



ANDY WILSON

OHIO ATTORNEY GENERAL

Charitable Law Section
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August 7, 2026

Fraternal Order of Eagles Aerie #444
608 King Street
Sandusky, OH 44870
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Notice of Intent to Deny the Application for a 2026 Type III Instant and Electronic Instant Bingo License

- A. For purposes of this Notice: the terms “you” or “your” shall refer to the organization “Fraternal Order of Eagles Aerie #444” (“Eagles #444”) and specific terms contained herein shall have the same meaning as defined and set forth in the provisions of Chapter 2915 of the Revised Code and Agency 109:1 of the Administrative Code.
- B. Rule 109:1-4-02 of the Administrative Code imposes upon an applicant for a license under Chapter 2915. of the Revised Code and Agency 109:1 of the Administrative Code “the burden of demonstrating to the attorney general, by clear and convincing evidence, that the applicant is eligible, qualified, and suitable to be granted and retain the license or endorsement for which application is made under the applicable standards and requirements of Chapter 2915. of the Revised Code and Agency 109:1 of the Administrative Code.”
- C. The Ohio Attorney General’s Office hereby informs you that you have not met your burden of establishing by clear and convincing evidence your eligibility, qualification and suitability for bingo licensure. Therefore, pursuant to Chapter 2915 of the Ohio Revised Code and agency 109:1 of the Administrative Code, the Attorney General intends to deny your 2026 Type III Instant and Electronic Instant Bingo License Application (“Application”) based on the following circumstances:
 - 1. On or about May 13, 2026, two individuals who were not members of Eagles #444 or invited guests of a member of your organization played one of your electronic instant bingo machines.
 - 2. On or about May 13, 2026, one of your bingo game operators and/or employees purchased instant bingo tickets or cards at your premises.
 - 3. You are the holder of current D-4 and D-6 liquor permits, Permit #27940110445. The Ohio Division of Liquor Control issued the permits on February 2, 2026 and they expire on February 1, 2027.
- D. In view of the foregoing, the Attorney General’s Office intends to deny your Type III Electronic Instant Bingo License Application because you have not met your burden of

demonstrating to the attorney general, by clear and convincing evidence, that you are eligible, qualified, and suitable to be granted a license under the applicable standards and requirements of Chapter 2915. of the Revised Code and agency 109:1 of the Administrative Code and based on the following reasons:

1. Revised Code Section 2915.13(A)(2) requires a fraternal organization to “limit[] the sale of instant bingo or electronic instant bingo to its own premises and to its own members and invited guests.” In violation of Revised Code Section 2915.13(A)(2), you allowed persons other than your own members and/or invited guests of a member of your organization to play electronic instant bingo on your premises.
2. Revised Code Section 2915.091(A)(12)(a) prohibits a charitable organization from “allow[ing] instant bingo tickets or cards to be sold to bingo game operators at a premises at which the organization sells instant bingo tickets or cards or to be sold to employees of a D permit holder who are working at a premises at which instant bingo tickets or cards are sold.” In violation of Revised Code Section 2915.091(A)(12)(a) you allowed a bingo game operator and/or employee to purchase instant bingo tickets or cards at your premises where you hold a D liquor permit.
3. 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.” In view of the foregoing circumstances, 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 any rule it has adopted.

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.**

Very respectfully yours,

D. ANDREW WILSON
Ohio Attorney General



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