



**DAVE YOST**

OHIO ATTORNEY GENERAL

Charitable Law Section  
Office 614-466-3181  
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October 26, 2022

The Stages Family Inc  
14511 Union Rd  
Laurelville, OH 43135

Certified Mail # 7011 3500 0000 6930 0814

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

Bingo Game Operators:

Enclosed is a Notice of Intent to Reject and Opportunity for Hearing. Please read it carefully as the information contained within concerns The Stages Family Inc.'s bingo license. Be advised if you would like to request a hearing on this matter, **you must do so within 30 days of the mailing of this Notice.**

Thank you for your time and attention to this matter.

Very respectfully yours,

DAVE YOST  
Ohio Attorney General

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

Enclosure

CC: Liza Dietrich  
Associate Assistant Attorney General  
Charitable Law Section  
Telephone: (614) 728-1819  
[Liza.Dietrich@OhioAGO.gov](mailto:Liza.Dietrich@OhioAGO.gov)



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OHIO ATTORNEY GENERAL  
CHARITABLE LAW SECTION

IN THE MATTER OF:

The Stages Family Inc  
14511 Union Rd  
Laurelville, OH 43135

October 26, 2022

**NOTICE OF INTENT TO REJECT AND  
OPPORTUNITY FOR HEARING**

**INTRODUCTION & JURISDICTION**

Notice is hereby given that, pursuant to Ohio Revised Code (“R.C.”) Section 2915.08(F)(2) the Ohio Attorney General intends to reject The Stages Family Inc. (“Stages Family”) the 2022 Bingo License Application. In accordance with the provisions of R.C. Sections 119.06 and 119.07, you are hereby notified that you are entitled to a hearing.

Stages Family first incorporated with the Ohio Secretary of State in 2018. Stages Family was first issued bingo license no. 1007-45 on May 25, 2021. The organization has been authorized to conduct bingo since it was licensed.

On or about December 31, 2021, Stages Family filed a 2022 Bingo license application. Stages Family was issued a 2022 Temporary Permit on January 4, 2022.

The issuance of the temporary permit does not grant any rights to Stages Family other than those granted in R.C. 119.06 and does not prohibit the Attorney General from rejecting Stages Family’s application. R.C. 2915.08(A)(3).

On or about May 15, 2021, the Stages Family’s tax-exempt status as a 501(c)(3) organization was automatically revoked by the Internal Revenue Service (“IRS”). The revocation was posted by the IRS on August 8, 2021. As of October 2022, Stages Family has not been reinstated as a tax-exempt organization.

Due to the revocation of Stages Family’s tax-exempt status, the organization is not a charitable organization as defined in R.C. Section 2915.01(H), and is therefore not eligible to obtain a bingo license or to conduct bingo. R.C. Section 2915.07; R.C. Section 2915.08.

**Notice is hereby given that the Attorney General intends to reject the 2022 Bingo License Application submitted by Stage's Family for the following reasons:**

**COUNT 1**

Stages Family does not meet the statutory definition of a "charitable organization" described in R.C. Section 2915.01(H) and is therefore not eligible to obtain a bingo license pursuant R.C. Section 2915.08. Furthermore, because Stages Family is not a charitable organization, any bingo advertised or conducted by Stages Family violates R.C. Section 2915.07(A).

Only a "charitable organization" may apply for a license to conduct bingo and, if licensed, actually conduct bingo. R.C. Section 2915.08(A)(1); R.C. Section 2915.07(A). A charitable organization is one that is exempt from federal income taxation under subsection 501(a) and described in subsection 501(c)(3) of the Internal Revenue Code; or a volunteer rescue service organization, volunteer firefighter's organization, veteran's organization, fraternal organization, or sporting organization that is exempt from federal income taxation under subsection 501(c)(4), (c)(7), (c)(8), (c)(10) or (c)(19) of the Internal Revenue Code. R.C. Section 2915.01(H).

On or about May 15, 2021, the Stages Family's tax-exempt status as a 501(c)(3) organization was automatically revoked by the IRS. As of October 2021, Stages Family's tax-exempt status has not been reinstated. Stages Family is therefore not currently a tax-exempt organization.

Because Stages Family is no longer tax-exempt, the organization does not meet the statutory definition of a "charitable organization" and is neither eligible to obtain a bingo license, nor is it eligible to conduct bingo.

**LAWS AND RULES**

R.C. Section 2915.08(A)(1) states, "Except as otherwise permitted under section 2915.092, annually before the first day of January, a *charitable organization* that desires to conduct bingo, shall apply to the attorney general..." (emphasis added).

R.C. Section 2915.01(H) defines "charitable organization" as an organization that is exempt from federal income taxation under subsection 501(a) and described in subsection 501(c)(3) of the Internal Revenue Code; or a volunteer rescue service organization, volunteer firefighter's organization, veteran's organization, fraternal organization, or sporting organization that is exempt from federal income taxation under subsection 501(c)(4), (c)(7), (c)(8), (c)(10) or (c)(19) of the Internal Revenue Code.

R.C. Section 2915.08 (F)(2) states "If any of the following applies to an organization, the attorney general may refuse to grant a license to the organization, may revoke or suspend the organization's license, or may place limits, restrictions, or probationary conditions on the organization's license for a limited or indefinite period, as determine by the attorney general:

- (a) The organization fails or has failed at any time to meet any requirement of section 109.26, 109.31, or 1716.02, or sections 2915.07 to 2915.15 of the Revised Code, or violates or has violated any provision of sections 2915.02 or 2915.07 to 2915.13 of the Revised Code or any rule adopted by the attorney general pursuant to this chapter.

### HEARING PROCEDURES

Pursuant to the Administrative Procedure Act, R.C. Section 119.07, an Applicant who has been issued a Notice of Intent to Reject and Opportunity for Hearing may request a hearing before the Charitable Law Section of the Office of the Ohio Attorney General within thirty (30) days of the time of the mailing of the Notice. **The request for a hearing must be received by the Charitable Law Section of the Office of the Ohio Attorney General within thirty (30) days of the mailing of this Notice.**

The Applicant may appear in person, by his or her attorney, or by such other representative who is permitted to practice before the Ohio Attorney General's Office. The Applicant may present evidence and examine witnesses appearing for and against the Applicant or may present a position, argument and contentions in writing in lieu of appearing at the hearing. A hearing may be continued on motion of either the Attorney General or the Applicant, if the Attorney General so approves.

Failure to request a hearing within the time prescribed may result in the Attorney General issuing an adjudication order regarding the application without conducting a formal hearing in the matter.

Requests for a hearing upon the Notice of Intent to Reject and Opportunity for Hearing must be submitted to the undersigned at the address listed below.

Very respectfully yours,

DAVE YOST  
ATTORNEY GENERAL



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Daniel W. Fausey  
Section Chief  
Ohio Attorney General's Office  
Charitable Law Section  
30 E. Broad Street, 25th Floor  
Columbus, Ohio 43215-5148  
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