## **EXAMINATION REPORT**

# Pennsylvania Liquor Control Board Fine Wine and Good Spirits Store 0281

1706 Mount Royal Boulevard Glenshaw, Pennsylvania 15116 For the Period November 26, 2024 to October 6, 2025

November 2025



Commonwealth of Pennsylvania Department of the Auditor General

Timothy L. DeFoor • Auditor General



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TIMOTHY L. DEFOOR AUDITOR GENERAL

The Honorable Darrell Clarke, Chairman Pennsylvania Liquor Control Board 518 Northwest Office Building Harrisburg, PA 17124

#### Dear Chairman Clarke:

We have performed an examination of Fine Wine and Good Spirits Store 0281, Allegheny County, District 3-04, operated by the Pennsylvania Liquor Control Board (PLCB). We examined store operations for the period November 26, 2024 to October 6, 2025.

This report presents the results of the Department of the Auditor General's examination of store operations under the jurisdiction of the Pennsylvania Liquor Control Board (PLCB). The examination was conducted under statutory authority provided under 47 P.S. § 3-306 of the Pennsylvania Liquor Code.

This examination was conducted only to the extent that we considered necessary to determine if the wine and spirits store operated in compliance with PLCB operating procedures. The examination was not conducted, nor was it required to be, in accordance with professional auditing or attestation standards.

#### Our examination included:

- Conducting a physical inventory count for a selection of liquor codes and comparing our results to the store's perpetual inventory records to determine whether inventory differences in excess of \$200 in value exists for these codes;
- Reviewing deposits, consisting of cash and checks deposited manually and credit and debit card receipts deposited electronically, to determine whether deposits were appropriately accounted for and agreed with PLCB financial records;
- Reviewing Clerk Performance Reports, Ad Hoc Reports, Shipment Invoices, and Transfer Reports to determine the store's compliance with PLCB internal controls;

- Performing a count of all cash on hand to determine whether the store's cash on hand agrees with supporting store documents and bank records, and verifying whether the total store operating fund charged to the store agrees with the amount provided by the PLCB;
- Performing tests of Licensee Sales, Tax-Exempt Sales, Minor Challenges, System Prices, Register Voids, Register Deposits, and Breakage/Adjustment Controls to determine whether store operations were in compliance with PLCB operating procedures;
- Selecting liquor codes and verifying that the sales price in the store system agrees to the PLCB's approved price list; and,
- Locating and verifying that all PLCB capital assets are present at the store and comparing our results to the PLCB fiscal year asset equipment list for accuracy.

The results of our examination found that Fine Wine and Good Spirits Store 0281 operated in compliance with all PLCB operating procedures falling within the scope of our examination, except as noted in the following findings and discussed later in this report. These matters were discussed with appropriate personnel and are intended to assist you in improving internal controls.

 Instant Redeemable Coupon Used Along with Licensee Discount – Finding No. 1 Repeat Finding

Finding No. 2 – Tax-Exempt Sales – Improper Documentation

We would like to thank store management for their cooperation extended to us during the conduct of the examination.

If you have any questions concerning this report, please contact the Bureau of Liquor Control Audits at (717) 783-1236.

Sincerely,

Timothy L. DeFoor Auditor General

Timothy L. Detool

October 24, 2025

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#### **BACKGROUND**

The Pennsylvania Liquor Control Board (PLCB) operates a diverse network of retail and wholesale distribution facilities across the Commonwealth, including Premium Collection Stores, One-Stop/Supermarket Stores, Taste & Learn Stores, Lottery Locations, Wholesale Stores/Licensee Service Centers (LSCs) and an online E-Commerce Store. Each of these store types serves a distinct function – ranging from public retail and licensee fulfillment to education, special product releases, and bulk distribution.

The Department of the Auditor General's authority to examine PLCB store operations is derived from Section 306 of the Pennsylvania Liquor Code (47 P.S. § 3-306).

## <u>Finding No. 1 – Instant Redeemable Coupon Used Along with Licensee Discount - Repeat</u> Finding

#### Condition

Our examinations of 36 licensee sales records disclosed the store was not in compliance with the PLCB Instant Redeemable Coupons (IRC) policy. We found one sale to a licensee that allowed both an IRC and the licensee discount, for a total loss to the Commonwealth of \$4.00.

#### Criteria

PLCB Memo from Chief Counsel, 6/15/2015, states that based on the State and Federal laws governing inducements, it would not be permissible for retail licensees to redeem instant rebate or mail-in rebate coupons, offered by manufacturers or suppliers on purchases of wine or spirits from the Boards's Fine Wine & Good Spirits stores under any circumstances, regardless of whether they are attempting to make the purchase at wholesale using their ten percent licensee discount.

In addition, the Liquor Code and the Board's Regulations also contain interlocking business prohibitions that would preclude retail licensees from redeeming instant rebate or mail-in rebate coupons offered by manufacturers or suppliers on purchases of wine or spirits from the PLCB's Fine Wine & Good Spirits store per Section 411 (c) of the Liquor Code.

Further, POS Message 5638 instructs store personnel that licensees are not permitted to use IRCs in conjunction with either walk-in or portal orders. These regulations fall under both Federal and State Code.

Finally, PLCB PROCEDURE BULLETIN #32, states IRCs are for retail sale transactions. No IRCs will be honored on Special Liquor Orders, Licensee Orders, Tax-Exempt Sales or Retail Invoices.

#### Cause

Store manager indicated a clerk completed a licensee sales transaction and allowed a coupon to be combined with the wholesale discount.

#### **Effect**

As a result of the store not complying with this PLCB procedure, the PLCB lost \$4.00 in revenue.

## Finding No. 1 – (Continued)

#### **Recommendation**

We again recommend that store management establish adequate internal control policies to ensure compliance with PLCB IRC policy and procedures, to ensure that licensees use an IRC or the licensee discount, but not both.

## **Management Response**

The manager agreed with the finding and stated that training will be held with the new employees to ensure that they are aware of both the IRC and licensee policy and procedures.

## **Examiner's Conclusion**

Compliance along with any subsequent corrective action taken will be subject to verification in the subsequent examination.

## Finding No. 2 – Tax-Exempt Sales - Improper Documentation

#### **Condition**

Our examination of the store's tax-exempt sales disclosed that it was not in compliance with PLCB Tax-Exempt Sales procedures and the Revenue Code regarding required documentation. We examined one invoice for tax-exempt sales and found the following documentation discrepancies:

Date	Invoice Number	Total Price	Discrepancy
7/28/25	00281001368920250728	\$39.98	REV-1220 not attached

#### **Criteria**

The Revenue Code, 61 Pa. Code § 32.2(b) states, in part, a seller who accepts an exemption certificate in good faith is relieved of the sales tax liability. The seller is to retain physical possession of the certificate.

PLCB's Tax Exempt Sales Policies, BRO-0052 and BRO-0052.1, effective January 18, 2021, state that a purchaser must present a valid Tax-Exempt certificate, REV-1220, for <u>each</u> purchase, the certificate must be signed and dated by the purchaser at the time of purchase, and the completed certificate must be attached to the store copy of the invoice and filed accordingly. For purchases exceeding \$200 or more, purchasers claiming exemption from sales tax shall also complete REV-1715 Declaration of Sales Tax Exemption and a signed, original REV-1220 and REV-1715 is to be retained by the store.

#### Cause

The general manager and clerk failed to obtain a REV-1220 form from the customer and have it completed accurately.

#### **Effect**

As a result of the store not complying with PLCB tax-exempt sales procedures, the store may be providing tax exemptions to customers that should not be receiving them, which results in a loss of revenue to the Commonwealth. Additionally, non-compliance with the Revenue Code could result in the PLCB being liable for the tax that was exempted.

## Finding No. 2 – (Continued)

#### **Recommendation**

We recommend that store management take appropriate action to ensure that its employees follow the PLCB procedures for tax-exempt sales, correct the PLCB POS when necessary, and comply with the Revenue Code's documentation requirements.

## **Management Response**

The manager agreed with the finding and stated that another meeting will be held with all clerks and managers as to how to accurately complete tax-exempt sales.

## **Examiner's Conclusion**

Compliance along with any subsequent corrective action taken will be subject to verification in the subsequent examination.

## STATUS OF PRIOR FINDINGS AND RECOMMENDATIONS

## **Random Sample Shortages**

Our prior examination of a random sample of the store's inventory reported an inventory discrepancy exceeding \$200 between actual and perpetual inventory. Store management complied with our recommendation.

#### **IRC Policy**

Our prior examination reported noncompliance with PLCB Instant Redeemable Coupons (IRC) policy. Store management failed to comply with our recommendation (see Finding No. 1).

#### **Tax-Exempt Sales**

Our prior examination reported noncompliance with PLCB Tax-Exempt Sales procedures – Incorrect Classification. Store management complied with our recommendation.

## COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA LIQUOR CONTROL BOARD FINE WINE AND GOOD SPIRITS STORE 0281 REPORT DISTRIBUTION LIST

This report was initially distributed to the following:

#### The Honorable Darrell Clarke

Chairman Pennsylvania Liquor Control Board

#### **Faith Deitrich**

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PLCB Audit Services Division/Bureau of Audits
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Director of Store Operations Pennsylvania Liquor Control Board

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