



SPIRITUS LAW

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We at Spiritus Law understand the complexity and confusion of emergency orders as they proliferate through media reports. Please understand that not all reports include all relevant substantive details and you should consult state regulators and/or counsel to be sure you are in compliance with active emergency orders. Violation of emergency orders can result in fines and even arrest of on-premise staff. While our physical office may be required to close in the coming days, please note that we are fully capable of continuing operations remotely for the duration of our national state of emergency.

Emergency Order Closing Checklist

- ✓ Confirm closure requirements on the State and local levels;
 - Closure requirements vary from jurisdiction to jurisdiction and may impact full facility operation or only on-premise service options;
 - Emergency orders may include limited hours of sale or operation where businesses are allowed to remain open;
 - Many jurisdictions that are requiring closure are still allowing pick-up/delivery ordering.
- ✓ Update inventory and confirm all food/alcohol in-stock.
 - Keep in mind that food and alcohol wholesalers may be overloaded as emergency orders are lifted and may not be able to service your location quickly;
 - Place re-stock orders for essential items early;
 - Confirm expiration and “use by” dates on perishable products in order to compile accurate re-stocking lists.
- ✓ Seal open bottles with tape and indicate sealed/closing date.
 - Where possible as time and staffing resources allow, it is advisable to seal bottles with tape and indicate “sealed on” date with employee initials;
 - Do not refill or combine alcohol bottle contents!
 - Do not destroy inventory without checking state regulations on same;
 - These steps help reduce likelihood of tampering and/or loss.
- ✓ Move alcohol products into locked storage room and keep access log;
 - Alcohol products should be moved into locked storage rooms where available with access log sheets;
 - Log sheets should indicate any access to storage areas and any removal or addition of alcohol product.
- ✓ Mark expiration and “use by” dates.
 - All perishable alcohol beverages (primarily beer/perishable wine products) and food items should be clearly marked.
- ✓ Empty and clean beer lines/draft equipment.
- ✓ Keep all invoices and purchase/sale records as usual.
- ✓ Confirm state orders re: waivers on escrow/safe keeping requirements;
 - At this time, it appears some states may waive license escrow and safe-keeping requirements, so businesses are immediately ready to open as emergency orders are lifted;
 - Please do not wait to close pending confirmation as closure orders require immediate attention! If you need assistance in this area, please let us know and we will confirm, and act as needed.

We are actively monitoring all closing and emergency orders. Please contact us should you need clarification on closing procedures and internal protocols.