

**IN THE MATTER OF
POLISH LEGION OF AMERICAN VETERANS #32
2026 INSTANT
BINGO APPLICATION**

SUMMARY OF DECISION

On January 8, 2026 the Ohio Attorney General's Office ("AGO") sent to the Polish Legion of American Veterans # 32 ("Polish Legion #32") a Notice of Intent to Deny its 2026 Type III Instant Bingo License renewal application and an Opportunity for Hearing on the matter. Polish Legion #32 signed for the Notice on or about January 22, 2026, but did not request a hearing on the intent to deny. This matter is now before the Attorney General for adjudication. Upon independent review of the record, the Attorney General hereby **denies** the application.

INTRODUCTION AND SUMMARY

On or about December 31, 2025 Polish Legion #32 submitted to the AGO its completed renewal application for a 2026 Type III Instant Bingo License ("Application"). See, Exhibit G, Renewal Application. Upon review of the Application, AGO Charitable Law Section Chief Dan Fausey determined that it should be denied. See, Exhibit A, Notice of Intent to Deny. The denial was based on Polish Legion #32's prior violations of Ohio law, which occurred while it held a bingo license issued by the AGO.

Specifically, on December 19, 2024, agents from the Ohio Investigative Unit ("OIU") of the Ohio Department of Public Safety issued five liquor citations under O.A.C. § 4301:1-1-53 ("Rule 53") to Polish Legion #32 for having three illegal slot machines. See, Exhibit D, Violation Notice. OIU also criminally charged Vincent Cervellino with gambling and operating a gambling house related to those same gambling machines. On May 21, 2025 Cervellino pled guilty to an amended charge of possessing of criminal tools. See, Exhibit F, Akron Municipal Court record of conviction. On October 30, 2025 the Ohio Liquor Control Commission ruled on the Rule 53 citations and by Final Order found that Polish Legion #32 had committed five gambling offenses on the liquor permit premises. See, Exhibit E, Final Order Liquor Control Commission. The Commission imposed a 15-day suspension of the liquor permit or a \$1500 forfeiture in lieu of suspension as a penalty. *Id.* Critically, Cervellino submitted Polish Legion #32's 2026 Type III renewal application and identified himself as a principal person of the charitable organization, custodian of bingo records, and bingo volunteer. Exh. G. These facts are undisputed.

In addition, during a September 9, 2025 site inspection at Polish Legion #32 an AGO Bingo Compliance Inspector discovered two unlicensed gambling machines. On November 21, 2025, during a follow-up conversation, a representative of Polish Legion #32 acknowledged that the machines were still at the premises. In other words, even after Mr. Cervellino was criminally convicted for offenses related to the gambling machines *and* the Ohio Liquor Control Commission penalized it for having them, Polish Legion #32

continued to possess illegal gambling machines. Based on these facts, Section Chief Fausey determined that Polish Legion #32 had not met its burden of demonstrating that it is eligible, qualified and suitable to hold a Type III Instant Bingo License. Exh. A.

ANALYSIS AND CONCLUSION

Ohio Revised Code Section 2915.09 prohibits a charitable organization from permitting any person who has been convicted of a felony or a gambling offense to be a bingo game operator. It is undisputed that Polish Legion #32's principal bingo operator, Mr. Cervellino, pled guilty to possessing criminal tools, a charge which was amended from the offenses of gambling and operating a gambling house.

Ohio Administrative Code Section 109:1-4-04 permits the Attorney General to deny a bingo license application if there has been an entry of a civil or administrative judgment against the applicant, a key employee, or any affiliate of the applicant, where judgment is based in whole or in part on felony or gambling activity that may reflect unfavorably on the integrity of charitable gaming in Ohio. It is again undisputed that the Ohio Investigative Unit issued liquor citations in accordance with O.A.C. 4301:1-1-53 to Polish Legion #32 for having illegal gambling machines on the liquor permit premises. The Ohio Liquor Control Commission found Polish Legion #32 had violated Rule 53 in relation to the gambling machines and by Final Order imposed a 15-day suspension or a \$1500 forfeiture in lieu of serving the suspension. That is an administrative judgment.

Finally, R.C. 2915.08(F)(2)(e) authorizes the AGO to deny a bingo license if it has good cause to believe that the organization will not conduct bingo in accordance with R.C. 2915.07 to 2915.15 or with any Ohio Administrative Code provision adopted by the AGO. In addition to the undisputed conduct set forth above, during a site inspection an AGO Compliance Inspector discovered two unlicensed electronic gambling machines at Polish Legion #32. Said differently, while Polish Legion #32 held a valid Type III Instant Bingo License which allowed it to conduct bingo legally, it still possessed bingo machines to conduct it illegally. It then kept them even after the AGO's Compliance Inspector pointed out that the machines were illegal, after Mr. Cervellino was criminally convicted for an offense related to them, and after the Ohio Liquor Commission issued its penalty for gambling violations. Polish Legion #32 has given the AGO no reason to believe that it will comply Ohio law if its Type III Instant Bingo License is issued.

Section Chief Fausey's conclusion that, for the reasons set forth in R.C. 2915.09, 2915.14, O.A.C. § 109:1-4-04, and R.C. 2915.08(F)(3), Polish Legion #32 had not met its burden of establishing entitlement to a Type III Instant Bingo License is well-founded. Polish Legion #32 did not dispute that conclusion, or any of the evidence which supports it. See, Exhibits A – G. For the foregoing reasons Polish Legion #32's Type III Instant Bingo License Renewal Application is **rejected**.

ADJUDICATION

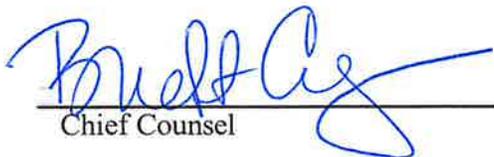
IT IS ORDERED, ADJUDGED AND DECREED THAT POLISH LEGION #32'S 2026 TYPE III INSTANT BINGO LICENSE RENEWAL APPLICATION IS HEREBY DENIED.

Any appeal from this Adjudication must be pursued by filing a Notice of Appeal (a copy or the original) with the Ohio Attorney General's Office, Charitable Law Section, 30 East Broad Street, 25th Floor, Columbus, Ohio, 43215.

The appeal must set forth the order appealed from and state that the Order is not supported by reliable, probative and substantial evidence and is not accordance with law. A copy or the original of such Notice of Appeal shall also be filed by the appellant with the Court of Common Pleas of the county in which the place of business of the appellant is located. Such Notice of Appeal shall be filed within fifteen (15) days after the mailing of the notice of the Ohio Attorney General's Order as provided in Section 119.12 of the Ohio Revised Code.

By Order of the Ohio Attorney General
DAVE YOST

March 6, 2026



Chief Counsel

Appendix - Delegation Letter



DAVE YOST
OHIO ATTORNEY GENERAL

Administration
Office 614-728-5458
Fax 614-466-5087

February 24, 2023

Re: Authorized Designee for Charitable Bingo and Distributor Adjudications

Chief Counsel and Ethics Officer, Bridget C. Coontz will serve as the designee of Ohio Attorney General Dave Yost for Charitable Bingo and Distributor Adjudications issued pursuant to Ohio Revised Code Chapters 2915 and 119, revoking the prior designation of Deputy Attorney General, Jonathan Fulkerson.

The Charitable Law Section will transmit the record of proceedings to Chief Counsel and Ethics Officer, Bridget C. Coontz with ten (10) days of the deadline to file objections to the hearing officer's report and recommendation pursuant to ORC 119.09.

Upon receipt of an adjudication order, the Charitable Law Section will enter the order in its journal and serve a copy to the party affected in accordance with ORC 119.09.

This designation shall remain in effect for the duration of her employment or until revoked under my signature.

DAVE YOST
Ohio Attorney General