



ANDY WILSON
OHIO ATTORNEY GENERAL

Charitable Law Section
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SETTLEMENT AGREEMENT

This SETTLEMENT AGREEMENT is made by and between Amvets Post #120 (AMVETS #120), located at 605 S. Main St., Franklin, Ohio 45005 (EIN# 31-1336957) and the Attorney General of Ohio ("Attorney General"), for the purpose of resolving issues regarding AMVETS #120's charitable bingo operations. Together, the Attorney General and AMVETS #120 are referred to hereinafter as "the parties."

1. The Attorney General is responsible for the administration and enforcement of Ohio Revised Code Section 2915 ("ORC 2915 *et seq.*"), and the Ohio Administrative Code rules adopted thereunder, which regulate the conduct of charitable bingo in the State of Ohio.
2. The Attorney General is responsible for the enforcement of Ohio Revised Code Section 1716 ("ORC 1716 *et seq.*"), and the Ohio Administrative Code rules adopted thereunder, which requires, among other things, that every charitable organization, unless exempt, who intends to solicit contributions in this state by any means or have contributions solicited in this state on its behalf by any person or entity, prior to engaging in any solicitation, shall file a registration statement and other documentation with the Attorney General.
3. The Attorney General is responsible for the enforcement of Ohio Revised Code Section 109 ("ORC 109.23-33"), and the Ohio Administrative Code rules adopted thereunder, and, in particular, ORC 109.24, which reads, "[t]he Attorney General shall institute and prosecute a proper action to enforce the performance of any charitable trust and to restrain the abuse of it".
4. The Attorney General has authority to refuse to grant a bingo license to an 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.
5. AMVETS #120 is a 501(c)(19) tax exempt organization with the Internal Revenue Service ("IRS"). AMVETS #120 is registered with the Attorney General as required under ORC Sections 1716 and 109.
6. During all relevant times associated with this agreement AMVETS #120 has held a Type III paper and electronic instant charitable bingo license/permit # 0443-27. AMVETS #120 submitted a 2026 bingo renewal application on December 30, 2025 and was granted a Type III paper and electronic instant bingo permit on January 2, 2026.

7. The Attorney General conducted annual financial inspections of AMVETS #120 for the bingo fiscal years 2024-2025.
8. As a result of the inspection, AMVETS #120 had paper instant bingo deposit shortages of \$1,545 for 2024 and an overage of \$3,736 for 2025.
9. As a result of the inspection, AMVETS #120 had electronic instant deposit shortages of \$11,705 for 2024 and \$41,103 for 2025.
10. AMVETS #120 had several unallowable expenses paid from the bingo checking accounts as reflected on their 2024-2025 financial inspection.
11. AMVETS #120 permitted bingo game operators to play electronic instant bingo in violation of O.R.C. 2915.14(B)(11).

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

- A. AMVETS #120 shall pay a Civil Penalty Amount of \$5,000 (five thousand dollars and no cents). Upon execution of this SETTLEMENT AGREEMENT the Attorney General agrees to STAY \$5,000 (five thousand dollars and no cents) of the Civil Penalty Amount upon compliance of the terms of this SETTLEMENT AGREEMENT. The Attorney General has sole authority to determine whether AMVETS #120 has fully complied with this SETTLEMENT AGREEMENT. Should the Attorney General determine that AMVETS #120 has failed to comply with this SETTLEMENT AGREEMENT, the Civil Penalty Amount shall be payable upon demand;
- B. If AMVETS #120 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, AMVETS #120 agrees to pay additional collection costs assessed by Collections in accordance with Ohio Revised Code Section 131.02(A) equal to the amounts charged pursuant to Ohio Revised Code Sections 109.08 and 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 Ohio Revised Code Section 131.02(D). Nothing in this paragraph should be construed to limit the Attorney General's discretion to pursue any other available remedy;
- C. AMVETS #120 agrees that if the previously stayed Civil Penalty becomes due all money used to fulfill the terms of this SETTLEMENT AGREEMENT shall come exclusively from AMVETS #120's general operating account. Money collected under paragraph A above will be allocated as charitable distributions;

- D. Upon execution of this agreement, AMVETS #120 agrees to implement financial accounting logs requiring two people to count and verify any collection, withdrawal or deposit of bingo monies on a daily, weekly and monthly basis;
- E. AMVETS #120 agrees to develop and provide a copy of internal controls specifically detailing who, how, and when the organization will comply with deposit requirements pursuant to Ohio Revised Code 2915.10(C) within 30 (thirty) days of executing this agreement.

O.R.C. 2915.10(C) requires the gross profit from each bingo session, "be deposited into a checking account devoted exclusively to the bingo session or game. Payments for allowable expenses incurred in conducting the bingo session or game and payments to recipients of some or all of the net profit of the bingo session or game shall be made only by checks or electronic fund transfers drawn on the bingo session or game account";

- F. AMVETS #120 agrees that if it fails to comply with any requirements in Paragraphs A through E above, AMVETS #120 shall pay the stayed amount of the civil penalty in paragraph B above;
- G. AMVETS #120 agrees that if it fails to comply with requirements in Paragraph A through E above, it will surrender its Charitable Bingo License and/or Charitable Bingo Temporary License to the Attorney General as well as request, in writing, the withdrawal of any Charitable Bingo License Applications it has pending or refrain from initiating an application for the next two license years;
- H. AMVETS #120 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 AMVETS #120's charitable gaming operations;
- I. AMVETS #120 agrees to comply with the requirements of ORC 2915 *et seq.*, and any Ohio Administrative Code rules adopted thereunder;
- J. AMVETS #120 agrees to comply with the requirements of ORC 1716 *et seq.* (the Ohio Charitable Organizations Act), and any Ohio Administrative Code rules adopted thereunder;
- K. AMVETS #120 agrees to comply with the requirements of ORC 109.23-109.33 (the Charitable Trust Act), and any Ohio Administrative Code rules adopted thereunder;
- L. The Attorney General may consider the facts stated above when issuing future charitable bingo licenses to AMVETS #120.
- M. AMVETS #120 agrees that any evidence of a violation of this SETTLEMENT AGREEMENT shall be *prima facie* evidence of AMVETS #120's violation of the applicable laws related to charitable gaming, ORC 2915 *et seq.*, ORC 1716 *et seq.*, ORC 109.23-109.33, or any Ohio

109.23-109.33, or any Ohio Administrative Code rules adopted thereunder, in any subsequent action or proceeding brought by the Attorney General;

- N. 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 AMVETS #120 will discharge the Attorney General from any obligations under the terms of this SETTLEMENT AGREEMENT, but will not discharge AMVETS #120 from any obligation it has under this SETTLEMENT AGREEMENT;
- O. By signing this SETTLEMENT AGREEMENT, the Attorney General is not waiving any rights he has to conduct further investigations of AMVETS #120 and to initiate an action against AMVETS #120 for further violations of ORC 2915 *et seq.*, ORC 1716 *et seq.*, ORC 109.23-33, or any Ohio Administrative Code rules adopted thereunder;
- P. This SETTLEMENT AGREEMENT may be modified in writing by the parties. Modifications are at the sole discretion of the Attorney General;
- Q. 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;
- R. This SETTLEMENT AGREEMENT is a limit, restriction, or probationary condition on Amvets #20's 2026, and if submitted, 2027 charitable bingo license or temporary permit.
- S. This SETTLEMENT AGREEMENT supersedes any and all prior agreements between the Parties; and
- T. 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.

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:

AMVETS #120

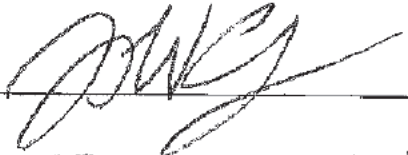
Rick Dillon

Date

10/5/26

By: Rick Dillon (Print Name)

Its: Commander (Organizational Title)

 Date 10/5/26

By: James W. Kibore (Print Name)

Its: 1st Vice commander (Organizational Title)

OHIO ATTORNEY GENERAL ANDY WILSON

By:  Date 10/13/26
Daniel W. Fausey
Section Chief, Charitable Law Section