



ANDY WILSON
OHIO ATTORNEY GENERAL

Charitable Law Section
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August 7, 2026

Benevolent Protective Order of Elks, Post No. 177
a.k.a. BOE #177 Per Association
Attn: Monica Blanton and Teresa Howell
416 Park Ave.
Ironton, Ohio 45638
EIN:31-4126570
License: 0014-28 (2026 Temp. Permit)

Sent via certified mail and Kiteworks to Monica Blanton at: elks177@gmail.com and Teresa Howell at: thowell638@gmail.com

**Notice of Intent to Reject and Deny the Application for a
2026 Type III Paper and Electronic Instant Bingo License**

For purposes of this Notice, the terms “you” or “your” shall refer to the organization Benevolent Protective Order of Elks, Post No. 177 or “Elks #177”.

The Ohio Attorney General’s Office hereby informs you that it intends to reject and deny your 2026 Type III Paper and Electronic Instant Bingo License Application for the following reasons:

1. Ohio Revised Code Section (ORC) 2915.101(A)(1) requires Veterans and Fraternal to distribute a percentage of the net profit from the proceeds of the sale of electronic instant bingo to an organization described in ORC 2915.01(V)(1).

In violation of ORC 2915.101(A)(1), you have underpaid your 2025 designated charity (Ohio Elks Charitable Trust) in the amount of \$19,831.83.

2. ORC 2915.10(C) requires the gross profit from each bingo session, “be **deposited** into a checking account devoted exclusively to the bingo session or game. Payments for allowable expenses incurred in conducting the bingo session or game and payments to recipients of some or all of the net profit of the bingo session or game shall be made only by checks or electronic fund transfers drawn on the bingo session or game account.”

As a result of your 2025 financial inspection and in violation of ORC 2915.101(A)(1) your organization failed to deposit \$3,111 into the paper instant checking account. This deposit shortage represents 38.7% of your gross profits.

3. ORC 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.”

In addition to the above-mentioned bingo violations, your organization violated:

- “Paragraph E” of the May 22, 2025, Settlement Agreement by failing to pay Elk #177’s current 2025 charitable distributions while satisfying the distribution shortages for 2022-2023.
- “Paragraph M” of the May 22, 2025, Settlement Agreement by failing to deposit the full gross bingo profit into the designated checking account pursuant to ORC 2915.10(C).

Pursuant to Section 119.07 of the Revised Code, you are entitled to a hearing on this matter if you timely request one. If you wish to request a hearing, the Attorney General’s Office must receive the request from you within 30 days of the date you are served with this notice. You may email a request for a hearing to the Ohio Attorney General’s Charitable Law Section at kimberly.bossman@ohioago.gov. Alternatively, you may mail a request to:

Ohio Attorney General’s Office
Attn: Bingo Unit, Charitable Law Section
30 East Broad Street, 25th Floor
Columbus, Ohio 43215

In the event you timely request a hearing, you may appear in person and represent yourself or be represented by an attorney that is permitted to practice law in the State of Ohio.* At the hearing, you may present evidence and examine witnesses appearing for and against you. In lieu of attending the hearing, you may also present your position, arguments, or contentions in writing. At all times, you have the burden of demonstrating to the attorney general, by clear and convincing evidence, that you are eligible, qualified, and suitable for licensure under Chapter 2915 of the Revised Code and Agency 109:1 of the Administrative Code.

***Be advised that, under Ohio law, corporations must be represented by an attorney authorized to practice law in this State and that individuals not so authorized may not appear and represent those entities. If you have any questions regarding your status, you should contact an attorney for further guidance.**

Respectfully,

Ohio Attorney General Andy Wilson



Daniel W. Fausey
Section Chief, Charitable Law
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