ANDY WILSON
OHIO ATTORNEY GENERAL

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

SETTLEMENT AGREEMENT

A. This SETTLEMENT AGREEMENT is made by and between the Fraternal Order of Eagles, Aerie #444 ("Eagles #444"), located at 608 King Street, Sandusky, Ohio 44870, and the Ohio Attorney General ("Attorney General") for the purpose of resolving issues regarding Eagles #444's charitable bingo operations. Together, the Attorney General and Eagles #444 are referred to herein as "the Parties." For purposes of this Settlement Agreement, 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. Additionally, the terms "you" or "your" shall refer to the Fraternal Order of Eagles, Aerie #444.

The Parties recognize and acknowledge that:

1. The Attorney General is responsible for the administration and enforcement of Ohio Revised Code (O.R.C.) Chapter 2915 ("Chapter 2915"), and the administrative rules adopted thereunder, which regulate the conduct of charitable bingo in the State of Ohio.

2. The Attorney General has authority to refuse to grant a bingo license to a charitable organization, may revoke or suspend a charitable organization's license, or may place limits, restrictions, or probationary conditions on the charitable organization's license for a limited or indefinite period.

3. The Attorney General may also impose a civil fine on an organization licensed or permitted under this chapter for failure to comply with any restrictions, limits, or probationary conditions on its license, and for failure to comply with this chapter or any rule adopted under this chapter.

4. On November 3, 2025, the Attorney General received a complaint alleging that on October 26, 2025 an underage male played one of your electronic instant bingo machines. By letter dated November 20, 2026, our office warned you that "Ohio Revised Code Section 2915.14(B)(7) prohibits "[a]ny person the charitable organization knows, or should have known, to be under eighteen years of age to play electronic bingo." The letter further warned that "If your organization permits an underage person to play electronic bingo, that conduct is strictly prohibited by statute and a violation of such could directly impact your licensing status."

5. On December 6, 2025, Eagles #444 submitted an application for a Type III Instant Bingo and Type III Electronic Instant Bingo License. The Attorney General issued a temporary permit on December 15, 2025 while it reviewed the organization's license application.

6. 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.

7. On or about May 13, 2026, one of your bingo game operators and/or employees purchased instant bingo tickets or cards at your premises.

8. On August 7, 2026, the Attorney General received a complaint alleging that a minor played one of your organization's electronic instant bingo machines. The Attorney General has been unable to substantiate the allegation.

9. 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.

10. On December 7, 2023, the Ohio Liquor Control Commission ("Commission") found you in violation of Revised Code Section 4303.17(A) for selling alcohol to a non-member. The Commission ordered your liquor permit suspended for three days, but it gave you option of paying a $300 forfeiture in lieu of serving the suspension.

B. On June 23, 2026, the Attorney General's Office issued a Notice of Intent ("NOI") to deny your organization's Type III Instant Bingo and Electronic Instant Bingo License Application 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 Eagles #444 will not conduct bingo in accordance with Revised Code Sections 2915.07 to 2915.15 or with any rule it has adopted.

C. NOW THEREFORE, in consideration of the mutual promises herein expressed, and with intent to be legally bound, the parties agree as follows:

1. Eagles #444 agrees to pay a civil penalty of **$5,000** (five thousand dollars and no cents). This payment shall be made exclusively from Eagles #444's general operating account;

2. Upon execution of this Settlement Agreement, Eagles #444 shall pay the **$5,000** (five thousand dollars and no cents) civil penalty by check, cashier's check, money order, or wire transfer (for wire transfer please contact CharitableFundsAccounting@OhioAGO.gov), payable to "**Treasurer of the State of Ohio**" as Custodian for the Ohio Attorney General and mailed to:

   Ohio Attorney General
   Charitable Law Section
   30 East Broad Street, 25th Floor
   Columbus, Ohio 43215
   RE: Fraternal Order of Eagles, Aerie #444

   The civil penalty amount shall be deposited in accordance with Revised Code Section 109.112 into the Attorney General Office's Court Order and Settlement Fund for transfer, upon the Attorney General's request, to the Charitable Law Fund established under Revised Code Section 109.32;

3. If Eagles #444 fails to comply with the payment requirements above, the Attorney General shall certify the unpaid balance of the payment to the Ohio Attorney General's Collections Enforcement Section ("Collections") for collection. In the event of certification, Eagles #444 agrees to pay additional collection costs assessed by Collections in accordance with Revised Code Section 131.02(A) equal to the amounts charged pursuant to Revised Code Sections 109.08 & 109.081 for the cost of certification and the use of Special Counsel for the collection of the debt. Interest shall also be charged upon certification in accordance with Revised Code Sections 131.02(D). Nothing in this paragraph should be construed to limit the Attorney General's discretion to pursue any other available remedy;

4. Eagles #444 agrees that it will not allow the following conduct:

   i. persons other than its own members and/or invited guests of a member to play electronic instant bingo on its premises;
   ii. persons under the age of eighteen (18) to play instant bingo or electronic instant bingo; or
   iii. its bingo game operators and/or employees to purchase instant bingo tickets or cards;

5. Eagles #444 agrees to comply with all state and federal laws relating to charitable gaming, and to fully cooperate with all state and federal authorities conducting investigations of Eagles #444's charitable gaming operations;

6. Eagles #444 agrees to comply with the requirements of Revised Code Chapter 2915 and any rules adopted thereunder;

7. Eagles #444 agrees to comply with the requirements of Revised Code Chapter 1716 (the Ohio Charitable Organizations Act), and any rules adopted thereunder;

8. Eagles #444 agrees to comply with the requirements of Revised Code Sections 109.23 *et. seq.* (the Charitable Trust Act), and any rules adopted thereunder;

9. Eagles #444 agrees that if it fails to comply with the requirements in Paragraphs 1 through 8 above, such actions could result in the summary suspension of any bingo license it may have, the rejection of any pending bingo license application, or the Attorney General pursuing other corrective action as provided in Revised Code Chapter 2915 or the rules adopted thereunder;

10. By executing this Settlement Agreement, Eagles #444 agrees that it shall serve as a withdrawal of its Request for Hearing on the NOI.

11. The Attorney General may consider the facts giving rise to this agreement when determining whether to issue or deny future bingo licenses to Eagles #444 and may revoke, suspend, deny, place limitations or probationary terms on Eagles #444's Charitable Bingo License or application based on those facts;

12. Eagles #444 agrees that any evidence of a violation of this Settlement Agreement shall be *prima facie* evidence of Eagles #444's violation of the applicable laws related to charitable gaming, Revised Code Chapters 109, 1716 or 2915, or any administrative rule adopted thereunder, in any subsequent action or proceeding brought by the Attorney General;

13. The Attorney General has sole authority to determine whether Eagles #444 has fully complied with this Settlement Agreement. Should the Attorney General determine that Eagles #444 has failed to comply with this Settlement Agreement, Eagles #444 shall be subject to the penalties included in Revised Code Chapter 2915 and any rules adopted thereunder;

14. This Settlement Agreement is binding upon the parties, any and all successors, assigns, subsidiaries, agents, employees, or representatives of the parties or any other affiliates. Any breach of this Settlement Agreement by Eagles #444 will discharge the Attorney General from any obligations under the terms of this Settlement Agreement, but will not discharge Eagles #444 from any obligation it has under this Settlement Agreement;

15. By signing this Settlement Agreement, the Attorney General is not waiving any rights he has to conduct further investigations of Eagles #444 and to initiate an action against Eagles #444 for further violations of Revised Code Chapters 109, 1716 or 2915, or any administrative rule adopted thereunder;

16. This Settlement Agreement may be modified in writing by the parties. Modifications are at the sole discretion of the Attorney General;

17. The parties have read and understand this Settlement Agreement and have entered into the same knowingly, voluntarily, and with the opportunity to gain advice of counsel;

18. This Settlement Agreement supersedes any and all prior agreements between the Parties with respect only to the matters described herein and shall not affect any prior Settlement Agreement except as set forth herein;

19. This Settlement Agreement is entered into by both parties and may be executed in counterparts or facsimiles, each of which shall be deemed an original, but all of which shall constitute one and the same instrument. It shall be considered binding and effective upon the date of the last signature of all requisite parties and individuals;

20. The parties to this Settlement Agreement have either executed it or caused it to be executed by their duly authorized representatives as evidenced by the signatures below:

Fraternal Order of Eagles, Aerie #444

Keli Clark — 10-14-26
Date

By: Keli Clark (Print Name)

Its: President (Organizational Title)

Linda J. Burkett — 10/14/26
Date

By: Linda J. Burkett (Print Name)

Its: Secretary (Organizational Title)

OHIO ATTORNEY GENERAL ANDY WILSON

By: _____ — 10/19/26
Daniel W. Fausey
Charitable Law Section Chief
Date