



December 3, 2024

Brian Cornell  
Chairman and CEO  
Target Corporation  
1000 Nicolett Mall  
Minneapolis, MN 55403

Dear Chairman Cornell,

We are writing on behalf of the non-profit organizations Alcohol Justice, Consumer Federation of America, and Fairplay. We are shocked and disturbed by Target's decision to stock and sell MGA Miniverse "Happy Hour" balls, an alcohol-themed line of a popular kids' collectibles. These are deeply disturbing products in a very popular set of toys, as they are seemingly specifically designed to encourage underage alcohol use. On behalf of parents across the country, we ask that you remove these products from your stores and your website, and join Alcohol Justice, Consumer Federation of America, and Fairplay in pushing the toymaker MGA to cease making this product.

A little background: On Nov. 6, the young daughter of Cruz Avila, the Executive Director of Alcohol Justice, saw a large cardboard display of the MGA Miniverse "Happy Hour" balls on the endcap of a toy aisle at the Target store in Napa, CA. These balls contain miniature, moldable, dollhouse-type cocktail glasses, to be filled with resin "cocktails." Our research has shown these products are for sale at Target stores in various parts of the country — in some cases positioned near alcohol and in some cases in or near the toy section.

We have also observed a notice on the "Happy Hour" display that says "21+: Adults Only." This acknowledges that these products are not appropriate for children and teens. However, that notice will do little good when the display is in the toy aisle, directly adjacent to Hatchimals, Furbys and other kids' toys. And most disturbing is that these products are presently for sale on Target's website with this prominent text: "WARNING: choking hazard - small parts. Not for children under 3 yrs." Buried in the description of the item, it says: "DISCLAIMER: ALL Ingredients are NOT edible and do include resin play. Not suitable for kids."<sup>1</sup>

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<sup>1</sup> <https://www.target.com/p/mga-39-s-miniverse-make-it-mini-happy-hour/-/A-89981872>

Target should treat this as a dangerous campaign that markets alcohol to youth. Alcohol causes a litany of harms to youth, being a major driver of the three leading preventable causes of underage mortality: motor vehicle crashes, suicide, and homicide.<sup>2</sup> It is associated with risks of physical assault,<sup>3</sup> sexual assault,<sup>4</sup> and intimate partner violence<sup>5</sup> among teens. It can be synergistic with many depressants, including opioids, turning experimentation into overdose.<sup>6</sup> And the drinking patterns learned early in adolescence tend to stick across the course of life, as people who began drinking before age 15 are over three times more likely to develop symptoms of alcohol use disorder by their mid-twenties.<sup>7</sup>

This should be reason enough to be cautious about mixing toys meant for children and young teens with alcohol products. Moreover, the specific nature of these toys — miniature alcoholic cocktails — requires even more caution and scrutiny. Children model behaviors they find directly relevant, particularly ones to which people they trust draw their attention.<sup>8</sup> The inclusion of toys on the aisle endcap will inherently generate attention, while the representation of alcohol in the toys also flags drinking as an important thing to pay attention to. This generates a greater intention to drink, reduced caution around the presence of alcohol, and a resistance to arguments that they should avoid consuming it.

These concerns are driven not only by research on how toys prime children to seek addictive substances, but also by the well-observed, well-documented tactics of the tobacco industry, ones they themselves identify in their internal documents. Researchers have long recognized that candy and toy cigarettes— often cross-branded with superheroes or other recognized youth icons— and similar promotional strategies were effective in creating interest in smoking among children.<sup>9</sup> Even if they are not made by the alcohol industry, the MGA Miniverse “Happy Hour” balls serve the same purpose, but for ethanol instead of nicotine.

The MGA Miniverse products are an extremely popular, award-winning line of collectibles that are generally sold in the toy section. Every possible signal has been sent by the manufacturer and by

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<sup>2</sup> United States Centers for Disease Control. CDC WONDER [web site]. Atlanta, GA: US Centers for Disease Control. Accessed November 15, 2024.

<sup>3</sup> Waterman EA, Lee KDM, Edwards KM. Longitudinal associations of binge drinking with interpersonal violence among adolescents. *J Youth Adolesc.* 2019 Jul;48:1342–52, 2019.

<sup>4</sup> Young A, Grey M, Abbey A, Boyd CJ, McCabe SE. Alcohol-related sexual assault victimization among adolescents: Prevalence, characteristics, and correlates. *J Stud Alc Drug.* 2008. 69(1): 39-48.

<sup>5</sup> Stockl H, March L, Pallitto C, Garcia-Moreno C. Intimate partner violence among adolescents and young women: Prevalence and associated factors in nine countries: a cross-sectional study. 2014. *BMC Pub Health.* 14(751).

<sup>6</sup> Tori ME, Larochelle MR, Naimi TS. Alcohol or benzodiazepine co-involvement with opioid overdose deaths in the United States, 1999-2017. *JAMA Network Open.* 2020;3(4):e202361.

<sup>7</sup> National Institute on Alcohol Abuse and Alcoholism. Get the Facts About Underage Drinking. 2022; Bethesda, MD: National Institute on Alcohol Abuse and Alcoholism. Available at: <https://www.niaaa.nih.gov/publications/brochures-and-fact-sheets/underage-drinking>. Accessed November 15, 2024.

<sup>8</sup> Bandura A. “Social-learning theory of identificatory processes.” *Handbook of Socialization Theory and Research.* 1969;213(262).

<sup>9</sup> Klein JD. Do candy cigarettes encourage young people to smoke? *BMJ* 2000;321(362).

Target that these are toys, thus meant for children and youth. There is simply no reason, and no excuse, to sell toys that mimic alcohol-related behaviors meant only for adults. In fact, the toys sometimes being in the alcohol aisle and not in the toy aisle suggests Target is aware that they are not appropriate in child-focused areas, begging the question: Why does this product exist at all? The solution to this quandary seems simple: Target should stop stocking these products and join us in urging MGA to cease manufacturing them.

I hope Target will take the risks of promoting alcoholic products to youth seriously. The store has, in the past, focused on a family-friendly image, and we hope that Target treats the selling of child/youth-oriented alcohol products as a serious public health issue, no different from encouraging similar youth-oriented tobacco products.

We are happy to lend time and staff to educate your stakeholders on the urgency of this problem. We hope you will take swift action to pull this line of products from your own stores and website, and join us in asking MGA to make the responsible decision to cease selling these products entirely. You owe it to your customers, and we all owe it to the kids.

Respectfully,

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Executive Director  
Alcohol Justice

David Monahan  
Campaign Director  
Fairplay

Thomas Gremillion  
Director of Food Policy  
Consumer Federation of America

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