



STATE OF SOUTH CAROLINA
DEPARTMENT OF REVENUE

300A Outlet Pointe Blvd., Columbia, South Carolina 29210
P.O. Box 125, Columbia, South Carolina 29214-0575

SC REVENUE RULING #24-4

SUBJECT: Golf Club Monthly or Annual Dues
(Admissions Tax)

EFFECTIVE DATE: May 13, 2024

MODIFIES: S.C. Private Letter Ruling #91-5
S.C. Revenue Ruling #91-18
S.C. Revenue Ruling #05-14

SUPERSEDES: All previous advisory opinions and any oral directives in
conflict herewith.

REFERENCES: S.C. Code Ann. § 12-21-2420

AUTHORITY: S.C. Code Ann. § 12-4-320
S.C. Code Ann. § 1-23-10(4)
SC Revenue Procedure #09-3

SCOPE: The purpose of a Revenue Ruling is to provide guidance to the public. It is an advisory opinion issued to apply principles of tax law to a set of facts or general category of taxpayers. It is the Department's position until superseded or modified by a change in statute, regulation, court decision, or another Department advisory opinion.

S.C. Code Ann. § 12-21-2420 imposes an admissions tax of five percent (5%) upon all paid admissions to places of amusement within this State. On May 13, 2024, Governor Henry McMaster signed Bill Number H. 3880 ("Act"), which amends S.C. Code Ann. § 12-21-2420 to exempt from admissions tax "annual or monthly dues paid to a golf club." The purpose of this advisory opinion is to address questions concerning the scope of this exemption.

1. What type of dues are exempt? Does the exemption apply to other dues processed by golf clubs?

The Act exempts monthly and annual membership dues paid to a golf club from the state's admissions tax. Accordingly, any membership dues that are paid to a golf club are exempt from the state's admissions tax. However, the exemption does not apply to monthly or annual membership dues paid to a club which does not offer golf. For example, the exemption does not apply to a location which only offers a membership to play tennis and/or access a pool. (See also Response No. 6 concerning dues that allow members to play golf at other locations.)

2. Will the exemption apply to any local admissions taxes or fees imposed by counties?

A local admissions fee is imposed under a county ordinance and is governed by the county. Taxpayers are encouraged to consult with the county in which the local admissions fee is imposed to determine whether the golf club membership dues are exempt from the local admissions fee.

3. Does the exemption apply to green fees or driving range fees charged to both members and non-members?

No. The Act exempts golf club membership dues, both monthly and annual, from the State admissions tax. It does not exempt other fees, including green fees or driving range fees. For example, the state's admissions tax still applies when a semi-public golf club charges a greens fee to non-members.

4. Will a refund be issued for admissions tax already reported and paid for annual membership dues billed and collected from members for 2024?

No. The Governor signed the Act on Monday, May 13, 2024, and it became effective on that day. When golf clubs file their admissions tax return for May, they will not need to include any annual or monthly dues paid on or after May 13, 2024. However, because the exemption was not available before the effective date of the Act, any dues paid before May 13, 2024 were subject to the tax and no refund is available.

5. When will golf clubs no longer need to report/submit admissions tax on monthly or annual membership dues?

The Act was signed by the Governor on Monday, May 13, 2024, and became effective that day. When golf clubs file their admissions tax return for May, they will not need to include any annual or monthly dues paid on or after May 13, 2024.

6. Does the exemption apply to outside memberships that golf clubs may offer to their members, which allows their members to receive benefits at other participating clubs?

The Act exempts golf club membership dues, both monthly and annual, from the State admissions tax. If the outside memberships offered by golf clubs to their members include access to golf, then the membership dues are exempt from the tax.

SOUTH CAROLINA DEPARTMENT OF REVENUE

s/W. Hartley Powell

W. Hartley Powell, Director

July 11, 2024
Columbia, South Carolina