April 23, 2007

Dear Attorneys General:

On behalf of Beam Global Spirits & Wine, Inc. ("Beam Global"), we appreciate the time taken by you and your colleagues to engage with us in frank and constructive dialogue regarding the issue of Underage Drinking, which remains a stubborn societal problem despite concerted efforts by many interested parties, including Beam Global. Beam Global does not accept Underage Drinking as a rite of passage or as an inevitable phase of maturation for Americans under age 21.

As you know, many factors have been identified in the relevant literature as potentially contributing to or affecting Underage Drinking including parental influences, access to alcohol, peer pressure, role models, cultural practices and advertising and marketing of alcohol products, although there are significant differences of view as to the relative impact of these factors, if any, on Underage Drinking.

There also are significant differences of opinion as to how best to address the issue of Underage Drinking. As an example, representatives of certain Attorneys General have stated an intention to investigate and if necessary institute litigation against members of the U.S. beverage alcohol industry regarding the placement practices for advertising and promotional materials, based on alleged unfair and deceptive trade practices with respect to "overexposure" of Underage Persons to alcohol advertising and promotion. We believe that any such litigation against any industry member that complies with the letter and spirit of applicable industry codes such as Beam Global would be without merit. More importantly, we also strongly believe that it would be more constructive for all interested parties to work together to pursue innovative strategies to address this issue of mutual concern.

Beam Global, both as an individual company and as a member of organizations such as The Century Council, DISCUS and the Wine Institute, has implemented policies and best practices in an effort to advance the overall goal of eliminating Underage Drinking. As you know, Beam Global has previously agreed voluntarily to place advertisements and promotions for Beam Global products exclusively in media which meet or exceed a 70 percent Legal Purchase Age ("LPA") advertising placement standard, pursuant to the DISCUS and Wine Institute Codes. Beam Global believes that the 70 percent LPA advertising demographic standard is an appropriate and responsible standard for ensuring that persons under age 21 are not targeted by or unduly exposed to alcohol advertising.

We recognize that the Attorneys General and certain other industry observers have publicly stated they believe that the alcohol beverage industry should move to an 85
percent audience demographic threshold (based on the 12+ population) for the placement of alcohol advertising. Over the course of discussions, the Attorneys General have challenged Beam Global to implement higher audience demographic standards for advertising placements as significant and useful improvements over the current alcohol beverage industry practice and as a reflection of Beam Global’s willingness to take a leadership position in adopting policies and practices demonstrating meaningful commitment to reduce Underage Persons’ exposure to alcohol advertising.

Mindful of our duty to our stockholders, Beam Global’s business purpose and fiduciary responsibility is to exercise its Constitutional right to advertise and promote its products to win market share from competing products and to maximize sales and profits from sales to LPA adults. That said, Beam Global’s management took your challenge very seriously and, over the past months, has conducted a comprehensive internal review of its marketing and advertising practices. These discussions have taken place at the highest levels of management within Beam Global, whose obligation is to further our business purpose, including our continued ability to compete in the highly competitive marketplace, while meeting our commitment to social responsibility and responsible marketing.

We are pleased to report that Beam Global’s review is now complete and, more importantly, that with the adoption of the Voluntary Principles, Beam Global has in many instances met or exceeded the challenge you issued. As set forth in the Statement of Voluntary Principles, attached, Beam Global adopts new policies and practices regarding its promotional activities including the following:

- Effective with media placements commencing on or after January 1, 2008, Beam Global will implement a 75 percent audience demographic placement standard for each advertisement for a Beam Product, consistent with the guidelines set forth in Appendix B to the Statement of Voluntary Principles.

- Effective January 1, 2008, Beam Global will purchase advertising only in broadcast television, cable television, radio and print communications vehicles in order to achieve on an annual, calendar year basis a minimum aggregate average of 85 percent of all impressions delivered to persons age 21 or older, for each advertised brand and in each media category listed above.

- In addition, Beam Global has committed to enhanced procedures and standards in other important areas including promotional events, special subscriptions for print magazines mailed only to persons age 21 or older, branded apparel, marketing on college campuses, and product placements on television and in movies.
• Beam Global will not introduce or market any Flavored Malt Beverage.

• Beam Global will restrict promotional activities with respect to Spring Break.

If you have reason to believe at any time that we are not acting in accordance with our Voluntary Principles, we ask that you contact us to discuss the matter informally. We also ask, in the event any differences of opinion are not resolved by such informal communications, that you provide us with written notice specifying the issue(s) in question and with information forming the basis for your position. Any request for disclosure by Beam Global should in such circumstances be specific to the subjects of discussion, and all parties should observe confidentiality until the matter is finally resolved.

We understand that, despite Beam Global’s leadership and commitment in this critical area, there will be those who will criticize our actions and Voluntary Principles. We invite those parties to work with us to eliminate Underage Drinking including actions to minimize access to alcohol from parents, family members and friends, to enforce existing laws and to educate those younger than 21 that Underage Drinking is illegal.

Very truly yours,

[Signature]

Thomas J. Flocco