

April 9, 2014

Telephone: (717) 783-9454

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Mike Dotter

**Re: Club Steward Compensation**

Dear Mr. Dotter:

ISSUE: Your e-mail of March 12, 2014 inquires whether a steward at an unidentified local fire company private club is required to be compensated and “on the books” for being paid, or whether the steward’s time could be volunteered.

OPINION: Nothing in the Liquor Code or the Board’s Regulations requires that a steward at a licensed club be compensated, nor prohibits a steward from working on a volunteer basis.

Club licensees must adhere to the provisions of their constitution and bylaws. [40 Pa. Code § 5.81]. Therefore, if the club has a provision in its constitution or bylaws addressing this matter, it must be followed.

If you have any further questions or concerns regarding this matter, please do not hesitate to contact this office.

THIS OPINION APPLIES ONLY TO THE FACTUAL SITUATION DESCRIBED HEREIN AND DOES NOT INSULATE THE LICENSEE OR OTHERS FROM CONSEQUENCES OF CONDUCT OCCURRING PRIOR TO ITS ISSUANCE. THE PROPRIETY OF THE PROPOSED CONDUCT HAS BEEN ADDRESSED ONLY UNDER THE LIQUOR CODE AND REGULATIONS. THE LAWS AND POLICIES ON WHICH THIS OPINION IS BASED ARE SUBJECT TO CHANGE BY THE LEGISLATURE OR THE PENNSYLVANIA LIQUOR CONTROL BOARD.

Very truly yours,

Mike Dotter  
April 9, 2014  
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FAITH S. DIEHL  
CHIEF COUNSEL

cc: Pennsylvania State Police,  
Bureau of Liquor Control Enforcement  
Jerry W. Waters, Director of Office of Regulatory Affairs  
Tisha Albert, Director, Bureau of Licensing  
Jeffrey Lawrence, Assistant Director, Bureau of Licensing

LCB Advisory Opinion No. 14-131