



DAVE YOST

OHIO ATTORNEY GENERAL

Charitable Law Section
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SETTLEMENT AGREEMENT

This SETTLEMENT AGREEMENT is made by and between Loyal Order of Moose, Inc. ("LOOM #1533"), located at 11044 Lake St., Lakeview, OH 43331 and the Attorney General of Ohio ("Attorney General"), for the purpose of resolving issues regarding LOOM #1533's charitable bingo operations. Together, the Attorney General and LOOM #1533 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 charitable 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. LOOM #1533 is an I.R.C. 501(c)(8) tax exempt organization with the Internal Revenue Service ("IRS"). LOOM #1533 is registered with the Attorney General as required under ORC Sections 1716 and 109.
6. LOOM #1533 was first issued bingo license no. 0176-38 in 2020.
7. On or about December 11, 2025, LOOM #1533 filed a 2026 bingo license application. The Office issued LOOM #1533 a temporary 2026 Charitable Bingo License on December 12, 2025 for instant and electronic instant bingo conducted other than at a bingo session. The Office has not yet issued a permanent Charitable Bingo License for LOOM #1533 for 2026.

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8. A Loyal Order of Moose Territory Manager conducted a visit to LOOM #1533 for a routine audit of the Lodge's books and finances. During this audit, Territory Manager noticed payments from Hardin County Genealogy Society on LOOM #1533's bank statements, which appeared unusual for a Lodge to receive such a donation. Territory Manager researched the account and realized these payments were improper.
9. Hardin County Genealogy Society ("Genealogy Society") is an Ohio nonprofit corporation and I.R.C. 501(c)(3) tax-exempt organization and had been a contracted charity for LOOM #1533 continuously since at least 2018, and therefore it was contractually entitled to receive the charitable portion of LOOM #1533's bingo revenue.
10. The Territory Manager researched the issue and learned that the Genealogy Society had, for years, been returning a portion of its share of LOOM #1533's bingo revenue back to LOOM #1533.
11. Upon receiving a report of the payments from the Genealogy Society to LOOM #1533, the Office conducted an independent investigation ("the Investigation").
12. Kickbacks received from Hardin County Genealogy Society were approximately 75% of each payment sent to this organization from December 31, 2018 to December 18, 2023, totaling \$121,037.26.
13. These payments were deposited in LOOM #1533's general account fund.
14. The payment of \$49,864.00 from December 18, 2023 was returned by LOOM #1533 to the Hardin County Genealogy Society on February 19, 2024.
15. LOOM #1533 has replaced the Hardin County Genealogy Society with Indian Lake Local Schools as its contracted charity for 2025.
16. The Office regards the foregoing conduct as a breach of fiduciary duties under ORC 109.23 and 1716.15. The Office further regards the foregoing conduct as violating ORC 2915.101 and ORC 2915.13.

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

- A. LOOM #1533 will pay \$71,173.26 to the Attorney General's Office as restitution to be deposited in accordance with R.C. 109.112 into the AGO Court Order and Settlement Fund for transfer, upon the Attorney General's request, to the Charitable Law Distributions Fund for distribution for charitable purposes at the sole discretion of the Attorney General;
- B. LOOM #1533 will pay \$3,000.00 to the Attorney General's Office as civil penalties to be deposited in accordance with R.C. 109.112 into the AGO Court Order and Settlement Fund for transfer, upon the Attorney General's request, to the Charitable Law Fund established under R.C. 109.32;

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- C. All Board Members shall complete the Office's Charitable University within 90 days of execution of this Agreement, and provide evidence of completion to the Office;
- D. All Board Members shall attend the Office's Bingo Training within 90 days of execution of this Agreement, and provide evidence of completion to the Office;
- E. LOOM #1533 and all Board Members hereby agree to cooperate with any future investigation related to LOOM #1533 or persons and entities involved with LOOM #1533, conducted by the Office;
- F. If LOOM #1533 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, LOOM #1533 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;
- G. LOOM #1533 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 LOOM #1533's charitable gaming operations;
- H. LOOM #1533 agrees to comply with the requirements of ORC 2915 *et seq.*, and any Ohio Administrative Code rules adopted thereunder;
- I. LOOM #1533 agrees to comply with the requirements of ORC 1716 *et seq.* (the Ohio Charitable Organizations Act), and any Ohio Administrative Code rules adopted thereunder;
- J. LOOM #1533 agrees to comply with the requirements of ORC 109.23-109.33 (the Charitable Trust Act), and any Ohio Administrative Code rules adopted thereunder;
- K. The Attorney General will issue LOOM #1533 its Bingo License for 2025 and will not consider the facts giving rise to this SETTLEMENT AGREEMENT when issuing charitable bingo licenses to LOOM #1533 in the future unless LOOM #1533 fails to comply with any provision of this SETTLEMENT AGREEMENT. In that event, the Attorney General may consider the facts giving rise to this SETTLEMENT AGREEMENT when determining whether to issue or deny future bingo licenses to LOOM #1533 and may move to revoke, suspend, deny, place limitations or probationary terms on LOOM #1533's Charitable Bingo License or application based on those facts;
- L. LOOM #1533 agrees that any evidence of a violation of this SETTLEMENT AGREEMENT shall be *prima facie* evidence of LOOM #1533's violation of the applicable laws related to charitable gaming, ORC 2915 *et seq.*, ORC 1716 *et seq.*, ORC 109.23-

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

- M. 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 LOOM #1533 will discharge the Attorney General from any obligations under the terms of this SETTLEMENT AGREEMENT, but will not discharge LOOM #1533 from any obligation it has under this SETTLEMENT AGREEMENT;
- N. By signing this SETTLEMENT AGREEMENT, the Attorney General is not waiving any rights he has to conduct further investigations of LOOM #1533 and to initiate an action against LOOM #1533 for further violations of ORC 2915 *et seq.*, ORC 1716 *et seq.*, ORC 109.23-33, or any Ohio Administrative Code rules adopted thereunder;
- O. This SETTLEMENT AGREEMENT may be modified in writing by the parties. Modifications are at the sole discretion of the Attorney General;
- P. 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;
- Q. This SETTLEMENT AGREEMENT supersedes any and all prior agreements between the Parties;
- R. This SETTLEMENT AGREEMENT is a limit, restriction, or probationary condition on LOOM #1533's charitable bingo license; and
- S. 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. The parties warrant that the individuals executing this Settlement Agreement on their behalf possess the capacity and authority to do so.

LOOM #1533


_____ Date 1-26-26

By: DWAYNE BROWN (Print Name)

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Its: ADMINISTRATOR, LOOM 1533 (Organizational Title)

B. C. _____ Date 1/27/2026

By: BRIAN CHEW (Print Name)

Its: TREASURER, LOOM 1533 (Organizational Title)

OHIO ATTORNEY GENERAL DAVE YOST

By: D. W. Fausey _____ Date 1/27/26
Daniel W. Fausey
Section Chief, Charitable Law Section