IN THE MATTER OF THE TECUMSEH CUBS'
2026 TYPE II INSTANT BINGO LICENSE APPLICATION

SUMMARY OF DECISION

On August 13, 2026 the Ohio Attorney General's ("AGO") Charitable Law Section issued a Notice of Intent to Deny the Tecumseh Cubs Youth Football and Cheer Program's ("Cubs") 2026 Type II Instant Bingo Application and an Opportunity for Hearing on the Matter. The Cubs did not request a hearing on the intent to reject. This matter is now before the Attorney General for adjudication. Upon independent review of the record, the Attorney General hereby **rejects** the application.

BACKGROUND

On March 1, 2026, the Cubs submitted an application for 2026 Type II Instant Bingo License for an event to occur on March 14, 2026. The application was deficient, the AGO informed the Cubs of that fact, and on March 11, 2026 the Cubs submitted a revised application. While the AGO was reviewing the Cubs' corrected application, and despite the fact that the license had not yet been issued, the Cubs held its events and sold pull tab tickets. The AGO contacted the bingo supplies distributor Cubs listed on its application, Ace Toys & Festival Supplies, to determine if it had sold instant bingo tickets to the Cubs. Ace Toys informed the AGO that it did not have any record of having dealt with Tecumseh Cubs. The Cubs later confirmed to Compliance Examiner, Denise White, that although it represented to the AGO that it would purchase from Ace, it had instead purchased its pull tabs from Bingo Supply Warehouse, which is located in New York and is not licensed in Ohio. Given all this, the AGO contacted the Cubs and gave it the opportunity to withdraw its pending Type II bingo license application. The Cubs did not respond.

In other words, the Cubs submitted an application seeking permission to conduct an event at which it would sell pull-tab instant bingo tickets but conducted the event without first getting that permission. When it did so, it purchased its supplies from an unlicensed supplier, as opposed to the Ohio-based licensed supplier that it represented on its application that it would be using. When given the chance to withdraw its application (because the event had already occurred), Cubs did not do so, much less respond to the AGO's contacts asking if it wanted to withdraw. The foregoing is established by Exhibits A-I (attached hereto and incorporated by reference herein) and is undisputed by the Cubs.

ANALYSIS AND CONCLUSION

The AGO is authorized to issue a bingo license to an entity that meets the definition of a "charitable organization" in Ohio Revised Code Section 2915.08(H)(l). Though Cubs meets that definition, it goes without saying that it must *have* the bingo license before conducting bingo. Specifically, Revised Code Sections 2915.07 and 2915.08 prohibit a charitable organization from conducting instant bingo without first having obtained a license from the Ohio Attorney General. Cubs conducted a bingo in without a license, in violation of those sections.

But even if Cubs had a license before it conducted the bingo, it purchased its supplies from an

unlicensed supplier outside of Ohio, contrary to the representations it made on its application and Ohio law. That is, R.C. 2915.081(A)(5) prohibits a charitable organization from purchasing bingo supplies "used to conduct instant bingo * * * from any person except a distributor licensed under section 2915.081 of the Revised Code." Bingo Supply Warehouse, located in New York, is not a licensed distributor of bingo supplies in Ohio. Cubs violated R.C. 2915.08(A)(5) when it purchased its supplies from it.

Revised Code Section 2915.08(F)(2)(e) authorizes the Attorney General to deny a bingo license if it "has good cause to believe that the organization will not conduct bingo in accordance with sections 2915.07 to 2915.15 of the Revised Code or with any rule adopted by the attorney general pursuant to this chapter." It is undisputed that Cubs already failed to conduct a bingo in accordance with Ohio law.

Based on the foregoing, the Attorney General **concurs** with the proposed denial of the Cubs Type II Instant Bingo License Application.

ADJUDICATION

IT IS **ORDERED, JUDGED AND DECREED** THAT THE 2026 Type II INSTANT BINGO LICENSE FILED BY THE TECUMSEH CUBS YOUTH FOOTBALL AND CHEER PROGRAM 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 E. Broad St., 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 in accordance with the 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 Revised Code.

By Order of the Ohio Attorney General
D. Andy Wilson

Bridget C. Coontz, Chief Counsel

10-15-26
Date

Appendix – Delegation Letter

ANDY WILSON
OHIO ATTORNEY GENERAL

Administration
Office 614-728-5458

August 31, 2026

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 Andy Wilson 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.

Sincerely,

Andy Wilson
Ohio Attorney General