

# Financial Policy & Procedure Statement G



### **BINGO**

Over the years, parishes and schools have used numerous types of fund-raising activities to help finance programs that enable them to carry out their mission. These include such things as building fund drives, bazaars, candy or magazine sales and golf outings.

In recent years many parishes have conducted Bingo games as their principal fund-raising activity. Unlike other types of fund-raising, however, operating Bingo games carries with it several legal and reporting responsibilities.

Bingo games are licensed by the State of Ohio. The games are under the scrutiny of the Attorney General, the U.S. Internal Revenue Service and local law enforcement agencies. Numerous rules and regulations have been established, detailed reports required, and surprise or undercover audits and investigations are always possible. The detailed information submitted to the Attorney General is available to various agencies as well as the general public. This information is looked at and is used for various purposes.

For these reasons, this Financial Policy and Procedure Statement goes into considerable detail to provide (1) the information needed to comply with Federal and State requirements and (2) suggested procedures to establish, operate and control Bingo games. These requirements and suggested procedures are appended to this Statement as follows:

STATEMENT G-1 - Bingo Legal Requirements

STATEMENT G-2 - Ohio Revised Code, Chapter 2915: Gambling

STATEMENT G-3 - Charitable Bingo Game Fact Sheet

STATEMENT G-4 - Planning and Operating a Bingo Game

STATEMENT G-5 - Internal Controls over Bingo Operations

STATEMENT G-6 - IRS Reporting and Withholding Taxes

Those parishes and schools that operate or plan to operate Bingo games should familiarize themselves with these statements.

While these statements contain considerable information, the following points need to be stressed:

- Those responsible for the administration of the parish or school MUST personally stay on top of the Bingo game or appoint someone else to independently monitor the game on a continuing basis and report back to them.
- Substantial cash is handled at all Bingo games and the type of INTERNAL CONTROLS suggested in Statement G-5 should be adopted to prevent irregularities.
- The Attorney General's office, the IRS and local law enforcement agencies are WATCHING all Bingo games and can hold an organization pecuniary liable for misappropriated funds and can suspend or cancel a license to operate a Bingo game.
- It is illegal to PAY workers (except security) or give tuition credits. Violations may jeopardize your Bingo license and could result in IRS sanctions for failure to report payments or tuition credits to individuals. The individuals receiving payments or credits are also subject to tax assessments and penalties if not reported to IRS.
- The organization is responsible for maintaining ADEQUATE RECORDS to support all receipts and disbursements. These records should be maintained at the parish or school office.
- One of the most persistent problems facing Bingo games is the difficulty in recruiting sufficient VOLUNTEERS to adequately staff the Bingo game. The head of the organization must pay attention to this situation and personally get involved.

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# Financial Policy & Procedure Statement G-1 BINGO LEGAL REQUIREMENTS



#### APPLYING FOR A BINGO LICENSE

For a parish to operate a Bingo game in Ohio, it must submit an "Application for a Charitable Bingo License" to the Ohio Attorney General. To obtain an application, write the Attorney General's office at 101 East Town Street, Columbus, 43266-0900 or call (614) 466-3180. Considerable data is required, including a copy of the IRS Determination letter that your organization is a non-profit 501(C)(3) organization. If you do not have this letter on file, it can be obtained from the Diocese Finance Office. You should allow about 90 days to process the application.

Before December 31 of each subsequent year, the parish must apply for a new license for the calendar year. When the renewal application is sent to the Attorney General, the parish must submit financial and other data for the prior 12-month period ending October 31. Upon receiving the annual application, the Attorney General issues a temporary license for the year and, after reviewing the data in the application, will issue the license in the next month or two.

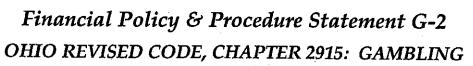
If you need assistance in completing the initial or renewal license application, you may call the Diocese Finance Office or the Charitable Foundations Section of the Attorney General's Office in Columbus.

#### LEGAL AUTHORITY FOR BINGO GAMES

The legal authority for the operation of Bingo games in Ohio is included in "Chapter 2915: Gambling" of the Ohio Revised Code. The chapter contains a number of specific legal requirements for Bingo operators. This chapter of the revised code is reproduced in Financial Policy and Procedure Statement G-2.

Because Chapter 29 of the revised code applies to more than just Bingo games and is difficult for non-legal people to understand, the Attorney General has issued a "Charitable Bingo Game Fact Sheet". The fact sheet was prepared to answer many questions frequently received concerning Bingo operations. This fact sheet is reproduced in Financial Policy and Procedures Statement G-3. Those responsible for managing the Bingo operation should become familiar with the contents of Statements G-2 and G-3.

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AS OF APRIL 1994, SUBSTANTIAL CHANGES IN LEGISLATION ARE UNDER ACTIVE CONSIDERATION BY THE OHIO LEGISLATURE.

THIS STATEMENT WILL BE COMPLETED AFTER LEGISLATION, IF ANY, IS PASSED BY THE LEGISLATURE.

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# Financial Policy & Procedure Statement G-3 CHARITABLE BINGO FACT SHEET



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# Financial Policy & Procedure Statement G-4 PLANNING AND OPERATING A BINGO GAME



#### ADVANCED PLANNING FOR A NEW BINGO GAME

While bingo games are usually profitable and help support schools and other parish activities, careful thought should be given as to whether a Bingo game is the wisest course of action to take. Considerable effort is involved in operating a Bingo game and the parish/school may want to consider other fund-raising techniques.

If Bingo is considered feasible and desirable, the following questions should be considered:

- On what day(s) will the games be conducted?
- Where will the games be conducted?
- What impact will the site of the Bingo games have on parish or school activities?
- Who will be responsible for managing the Bingo operation?
- Can sufficient volunteers be recruited to work on a regular basis over an extended period of time?
- Does the pastor (or a responsible person designated by the pastor) have sufficient time to independently oversee the Bingo operation to assure that it is well managed and that problems are quickly identified and resolved?

If these questions are answered in the affirmative, contact the Attorney General's office for a bingo license application.

#### **OPERATION OF A BINGO GAME**

No two Bingo games are alike. Each game has its own set of rules, types of individual games, choice of hard cards or paper (or both), types of "instant Bingo" tabs used, prizes offered, etc.

Regardless of the differences, each game should have certain basic policies and procedures to have a well run game that includes strict internal controls over the large amounts of cash involved in the operation of the Bingo game.

When setting up a Bingo, a number of procedures should be followed to develop a well-managed operation. These include:

- Forms should be designed to: show cash received and paid out during the session; document
  the flow of cash from one person to another; and provide the other data that is needed to complete
  the annual license application to the Attorney General. The forms should be retained for a 3-year
  period for audit purposes.
- 2. It is helpful to have written procedures showing what should be done at the game. The procedures should provide for clear cut lines of responsibilities for the various workers. The procedures are also helpful in training new workers in assigned tasks.
- 3. The written procedures should provide for the segregation of duties between various individuals as well as the periodic rotation of duties. Both the segregation and rotation of duties are important to provide adequate internals controls over Bingo to prevent losses.
- 4. Ordering of Bingo supplies should be done by one person if possible. Payments for all purchases (except for minor purchases of small amounts of concession supplies and the like) should be by check. At no time should instant Bingo supplies be purchased with cash.

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- 5. With large sums of money being handled, it is important that competent security be provided during the Bingo session. See item 14 on the Attorney General Fact Sheet in Statement G-4 for the hiring requirements for security personnel. Security guards are prohibited from doing any work at the Bingo game, except to provide security. The security guard should accompany the individual(s) taking the money to the rectory or to the bank night depository. (NOTE: It may be necessary to prepare an IRS form 1099 if the security guard is paid \$600 or more in a calendar year.)
- 6. The storage of instant Bingo tickets should be handled carefully because the tickets represent cash. Only the Bingo manager or instant Bingo manager should have access to the unsold tickets. Inventory records should be maintained on all instant Bingo games received and sold.
- 7. The Bingo operator should establish a system whereby a reconciliation is made between the number of instant Bingo tickets released to a worker to sell and the amount of cash, winning tickets paid and unsold tickets turned in.
- 8. Numerical control over attendance reported is important as the reported attendance is used as a gauge to determine the reasonableness of sales and profits reported. This can be done through the use of pre-numbered receipts or cash registers.
- State law requires that separate bank accounts be maintained for bingo games. Bingo operators should not be permitted to write checks or receive monthly statements or correspondence from banks.

### NEED FOR STRONG INTERNAL CONTROLS

Because substantial cash pass hands during the course of a Bingo session, internal controls are obviously very important to the financial success of the game. Audits and investigations have disclosed numerous problems that have resulted in major losses.

Financial Policy and Procedure Statement G-5, Internal Controls over Bingo Operations, was prepared to assist parishes and schools in establishing controls to minimize losses through mismanagement and theft.

### NEED FOR ADEQUATE RECORD KEEPING

Because of State and Federal interest in Bingo games, parishes and schools must maintain extensive records supporting all receipts and disbursements. If documentation is lacking, the organization may be held accountable for missing funds. For example, if an IRS auditor determines from an analysis of instant bingo pull-tabs purchased during the year that the reported income is significantly less than the amount that should have been earned, the parish or school may be required to explain the difference. Without proper records to explain the differences, the parish or school may be held pecuniary liable to the IRS or the State for taxes, penalties and interest.

All Bingo records belong to the parish and should be maintained at the rectory or school office. Bingo operators should not be permitted to write checks or to receive correspondence from the bank. As a minimum, the records should be kept for three years.

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# Financial Policy & Procedure Statement G-5 INTERNAL CONTROLS OVER BINGO OPERATIONS



#### IMPORTANCE OF INTERNAL CONTROLS

These guidelines are intended to help parishes and schools better manage their bingo games. Some of the suggested controls are time-consuming and may require more volunteers to implement. But, a substantial amount of cash passes through bingo workers' hands and controls must be established to assure that (1) all money earned ends up in the bank account and (2) workers are not tempted to misappropriate funds because no one is checking.

### **RESULTS OF AUDITS AND INVESTIGATIONS**

Audits and investigations by the Attorney General, Internal Revenue Service, local law enforcement officials and others have disclosed numerous irregularities that could have been avoided with better internal controls. The more important problem areas can be grouped as follows:

- 1. Lack of controls over cash received at the door.
- Lack of controls over reported attendance. (This data is important for analysis of the reasonableness of cash received and profits made.)
- 3. Lack of controls over the purchase, storage, selling, and recording of instant bingo games. (This area is the most susceptible to abuse.)
- 4. Lack of an independent oversight of the bingo games that has resulted in substantial losses over a long period of time without detection.

#### CONTROLS OVER DOOR RECEIPTS

At the beginning of a bingo session, a substantial amount of cash is received for admission tickets that entitle players to receive hard cards, packages and/or specials. With all the activity at the start of the session, considerable confusion results - cash received, change returned, games selected and given to players, etc. It is critical that an "audit trail" be made so that the cash received at the door can be traced through the system to where it is ultimately deposited into the bank. As a minimum, the following types of controls should be established:

- Pre-numbered, two-part tickets or two-part carbonless forms can be used. The amount received should be shown on both ticket parts - with one part given to the customer and the other part retained. The customer shows the ticket to a bingo worker who gives the customer the games purchased. This ticket should be in clear view while the customer is playing to compare the number of cards being played to the paid cards or specials.
- A programmed cash register is a good alternative to the two-part tickets. The cash register prints
  the amount received, date and a serial number on the customer's receipt. The data is retained in
  the cash register for use in determining the attendance and reconciling the cash received to the
  register totals.
- A control sheet should be prepared for each session. The workers record on this sheet (1) the beginning and ending serial number of the tickets used; (2) the total money shown on tickets sold (or the amount collected shown on the cash register); (3) the cash transferred from the door to the "back-room" while the monies were being collected; (4) receipts from selling "Early Bird" specials, daubers and markers, etc; (5) the "bank" of cash initially placed at the door; and (6) a reconciliation of the total cash collected to the actual cash turned in and deposited. Differences should be checked out. The cash register tapes should be retained.

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• For bingo operations that have "packages" or "all-paper" games, the number of sets released to the door should be reconciled to the number of sets sold and the number of sets returned to inventory. Since each set represents cash, the reconciliation is important.

#### CONTROLS OVER REPORTED ATTENDANCE

As discussed above, accurate attendance data is important for analytical and state reporting purposes. The bingo operator should assure that players pay for the bingo games they play. The following procedures are suggested:

- The unused pre-numbered, two-part tickets discussed above should be stored in a secure area with an inventory control record maintained for each set of pre-numbered tickets. This record should show the date the tickets were received from the printer, when they were released to the floor (show ticket numbers), and unused tickets returned from the floor. This data should be compared to the attendance reported for the session.
- If a cash register is used, the total attendance and number of various packages sold should be shown on the summary tape printed after the door is closed.
- Players should be required to keep their paid ticket in front of them during the bingo session. This
  ticket should be checked before prizes are paid.
- A person independent of those handling the door sales should count the people playing and compare this count to reported attendance. Differences should be checked out.

#### CONTROLS OVER INSTANT BINGO

Most bingo profits result from the sale of instant bingo pull-tabs. This is where most irregularities are found. Because of the large amounts of cash involved, extremely tight internal controls are needed to prevent substantial losses.

Instant bingo consists of selling pull-tab tickets that come in boxes purchased from bingo suppliers. Each box of pull-tabs sold is supposed to generate a specified net profit. Comparing the expected profits from boxes actually sold to the reported profits may disclose differences that need to be checked out.

Managers must realize that when instant bingo tickets are given to workers to sell, they are, in effect, giving them the equivalent of actual cash. Accordingly, they need controls over all aspects of the instant bingo operation to assure that all cash received ends up in the bank account.

Following are examples of problems that have resulted in major shortages in instant bingo:

- Failure to reconcile the instant bingo pull-tabs put on the floor to the cash, winning tickets and unsold tickets turned in by workers,
- Winning tickets not canceled when paid, leading to possible duplicate payoffs,
- Unsold instant tickets stored in an unsecured area,
- Introduction of tickets onto the floor by workers or managers who personally purchased boxes
  of instant bingo tickets for cash directly from a distributer,
- Lack of a system to reconcile the instant bingo money deposited to the amount that should have been received.

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# Financial Policy & Procedure Statement G-5 INTERNAL CONTROLS OVER BINGO OPERATIONS



Discussed below are some internal controls that need to be exercised over instant bingo to minimize losses.

#### PURCHASE OF INSTANT BINGO GAMES FROM SUPPLIERS

Instant bingo games purchases should be carefully controlled. Purchases should be authorized by the pastor or bingo manager and paid for only by check to assure accountability over all instants being sold. Some bingo games have incurred losses by workers paying cash from instant bingo proceeds for instant bingo boxes delivered by suppliers during the bingo session. In such cases, parishes obviously lose control and losses can result.

When the instant bingo games are delivered to the site of the bingo operation, the quantities received should be compared to the list of games ordered for quantities, name and form number of the games ordered and related data. Discrepancies need to be checked out before the shipment is accepted.

Parishes may want to consider a purchase order system to control instant bingo purchases. Under this system, purchases would be authorized in advance through the use of serially-numbered forms that show the quantity, name and form number of the instant bingo games to be purchased. The boxes delivered are checked back to the purchase order for correctness.

#### INVENTORY CONTROL OVER UNUSED INSTANT BINGO TICKETS

Unused instant bingo tickets must be securely safeguarded under lock and key at all times. Only a limited number of people should have access to the instant bingo storage area.

An inventory record should be maintained for each type of instant bingo game delivered. This record should show the name and form number of the game, serial numbers, price per ticket, the number of boxes per case, and expected net proceeds on each box. As shipments are received, the inventory record should be updated to show dates and quantities delivered and the serial number of each game. This serial number is critical since it is necessary to track each game from the time it is received until the entire game is sold and reconciled.

#### DISTRIBUTION OF INSTANT BINGO TICKETS FOR SALE

At the beginning of a session, the instant bingo games thought to be needed for that session should be released to the person(s) designated to be responsible for managing the instant bingo. When the games are released, the inventory records need to be annotated to show how many and what games (including serial number) were consigned to the floor for that session. At the end of the session, the records must again be updated to show the games and partial games returned to inventory.

Prior to releasing the instant bingo tabs to floor workers for sale to players, an independent person(s) should pre-count the pull-tabs into bundles of 50 or 100 to aid in the distribution. An inexpensive electronic scale is helpful in counting the number of tickets. (Such pre-counting can be done prior to the beginning of the bingo session provided the box of pull-tabs is resealed and the box marked accordingly.) To avoid player and worker "tracking" of winning tickets, it is recommended that when tickets are pre-counted, they be mixed so that the position on the row in the box from which they have been taken is not obvious. The total number of pull-tabs pre-counted must be compared to the count marked on the box and differences recorded and reported.

When pull-tabs are given to workers for sale, both the worker and the person(s) responsible for managing the instant bingo for the session should sign off on the number of tabs released as well as the name and serial number of the deal. After the worker sells the pull-tabs, the worker returns the money

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received and ALL winning tickets to the manager. The cash and winning tickets turned in must be reconciled to the tickets released plus the "bank" involved. Differences must be checked out and recorded. Because more than one instant bingo game is normally on the floor at any given time, one worker may pay off on an instant bingo game being sold by another worker. For this reason, each instant bingo worker should have a list to check for names and serial numbers of all instant bingo games being played during that session. This will reduce the chances that players or workers will introduce bogus winners. All workers must be alert for counterfeit or bogus pull-tabs. If any bogus pull-tabs are detected, the player should be identified and security personnel notified immediately.

The instant bingo manager(s) should maintain a control sheet showing, by worker, the money and winning tickets turned in during the session. This control sheet is needed at the end of the session to reconcile the amounts received to deposits.

#### PAYING WINNING TICKETS

A limit should be established on the amount a floor worker may pay to a winner. This could be \$20 or \$25. Larger winning ticket are normally cashed by the instant bingo manager or paymaster to provide greater control over payouts and to preclude losses through the cashing of bogus tickets. As is the case of floor workers, the manager or paymaster must check all winning tickets to the list of instant bingo games (including serial numbers) that are in play for that session.

Most large instant bingo pull-tab manufacturers have a feature called "WIN-GUARD", "WIN-CODE" or a similar name, to preclude paying off bogus pull-tabs. This involves the use of a sealed card placed in an sealed envelope in a box of pull-tabs. This card is available only to the instant bingo paymaster and shows the numbers for each of the higher-tier winners in a box. As each large winner is paid off, the number of the winning ticket is crossed off, thus avoiding payment of a bogus ticket. (NOTE: Ohio law requires that the bingo operator must obtain the name and address of all persons who are winners of \$100 or more in value. The bingo operator should also comply with IRS requirements related to tax withholding and reporting of large winners.)

All winning tickets should be sorted out by serial number and reconciled to payouts shown on the box. As soon as winners are paid (either on the floor or by the paymaster) they should be defaced in some way to clearly show that they have been paid. This can be done with a hole-punch, a rubber void stamp, tearing off a corner, use of a marker pen, etc. A paid-off but not voided ticket is like cash and must be avoided to preclude duplicate payments!

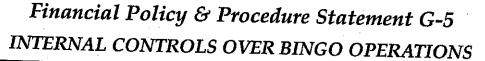
Canceled and reconciled winning tickets should be retained for a short period of time after the bingo session for audit purposes. For organizations selling "seal cards", they may want to display the paid off seal cards for players to review to satisfy themselves that the correct winner was paid. Also, these seal cards (together with winning tickets) should also be retained along with the winning tickets from regular instant bingo games.

#### END-OF-SESSION RECONCILIATION OF INSTANT BINGO SALES

While internal controls are needed during the bingo session, the end-of-session reconciliation of the pull-tabs released for sale to the cash and winning tickets paid is also critical.

At the end of the session, all unopened instant bingo game boxes and partially sold boxes must be counted and returned to the inventory storage area. The number of unused tickets in the opened boxes must be determined and the box resealed prior to returning the opened box for storage. The

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money that should have been received can be computed by determining the number and type of instant bingo boxes released to the instant bingo manager(s) at the beginning of the session minus the unopened or partially sold boxes returned to the inventory control area at the end of the session. Also, the cash turned in by workers can be determined from the control sheets prepared during the session.

The reconciliation and counting of cash should be done by two or more people. Shortages and overages must be checked out to the extent possible before the books are closed for the session. Those reconciling should sign the related forms prepared. The monies received from instant bingo should be deposited separately.

## INDEPENDENT OVERSIGHT OF BINGO OPERATIONS

Experience has shown that when problems in bingo games were detected, there had been limited involvement or oversight by the pastor or independent person from the parish. Some problems remained undetected for several years.

The pastor or pastoral team has responsibility for such oversight but often they cannot devote sufficient time or they may lack the expertise to exercise the oversight needed. For this reason, they may have someone from the Parish Finance Council or Parish Pastoral Council assist them.

Whoever handles this function must become familiar with all aspects of the bingo operation through discussions with the bingo manager and observing what happens at a bingo session. They must also obtain reports on each bingo session as well as monthly or quarterly reports on the overall operation. They must be alert for trends and significant deviations from what is expected based on prior games and check out differences. For example, if a session with 200 people resulted in bank deposits of \$1,500 compared to \$3,000 be expected with that crowd size, the reason for differences need to be explored. This person should also visit bingo sessions periodically to observe the games in progress and talk to various workers about their concerns.

This independent person needs to regularly meet with the pastor or pastoral team to share the results of the oversight so they can be alert for potential problems. They also need to review the monthly or quarterly reports and ask questions on deviations from what is expected.

# CONTROLS OVER OTHER BINGO FUNCTIONS

In addition to cash received from regular bingo sales at the door and instant bingo sales, cash is also received from other sources. These sources include the sale of: specials by workers on the floor; daubers and markers and food and beverages. Even though the cash from these sources usually is not significant, internal controls must be established. For example, if a worker is given 100 specials to sell on the floor for \$1.00, the worker should return \$100 in cash or unsold specials.

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# IMPORTANT POINTS TO REMEMBER

- 1. Most people working at the bingo are honest but can make errors. If a worker repeatedly makes errors when handling cash, assign the worker to a different job.
- 2. Instant bingo pull tabs are the equivalent of cash. It is a "must" that the money, winning tickets and unsold tickets turned in by sellers be reconciled to the instant bingo tickets given to the workers for selling.
- 3. All records should be prepared in ink to avoid erasures of pertinent data.
- 4. To the extent possible, the duties of those handling cash or responsible for reconciliations should be segregated so that one person does not have control over an entire function.
- 5. Periodically, the duties of workers should be rotated, especially when they handle large amounts of cash. Be wary if a person in a key role never misses working a bingo session and never takes a vacation. People in such positions should be required to take off for at least two consecutive sessions once a year.
- 6. Most major problems can be traced to the lack of internal controls. The common plight of most bingo managers is that they cannot institute some controls because of the lack of volunteers. In this case, the pastor should be informed so he can assist in recruiting more people.
- 7. All bingo records are the property of the parish and should be retained at the parish office. The bingo checkbook also must be maintained and reconciled monthly at the parish office.
- 8. While not illegal, bingo workers should not be allowed to buy instant bingo pull-tabs at the sessions they work as this practice might affect the credibility of the games.
- 9. Bingo workers cannot be paid directly or indirectly through tuition credits. Detection of such payments by the Attorney General or I.R.S. could lead to license suspension or revocation. Also, such credits may be considered as taxable income to the volunteer.
- 10. For parishes without Bingo, be wary of organizations or individuals that want to start a new game and use your tax-exempt status for a license. Such an arrangement may be a scam to give you a little cash while they are skimming off hugh profits. These types of arrangements are illegal and can be the source of major embarrassment.

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# Financial Policy & Procedure Statement G-6 IRS REPORTING AND WITHHOLDING TAXES



While Bingo games in the State of Ohio are subject to state laws and licensed by the Attorney General, the games are also subject to Internal Revenue Service requirements. These include reporting payments made to security personnel and reporting large dollar payouts to Bingo players.

## PAYMENTS TO SECURITY PERSONNEL

Under state law, security personnel are the only people allowed to be paid compensation. They are not allowed to do any task except to provide security.

If a security person is paid directly by the Bingo operator and the total paid exceeds \$600 in a calendar year, an IRS form 1099- MISC must be prepared and given to the individuals involved by January 31 of the following year. Failure to report payments of \$600 or more could result in fines and penalties by IRS.

If the payments for security are made to an incorporated security company, it is unnecessary to report the payments to IRS even if the amounts involved exceed \$600.

# PAYMENTS TO OTHER BINGO PERSONNEL

Under state law, other Bingo workers are not permitted to receive payments or other compensation (such as school tuition payments or tips from Bingo players).

If the state discloses through its audits that payments or other compensation has been paid to workers, the Bingo license could be revoked or suspended by the state. Further, if such improper payments have been made, the IRS may assess fines and penalties on the bingo operator for not reporting such amounts to them and may also tax the individuals involved for the unreported payments or credits made on their behalf.

## REPORTING OF LARGE BINGO PRIZES

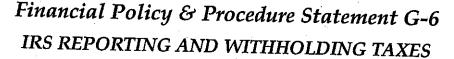
Most Bingo prizes are for relatively small amounts and do not have to be reported to IRS. However, a single regular Bingo prize or Door prize of \$1,200 or more and an Instant Bingo prize of \$600 or more must be reported to IRS. In some cases, it may be necessary to withhold income taxes from the prize payments. A single prize refers to a single payout only and prize winnings are not cumulative from game to game. The detailed instructions and examples related to the reporting of large winners and Federal Income Tax withholding are summarized below.

# LARGE REGULAR BINGO OR DOOR PRIZE WINNERS

For prizes of \$1,200 or more (including non-cash door prizes valued at \$1,200 or more), the Bingo game operator must complete an IRS form W-2G. If the winner provides at least two positive forms of identification (e.g., driver's license, Social Security card, voter registration card), it is unnecessary to withhold income tax.

If the prize winner does not provide adequate identification, the Bingo operator must withhold 31 percent for Federal Income Tax. If a Bingo player wins a non-cash door prize valued at \$1,200 or more and does not provide proper identification, the winner must pay the Bingo game operator the cash equivalent of 31 percent of the door prize's value for income tax in order to claim the prize.

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## LARGE INSTANT BINGO WINNERS

For instant bingo winners, the IRS requirements are somewhat different. For instant bingo prizes of at least \$600 but not more than \$5,000, the Bingo operator must complete an IRS form W-2G. If the winner does not provide proper identification, the Bingo operator must withhold 31 percent for Federal Income Tax.

If an Instant Bingo prize is more than \$5,000, the operator must automatically withhold 28 percent for Federal Income Tax even when proper identification is provided. If such identification is not provided, 31 percent income tax must be withheld.

# MULTIPLE WINNERS OR PRIZE CLAIMED BY NON-WINNER

When the person receiving the winnings is not the actual winner or is a member of a group of two or more winning a \$600 or more single prize, the Bingo operator must complete IRS form 5754 - Statement by Person(s) Receiving Gambling Winnings. The information to complete this form must be furnished by the person receiving the winnings. The Bingo operator should keep the information to complete IRS form W-2G for each winner. Form 5754 is not submitted to IRS.

# COMPLETING AND FORWARDING IRS FORM W-2G

The form W-2G should be completed by the Bingo operator when the prize is paid to the winner. Copies B, C and 2 should be given to the prize winner at that time. Copy A of the form and a completed IRS form 1096 must be submitted to the IRS by the end of February of the following year the prizes were paid. Copy 1 of the form W-2G is submitted to the state and copy D is retained by the organization.

## REPORTING TAXES WITHHELD TO IRS

The Federal Income Tax withheld on various Bingo prize winnings must be reported to IRS on IRS Form 945 - Annual Return of Withheld Federal Income Tax (Effective July 1994). The form must be submitted to IRS by the last day of the January following the close of the calendar year.

As a general rule, the organization must deposit the Federal tax withheld rather than remitting the tax with the IRS Form 945. Please refer to IRS Publication 15, Circular E, Employer's Tax Guide, for additional information on depositing taxes withheld.

# **EXAMPLES OF PREPARING IRS FORMS W-2G AND 5754**

To assist in preparing IRS Forms W-2G and 5754, the Internal Revenue Service has prepared several examples for Bingo operators to follow. Excerpts from the IRS guidelines are presented on the following pages.

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# Financial Policy & Procedure Statement G-6 IRS REPORTING AND WITHHOLDING TAXES



# EXAMPLE 1 - REGULAR BINGO PRIZE OF \$1,200 OR MORE

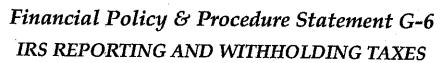
CDN Organization conducts a weekly bingo game. A payout of \$1300.00 is made for a single game. The winner furnishes identifying information, along with her SSN to the organization; therefore, the organization does not have to withhold any tax. See Exhibit 1 for the completed Form W-2G.

#### **EXHIBIT 1**

SESE eman 8'REYAR	CORRECTED  1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-023
CDN Organization	1300.00		ടി <b>െമ</b> ?
Street address	3 Type of wager	4 Date won	i but
100 S. Third Street	Bingo	08   13   93	Certair
City, state, and ZIP code	5 Transaction	6 Race	
Dayton, OH 45403	1091		Gambling
Faderal Identification number	7 Winnings from identical wagers	8 Cashler	Winnings
32-9999999		XX	For Paperwor
WINNER'S name	9 Winner's teopayer Identification no.	10 Window	Reduction Act Notice
Linda Spruce	910-56-7890		and Instructions to completing this form
Street address (including apt. no.)	11 First I.D.	12 Second I.D.	see instructions to
529 Main Street	PR999999	910-56-7890	Forms 1099, 1098
City, state, and ZIP code	13 State/Payer's state identification no.	14 State income tax withheld	5498, and W-2G
Dayton, OH 45405			File with Form 1096
Under penalties of perjury, I declare that, to the best of my kn	owiedge and belief, the name, address, and taxpayer ident	tification number that I have furnished	Copy A
correctly identify me as the recipient of this payment and any pa		erraned to any part of these payments.	For Internal Revenue
Bignature > Ilada Joseph m W-2G	ه عام	ate > 8//3/93	Service Center

Per Instructions for Forms 1099, 1098, 5498, and W-2G, the winner's driver's license number was reported in box 11 and her SSN in box 12 of the Form W-2G. The temporary regulations state that two types of identification (e.g., driver's license, social security card, or voter registration card) should be furnished by the winner to verify his or her name, address, and Social Security number.

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# EXAMPLE 2 - REGULAR BINGO PRIZE OF \$1,200 OR MORE BUT SOCIAL SECURITY NUMBER NOT FURNISHED

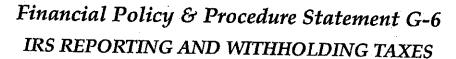
If Linda Spruce in Example 1 had refused to provide her Social Security number, the Form W-2G would be completed as follows: (See Exhibit 2) Note: The winner would receive \$897.00 (\$1300.00 gross winnings minus \$403.00 ( $$1300 \times .31$ ) federal income tax withheld).

#### **EXHIBIT 2**

3535	L CORRECTED		
PAYER'S name CDN Organization	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-023
Street address	3 Type of wager	403.00 4 Date won	199:
100 S. Third Street	Bingo	08 : 13 : 93	
City, state, and ZiP code	5 Transaction	6 Race	Certair
Dayton, OH 45403	1091		Gambling
Federal Identification number 32-9999999	7 Winnings from identical wagers	8 Cashler XX	Winning: For Paperwor
WINNER'S name	Winner's taxpayer identification no.	10 Window	Reduction Act Notic and instructions fo
Street address (including apt. no.)	11 First I.D.	12 Second I.D.	completing this form see instructions to Forms 1099, 1098
City, state, and ZIP code	13 State/Payer's state Identification no.	14 State Income tax withheld	5498, and W-2G
		-	File with Form 1096
Under penalties of perjury, I declare that, to the best of my kno correctly identify me as the recipient of this payment and any pa	awledge and belief, the name, address, and taxpayer iden	tification number that I have furnished	Copy A
		1	For Internal Revenue
Signature ►	D	ate >	Service Center

In this instance, backup withholding was applied to the amount of the winnings. At the option of the payer, backup withholding can be applied to the amount of the winnings reduced by the amount wagered. For example, if the winner in Example 2 had wagered \$10.00, the organization could elect to apply backup withholding against \$1290.00 (\$1300.00 - \$10). Thus, \$399.90 would be withheld from the winnings. However, in determining whether the winnings equal or exceed \$1200.00, the amount of winnings shall not be reduced by the amount wagered.

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## EXAMPLE 3 – INSTANT BINGO OF \$600.00 OR MORE BUT SOCIAL SECURITY NUMBER NOT FURNISHED

CDN Organization from Example 1 also sells instant bingo game tickets. A lucky winner receives \$950.00 from one of the pulltabs, which cost \$1.00. The winner refuses to provide his identification number; therefore, the CDN Organization must complete Form W-2G as well as withhold 31 percent of the winnings. See Exhibit 3 on page 5 for the completed Form 2-2G. The winner would receive \$655.50 (\$950.00 gross winnings minus \$294.50 (\$950 x .31) federal income tax withheld).

PAYER'S name CDN Organization	1 Gross winnings 950.00	2 Federal income tax withheld 294 -50	. OMB No. 1545-029
Street address 100 S. Third Street	3 Type of wager Pulltab	4 Date won 08   27   93	Certair
City, state, and ZIP code Dayton, OH 45403	5 Transaction 2185	6 Race	Gambling
Federal Identification number 32-9999999	7 Winnings from Identical wagers	8 Cashler XX	Winning: For Paperwor
WINNER'S name	9 Winner's taxpayer Identification no.	10 Window	Reduction Act Notice and instructions for
Street address (including apt. no.)	11 First I.D.	12 Second I.D.	<ul> <li>completing this form see instructions to Forms 1099, 1096</li> </ul>
City, state, and ZIP code	13 State/Payer's state Identification no.	14 State Income tax withheld	5498, and W-20 File with Form 1096
Under penalties of perjury, I declare that, to the best of my knowledge correctly identify me as the recipient of this payment and any payments Signature	from identical wagers, and that no other person is		Copy / For Internal Revenue Service Cente

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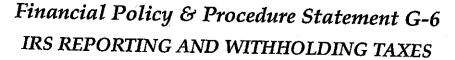


# EXAMPLE 4 - INSTANT BINGO PRIZE OF MORE THAN \$5,000

Another week CDN Organization from Example 1 has another lucky winner of \$5100.00 from one of the pulltabs, which costs \$10.00. Because the winnings, less the wager, exceed \$5000.00, a Form W-2G is completed and federal income tax is withheld. See Exhibit 4 below for the completed Form W-2G. The amount in box 2 computed as follows: \$5100 minus \$10.00 equals \$5090.00, times 28 percent, equals \$1425.20. The winner would receive \$3674.80 (\$5100.00 gross winnings less \$1425.20 withholding tax).

PAYER'S name	LJ CORRECTED		
CDN Organization Street address	1 Gross winnings 5100.00	2 Federal income tax withheld 1425.20	
100 S. Third Street	3 Type of wager Pulltab	4 Date won 07 ; 09 ; 93	1993
City, state, and ZIP code Dayton, OH 45403	5 Transaction	8 Race	Certair Gambling
Federal Identification number 32-9999999	7 Winnings from Identical wagers	8 Cashler	Winnings
WINNER'S name Donna Oak	9 Winner's taxpayor Identification no. 090-99-0312	10 Window	For Paperwork Reduction Act Notice and instructions to
Street address (including apt. no.) 1019 10th Street City, state, and ZIP code	11 First i.D. PR7777777	12 Second LD. 090-99-0312	completing this form see instructions fo Forms 1099, 1098
Dayton, OH 45410	13 State/Payor's state identification no.	14 State income tax withheld	5498, and W-2G.
Under penalties of perjury, I declare that, to the best of my knowle correctly identify me as the recipient of this payment and any comme	age and belief, the name, address, and taxpayer ident	tification number that I have furnished	File with Form 1096.
correctly identify me as the recipient of this payment and any payment some Signature Some Oak  Signature Oak  Form W-2G		emitted to any part of these payments.  ute ► 7/9/93	Copy A For Internal Revenue Service Center

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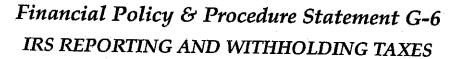


# EXAMPLE 5 - DOOR PRIZE VALUED AT \$1,200 OR MORE

To increase attendance the CDN Organization decides to give monthly door prizes in conjunction with its weekly bingo game. In July the prize was a television valued at \$1300.00 However, the winner refused to provide proper identification; therefore, the winner had to pay \$403.00 ( $$1300 \times .31$ ) to the organization before the prize could be claimed. See Exhibit 5 for the completed Form W-2G.

PAYER'S name	LI CORRECTED		
•	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-02
CDN Organization Street address	1300.00	403.00	199:
100 S. Third Street	S Type of wager	4 Date won	
	Door Prize	07   30   93	Certai
City, state, and ZIP code	5 Transaction	6 Race	7
Dayton, OH 45403 Federal identification number			Gamblin
32-9999999	7 Winnings from identical wagers	8 Cashler	Winning
WINNER'S name	# Wards by the Market State of the State of		For Paperwo
•	<ul> <li>Winner's taxpayer identification no.</li> </ul>	10 Window	Reduction Act Notice and Instructions for
Street address (including apt. no.)	11 First LD.	12 Second J.D.	completing this form
• • • • • • • • • • • • • • • • • • • •	Trabello.	12 Second I.D.	see Instructions fo
City, state, and ZIP code	13 State/Payer's state Identification no.	44 854	Forms 1099, 1099 5498, and W-20
•	to blank special and the state (10) (10.	14 State income tax withheld	
Under penalties of perjury, I declare that, to the best of my know	deduce and holled the game addrage and toyoning lider		File with Form 1090
correctly identify me as the recipient of this payment and any paym	nents from identical wagers, and that no other person is	entitled to any part of these payments	Copy A
Signature ▶			For Internal Revenue
m W-2G	D	ate >	Service Cente

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### EXAMPLE 6 – DOOR PRIZE OF \$1,200 BUT SOCIAL SECURITY NUMBER NOT FURNISHED

In August, the CDN Organization gave \$1500.00 cash as the door prize. Once again, the winner refused to provide proper identification. See Exhibit 6 below for the completed Form W-2G. The amount in box 2 is computed as follows: \$1500.00 times 31 percent equals \$465.00. The winner would receive \$1035.00 (\$1500.00 gross winnings less \$465.00 withholding tax.

3232	CORRECTED	* ***		
PAYER'S name CDN Organization	1 Gross winnings 1500.00	2 Federal Income tax withheld 465.00	OMB No. 1545-0238	
Street address 100 S. Third Street	3 Type of wager Door Prize	4 Date won 08 : 27: 93	1993	
City, state, and ZIP code Dayton, OH 45403	5 Transaction	6 Race	Certain Gambling	
Federal Identification number 32-9999999	7 Winnings from identical wagers	8 Cashier	Winnings	
WINNER'S name	9 Wiener's taxpayer Identification no.	10 Window	For Paperwork Reduction Act Notice and instructions for	
Street address (including apt. no.)	11 First I.D.	12 Second I.D.	completing this form, see instructions for Forms 1099, 1098,	
City, state, and ZIP code	13 State/Payer's state identification no.	14 State income tax withheld	5498, and W-2G.	
Under penalties of perjury, I declare that, to the best of my know correctly identify me as the recipient or this payment and any pay.	wiedge and belief, the name, address, and taxpayer iden	ntification number that I have furnished	File with Form 1096.	
Signature ►		entitled to any part of these payments.	For internal Revenue Service Center	

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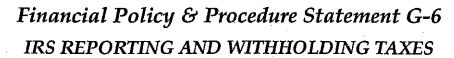
### EXAMPLE 7 – INSTANT BING PRIZE OF MORE THAN \$5,000 BUT MULTIPLE WINNERS INVOLVED

If Donna from Example 4 had purchased the pulltab for herself and another individual, the CDN Organization would be required to prepare a Form 5754 along with two Forms W-2G. See Exhibits 7-9 on pages 6.9 and 6.10 for the completed Forms 5754 and W-2G. Donna and Jamie contributed equal amounts toward the purchase of the ticket, and agreed to share equally in any prizes won.

Internal Revenue Service  Date won	Type of winning	nings should see the separate insti 1098, 5498, and W-2G.	·	Explies 1-31-95
07/09/93	Pulltab	gs Game number	Machine number	Race number
Part I Person to	Whom Winnings Are Pai	d	· · · · · · · · · · · · · · · · · · ·	
Donua Oak	Name	1019 10th Street Dayton, OH 45410	Address	<del></del>
Texpayer Identification numb	PR777777	Other I.D.	Amount received 5100.00	Federal income lax withheld 1425.20
Persons to	Whom Winnings Are Ta	cable (continued on page 2)		<u>.</u>
(a) Name	(b) Taxpayer identification number	· (c) Address	(d) Amount won	(e) Winnings from identical wagers
Donna Oak	Same as Above	Same as above	2550.00	0
nder penalties of parjury. I declar	ire that, to the best of my knowledg	e and ballef, the names, addresses, and to h person entitled to any part of this payme	XDaver identification numbers that	

Part II Persons to	Whom Winnings Are To	axable (continued from page 1	"		
(a) Name	(b) Yaxpayer Identification number	(c) Address	(d) Amount wan	(e) Winnings from identical wagers	
Jamie Oak	.119-99-8877	1019 10th Street Dayton, OH 45410	2550.00	0	

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### **EXHIBIT 8**

PAYER'S name CDN Organization	1 Gross winnings 2550.00	2 Federal income tax withheld 712.60	OMB No. 1545-023
Street address 100 S. Third Street	3 Type of wager Pulltab	4 Date won 07	1993
City, state, and ZIP code Dayton, OH 45403	5 Transaction	6 Race	Certair Gambling
Federal Identification number 32-9999999	7 Winnings from Identical wagers	8 Cashler	Winning
WNNER'S name Donna Oak	Winner's taxpayer Identification no.     090-99-0312	10 Window	For Paperwork Reduction Act Notice and instructions fo
Street address (including apt. no.) 1019 10th Street	11 First I.D. PR777777	12 Second I.D. 090-99-0312	completing this form see instructions to Forms 1099, 1098
City, state, and ZIP code Dayton, OH 45410	13 State/Payer's state identification no.		5498, and W-2G File with Form 1096
Under penalties of perjury, I declare that, to the best of my kno correctly identify me as the recipient of this payment and any pay Signature	ments from identical wagers, and that no other person is	iffication number that I have furnished another to any part of these payments.	Copy A For internal Revenue Service Cente

PAYER'S name	1 Gross winnings	2 Federal income tax withheld	OMB No. 1545-023
CDN Organization	2550.00	712.60	
Street address	3 Type of wager	4 Date won	19 <b>9</b> 3
100 S. Third Street	Pulltab	07   09   93	Onedante
City, state, and ZIP code Dayton; OH 45403	5 Transaction	6 Race	Certair Gambling
Federal Identification number 32-9999999	7 Winnings from identical wagers	8 Caphier	Winnings
WINNER'S name Jamie Oak	9 Winner's taxpayer identification no. 119-99-8877	10 Window	For Paperwork Reduction Act Notice and instructions to
Street address (including apt. no.) 1019 10th Street	11 First LD. PR 9998887	12 Second I.D. 119-99-8877	completing this form see instructions for Forms 1099, 1098
City, state, and ZIP code Dayton, OH 45410	13 State/Payer's state Identification no.	14 State income tax withheld	5498, and W-2G File with Form 1098
Under penalties of perjury, I declare that, to the best of my knowledge are correctly identify me as the recipient of this payment and any payments from Signature >	m identical wagers, and that no other person is	tification number that I have furnished entitled to any part of these payments.	Copy A For Internal Revenue Service Center

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## EXAMPLE 8 - COMPLETION OF IRS FORM 1096

If the Forms W-2G from Examples 1, 3, 4, 5 and 6 were the only ones prepared in 1993 by the CDN Organization, the Form 1096 would be prepared as follows: (See Exhibit 10). The Form 1096 along with a copy of A of Forms W-2G must be submitted to Internal Revenue Service by February 28, 1994.

Form	096	- [		Annu	al Sun	nmarv	and Tr	ansmi	ttal of			DMB No. 1545-01
Department internal Reve	of the Tressur nue Service	у	. "		U.S. I	nforma	ation R	eturns	•			1993
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