

February 23, 2016

Francis X. O'Brien, Esquire  
411 Walnut Street  
Harrisburg, PA 17101

**RE: Bowling Alley on Privately-owned Public Golf Course**

Dear Mr. O'Brien:

ISSUE: Your letter of January 8, 2016 states that you have a client holding a privately-owned public golf course ("PGR") liquor license which covers the whole course. Your client has a storage building on the course into which he would like to move a bowling alley. You inquire whether the Pennsylvania Liquor Control Board ("Board") would permit the PGR license to cover the building to be used for a public bowling alley.

OPINION: Nothing in the Liquor Code or the Board's Regulations would prohibit the arrangement you describe *per se*. However, as the bowling alley would constitute another business, Board approval would be required. [40 Pa. Code § 3.52(c)]. In addition, the prohibition against minors frequenting the licensed premises may be problematic. [47 P.S. § 493(14)].

As you are aware, any such arrangement would be subject to investigation by the Bureau of Licensing and approval at the discretion of the Board.

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

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February 23, 2016

Page 2

IS BASED ARE SUBJECT TO CHANGE BY THE LEGISLATURE OR THE  
PENNSYLVANIA LIQUOR CONTROL BOARD.

Very truly yours,

RODRIGO J. DIAZ  
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. 16-039