

April 15, 1999

Terry Jones, Secretary/Manager  
Derry F.O.E. 1612  
149 E. 1<sup>st</sup> Avenue  
Derry, PA 15627

Dear Mr. Jones:

**ISSUE:** In your letter dated March 19, 1999, you inquired as to whether an employee of a fraternal organization which holds a club liquor license could also be employed as a secretary/manager in another fraternal organization holding a club liquor license.

**OPINION:** There is nothing in the liquor laws which would prohibit an individual from being employed concurrently by two club liquor licensees. Therefore, an employee of a licensed fraternal organization may also, at the same time, be an employed secretary/manager of another fraternal organization holding a club license.

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,

FAITH S. DIEHL  
CHIEF COUNSEL

cc: Bureau of Liquor Control Enforcement,

Pennsylvania State Police  
David C. Martin

Refer to: (717) 783-9454  
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Advisory Opinion No. 99-135