §1332(d)(2). The matter in controversy,
 22 exclusive of interest and costs, exceeds the sum or value of \$5,000,000, and there is
 23 complete diversity of citizenship.

24 3. Venue is proper in this District under 28 U.S.C. §1391(b)(2) because
 25

26 ¹ As used in this Complaint, the term "Red Stripe" refers to six and twelve packs of
 27 bottles of Red Stripe lager.

28 ² True and correct copies of photographs of Red Stripe's packaging are attached
 hereto as Exhibit A.

1 Plaintiffs reside within it, a substantial part of the events or omissions giving rise to
2 the claims occurred within this District, and Defendants caused harm to Class (as
3 defined herein) members residing in this District.

4 **III. THE PARTIES**

5 4. Plaintiff Aaron Dumas ("Dumas") is a San Diego, California, resident.
6 Plaintiff Dumas bought Red Stripe six and twelve packs, as well as individual
7 bottles from bars and restaurants.

8 5. Plaintiff Eugene Buner ("Buner") is a San Diego, California, resident.
9 Plaintiff Buner bought Red Stripe six and twelve packs.

10 6. Defendant Diageo is incorporated as a public limited company in
11 England and Wales with principal executive offices located at Lakeside Drive,
12 Park Royal, London NW10 7HQ, England. Accordingly, defendant Diageo is a
13 citizen of England and Wales. Defendant Diageo is a global leader in beverage
14 alcohol with iconic brands in spirits, beer, and wine. Defendant Diageo owns
15 manufacturing production facilities across the globe and its brands are also
16 produced at plants owned and operated by third parties and joint ventures at a
17 number of locations internationally. Defendant Diageo produces more than 6.5
18 billion liters annually from more than 100 sites in thirty countries with reported
19 sales of £13.9 billion (approx. \$21.3 billion) for fiscal year 2014. Defendant
20 Diageo was formed by the merger of Grand Metropolitan Public Limited
21 Company and Guinness plc in December 1997. Defendant Diageo owns a 58%
22 controlling interest in D&G, the Jamaican brewer of Red Stripe lager.

23 7. Defendant DGUSA is a Delaware corporation and is a wholly owned
24 subsidiary of Defendant Diageo. Its principal executive offices are located at 801
25 Main Avenue, Norwalk, Connecticut. Accordingly, defendant DGUSA is a citizen
26 of Delaware and Connecticut. Defendant DGUSA sells and markets Red Stripe.
27 Defendant DGUSA operates as part of Diageo North American business.

28 8. During the Class Period (as defined herein), Plaintiffs and Class

1 members purchased Defendants' Red Stripe beer in reliance on the representations
2 contained on the packaging and Red Stripe's history of being an imported beer from
3 Jamaica. Plaintiffs and Class members took into account Defendants'
4 misrepresentations that Red Stripe was imported from Jamaica in making their
5 purchases, and would not have purchased Red Stripe had they known that
6 Defendants' representations were false. Based on Defendants' misrepresentations
7 and deceptive conduct, Plaintiffs and Class members purchased beer that had less
8 value than what they paid, and they have accordingly suffered legally cognizable
9 damages proximately caused by Defendants' misconduct.

10 9. Plaintiffs and Class members face a real and immediate threat of
11 future harm in the form of deceptively packaged, labeled, and marketed Red Stripe
12 beer sold at inflated prices based upon deception, which an injunction by the Court
13 would end. Plaintiffs would purchase Red Stripe again if and when it is properly
14 packaged, labeled, and priced.

15 **IV. FACTUAL ALLEGATIONS**

16 **A. The History of Red Stripe Brewery**

17 10. Red Stripe was first produced in 1938. It was first brought to the
18 United States in 1985. At that time, it was shipped in a standard green bottle,
19 trying to take advantage of the style most German beers, such as Beck's and
20 Heineken, were sold. This initial entrance into the United States was met with
21 poor sales, as consumers were reluctant to purchase the beer since it did not come
22 in the distinctive squat brown container that Jamaican expatriates and Americans
23 who had travelled to Jamaica had previously experienced. Red Stripe changed the
24 bottle structure back to its traditional short brown size and has been closely
25 associated with Jamaica ever since, including sponsoring the Jamaican national
26 bobsled team.

27 11. In September 1993, the predecessor to Diageo bought a controlling
28 stake in D&G, the Jamaican brewery with the rights to Red Stripe.

1 12. In 2012, Diageo moved production of the U.S. supply of Red Stripe
2 from Jamaica to the United States. Red Stripe is now made in Latrobe,
3 Pennsylvania, by City Brewing Company.

4 13. Defendants market Red Stripe through its "brand identity," and the
5 brand identity of Red Stripe has always been that it is a Jamaican beer. In moving
6 Red Stripe production to the United States, it was critical that Red Stripe maintain
7 its brand identity as a Jamaican beer, even though it would no longer be brewed
8 in Jamaica with Jamaican ingredients. Preserving that brand identity was and is
9 important to Defendants so they can charge a premium for Red Stripe and
10 compete with other imported brands. To sustain that (now false) brand identity,
11 Defendants kept the distinctive Jamaican references on Red Stripe's packaging,
12 deceiving consumers that it was still Jamaican, brewed in Jamaica with
13 Jamaican ingredients.

14 14. Although Red Stripe is no longer imported from Jamaica, the
15 marketing and advertising of Red Stripe has remained mostly unchanged.
16 Defendants' new packaging for Red Stripe beer was specifically designed in
17 order to maintain the brand identity of Red Stripe beer as Jamaican beer.
18 Nowhere on the cardboard packaging of Red Stripe does the label indicate
19 that Red Stripe is brewed in the United States with domestic ingredients. In
20 fact, the new packaging for Red Stripe boldly states that it is a "Jamaican Style
21 Lager" that contains "The Taste of Jamaica," and the packaging displays the
22 distinctive D&G logo, despite the fact that Red Stripe now originates from
23 Latrobe, Pennsylvania – not Jamaica.

24 15. The individual bottles also remain almost identical to the imported
25 beer bottles. In fact, bottles of Red Stripe specifically state, "For Over 80 years
26 ... Red Stripe® has embodied the spirit, rhythm and pulse of Jamaica and its
27 people." The only clue that Red Stripe is no longer a Jamaican beer is that on the
28 border of the new labels, in obscure white text, the bottle says: "Brewed &

1 Bottled by Red Stripe Beer Company Latrobe, PA." Although certain aspects of
2 the bottle label are reviewed by the Alcohol and Tobacco Tax and Trade Bureau
3 and are subject to its Certificate of Label Approval System, Defendants' labeling
4 cannot even be seen before twelve packs are purchased, cannot be seen in six-pack
5 packaging unless a bottle is removed and examined, and is inadequate to
6 inform the reasonable consumer that Red Stripe, a beer that had been brewed in
7 Jamaica since 1938, is no longer imported. Defendants' packaging and labeling
8 are insufficient for a reasonable consumer to believe that Red Stripe is no longer
9 imported from Jamaica. Reasonable consumers, including Plaintiffs, cannot or
10 do not read the concealed fine print on the bottles and cans until after they have
11 already purchased Red Stripe. Even then, the print on the label is ambiguous
12 and difficult to read.

13 16. Defendants' misrepresentations cause confusion among consumers.
14 Consumers believe they are purchasing Jamaican beer, imported from Jamaica,
15 brewed using Jamaican ingredients, when, in fact, they are purchasing beer brewed
16 in Latrobe, Pennsylvania with ingredients from the United States.

17 17. Defendants know that consumers are willing to pay more for
18 imported beer products. Plaintiffs believed that they were paying costs associated
19 with importing the beer from Jamaica containing Jamaican ingredients.

20 18. Furthermore, Defendants' misrepresentations cause confusion among
21 retailers, restaurants, and bars. Based on Defendants' representations, these
22 establishments purchase Red Stripe and market Red Stripe to the general public as
23 an imported beer. Many retailers and restaurants charge a premium for imported
24 beers, and consumers are further damaged by Defendants' misrepresentations.
25 Retailers also typically group imported beers from domestic ones, reinforcing the
26 belief that Red Stripe is imported.³ Thus, consumers are further harmed by

27 ³ True and correct copies of examples of advertisements and websites
28 erroneously stating Red Stripe is "imported" are attached hereto as Exhibit "B."

1 retailers, restaurants, and bars selling Red Stripe at higher prices under the false
2 belief that it is still imported.

3 19. Beer consumers are willing to pay a premium for high quality,
4 imported beer. Consumers in the United States often pay higher prices for their
5 beer because imported breweries follow the traditions and brewing practices of
6 their originating country. Consumers have grown accustomed to the consistency
7 from these imported beers. As a result, consumers, including Plaintiffs, pay higher
8 prices for imported beer than similar beers that are brewed domestically.

9 20. Defendants are aware that consumers are willing to pay more for
10 imported beers, and for that reason Defendants have continued to market Red
11 Stripe as an imported beer to induce the purchase of Red Stripe, sell a greater
12 volume, and sell Red Stripe at a higher price in comparison to domestic beers.

13 21. As a result of Defendants' false, deceptive, and misleading packaging,
14 labeling, and omissions, consumers such as Plaintiffs are deceived and induced into
15 purchasing and overpaying for Red Stripe under the belief that the beer that they
16 purchased was of superior quality because it was represented by Defendants as an
17 imported beer. Had Plaintiffs and similarly situated consumers been made aware
18 that Red Stripe was not in fact an imported beer, they would not have purchased
19 Red Stripe, or would have paid less for it, or would have purchased a different
20 product. Therefore, Plaintiffs and the Class, as described below, suffered injury in
21 fact and lost money and/or property as a result of Defendants' conduct complained
22 of herein.

23 22. During the "Class Period," as defined below, Plaintiffs and other
24 similarly situated consumers, were exposed to and saw Defendants' advertising,
25 marketing, and packaging claims disseminated by Defendants for the purpose of
26 selling its Red Stripe beer. Plaintiffs and Class members purchased Red Stripe in
27 reliance on Defendants' claims, and thereby suffered injury in fact and lost money
28 and/or property as a result of Defendants' unfair, misleading, and unlawful conduct

1 described herein.

2 23. As a result of these unfair and deceptive practices, Defendants have
3 collected millions of dollars from the sale of Red Stripe that they would not have
4 otherwise earned. Plaintiffs and Class members paid money for a product that is
5 not what it claims to be or what they bargained for. They paid a premium for Red
6 Stripe when they could have instead bought other, less expensive, domestic beer,
7 and consumers have lost the opportunity to purchase and consume other, truly
8 imported beer. The improper premium for Red Stripe could not have been
9 charged without Defendants' misrepresentations, and if Defendants were forced
10 by this Court to end their deceptive conduct, Red Stripe would not be inflated by
11 the improper premium, and would cost less to the consumer, or would reflect its
12 genuine market value.

13 **V. CLASS ALLEGATIONS**

14 **A. Class Definitions**

15 24. Plaintiffs bring this action against Defendants pursuant to Rule 23
16 of the Federal Rules of Civil Procedure ("Rule 23") on behalf of themselves and
17 all other persons similarly situated. Plaintiffs seek certification of the California
18 Class (the "Class"), defined as follows:

19 All consumers who purchased Red Stripe at retail in the state of
20 California for personal, family, and/or household purposes, and not
21 for re-sale, during the period that Red Stripe was not imported from
22 Jamaica, and within the four years prior to the Complaint filed in this
action (the "Class Period").

23 25. Defendants subjected Plaintiffs and the respective Class members to
24 the same unfair, unlawful, and deceptive practices and harmed them in the same
25 manner, and were unjustly enriched in the same manner.

26 **B. Numerosity**

27 26. The proposed Class is so numerous that joinder of all members would
28 be impracticable. Defendants sell and distribute Red Stripe throughout the State of

1 California. Although the number of Class members is not presently known, it is
2 likely to be comprised of many thousands of consumers. The Class is all so
3 numerous that joinder of all members is impracticable.

4 **C. Commonality**

5 27. As outlined below, there are questions of law and fact that are
6 common to Plaintiffs' and Class members' claims. These common questions
7 predominate over any questions that go particularly to any individual member of
8 the Class. Common questions of fact and law exist because, among other things,
9 Plaintiffs and all Class members purchased Red Stripe as a Jamaican beer,
10 consistent with its brand identity. Indeed, all of Defendants' packaging and
11 labeling for Red Stripe is uniform throughout the contiguous United States. Red
12 Stripe is bottled and packaged in one location, Latrobe, Pennsylvania, and then
13 shipped throughout the contiguous United States.

14 28. The common questions include, but are not limited to:

15 (a) whether Defendants falsely, deceptively, and/or misleadingly
16 misrepresented Red Stripe as an imported or Jamaican beer;

17 (b) whether Defendants' misrepresentations and omissions are
18 likely to deceive a reasonable consumer;

19 (c) whether Plaintiffs and members of the Class were damaged by
20 Defendants' conduct;

21 (d) whether Plaintiffs and members of the Class are entitled to
22 damages;

23 (e) whether Defendants violated section 17200, *et seq.* ("section
24 17200") of the California Business and Professions Code, California's Unfair
25 Competition Law (the "UCL");

26 (f) whether Defendants violated section 17500, *et seq.* ("section
27 17500") of the California Business and Professions Code, California's False
28 Advertising Law (the "FAL");

1 (g) whether Defendants violated section 1750, *et seq.* ("section
2 1750") of California's Consumer Legal Remedies Act (the "Act");

3 (h) whether and to what extent Defendants have been unjustly
4 enriched by their conduct;

5 (i) whether Plaintiffs and Class members are entitled to
6 compensatory damages, including actual and statutory damages plus interest
7 thereon and/or monetary restitution;

8 (j) whether Defendants must disgorge any sums they have made
9 as a result of their misconduct;

10 (k) whether Defendants' conduct rises to the level of willfulness
11 so as to justify punitive damages; and

12 (l) whether an injunction is appropriate in order to prevent
13 Defendants from continuing to engage in unfair, deceptive, and unlawful activity.

14 **D. Typicality**

15 29. Plaintiffs' claims are typical of the claims of the Class members
16 because they purchased and consumed Red Stripe, which was deliberately
17 misrepresented as being an imported beer. Thus, Plaintiffs and all Class
18 members sustained the same injury arising out of Defendants' common course of
19 conduct in violation of law as complained of herein. The injury of each Class
20 member was caused directly by Defendants' uniform wrongful conduct in
21 violation of law as alleged herein. Each Class member has sustained, and will
22 continue to sustain, damages in the same manner as Plaintiffs as a result of
23 Defendants' wrongful conduct. Defendant has no defenses unique to the Plaintiffs.

24 **E. Adequacy of Representation**

25 30. Plaintiffs will fairly and adequately protect the interests of the Class
26 members. Plaintiffs have retained highly competent and experienced class
27 action attorneys to represent their interests and those of the Class. Plaintiffs'
28 counsels have the necessary financial resources to adequately and vigorously

1 litigate this class action. Plaintiffs have no adverse or antagonistic interests to
2 those of the Class. Plaintiffs are willing and prepared to serve the Court and
3 the Class members in a representative capacity, with all of the obligations and
4 duties material thereto, and they are determined to diligently discharge those
5 duties by vigorously seeking the maximum possible recovery for Class members.

6 31. To prosecute this case, Plaintiffs have chosen the undersigned law
7 firms, which are very experienced in class action litigation and have the financial
8 and legal resources to meet the substantial costs and legal issues associated with
9 this type of litigation.

10 **F. Requirements of Rule 23(b)(3)**

11 32. This action is appropriate as a class action pursuant to Rule
12 23(b)(3).

13 33. *Common Questions of Law and Fact Predominate:* The questions of
14 law or fact common to Plaintiffs' and each Class member's claims predominate
15 over any questions of law or fact affecting only individual members of the Class.

16 **G. Superiority**

17 34. A class action is superior to individual actions in part because of the
18 non-exhaustive factors listed below:

19 (a) joinder of all Class members would create extreme hardship
20 and inconvenience for the affected customers as they reside all across the
21 contiguous United States;

22 (b) individual claims by Class members are impractical because
23 the costs to pursue individual claims exceed the value of what any one Class
24 member has at stake. As a result, individual Class members have no interest in
25 prosecuting and controlling separate actions;

26 (c) there are no known individual Class members who are
27 interested in individually controlling the prosecution of separate actions;

28 (d) the interests of justice will be well served by resolving the

1 common disputes of potential Class members in one forum;

2 (e) individual suits would not be cost effective or economically
3 maintainable as individual actions; and

4 (f) the action is manageable as a class action.

5 35. Plaintiffs are unaware of any difficulties that are likely to be
6 encountered in the management of these class actions that would preclude their
7 maintenance as class actions.

8 **H. Requirements of Rule 23(b)(1) & (2)**

9 36. Prosecuting separate actions by or against individual Class members
10 would create a risk of inconsistent or varying adjudications with respect to
11 individual Class members that would establish incompatible standards of conduct
12 for the party opposing the Class.

13 37. Defendants have acted or failed to act in a manner generally
14 applicable to the Class, thereby making appropriate final injunctive relief or
15 corresponding declaratory relief with respect to the Class as a whole.

16 38. Defendants' wrongful conduct and practices, if not enjoined, will
17 subject Class members and other members of the public to substantial
18 continuing harm and will cause irreparable injuries to Class members and
19 members of the public who are damaged by Defendants' conduct.

20 **VI. COUNT I – VIOLATION OF SECTION 17200, *ET SEQ.***
21 **(CALIFORNIA'S UNFAIR COMPETITION LAW)**

22 39. Plaintiffs incorporate by reference and reallege each and every
23 allegation contained above, as though fully set forth herein.

24 40. As alleged herein, Defendants have marketed and sold beer in a way
25 that misleads consumers into believing that Red Stripe is still imported from
26 Jamaica, claiming that Red Stripe "Originated in Jamaica" and contains "The Taste
27 of Jamaica," and selling Red Stripe at prices substantially higher than those of
28 domestic beer, despite the fact that the beer is brewed in the United States with

1 domestic ingredients. Defendants took advantage of Plaintiffs' and the Class' trust
2 and confidence in the Red Stripe brand, and deceptively began brewing Red Stripe
3 in Latrobe, Pennsylvania, without informing Plaintiffs and the Class that Red
4 Stripe was no longer imported. Plaintiffs and the Class have suffered injury in fact
5 and lost money or property as a result of Defendants' conduct because Plaintiffs
6 and the Class purchased Red Stripe in reliance on Defendants' representations that
7 Red Stripe was brewed in Jamaica and imported into the United States. Plaintiffs
8 and the Class were willing to pay a premium for Red Stripe because of these
9 representations and Defendants' omissions of material facts, and would not have
10 purchased, would not have paid as much for the products, or would have
11 purchased alternative products in absence of these representations and omissions.

12 41. Plaintiffs and Defendants are each "person[s]" as defined by
13 California Business and Professions Code section 17201. California Business and
14 Professions Code section 17204 authorizes a private right of action on both an
15 individual and representative basis.

16 42. "Unfair competition" is defined by section 17200 as encompassing
17 several types of business "wrongs," four of which are at issue here: (i) an
18 "unlawful" business act or practice; (ii) an "unfair" business act or practice; (iii) a
19 "fraudulent" business act or practice; and (iv) "unfair, deceptive, untrue or
20 misleading advertising." The definitions in section 17200 are drafted in the
21 disjunctive, meaning that each of these "wrongs" operates independently from the
22 others.

23 **A. "Unlawful" Prong**

24 43. California's section 17200 prohibits any "unlawful," "fraudulent," or
25 "unfair" business act or practice and any false or misleading advertising. In the
26 course of conducting business, Defendants committed unlawful business
27 practices by, among other things, making the representations (which also
28 constitute advertising within the meaning of section 17200) and omissions of

1 material facts, as set forth more fully herein, and violating sections 1572, 1573,
2 1709, 1711, 1770, 17200, and 17500, *et seq.* of the California Civil Code and the
3 common law.

4 44. Because Defendants have violated section 17500 of the FAL,
5 Defendants have violated section 17200, *et seq.*, which provides a cause of action
6 for an "unlawful" business act or practice perpetrated on members of the
7 California public.

8 45. Defendants had other reasonably available alternatives to further their
9 legitimate business interest, other than the conduct described herein, such as
10 selling Red Stripe without falsely stating and/or misrepresenting the source and
11 origin of Red Stripe.

12 46. Plaintiffs and Class members reserve the right to allege other
13 violations of law, which constitute other unlawful business practices or acts, as
14 such conduct is ongoing and continues to this date.

15 **B. "Unfair" Prong**

16 47. Defendants' actions also constitute "unfair" business acts or practices
17 because, as alleged above, among other things, Defendants engaged in false
18 advertising and misrepresented and omitted material facts regarding Red Stripe
19 beer, and thereby offended an established public policy, and engaged in immoral,
20 unethical, oppressive, and unscrupulous activities that are substantially
21 injurious to consumers.

22 48. As stated herein, Plaintiffs and the Class allege violations of
23 consumer protection, unfair competition, and truth in advertising laws in
24 California and other states, resulting in harm to consumers. Defendants' acts and
25 omissions also violate and offend the public policy against engaging in false and
26 misleading advertising, unfair competition, and deceptive conduct toward
27 consumers. Defendants' practices are additionally unfair because they have caused
28 Plaintiffs and other Members of the Class substantial injury, which is not

1 outweighed by any countervailing benefits to consumers or to competition, and is
2 not an injury the consumers themselves could have reasonably avoided. This
3 conduct constitutes violations of the unfair prong of section 17200.

4 49. Further, California's Sherman Law, adopts, incorporates, and is, in all
5 relevant aspects, identical to the Federal Food, Drug, and Cosmetic Act, 21 U.S.C.
6 §301, *et seq.* ("FDCA") and the regulations adopted pursuant to that act. These
7 violations render Red Stripe "misbranded." Under section 403(a) of the FDCA
8 (the Sherman Law's counterpart), food is "misbranded" if its "labeling is false or
9 misleading." 21 U.S.C. §343(a). Misbranded products cannot be legally sold and
10 are legally worthless. This conduct constitutes violations of the unlawful prong
11 of section 17200.

12 50. There were reasonably available alternatives to further Defendants'
13 legitimate business interests, other than the conduct described herein.

14 **C. "Fraudulent" Prong**

15 51. Section 17200 also prohibits any "fraudulent business act or
16 practice."

17 52. Defendants' actions, claims, nondisclosures and misleading
18 statements, as more fully set forth above, were also false, misleading and/or likely
19 to deceive the consuming public within the meaning of section 17200.

20 53. Defendant engaged in fraudulent acts and business practices by
21 knowingly or negligently representing to Plaintiffs, and other similarly situated
22 consumers, whether by conduct, orally, or in writing by:

23 (a) intentionally designing the product's label to conspicuously
24 represent that Red Stripe is imported from Jamaica while concealing the fact Red
25 Stripe is actually brewed and bottled domestically in Pennsylvania; and

26 (b) intentionally allowing Defendant's resellers to use and advertise
27 Red Stripe as an imported bear through the use of Defendants' labels, marketing,
28 and advertising which contain misleading and false statements.

1 54. Plaintiffs reserve the right to allege further conduct that constitutes
2 other fraudulent business acts or practices. Such conduct is ongoing and continues
3 to this date.

4 55. Plaintiffs and other members of the Class have in fact been deceived
5 as a result of their reliance on Defendants' material representations and
6 omissions, which are described above. This reliance has caused harm to
7 Plaintiffs and other members of the Class who each purchased Red Stripe.
8 Plaintiffs and the other Class members have suffered injury in fact and lost
9 money as a result of these unlawful, unfair, and fraudulent practices. As a
10 result of Defendants' unfair conduct and deception, Plaintiffs and members of the
11 Class have been damaged in that they spent money on premium-priced Red
12 Stripe beer that they would not have otherwise purchased and did not receive the
13 value for – a product that is indeed considered worthless due to Defendants'
14 misbranding.

15 56. As a result of their deception, Defendants have been able to reap
16 unjust revenue and profit.

17 57. The fraudulent, unlawful, and unfair business practices and false and
18 misleading advertising of Defendants, as described above, presents a continuing
19 threat to consumers in that they will continue to be misled into purchasing Red
20 Stripe under false premises.

21 58. Unless restrained and enjoined, Defendants will continue to engage in
22 the above-described conduct. Accordingly, injunctive relief is appropriate.

23 59. Plaintiffs and the Class seek restitution and an injunction prohibiting
24 Defendants from continuing such practices, corrective advertising and all other
25 relief this Court deems appropriate, consistent with section 17203 of the UCL.

26 60. Pursuant to section 1021.5 of the California Code of Civil Procedure
27 ("section 1021.5"), Plaintiffs and the Class make claims for attorneys' fees and
28 costs.

1 61. Plaintiffs, on behalf of themselves and the Class, demand
2 judgment against Defendants for damages, restitution, pre- and post-judgment
3 interest, attorneys' fees, injunctive and declaratory relief, corrective advertising,
4 costs incurred in bringing this action, and any other relief as this Court deems just
5 and proper.

6 **VII. COUNT II –VIOLATION OF SECTION 17500, ET SEQ.**
7 **(CALIFORNIA'S FALSE ADVERTISING LAW)**

8 62. Plaintiffs incorporate by reference and reallege each and every
9 allegation contained above, as though fully set forth herein.

10 63. Plaintiffs bring this cause of action pursuant to section 17500 on
11 behalf of themselves and on behalf of the Class.

12 64. Plaintiffs and Defendants are both "person[s]" as defined by section
13 17506 of the California Business and Professions Code. Section 17535 of the
14 California Business and Professions Code authorizes a private right of action on
15 both an individual and representative basis

16 65. The misrepresentations, acts, and non-disclosures by Defendants of
17 the material facts detailed above constitute false and misleading advertising and
18 therefore violate section 17500 of the FAL.

19 66. At all times relevant, Defendants' advertising and promotion of Red
20 Stripe as a beer imported from Jamaica was untrue, misleading, and likely to
21 deceive the reasonable consumer and the public. As a result of Defendants'
22 conduct, Plaintiffs and consumers similarly situated were deceived by Defendants'
23 representations that Red Stripe was an imported beer when Defendant knew that
24 Red Stripe was no longer imported from Jamaica, but in fact brewed and bottled
25 domestically in Pennsylvania.

26 67. Defendants engaged in the false and/or misleading advertising and
27 marketing as alleged herein with the intent to directly or indirectly induce the
28 purchase of Red Stripe when Defendants knew, or had reason to know, that Red

1 Stripe was not in fact an imported beer.

2 68. In making and publicly disseminating the statements and/or omissions
3 alleged herein, Defendants knew or should have known that the statements and/or
4 omissions were untrue or misleading, and acted in violation of section 17500.

5 69. Plaintiffs and Class members have suffered injury in fact and have
6 lost money and/or property as a result of Defendants' false advertising, as more
7 fully set forth herein. Plaintiffs and Class members have been injured because they
8 were induced to purchase and overpay for Red Stripe on the belief that Defendants'
9 product was an imported beer. Plaintiffs and Class members have been injured
10 because had they been made aware that Red Stripe was not imported, but rather
11 brewed and bottled domestically, they would have not purchased Red Stripe, or
12 would have paid less for the product, or would have purchased a different product.

13 70. At a date presently unknown to Plaintiffs, but at least four years prior
14 to the filing of this action, and as set forth above, Defendants have committed acts
15 of untrue and misleading advertising and promotion of Red Stripe, as defined by
16 section 17500, *et seq.*, by engaging in the false advertising and promotion of its
17 beer as imported from Jamaica.

18 71. The false and misleading advertising of Defendants, as described
19 above, presents a continuing threat to consumers, as Defendants continue to use
20 the deceptive labels and advertising, which will continue to mislead consumers
21 who purchase Red Stripe under false premises.

22 72. As a direct and proximate result of the aforementioned acts and
23 representations of Defendants, Defendants received and continue to hold monies
24 rightfully belonging to Plaintiffs and other similarly situated consumers who were
25 led to purchase, purchase more of, or pay more for, Red Stripe, due to the unlawful
26 acts of Defendants, during the Class Period.

**VIII. COUNT III – VIOLATION OF SECTION 1750 (CONSUMERS
LEGAL REMEDIES ACT)**

73. Plaintiffs incorporate by reference and reallege each and every allegation contained above, as though fully set forth herein.

74. Plaintiffs bring this cause of action pursuant to section 1750 on behalf of themselves and on behalf of the Class.

75. Plaintiffs are consumers as defined by section 1761(d) of the California Civil Code. Red Stripe constitutes "goods" within the meaning of the Act.

76. Defendants violated and continue to violate the Act by engaging in the following practices proscribed by section 1770(a) of the California Civil Code ("section 1770") in transactions with Plaintiffs and the Class which were intended to result in, and did result in, the sale of Red Stripe:

(a) misrepresenting the source, sponsorship, approval, or certification of Red Stripe in violation of section 1770(a)(2);

(b) using deceptive representations or designations of geographic origin in connection with Red Stripe in violation of section 1770(a)(4);

(c) representing that Red Stripe has characteristics, uses, and benefits which it does not have in violation of section 1770(a)(5);

(d) representing that Red Stripe is of a particular standard, quality, or grade, when it is of another in violation of section 1770(a)(7);

(e) advertising Red Stripe with an intent not to sell it as advertised in violation of section 1770(a)(9); and

(f) representing that Red Stripe has been supplied in accordance with a previous representation when it has not in violation of section 1770(a)(16).

77. Defendants violated the Act by representing and failing to disclose material facts on Red Stripe's labels and associated advertising, as described above, when they knew, or should have known, that the representations were

1 unsubstantiated, false, and misleading and that the omissions were of material
2 facts they were obligated to disclose.

3 78. Pursuant to section 1782(d) of the California Civil Code ("section
4 1782(d)"), Plaintiffs and the Class seek a Court order enjoining the above-
5 described wrongful acts and practices of Defendants and for restitution and
6 disgorgement.

7 79. Pursuant to section 1780(e) of the California Civil Code ("section
8 1780(e)"), Plaintiffs and the Class make claims for damages and attorneys' fees
9 and costs.

10 80. Plaintiffs, on behalf of themselves and the Class demand
11 judgment against Defendants for damages, restitution, punitive damages,
12 statutory damages, pre- and post-judgment interest, attorneys' fees, injunctive and
13 declaratory relief, costs incurred in bringing this action, and any other relief as this
14 Court deems just and proper.

15 **IX. COUNT IV – NEGLIGENT MISREPRESENTATION**

16 81. Plaintiffs incorporate by reference and reallege each and every
17 allegation contained above, as though fully set forth herein.

18 82. At a date presently unknown to Plaintiffs, but at least four years prior
19 to the filing of this action, and as set forth above, Defendants represented to the
20 public, including Plaintiffs, by packaging and other means, that Red Stripe was a
21 beer produced and imported from Jamaica, as described further detail above.

22 83. Defendants made the representations herein alleged with the intention
23 of inducing the public, including Plaintiffs and Class members, to purchase Red
24 Stripe.

25 84. Plaintiffs and other similarly situated persons in California saw,
26 believed, and relied upon Defendants' advertising representations and, in reliance
27 on them, purchased Red Stripe.

28 85. At all times relevant, Defendants made the misrepresentations herein

1 alleged when Defendants knew, or should have known, these representations to be
2 untrue, and Defendants had no reasonable basis for believing the representations to
3 be true.

4 86. As a proximate result of Defendants' negligent misrepresentations,
5 Plaintiffs and other consumers similarly situated were induced to purchase,
6 purchase more of, or pay more for Red Stripe, due to the unlawful acts of
7 Defendants, in an amount to be determined at trial, during the Class Period.

8 **X. COUNT V – INTENTIONAL MISREPRESENTATION**

9 87. Plaintiffs incorporate by reference and reallege each and every
10 allegation contained above, as though fully set forth herein.

11 88. At a date presently unknown to Plaintiffs, but at least four years prior
12 to the filing of this action, and as set forth above, Defendants represented to the
13 public, including Plaintiffs, by packaging and other means, that Red Stripe was a
14 beer produced and imported from Jamaica, as described further detail above.

15 89. Defendants intentionally made such misrepresentations on bottles of
16 Red Stripe by specifically stating that "For Over 80 years ... Red Stripe® has
17 embodied the spirit, rhythm and pulse of Jamaica and its people," while printing in
18 obscure white text "Brewed & Bottled by Red Stripe Beer Company Latrobe, PA"
19 in a manner that is concealed from Plaintiffs and similarly situated consumers at
20 the time of purchase. In fact, nowhere on the cardboard packaging of Red Stripe
21 does Defendants' label indicate that Red Stripe is brewed in the United States with
22 domestic ingredients. Defendants' packaging for Red Stripe boldly states that it is
23 a "Jamaican Style Lager" that contains "The Taste of Jamaica," and the packaging
24 displays the distinctive D&G logo, despite the fact that Red Stripe now originates
25 from Latrobe, Pennsylvania – not Jamaica.

26 90. These statements by Defendants regarding Red Stripe were, and
27 continue to be, misleading because Defendants actually brew and bottle Red Stripe
28 domestically, contrary to what Defendants advertise on their label.

1 91. Plaintiffs and other similarly situated persons in California saw,
2 believed, and relied upon Defendants' advertising representations and, in reliance
3 on such representations, purchased the products, as described above.

4 92. At all times relevant, Defendants intentionally made the
5 misrepresentations herein alleged, allowed the misrepresentations to continue to be
6 made by its resellers and Defendants knew the representations to be false.

7 93. As a proximate result of Defendants' intentional misrepresentations,
8 Plaintiffs and other consumers similarly situated suffered an injury in fact as they
9 were induced to spend an amount of money to be determined at trial on
10 Defendants' misrepresented product.

11 94. Defendants knew that Red Stripe was not produced or imported from
12 Jamaica, but nevertheless made representations that it was with the intention that
13 consumers rely on their representations.

14 95. Defendants knew, or had reason to know, that retailers were
15 advertising Red Stripe as an imported beer as Defendant designed, manufactured,
16 and affixed the product labeling to Red Stripe before supplying its products to
17 retailers.

18 96. Plaintiffs and other consumers similarly situated, in purchasing and
19 using the products as herein alleged, did rely on Defendants' representations,
20 including the representations on Red Stripe's label, all to their damage and/or
21 detriment as herein alleged.

22 97. Plaintiffs allege the "who, what, when, where, and how" of the
23 alleged deception by Defendants as follows:

24 (a) the "who" is Defendants: Diageo plc and Diageo-Guinness
25 USA Inc.;

26 (b) the "what" is Defendants' representation that Red Stripe is
27 produced and imported from Jamaica;

28 (c) the "when" is the date that Plaintiffs purchased the product in

1 the Class Period of four years prior to the filing of this Complaint;

2 (d) the "where" is Defendants' product labeling; and

3 (e) the "how" is the allegation that Defendants misrepresented
4 and/or omitted that Red Stripe was not produced and imported from Jamaica, but
5 on the contrary, brewed and bottled in Pennsylvania.

6 98. By engaging in the acts described above, Defendants are guilty of
7 malice, oppression, and fraud, and each Plaintiff is therefore entitled to recover
8 exemplary or punitive damages.

9 **XI. PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiffs, on behalf of themselves and all similarly situated
11 individuals, demand judgment against Defendants as follows:

12 A. Declaring this action to be a proper class action maintainable
13 pursuant to Rules 23(a) and (b)(1), (2), and (3) of the Federal Rules of Civil
14 Procedure and declaring Plaintiffs to be representatives of the Class and Plaintiffs'
15 counsel as Class Counsel;

16 B. Enjoining Defendants from continuing the acts and practices
17 described above. Specifically, requiring Defendants to remove and/or clarify the
18 deceptive language and/or to include a prominent disclaimer on the labeling,
19 packaging, and marketing material that informs consumers Red Stripe is
20 "Brewed in the United States" (or similar language) or, in the alternative, to
21 resume production in Jamaica;

22 C. Awarding damages sustained by Plaintiffs and the Class as a result
23 of the Defendants' conduct, together with pre-judgment interest;

24 D. Finding that Defendants have been unjustly enriched and requiring
25 them to refund all unjust benefits to Plaintiffs and the Class, together with pre-
26 judgment interest;

27 E. Awarding Plaintiffs and the Class costs and disbursements and
28 reasonable allowances for the fees of Plaintiffs and Class counsel and experts, and

1 reimbursement of expenses;

2 F. Awarding Plaintiffs and the Class damages, restitution, punitive
3 damages, statutory damages, injunctive relief, declaratory relief, attorneys' fees,
4 and costs under sections 1021.5 and 1780(e);

5 G. Awarding the Class damages, injunctive relief, declaratory relief,
6 attorneys' fees, and costs; and

7 H. Awarding such other and further relief the Court deems just and
8 equitable.

9 **XII. DEMAND FOR JURY TRIAL**

10 Plaintiffs and the Class request a jury trial for any and all Counts for which a
11 trial by jury is permitted by law.

12 Dated: July 29, 2015

ROBBINS ARROYO LLP
BRIAN J. ROBBINS
KEVIN A. SEELY
ASHLEY R. RIFKIN
LEONID KANDINOV

16 
BRIAN J. ROBBINS

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ak@kazlg.com

27 HYDE & SWIGART
28 JOSHUA B. SWIGART

2221 Camino Del Rio South, Suite 101
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Telephone: (619) 233-7770
Facsimile: (619) 297-1022
josh@westcoastlitigation.com

Attorneys for Plaintiffs

1039178

CIVIL COVER SHEET 15CV1681 BTM BLM

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Aaron Dumas and Eugene Buner, on Behalf of Themselves and All Others Similarly Situated

DEFENDANTS

Diageo plc and Diageo-Guinness USA Inc.

(b) County of Residence of First Listed Plaintiff San Diego County

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant England/Connecticut

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Robbins Arroyo LLP

600 B Street, Suite 1900, San Diego, CA 92101

(619) 525-3990

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RS1 (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Class Action Fairness Act of 2005, 28 U.S.C. § 1332

Brief description of cause:

Consumer Class Action Complaint

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

07/29/2015

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

Aaron Dumas and Eugene Buner, on Behalf of Themselves and
All Others Similarly Situated v. Diageo plc and Diageo-Guinness USA Inc.

Class Action Complaint

Exhibit List

Exhibit:	Description	Page Nos.:
A	Photographs of Red Stripe label and packaging	1-6
B	Photograph of Beer listing from Dick's Last Resort, San Diego, California	9
	Buffalo Wild Wings website Beer listing	10-12
	Miller's Ale House Restaurants website Beer listing	13-19
	Steiners Pub website Beer listing	20-22
	The Seven Hundred website Beer listing	23-24
	The Irish House website Beer listing	25-27
	Ramparts Tavern website Beer listing	28-32

EXHIBIT A











EXHIBIT B

DRINK BEER!



"I GOT 99 PROBLEMS BUT A BEER AIN'T ONE!"

DRAFT BEERS IN A BIG-ASS OR LITTLE-ASS KEEPER GLASS

ENJOY DISCOUNTED REFILLS!

DOMESTICS: PBR * BUD * BUD LIGHT

CRAFTS: FAT TIRE * SAM ADAMS SEASONAL * SHOCK TOP

ANGRY ORCHARD * KONA SEASONAL * LAGUNITAS IPA

IMPORTS: DOS XX LAGER * STELLA ARTOIS

AMERICA		
BUD	12oz	4.50
BUD	32oz	8.00
BUD LT	12oz	4.50
BUD LT	32oz	8.00
BUD LT LIME	12oz	4.50
COORS	12oz	4.50
COORS LIGHT	12oz	4.50
COORS LIGHT CAN	24oz	6.75
MILLER LITE	12oz	4.50
MILLER LITE CAN	24oz	6.50
MILHELOB ULTRA	12oz	4.50
SHINING ROCK	12oz	4.50
SHINING ROCK CAN	24oz	6.50
CAN		
STOUTS CAN	25oz	10.00
REPUBLIC		
WINTER URQUELL	12oz	5.50
CAN		
WINTER	24oz	8.00
CAN		
WINTER LIGHT	12oz	5.50
WINTER	24oz	8.00
CAN		
WINTER CAN	14.8oz	8.00
CAN		
WINTER	11.2oz	5.50
CAN		
WINTER	22oz	8.00
CAN		
WINTER	12oz	5.50
WINTER	24oz	8.00
WINTER	12oz	5.50
WINTER	12oz	5.50

BOTTLES
O'
BEER



↑
Add a
Boobie
for
\$4.00

UNITED KINGDOM		
NEWCASTLE	12oz	4.50
CRAFT BREW		
FAT TIRE RAMPANT IPA	22oz	7.00
SAM ADAMS LAGER	22oz	7.00
SAM ADAMS REBEL IPA	16oz	5.00
LOCAL BREW		
ARROGANT BASTARD ALE	22oz	7.00
KARL STRAUSS		
AMBER LAGER	12oz	4.50
RED TROLLEY	12oz	4.50
TOWER 20	12oz	4.50
STONE BREWING IPA	22oz	7.00
MIKE'S HARD STOUT	22oz	7.00
HARDER LEMONADE	12oz	4.50
HARDER SEASONAL	16oz	5.00
NON-ALCOHOLIC		
O'DOULS	12oz	4.50

FANCY-PANTS JUICE		
	GLASS	BOTTLE
DOMINO MOSCATO	5.00	15.00
DOMINO CABERNET	5.75	19.00
NOBLE VINES RED BLEND	7.75	29.00
FOG HEAD SAUV BLANC	6.25	27.00
MASSIMO MALBEC	6.25	27.00
BOTA MERLOT	5.75	
TWISTED CHARDONNAY	6.25	21.00
TWISTED PINOT GRIGIO	6.25	21.00
GNARLY HEAD CHARDONNAY	7.75	27.00
GNARLY HEAD PINOT NOIR	7.75	27.00
MAD DOG 20/20		5.00
CHAMPAGNE		
CHAMPAGNE SPLITS		7.00
CHAMPAGNE BOTTLE		23.00
PERRIER JOUET		150.00



Buffalo Wild Wings

648 Turner Street

Auburn, Maine

207-689-3700

Menus

Info

Reviews

DRINKS

LEMONADES

Our signature blend of wild fruits and berries are handcrafted with lemonade.

Berry 3.79

Mango 3.79

Huckleberry 3.79

LIMEADES

Try one of three refreshing flavors made with lemon-lime soda.

Cherry 3.79

Classic Lime 3.79

Huckleberry 3.79

RED BULL®

It gives you wings - the kind without sauce.

Regular

Sugarfree



YOU WON'T GO DRY HERE.

We offer free refills. [Yes, you read that right.]

Coca-Cola™

Diet Coke™

Coke Zero™

Sprite™

Iced Tea

Coffee



*FREE MIXING LOCATIONS

BEER

Our draft and bottle beer selection is as wide as you are thirsty.

CHECK OUT OUR DRINK MENU FOR MORE ON BEER, WINE AND OUR SIGNATURE DRINKS.

DOMESTICS

Bud Light

Bud Light Platinum

Budweiser

Budweiser Select

Coors Light

Michelob Ultra

Miller 64

Miller Genuine Draft

Miller High Life

Miller Lite

Pabst Blue Ribbon

O'Doul's Non-Alcoholic

IMPORTS

Amstel Light

Bass Pale Ale

Corona Extra

Corona Light

Des Equis Lager

Foster's

Guinness

Guinness Black Lager

Heineken

Heineken Light

Modelo Especial

Newcastle Brown Ale

Red Stripe

Stella Artois

CRAFT & SPECIALTY

Angry Orchard Hard Cider

Batch 19

Blue Moon

Bud Light Lime

Killian's Irish Red

Leinenkugel's Summer Shandy

Mike's Hard Lemonade

Omission

Redhook Game Changer

Samuel Adams Boston Lager

Samuel Adams Seasonal

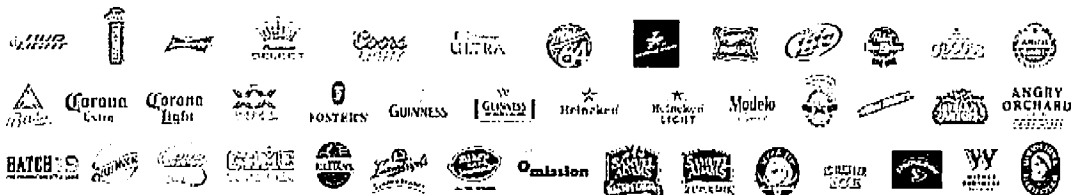
Shock Top

Smirnoff Ice

Strangbow

Widmer Hefeweizen

Woodchuck Hard Cider - Amber




Draft and bottle selection varies by location. Local draft beers also available. Ask your server for details. **Drink Responsibly. Drive Responsibly.**

HUNGRY FOR THE TRUTH?

Ever bitten into one of our **TASTY WINGS** and wondered where it began? No, not the egg it hatched from, we're talking Buffalo Wild Wings Grill & Bar, also known as B-Dubs.® Well, here's the story. Back in 1982, **JIM DISBROW** and **SCOTT LOWERY** relocated from Buffalo, New York to Kent, Ohio. Or, as they pronounced it, Can't. As in we Can't get any **AUTHENTIC BUFFALO-STYLE CHICKEN WINGS** in this sleepy little

★ College town. So they did what any two enterprising young men would do when fate sends
★ their souls into the turnbuckle. They sat down over a six pack, scribbled down some
★ recipes and turned chicken scratch into chicken wings. But not just any wings, no sir,
★ **WINGS SPUN IN THE MOST DELICIOUS SIGNATURE SAUCES KNOWN TO MAN.**
★ The rest is history. Lick-your-lips, suck your fingers,
★ kiss-the-trophy history.



BUFFALO WILD WINGS CANNOT ENSURE THAT MENU ITEMS DO NOT INCLUDE INGREDIENTS THAT MIGHT AFFECT THOSE WITH FOOD SENSITIVITIES OR ALLERGIES. PLEASE SPEAK TO THE OWNER, MANAGER, OR SERVER IF YOU HAVE ANY SPECIAL DIETARY NEEDS.

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File: F2B 07/15/13

THE USDA RECOMMENDS ADULTS LIMIT DAILY CALORIE INTAKE TO 2,600 CALORIES PER DAY; HOWEVER INDIVIDUAL CALORIE NEEDS VARY.

CALORIE CONTENTS ARE BASED ON STANDARD PREPARATION METHODS. ADDITIONAL NUTRITIONAL INFORMATION AVAILABLE UPON REQUEST.

Like 12 Tweet 1 2

loading



Amelia D
 104 100% 100% 100%
 Link to the photo of the menu. The photo
 shows the menu for the restaurant and the
 photo of the menu.

Was this helpful?

Helpful Not Helpful

Share this photo

100% 100% 100% 100%

Eric R. said: Love the menu. Great
 selection. The menu is really good. The
 menu is really good. The menu is really
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 is really good. The menu is really good.

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Everyday Special!

Bud & Bud Light Pints

23 oz. for \$1 more

\$2.75

MILLER'S ALE HOUSE BEERS, WINES AND DRINKS

Don't see your favorite beer here? Tell us what you'd like to see on our [facebook](#) [facebook](#) page or [contact](#) your nearest location.



BEERS & ALES ON TAP

CRAFT

Blue Moon
Curious Traveler
Goose Island IPA
Goose Island 312
Kona Big Wave
Kona Castaway
Magic Hat #9
Samuel Adams Rebel
Samuel Adams
Shock Top
Sierra Nevada
Yuengling

AMERICAN LAGER

Amber Bock
Bud Light
Budweiser
Coors Light
Michelob Ultra
Miller Lite

IMPORT

Bass Ale
Corona Light
Dos Equis
Guinness Stout
Guinness Blonde
Heineken
New Castle Brown Ale
Hoegaarden
Stella Artois

SEASONAL

Samuel Adams
Shock Top
Blue Moon
Leinenkugel

CIDER

Johnny Appleseed

Angry Orchard

... and many more regional favorites! Check with your local Ale House for more.

BOTTLED BEERS

AMERICAN PREMIUM

Budweiser
Bud Black Crown
Bud Light
Bug Light Lime
Coors Light
MGD
Miller High Life
Michelob Light
Michelob Ultra
Miller Lite
PBR (16oz. Can)
Rolling Rock

GLUTEN FREE

Omission

IMPORT

Amstel Light
Beck's
Corona Extra
Corona Light
Heineken
Heineken Light
Modelo Especial
Negra Modelo
Red Stripe

CRAFT

Dogfish Head 60 Minute
Lagunitas

SPECIALITY MALT BEVERAGES

Lime-A-Rita
Mang-O-Rita
Smirnoff Ice

NON-ALCOHOLIC

O'Doul's
Buckler

ALL DAY EVERY DAY SPECIALS

BEER

\$8.00 Pitchers Bud & Bud Light
\$5.95 Guinness & Guinness Blonde 20 oz
\$4.25 Seasonal Leincnkugel's Pint
\$2.00 PBR Cans

\$4.95 Dos Equis Pints
\$6.95 Craft Beer Flights

LIQUOR

\$3.95 Sauza Blue Margarita
\$4.95 Mang-o-Rita
\$3.95 Jager Shots
\$10.00 Pitchers Sangria
\$10.00 Pitchers Margarita



WINE SELECTIONS

REDS

CABERNET

Sutter Home
Sterling, Vintner's Collection
Simi, Sonoma
Franciscan, Napa Valley

MERLOT

Sutter Home
14 Hands, Washington State

PINOT NOIR

Cavit, Italy
Sterling, Vintner's Collection

OTHER RED

Malbec - Greg Norman (Not available in PA)
Red Blend - Menage a Trois
Shiraz - Yellow Tail

WHITE

CHARDONNAY

Sutter Home
Sterling, Vintner's Collection
Ferrari - Carano, California
Sonoma - Cutrer, Russian River

SAUVIGNON BLANC

Uppercut, California

PINOT GRIGIO

Cavit, Italy
Santa Margherita, Italy

OTHER WHITE

White Blend - Condundrum

Riesling - Chateau St. Michelle

OTHER

SPARKLING

Lunetta, Prosecco

Moet & Chandon, Imperial

Cavit Moscato

WHITE ZINFANDEL

Sutter Home

MILLER'S ALE HOUSE

LOCATIONS

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Orlando, FL 32811

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MILLER'S ALE HOUSE LOCATIONS: click on the location below that is nearest you for more information about your local Ale House

- **FLORIDA**

- EAST BOCA ALE HOUSE Boca Raton, FL
- WEST BOCA ALE HOUSE Boca Raton, FL
- BOYNTON ALE HOUSE Boynton Beach, FL
- DAYTON ALE HOUSE Daytona, FL
- DESTIN ALE HOUSE Destin, FL
- ESTERO ALE HOUSE Ft. Myers, FL
- FT. MYERS ALE HOUSE Ft. Myers, FL
- GAINESVILLE ALE HOUSE Gainesville, FL
- GARDENS ALE HOUSE Palm Beach Gardens, FL
- JENSEN ALE HOUSE Jensen Beach, FL
- JUPITER ALE HOUSE Jupiter, FL
- LAKELAND ALE HOUSE Lakeland, FL
- NAPLES ALE HOUSE Naples, FL
- OCALA ALE HOUSE Ocala, FL
- PENSACOLA ALE HOUSE Pensacola, FL
- SARASOTA ALE HOUSE Sarasota, FL
- TALLAHASSEE ALE HOUSE Tallahassee, FL

- **FT. LAUDERDALE**

- CORAL SPRINGS ALE HOUSE
- DAVIE ALE HOUSE
- HOLLYWOOD ALE HOUSE
- FT. LAUDERDALE ALE HOUSE
- PINES ALE HOUSE

- **JACKSONVILLE**

- HODGES ALE HOUSE
- MANDARIN ALE HOUSE
- ORANGE PARK ALE HOUSE
- REGENCY ALE HOUSE
- SOUTHSIDE ALE HOUSE

- **MIAMI**

- CORAL GABLES ALE HOUSE
- DORAL ALE HOUSE
- KENDALL ALE HOUSE
- MIAMI LAKES ALE HOUSE
- MIAMI LAKES ALE HOUSE
- NORTH MIAMI BEACH ALE HOUSE

- **ORLANDO**

- ALTAMONTE ALE HOUSE
- AIRPORT ALE HOUSE
- ALAFAYA ALE HOUSE
- BUENA VISTA ALE HOUSE
- FLORIDA MALL ALE HOUSE
- HEAWASSEE ALE HOUSE
- HUNTERS CREEK ALE HOUSE
- I-DRIVE ALE HOUSE
- KIRKMAN ALE HOUSE
- KISSIMMEE ALE HOUSE
- OVIEDO ALE HOUSE Oviedo, FL

- SANFORD ALE HOUSE
- WINTER PARK ALE HOUSE
- WINTER PARK VILLAGE ALE HOUSE
- **TAMPA/ST. PETERSBURG**
- BRANDON ALE HOUSE
- ST. PETERSBURG ALE HOUSE
- TAMPA ALE HOUSE
- **GEORGIA**
- ATLANTA ALE HOUSE Alpharetta, GA
- **ILLINOIS**
- LOMBARD ALE HOUSE Lombard, IL
- **MARYLAND**
- ROCKVILLE ALE HOUSE Rockville, MD
- **MASSACHUSETTS**
- BOSTON ALE HOUSE Watertown, MA
- **NEW JERSEY**
- N.J. ALE HOUSE Mt. Laurel, NJ
- PARAMUS ALE HOUSE Paramus, NJ
- WOODBIDGE ALE HOUSE Woodbridge, NJ
- **NEVADA**
- LAS VEGAS ALE HOUSE Las Vegas, NV
- HENDERSON ALE HOUSE Henderson, NV
- **NEW YORK**
- COMMACK ALE HOUSE Commack, NY
- D.E. ALE HOUSE Deer Park, NY
- L.E. ALE HOUSE Levittown, NY
- LAKE GROVE ALE HOUSE Lake Grove, NY
- REGO PARK ALE HOUSE Queens, NY
- STATEN ISLAND ALE HOUSE Staten Island, NY
- **OHIO**
- COLUMBUS ALE HOUSE Columbus, OH
- **PENNSYLVANIA**
- LANGHORNE ALE HOUSE Langhorne, PA
- PHILADELPHIA ALE HOUSE Philadelphia, PA
- SPRINGFIELD ALE HOUSE Springfield, PA
- WILLOW GROVE ALE HOUSE Willow Grove, PA



Beer

Domestic Bottled Beers

Name	Country	Type	Price
Beck's	USA	Lager	\$4.99
Budweiser	USA	Lager	\$4.99
Fuller's London	USA	Lager	\$4.99
Guinness	Ireland	Dark	\$4.99
Harbin Pilsner	USA	Pilsner	\$4.99
Miller Genuine Brew	USA	Lager	\$4.99
Miller High Life	USA	Lager	\$4.99
NYC Lager	USA	Dark	\$4.99
NYC Pils	USA	Pilsner	\$4.99
Rock Bottom	USA	Lager	\$4.99

Pub located in Las Vegas,
 NV.

Imported Bottled Beers

Name	Country	Type	Price
Anchor Steam	USA	Lager	\$4.99
Ball's	Canada	Lager	\$4.99
Belmont	Canada	Lager	\$4.99
Carlsberg Pilsener Beer	Denmark	Pilsner	\$4.99
Cosmopolitan	USA	Lager	\$4.99
Crown Lager	USA	Lager	\$4.99
Deerfoot	USA	Lager	\$4.99
Deerfoot Ale	USA	Lager	\$4.99
Deschutes	USA	Lager	\$4.99
Frontier Beer Works	Canada	Dark	\$4.99
GA. Brew Co.	USA	Lager	\$4.99
Harp	Ireland	Lager	\$4.99
Harbin	USA	Lager	\$4.99
Harbin Lager	USA	Lager	\$4.99
San Francisco Mills	USA	Lager	\$4.99
San Francisco	USA	Lager	\$4.99
Fuller's Blue	USA	Pilsner	\$4.99
Fuller's London	USA	Dark	\$4.99
Miller High Life	USA	Lager	\$4.99
Miller High	USA	Lager	\$4.99
Miller High	USA	Lager	\$4.99
Miller High	USA	Lager	\$4.99

Micro Brew Bottles/ Cider & Malt Beverages

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Domestic Imports

Imported Drafts

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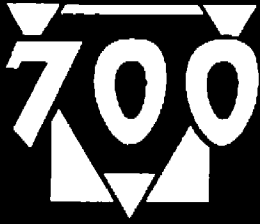
Micro Brew Drafts

Year	Country	Age	Sex
1997-1998	China	60-69	Male
1997-1998	China	60-69	Female
1997-1998	China	70-79	Male
1997-1998	China	70-79	Female
1997-1998	China	80-89	Male
1997-1998	China	80-89	Female
1997-1998	China	90-99	Male
1997-1998	China	90-99	Female

Non-Alcoholic Bottled Beer

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

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Beer Menu

Home	The Americas		
	Blue Moon Belgian White V	5	
Beer Menu	Budweiser V	3	
	Corona Extra (MEX) V	5	
Spirits & Wine	DG Ginger Beer (non-alcoholic—JAM)	2	
	Miller High Life V	3	
	Miller Lite V	3	
DJ Nights	Negra Modelo (MEX)	5	
	Pacifico Clara (MEX)	5	
Farty On The Telly	Red Stripe (JAM)	5	
	Rolling Rock V	3	
	Woodchuck Dark & Dry Cider V	5	
Upcoming Events	Yuengling Lager V	3	
	Yuengling Lord Chesterfield Ale V	3	
About Beer	Yuengling Porter V	3	
Philly Soccer Firm	Philadelphia Area Micros		
	Dogfish Head Red & White (25.6 oz) V	15	
Community	Philadelphia Brewing Company Newbold IPA	4	
	Philadelphia Brewing Company Rowhouse Red	4	
	Philadelphia Brewing Company Walt Wit V	4	
History	Sly Fox Phoenix Pale Ale	4	
	Sly Fox Pikeland Pils	4	
	Victory Golden Monkey V	5	
	Victory Hop Devil V	4	
	Yards India Pale Ale V	4	
	Yards Love Stout V	4	
	American Micros		
	Fonders Centennial IPA (MI)	5	
	Left Hand Brewing Company Juju Ginger (CO) V	5	
	Magic Hat Brewing Company #9 V	5	
	Sierra Nevada Pale Ale (CA)	5	
	Southampton Altbier (NY)	5	
	Unibroue Chambly Noire (QC) V	5	
	The Belgians		
	Chimay Ale Grande Réserve (25.4 oz) V	15	
	Chimay Ale Première (25.4 oz) V	13	
	Corsendonk Abbey Brown Ale	7.5	
	Corsendonk Abbey Pale Ale	7.5	
	Delirium Nocturnum (11.2 oz)	7.5	
	Delirium Tremens (11.2 oz)	7.5	
	Duchesse de Bourgogne (11.2 oz)	7.5	
	Duvel Golden Ale (11.2 oz) V	7.5	
	Karmeliet Tripel (11.2 oz)	7.5	
	Lindemans Framboise Lambic V	10	
	Lindemans Gueze Cuvée René V	10	
	Lindemans Pêche V	10	
	Ales & Lagers On Draught		
	We have ten beers on draught plus two hand pumped keg conditioned beers. What's on tap will change according to the season, as new beers become available or depending on our mood. Take a look at the chalkboard for our current selection.		
	The British Isles & Ireland		
	Bass Ale (ENG)	5	
	Belhaven Twisted Thistle IPA (16.9 oz-SCO)	6	
	Boddingtons Pub Ale (16 oz-ENG)	5	
	Fuller's ESB (11.2 oz-ENG) V	5	
	Fuller's London Porter (11.2 oz-ENG) V	5.5	
	Guinness Draught (14.9 oz-IRE)	5	
	Harp Lager (IRE)	5	
	Newcastle Brown Ale (ENG)	5	
	Samuel Smith Nut Brown Ale (ENG) V	6	
	Samuel Smith Oatmeal Stout (ENG) V	6	
	Samuel Smith Organic Ale (ENG) V	6	
	Samuel Smith Organic Lager (ENG) V	6	
	Strongbow Dry Cider (ENG) V	5	
	Theakston Old Peculier (ENG)	5	
	Young's Double Chocolate Stout (16.9 oz-ENG) V	7	
	The Dutch		
	Amstel V	5	
	Grolsch Premium Lager (16 oz) V	5	
	Heineken V	5	
	The Germans & Austria		
	Dr. Fritz Briem 1809 Berliner Weisse (16 oz)	8	
	Franziskaner Hefe-Weisse (16 oz) V	6	
	Gösser Dark (AUS)	5	
	Jever Pils (11.2 oz)	5	
	Köstritzer Schwarzbier	5	
	Paulaner Hefe-Weizen (16oz)	6	
	Paulaner Thomas Bräu (non-alcoholic)	5	
	Reissdorf Kölsch (16 oz) V	6	
	Sünner Kölsch (16 oz) V	6	
	The Czech Republic, Ukraine & Finland		
	Czechvar (11.2 oz-CZE)	5	
	Pilsner Urquell (CZE) V	5	
	Obolon Lager (16 oz-UKR)	5	
	Sinebrychoff Porter (11.2 oz-FIN)	8	
	The Japanese		
	Hitachino Nest Japanese Classic Ale (11.2 oz)	8	
	Hitachino Nest White Ale (11.2 oz)	8	

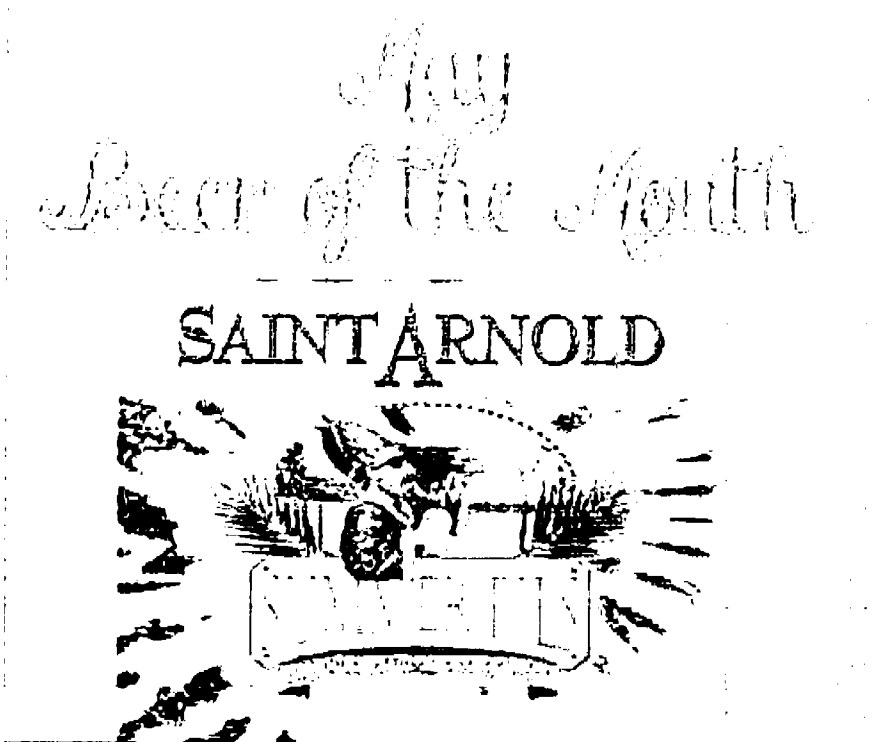
"V" indicates that, according to our diver group, this beer is suitable for vegans

Oerbier (11.6 oz)	7.5	Hitachino Nest XH (11.2 oz)	8
Petrus Aged Ale (11.2 oz)	8	Sapporo (16 oz)	7
Saison Dupont Farmhouse Ale (12.7 oz)	7.5		
St. Bernadus Abt 12 (25.4 oz)	15		
Trappist Rochefort 8 (11.2 oz)	12		

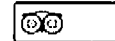
Availability and price subject to change without notice

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Beer



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12 oz Beers

Guinness Extra Stout

12 oz

Guinness Stout

12 oz

Guinness Stout

12 oz

Guinness Stout

12 oz

Guinness Stout

12 oz

Guinness Stout

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Guinness Stout

12 oz

Guinness Stout

12 oz

Guinness Stout

12 oz

Guinness Stout

12 oz

Bar located in New Orleans, LA

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Beer List

Over 100 Beers from All Over the World!

LAGER

Anchor Steam	California	12oz	4.9%	\$6.50
Abita Amber	Louisiana	12oz	4.5%	\$5.25
Brooklyn Lager	New York	12oz	5.2%	\$5.75
Dos Equis	Mexico	12oz	4.7%	\$5.50
Great Lakes Dor. Gold	Ohio	12oz	5.8%	\$5.50
Grolsch	Netherlands	16oz	5.0%	\$8.00
Landshark Lager	Florida	12oz	4.7%	\$5.00
Modelo Especial	Mexico	12oz	4.4%	\$5.50
Pabst Blue Ribbon	Illinois	16oz	4.7%	\$4.25
Pacifico	Mexico	12oz	4.8%	\$5.50
Peroni	Italy	12oz	5.1%	\$5.75
Red Stripe	Jamaica	12oz	4.7%	\$5.50
Sam Adams	Boston	12oz	4.9%	\$6.00
Sam Smith Original Lager	England	18oz	5.0%	\$10.00
Shiner Bock	Texas	12oz	4.4%	\$5.50
Stella Artois	Belgium	14.9oz	5.0%	\$6.00

Tavern located in Alexandria,
VA.

PILSNER

Bavik	Belgium	12oz	5.2%	\$6.50
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Beck's	Germany	12oz	5.0%	\$5.75
Carlsberg	Denmark	11.2oz	5.0%	\$5.75
Eggenberg	Austria	12oz	5.1%	\$5.50
Labatt Blue Light	Canada	12oz	4.0%	\$5.25
Mama's Little Yella Pils	Colorado	12oz	5.3%	\$6.25

ALE

Avery White Rascal	Colorado	12oz	5.6%	\$5.75
Fat Tire Ale	Colorado	12oz	5.2%	\$6.00
Flying Dog Tire Bite	Maryland	12oz	5.1%	\$5.75
Goose Island Honkers	Illinois	12oz	4.2%	\$5.75
Speakeasy Prohibition	San Fran.	12oz	6.1%	\$6.50
Yards ESA	Pennsylvania	12oz	6.0%	\$6.50

RED ALE

Anderson Boont Amber	California	12oz	5.8%	\$5.50
Bear Republic Red Rocket	California	12oz	6.8%	\$7.25
Oskar Blues G'Knight	Colorado	12oz	8.7%	\$7.75
Red Seal Ale	California	12oz	5.5%	\$6.50

PALE ALE

Bell's Pale Ale	Michigan	12oz	5.2%	\$6.00
Dale's Pale Ale	Colorado	12oz	6.5%	\$5.75
Kona Fire Rock	Hawaii	12oz	5.9%	\$5.75
Sierra Nevada	California	12oz	5.6%	\$5.50
Yards Pale Ale	Pennsylvania	12oz	4.3%	\$6.25

IPA

Anderson V. Hop Ottin	California	12oz	7.0%	\$5.50
21st Amon. Back-n-Black	San Fran.	12oz	6.8%	\$6.50
Bear Republic Racer 5	California	12oz	7.0%	\$7.25
Bell's Two Hearted	Michigan	12oz	7.0%	\$6.50
Dogfish Head 90 M. IPA	Delaware	12oz	9.0%	\$8.00
Flying Dog Snake Dog	Maryland	12oz	7.1%	\$5.75
Harpoon IPA	Boston	12oz	5.9%	\$6.00
Lagunitas Maximus D	California	12oz	8.2%	\$6.50
Oskar Blues G'Knight	Colorado	12oz	8.7%	\$7.75
Port City IPA	Virginia	12oz	6.3%	\$6.00
Stone IPA	California	12oz	6.9%	\$6.25
Victory HopDevil	Pennsylvania	12oz	6.7%	\$6.00

BROWN ALE

Boddingtons	England	16oz	4.7%	\$7.00
Brooklyn Brown	New York	12oz	5.6%	\$5.75
Duck Rabbit Brown Ale	N. Carolina	12oz	5.6%	\$6.50
Newcastle	England	12oz	4.7%	\$6.00

WHEAT BEER

Blue Moon	Colorado	12oz	5.4%	\$5.50
Erdinger Hefeweizen	Germany	12oz	5.3%	\$6.75
Lag. Little Sumpin' Sum	California	12oz	7.3%	\$6.50
Port City Optimal Wheat	Virginia	12oz	6.0%	\$6.00
Schneider & Sohn Witbier	Germany	12oz	8.2%	\$10.25
Weihenstephaner	Germany	12oz	5.4%	\$7.25
Wittekerke	Belgium	11.2oz	5.0%	\$7.25

STOUT

AVBC Oatmeal Stout	California	12oz	5.7%	\$7.25
Butternuts Moo Thunder	New York	12oz	4.9%	\$5.50
Guinness Foreign Extra	Ireland	12oz	7.5%	\$7.00
Old Rasputin Russian IS	California	12oz	9.0%	\$7.75
Sam Smith Oatmeal Stout	England	18oz	5.0%	\$10.00

PORTER

Founders Porter	Michigan	12oz	6.5%	\$6.50
St. Peter Old Style Porter	England	500ml	5.1%	\$13.00
Yards Washington Porter	Philadelphia	12oz	7.0%	\$6.50

FRUIT

Abita Purple Haze	Louisiana	12oz	4.2%	\$6.25
Angry Orchard Apple	Ohio	12oz	5.0%	\$5.75
Jack's Crisp Cider	California	12oz	5.0%	\$6.00
Magic Hat #9	Vermont	12oz	5.1%	\$6.00

CIDER

Angry Orchard Apple	Ohio	12oz	4.2%	\$5.75
Jack's Crisp Cider	California	12oz	4.9%	\$6.00
Kelly's Cider	Florida	12oz	4.6%	\$6.00
Strongbow	England	16.9oz	5.0%	\$8.00

GLUTEN FREE

Angry Orchard Apple	Ohio	12oz	4.2%	\$5.75
Jack's Crisp Cider	California	12oz	4.9%	\$6.00
Redbridge	Missouri	12oz	4.0%	\$5.75
Strongbow	England	16.9oz	5.0%	\$8.00

BELGIAN

Bavik	Pilsner	11.2oz	5.0%	\$6.50
Chimay Blue	Ale	25.4oz	9.0%	\$25.00
Chimay Red	Ale	25.4oz	7.0%	\$20.00
Delirium Tremens	Ale	12oz	8.5%	\$12.00
Grimbergen	Ale	11.2oz	6.5%	\$7.00
Hoegaarden	Ale	11.2oz	4.9%	\$6.00
Lefte Blonde Abby Ale	Ale	11.2oz	6.6%	\$6.50
Piraat	IPA	11.2oz	10.5%	\$12.00
Westmalle Trappist	Triple	25oz	9.5%	\$25.00
Wittekerke	Wheat	11.2oz	5.0%	\$7.25

CANS

21st Amen.Back-n-Black	IPA	12oz	6.8%	\$6.50
Amstel Light	Lager	12oz	3.5%	\$4.75
Anderson V. Hop Ottin	IPA	12oz	7.0%	\$5.50
Anderson V.Boont Amber	Amber Ale	12oz	5.8%	\$5.50
Avery White Rascal	Ale	12oz	5.6%	\$5.75
Bavik	Pilsner	12oz	5.2%	\$6.50
Blue Moon	Wheat	12oz	5.4%	\$5.50
Boddington	Brown Ale	16oz	4.7%	\$7.00
Butternuts Moo Thunder	Stout	12oz	4.9%	\$5.50
Harpoon IPA	IPA	12oz	5.9%	\$6.00
Mama's Little Yella Pils	Pilsner	12oz	5.3%	\$6.25
Oskar Blues Dales PA	Pale Ale	12oz	6.5%	\$5.75
Oskar Blues Gordon	IPA	12oz	8.7%	\$7.75
Pabst Blue Ribbon	Lager	16oz	4.7%	\$4.25
Sierra Nevada PA	Pale Ale	12oz	5.6%	\$5.50
Stella Artois	Lager	14.9oz	5.0%	\$6.00
Strongbow	Cider	16.9oz	5.0%	\$8.00
Wittekerke	Wheat	11.2oz	5.0%	\$7.25
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