

March 7, 2016

Marge Dailey  
Assistant General Manager  
Eagles Mere Country Club  
One Country Club Road  
P.O. Box 360  
Eagles Mere, PA 17731-0360  
**VIA E-MAIL**

**RE: Club Records**

Dear Ms. Dailey:

ISSUE: This office is in receipt of your e-mail dated February 17, 2016, wherein you request information regarding the records that a Pennsylvania Liquor Control Board (“PLCB”) club licensee must keep.

PLCB records indicate that Eagles Mere Country Club holds Catering Club Liquor License No. CC-5638 (LID 4021) for its licensed premises located at One Country Club Road, P.O. Box 360, Eagles Mere, Pennsylvania.

OPINION: Club licensees are required by PLCB regulations to maintain certain prescribed books of permanent record containing the following:

- **Membership Record**

A complete individual record shall be maintained for each member showing the date of application of the proposed member, the name of the sponsor, the date of admission after election and the date and amount of initiation fees and dues paid. This record shall be either on a ruled form or a card index, which shall carry at the top the name and address of the member and the serial number of the membership card issued. Dues for each month shall be totaled and posted to the proper column in the income account. When members are dropped or resign, their cards shall be removed from the active file and placed in the inactive file for two years.

- **Income Account**

A record in columnar form shall be posted currently showing all income separated into dues, income from malt or brewed beverages and liquor, income from food, and other items of income. This account shall be totaled

each month and used when the bank account is reconciled by the Treasurer. The total entries under 'Dues' should balance with the number of members active in the club.

- **Expenditures**

A record in columnar form shall be posted currently showing all expenditures separated into payments for malt or brewed beverages, liquor, food, payroll, entertainment, rent, heat, light, water, equipment, and details of all other expenditures. This record shall be balanced each month with the bank account and the Treasurer's records. Every expenditure shall be supported by delivery tickets, invoices, receipted bills, cancelled checks, petty cash vouchers or other sustaining data or memoranda.

- **Control Account**

A bank or cash account showing all income and expenditures must be maintained as control on the income and disbursements records. This account shall be balanced each month by the Treasurer and proper record made in the minutes of the Secretary.

- **Minute Book**

A minute book must be maintained of all regular and special meetings recorded currently by the Secretary. It shall show the names and dates of applicants for membership, the results of balloting and dates the members were admitted. The minute book shall record the financial reports of the Treasurer, all bills approved for payment, the reason therefor and the amounts involved. It shall record all parties, banquets, socials, etc., given the members free of charge and the costs involved. It shall show all elections and appointments of officers and committees and the term for which they are elected, together with all customary entries in a record of this nature.

In addition, the following documents and records must be maintained:

- Photostatic or certified copy of the charter, if incorporated.
- Copy of the Constitution.
- Copy of the Bylaws.
- All invoices and receipted bills covering purchases made by officers of the club for the benefit of the club.
- Prescribed books of record and membership lists.
- Certificate for coil cleaning.
- Records covering operations of concessionaire (if any).

All of these required records shall be maintained in the English language and shall be available for inspection by authorized employees of the PLCB or the Pennsylvania State Police, Bureau of Liquor Control Enforcement (“BLCE”), at any time during business hours.

Further, catering club licensees must maintain a club record showing the date and time catering arrangements were made, the name of the persons or organization making the arrangements and the approximate number of persons to be accommodated.

Lastly, section 493(12) of the Liquor Codes requires a licensee to have its business records at the licensed premises for the most recent six months, and it may only remove those records from the licensed premises for “a lawful business purpose,” and must return those records after such business has been concluded. A licensee may maintain records off the licensed premises that are between six months and two years old, provided that such records are returned to the licensed premises within twenty-four hours of a request by BLCE. [47 P.S. § 4-493(12)].

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.

Sincerely,

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. 16-063