



DAVE YOST

OHIO ATTORNEY GENERAL

Charitable Law Section
Office 614-466-3181
Fax 614-466-9788

May 26, 2026

Circleville Aerie No. 685, Fraternal Order of Eagles
Attn: Gerald Cotton and Doug Hartsaugh
135 E. Main St.
Circleville, Ohio 43113
EIN # 31-4283950
License: 2026 Temp. Permit No. 0243-32

Sent via certified mail to organization

Re: **Notice of Intent to Reject and Opportunity for Hearing**

Greetings Circleville Aerie No. 685:

Enclosed is a Notice of Intent to Reject your 2026 Bingo Application and Opportunity for Hearing. Please read it carefully as the information contained within concerns your bingo license. Be advised if you would like to request a hearing on this matter, **you must do so within 30 days of the service of this Notice.**

Thank you for your time and attention to this matter.

Very respectfully yours,

DAVE YOST
Ohio Attorney General

Amy Davison
Senior Assistant Attorney General
Ohio Attorney General's Office
Charitable Law Section
30 E. Broad Street, 25th Floor
Columbus, Ohio 43215
Amy.Davison@OhioAGO.gov
Certified Mail Receipt No. 9589 0710 5270 0568 8767 31

Enclosure



DAVE YOST

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May 26, 2026

Circleville Aerie No. 685, Fraternal Order of Eagles
Attn: Gerald Cotton and Doug Hartsaugh
135 E. Main St.
Circleville, Ohio 43113
EIN: 31-4183950
License No. 0243-32 (2026 Temp. Permit)

Sent via USPS certified mail and Kiteworks email to: Gerald Cotton at gcotton@midwestfab.com and Doug Hartsaugh at eaglestrustees685@gmail.com

Notice of Intent to Reject and Opportunity for Hearing

For purposes of this Notice, the terms “you” or “your” shall refer to the organization Circleville Aerie No. 685, Fraternal Order of Eagles, hereinafter “(Eagles #685)”.

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

1. O.R.C. 2915.07 prohibits any charitable organization from conducting instant bingo without a license issued under O.R.C. 2915.08.

Your organization violated this section by conducting Type III paper instant bingo without a license from September 25, 2025, until March 31, 2026. On March 31, 2026, the OAG instructed your organization to immediately cease conducting Type III paper instant bingo without the proper license.

2. O.A.C. 109:1-4-02(H)(2) states that a charitable bingo applicant or licensee “shall have a continuing duty to provide any information requested by the attorney general relating to licensing, endorsement or regulation; cooperate with the attorney general in investigations, hearings, and enforcement and disciplinary action; and comply with all conditions, restricts, requirement, orders, and ruling of the attorney general in accordance with the Ohio Revised Code and this chapter.”

On June 11, 2025 your organization entered into a SETTLEMENT AGREEMENT with the Attorney General. Term #36 of the SETTLEMENT AGREEMENT imposes limits, restrictions and probationary conditions on your bingo license. As such, your organization has violated the following:

- a. Term #20 by permitting Michael Roeder to engage in bingo conduct by endorsing nine checks from the electronic and paper instant bingo checking accounts;
 - b. Term #26 by conducting Type III paper instant bingo without a valid license (violating O.R.C. 2915.07);
 - c. Term #26 by breaching your fiduciary duties and committing other types of misconduct relating to FOE #685 through the lack of oversight by restricting your bank account access and conducting paper instant bingo without a license (O.R.C. 2915.08(F)(3) and (4)).
3. O.R.C. 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 consideration of the above captioned violations, the Attorney General has good cause to believe that you will not conduct bingo in accordance with sections 2915.07 to 2915.15 of the Revised Code or with rules promulgated thereunder.

Pursuant to Section 119.07 of the Ohio 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 of the mailing of this notice. You may email a request to the 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 there is a timely request for 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.

***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.**

Very respectfully yours,

DAVE YOST
Ohio Attorney General



Daniel W. Fausey
Section Chief
Ohio Attorney General's Office
Charitable Law Section
30 E. Broad Street, 25th Floor
Columbus, Ohio 43215
(614) 466-3181