



DAVE YOST

OHIO ATTORNEY GENERAL

Charitable Law Section
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October 17, 2025

Rayven's Acts Of Kindness
2124 West Prospect Road
Ashtabula, OH 44004
Email: rayvensactsofkindness@gmail.com

Notice of Intent to Deny the Application for 2025 Type I Bingo and Type II & Type III Instant Bingo License

- A. For purposes of this Notice: the terms “you” or “your” shall refer to the organization “Rayven’s Acts of Kindness” 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 Ohio 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 Revised Code and agency 109:1 of the Administrative Code, the Ohio Attorney General intends to deny your 2025 Type I Bingo and Type II & Type III Instant Bingo License application based on the following circumstances:
 - 1. You identify on your license application accounts at Key Bank and Lakeview Federal Credit Union as the financial institutions where you will deposit bingo proceeds. However, it appears you are depositing non-bingo revenue into those accounts, thereby co-mingling those funds with your bingo revenue.
 - 2. You identify on your license application accounts at Key Bank and Lakeview Federal Credit Union as the financial institutions where you will deposit bingo proceeds. However, you are paying organization expenditures from one or both accounts that do not qualify as expenses for which you may use bingo proceeds to satisfy.
 - 3. Over the last year, you have made a number of purchases of traditional and instant bingo supplies from Zeerow Distributors, Amazon, and eBay. None of these entities are licensed distributors authorized to sell bingo supplies in Ohio.

4. You conduct online “spin,” “spinners,” or “spinning” and football squares contests whereby participants pay, through consideration denominated as donations, for a chance to win a prize, thereby constituting a scheme of chance and/or a game of chance.
5. You identify Ashtabula County, Ohio as your principal place of business. However, you have conducted traditional and/or instant bingo while on one or more bus trips to the Seneca Allegany Casino in Salamanca, New York.
6. You identify Darren England as a Primary Bingo Game Operator on your license application. On February 5, 2001, Darren England was convicted of Theft, a 5th degree Felony, in Painesville Municipal Court.

D. In view of the foregoing, the Ohio Attorney General’s Office intends to deny your 2025 Type I Bingo and Type II & Type III 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 2915.10(C) requires the gross profit from each bingo session or game to “be deposited into a checking account devoted exclusively to the bingo session or game.” In violation of Section 2915.10(C), you are depositing non-bingo revenue into accounts you identified as ones where you deposit your bingo revenue, thereby co-mingling those funds.
2. Revised Code Section 2915.09(A)(2) requires charitable organizations to use all of the gross receipts for the paying of prizes and the expenses itemized in that Section and those defined in Section 2915.01(GG). In violation of Sections 2915.01(GG) and 2915.09(A)(2), you have paid for expenditures that do not qualify as prizes or expenses out of the accounts you identified as the ones where you deposit your bingo revenue.
3. Revised Code Section 2915.09(C)(10) prohibits a charitable organization from purchasing “bingo supplies from any person except a distributor issued a license under section 2915.081 of the Revised Code.” In violation of Section 2915.09(C)(10), on numerous occasions you purchased bingo supplies from Zeerow Distributors, Amazon, and eBay despite the fact that those entities are not licensed distributors authorized to sell bingo supplies in Ohio.
4. Revised Code Section 2915.08(F)(2)(a) authorizes the Attorney General to deny a license if an organization violates Section 2915.02(A)(2) of the Revised Code. Revised Code Section 2915.08(A)(2) prohibits any person from establishing, promoting, or operating or knowingly engaging “in conduct that facilitates any game of chance conducted for profit or any scheme of chance.” In violation of

Revised Code Sections 2915.08(A)(2) & (F)(2), you conduct online “spin,” “spinners,” or “spinning” and football squares contests whereby participants pay, through consideration denominated as donations, for a chance to win a prize, thereby constituting a scheme of chance and/or a game of chance conducted for profit.

5. Revised Code Section 2915.08(C)(3) requires organizations to conduct bingo “within the county in which the principal place of business of the applicant is located.” Although you identified Ashtabula County, Ohio as your principal place of business, you have conducted traditional and/or instant bingo outside that location while on one or more bus trips to the Seneca Allegany Casino in Salamanca, New York.
6. Revised Code Section 2915.09 prohibits a charitable organization from permitting “any person whom the charitable organization knows, or should have known, has been convicted of a felony or gambling offense in any jurisdiction to be a bingo game operator.” In violation of Section 2915.09 of the Revised Code, your license application identifies Darren England, a person convicted of a felony and/or a gambling offense, as a Primary Bingo Game Operator.
7. 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 the 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, including non-profit 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,

DAVE YOST
Ohio Attorney General



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Section Chief
Ohio Attorney General's Office
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