



# TEXAS DEPARTMENT OF LICENSING & REGULATION

LOTTERY & CHARITABLE BINGO DIVISION

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February 18, 2026

Mr. Cesar Beattie  
Tabs of Texas LLC  
127 E. Monroe St.  
Brownsville, TX 78520

*via certified mail no. 9214 8901 9403 8351 8612 22  
and regular mail and email at [REDACTED]*

Re: Bingo Advisory Opinion No. 2026-1112-0001

Dear Mr. Beattie:

This opinion responds to your request for a bingo advisory opinion received via email on November 12, 2025. Specifically, you asked the following question:

I respectfully request an advisory opinion regarding the limits of management and operational authority in the following situation:

- A building owner leases a bingo hall to one or more licensed authorized organizations (or a unit) to conduct bingo.
- The building owner is not licensed as an operator, has no workers registry with the Commission, and is not licensed as a lessor pursuant to the Bingo Enabling Act.
- The bingo games at the premises are conducted exclusively by registered bingo workers (e.g., operator, manager, conductor, cashier, pull-tab seller) associated with the licensed organization(s).

Question:

In this scenario, may the building owner—who holds no license of any kind (neither lessor nor workers registry)—give orders, directions, or instructions to the registered bingo personnel (operator, manager, conductor, or other registered employees) regarding the conduct and operation of bingo?

To ensure full compliance with the Bingo Enabling Act and the Texas Administrative Code, I seek clarification on the following specific points:

1. Operational Direction – Whether any operational direction from the owner to registered workers (e.g., decisions about game conduct, prize payouts, session timing, seating/floor management during gameplay, pull-tab sales procedures, inventory control, admissions, or cash handling) is prohibited as an exercise of operational control.

2. Purchasing and Game Decisions – Whether an unlicensed owner (without a workers registry or lessor license) may instruct bingo managers which pull-tabs to purchase, which games to play, or make any operational or purchasing decisions related to bingo sessions or pull-tab activities.
3. Consequences of Unauthorized Direction – The potential violations or enforcement consequences if an unlicensed building owner directs or controls registered workers in conducting bingo, and what actions the licensed organization should take if such interference occurs.
4. Compliance of Registered Workers – What are the consequences if a licensed operator or registered bingo worker follows instructions from someone who does not possess a valid workers or lessor license (such as the building owner)? Would this constitute a violation by the operator or the licensed organization for allowing unlicensed influence or control over bingo operations?

Below is our response:

In your scenario, you describe a building owner who holds no license under the Bingo Enabling Act (BEA), yet leases a bingo hall to one or more licensed authorized organizations (or a unit) to conduct bingo. The BEA requires a person who leases premises on which bingo is conducted directly to a licensed authorized organization be a licensed commercial lessor. Tex. Occ. Code §2001.151. A non-licensed building owner is not prohibited by the BEA from leasing premises to a licensed commercial lessor who leases the premises to licensed authorized organizations (or a unit). *See* BAO # 2005-0616-0049. Additionally, at the time of licensure, or renewal, an applicant or licensee to conduct bingo (the authorized organization/charity) must submit to the Charitable Bingo Operations Division, the address of the premises where and the time when the applicant or licensee intends to conduct bingo under the license sought, as well as the name and address of the licensed commercial lessor. Tex. Occ. Code §2001.102(b)(3) and (4). Therefore, the situation implied by the description in your scenario should not arise. If you believe a violation of the above statutes or other statutes of the BEA has or is occurring, please submit a complaint in writing to [https://www.txbingo.org/opencms/Players/Bingo\\_Complaint\\_Form.jsp](https://www.txbingo.org/opencms/Players/Bingo_Complaint_Form.jsp).

The BEA requires a licensed authorized organization to designate a bingo chairperson responsible for overseeing the organization's bingo activities. Tex. Occ. Code §2001.002(4-a). In addition, the organization must also designate the bingo operator, whose name(s) must be posted during the bingo occasion and must be present onsite during the occasion. The operator is the individual who is authorized to be in charge during the occasion. 16 Tex. Admin. Code §141.200(i)(2). The bingo manager is the individual who oversees the day-to-day operation of the bingo premises. 16 Tex. Admin. Code §141.402(a)(6). The bingo chairperson, operator and manager must all be on the Registry of Approved Bingo Workers. 16 Tex. Admin. Code §141.402(b).

Although employees are generally required to operate subject to their supervisory management instructions, registered bingo workers and bingo licensees must always follow the law, including the BEA and the bingo administrative rules. Failure to do so may result in administrative sanctions. Your questions ask whether the building owner may give orders, directions, or instructions to the

registered bingo workers about the conduct and operation of bingo, but do not describe or explain whether the operator, manager, conductor, or other registered workers have to follow or are following such orders, directions or instructions, or whether the orders, directions or instructions given by the unlicensed building owner violate the BEA or bingo administrative rules. All bingo licensees must adhere to the BEA and the bingo administrative rules, regardless as to who gives them “orders, directions, or instructions.” The interaction between an unlicensed property owner and the bingo worker staff is not contemplated, nor addressed in the BEA or the bingo administrative rules. Again, if you believe a violation of the BEA or bingo administrative rules has or is occurring, please submit a complaint in writing to [https://www.txbingo.org/opencms/Players/Bingo\\_Complaint\\_Form.jsp](https://www.txbingo.org/opencms/Players/Bingo_Complaint_Form.jsp).

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### SUMMARY

The interaction between an unlicensed property owner and bingo worker staff is not contemplated in the Bingo Enabling Act or the bingo administrative rules. Further, due to licensing requirements, the situation you describe with an unlicensed property owner leasing to licensed authorized organizations should not arise. All bingo licensees are expected to follow the law, including the Bingo Enabling Act and the bingo administrative rules, regardless of who gives them “orders, directions, or instructions.”

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This advisory opinion cannot be construed as a tax ruling or otherwise interpretative of the Internal Revenue Code. The information provided is completely limited to the context of the BEA and the Rules.

This advisory opinion is based on the laws, rules, and regulations in effect at the time of issuance. All the information provided herein is subject to changes in law.

This opinion is purely advisory in nature and is limited to the particular questions at issue at the time of the facts presented in the request. Therefore, this opinion must not be relied upon as a pre-determination regarding any conduct which is not substantially consistent with the opinion and the facts stated in the request.

This Bingo Advisory Opinion was reviewed by the Texas Commission of Licensing and Regulation (Commission) at the February 18, 2026, Commission open meeting.

Sincerely,

*LaDonna Castañuela*

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LaDonna Castañuela, Director  
Charitable Bingo Operations Division

cc: Rick Figueroa, Chairman  
Thomas F. Butler, Vice Chairman

Gerald R. Callas, Commissioner  
Nora Castañeda, Commissioner  
Sujeeth Draksharam, Commissioner  
Lori High, Commissioner  
Gary Wesson, Commissioner  
Courtney Arbour, Executive Director  
Sergio Rey, Interim Deputy Executive Director  
Deanne Rienstra, Interim General Counsel