



**WASHINGTON STATE
GAMBLING COMMISSION PUBLIC
MEETING - August 2019**

Hampton Inn and Suites
4301 Martin Way E.
Olympia, Wa 98516

	<p style="text-align: center;"><i>Commission Stearns, Brian Considine, Legal and Legislative Manager</i></p> <ul style="list-style-type: none"> • North American Gaming Regulators Association presentation <p style="text-align: right;"><i>Tina Griffin, Assistant Director</i></p>
Tab 9	<p>*Stars Group, Inc. Petition for Declaratory Order (Action)</p> <p style="text-align: right;"><i>Brian Considine, Legal and Legislative Manager</i></p>
	Public Comment

Upon advance request, the Commission will pursue reasonable accommodations to enable persons with disabilities to attend Commission meetings. Questions or comments pertaining to the agenda and requests for special accommodations should be directed to Julie Anderson, Executive Assistant at (360) 486-3453 or TDD (360) 486-3637. Questions or comments pertaining to rule changes should be directed to the Ashlie Laydon, Rules Coordinator (360) 486-3473.

Please silence your cell phones for the public meeting



STATE OF WASHINGTON
GAMBLING COMMISSION

"Protect the Public by Ensuring that Gambling is Legal and Honest"

July Gambling Commission Meeting Minutes
The Hotel Murano 1320 Broadway, Tacoma, WA 98402
Public Meeting
July 11, 2019

Commissioners Present:

Bud Sizemore, Chair
Chris Stearns
Ed Troyer
Alicia Levy

Ex Officio Members Present:

Senator Steve Conway

Staff Present:

David Trujillo, Executive Director; Tina Griffin, Assistant Director; Brian Considine, Legal and Legislative Manager; Julie Lies, Tribal Liaison; Julie Anderson, Executive Assistant; and Suzanne Becker, Assistant Attorney General.

Public Meeting Call to Order

Chair Bud Sizemore called the Gambling Commission meeting to order at 9:10 a.m. and welcomed everyone to Hotel Murano and his home town. He asked for a moment of silence to recognize law enforcement officers who were lost in the line of duty since we last met.

Chair Sizemore announced that Commissioner Stearns would be joining the meeting shortly, but the meeting could begin right away since there was a quorum.

There were 57 people in attendance.

Tab 1

Commissioner Troyer moved to approve the consent agenda including the Class III certifications for Snoqualmie and Cowlitz tribes as presented by staff.

Commissioner Levy seconded the motion.

The motion was passed 3:0

Tab 3

Service Suppliers/Distributor License Rules

Rules Coordinator Ashlie Laydon presented the materials for this tab. Ms. Diane Sperry with W.O.W. Distributing was present for comment. At the May 2019 commission meeting, the Commission moved to file draft language for further consideration. No further comments were received from stakeholders. Staff recommends making an additional change to WAC 230-03-210, striking the second "for compensation." This rule is up for final action.

Chair Sizemore asked for public comment. There was no public comment.

Commissioner Troyer moved to file the proposed rule language with recommended changes for final action with an effective date of 31 days after filing with the code revisers office.

Commissioner Levy seconded the motion.

The motion was passed 3:0

Tab 4

Card Shuffler Cellular Network Rules

Rules Coordinator Ashlie Laydon presented the materials for this tab. Ms. Jacqueline Hunter, Director of Technical Compliance for Bally Scientific Games, was available for comments. At the February 2019 commission meeting, the Commission accepted a petition from Bally Scientific Games and voted to initiate rule-making. The petitioner sought to amend current rules in order to allow card-shuffling devices to connect to a secure cellular modem for billing purposes. The change would offer a new billing option for card shufflers in licensed card rooms, and has already been tested and approved by Lac Tronic Gaming Lab for use in tribal facilities. Ms. Hunter expressed her appreciation to the Commission for its help with moving this rule forward.

Chair Sizemore asked for public comment. There was no public comment.

Commissioner Troyer moved to file the proposed rule language for final action with an effective date of 31 days after filing with the code revisers office.

Commissioner Levy seconded the motion.

The motion was passed 3:0

Tab 5

Defaults

Legal and Legislative Manager (LLM) Brian Considine presented the material for this tab.

Tola Nhet, Public Card Room Employee License Revocation

Chair Sizemore asked if Mr. Nhet was in the audience. He was not.

Commissioner Troyer moved to revoke the public card room employee license as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously. 4:0

Saroeung Seum, Public Card Room Employee License Revocation

Chair Sizemore asked if Ms. Seum was in the audience. She was not.

Commissioner Troyer moved to revoke the public card room employee license as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously. 4:0

Kenneth M Gash, public card room employee license revocation. Commissioners voted unanimously to revoke Mr. Gash's public card room employee license.

Chair Sizemore asked if Mr. Gash was in the audience. He was not.

Commissioner Troyer moved to revoke the public card room employee license as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously. 4:0

Savy S. Nuon, Public Card Room Employee License and Class III Certification Revocation

Chair Sizemore asked if Ms. Nuon was in the audience. She was not.

Commissioner Troyer moved to revoke the public card room employee license and Class III certification as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously. 4:0

Andrew Young, Public Card Room Employee License Revocation

Chair Sizemore asked if Mr. Young was in the audience. He was not.

Commissioner Troyer moved to revoke the public card room employee license as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously. 4:0

Tina G. Kuahiwinui, Class III Certification Revocation.

Chair Sizemore asked if Ms. Kuahiwinui was in the audience. She was not.

Commissioner Troyer moved to revoke the Class III certification as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously. 4:0

Su-Zhen Wu, Public Card Room Employee License Revocation

Chair Sizemore asked if Ms. Zhen-Wu was in the audience. She was not.

Commissioner Troyer moved to revoke the public card room employee license as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously. 4:0

Tab 2

Presentation-Commissioner Stearns

Commissioner Stearns provided a briefing on the Focus on the Future conference he attended, where he was also a panelist on “Sports Betting 101 for the Baffled and Bewildered.”

Commissioner Stearns also provided a briefing on a visit he made to the Free by the Sea Recovery Center. Free by the Sea is the first and only treatment center in Washington to offer inpatient treatment for gambling disorders. A question was raised about the daily cost of the facility for an individual. **Maureen Greeley, executive director of the Evergreen Council on Problem Gambling**, said: “Our council is currently in negotiations with Free by the Sea, because the state does not currently have funding available to support residential treatment, and

probably won't for the next biennium at the very least. Their current rate is \$500 a day, which is about twice what we're paying other residential treatment facilities.” There was discussion of the cost of other treatment facilities in the state.

Josh Herschlip addressed a particular slide and asked for clarification from **Commissioner Stearns**.

Chair Sizemore asked for any other public comment. There was no public comment.

Tab 6

2020 Agency Request Legislation

LLM Considine presented the materials for this tab. LLM Considine identified six recommended topic areas from staff: (1) General Fund appropriation for the agency’s criminal law enforcement functions; (2) Amending RCW 9.46.0209 to ensure inclusion of certain additional charitable nonprofit organizations that may not be qualified under current law; (3) Making changes to the money laundering forfeiture statute, adult protective services, and sports integrity laws to ensure Commission agents have proper jurisdiction on these issues; (4) Creating regulations related to social online casinos, loot boxes, and/or skin gambling; and (5) Amending the definition of theft as was done in HB 1159, Changing the Definition of Theft. **Commissioner Stearns** also proposed amending the Gambling Act to allow for unlicensed and unauthorized gambling companies and activities at a tradeshow based on tradeshow rule conversations that occurred earlier in the year.

LLM Considine also identified four stakeholder requests: (1) Amending the Gambling Act to allow online raffles; (2) Modernizing raffle and fund raising event limits; (3) Amending the current pull-tab tax requirements in RCW 9.46.110 to authorize taxation only on net receipts; and (4) Increasing the \$1 pull-tab wager limit in RCW 9.46.110 to a \$2/\$5 pull-tab limit.

The Commissioners and **LLM Considine** discussed each proposal. For staff proposal (1): **Director Trujillo** asked Chair Sizemore to talk with the Commission’s CFO, **Christopher Stanley**, about possible options to seek general fund appropriation for the agency’s law enforcement activities before there was further public discussion on the topic.

For staff proposal (2): **LLM Considine** stated that there have been some charitable or nonprofit organizations found to be not qualified recently and staff is unsure if these organizations were meant to be excluded and challenges to these determinations are taking up significant staff resources. Staff believes the agency should look to see if the standards in RCW 9.46.0209 could be better aligned with current state and federal charitable definitions. **LLM Considine** cited the IRS 501(c)(3) approved topics as an example to review.

For staff proposal (3): **LLM Considine** clarified that (3) was focused on the money laundering forfeiture statute in RCW 9A.83.030 and ensuring that final forfeited property/proceeds could go towards gambling activities because the current statute only allows it to go towards drug-related law enforcement activities. **LLM Considine** suggested that the adult protective services and sports integrity topics could be addressed next year as agency request legislation, if needed. **Commissioner Troyer** asked **Assistant Director Tina Griffin** if the money laundering forfeiture amendment would be helpful and she indicated it would be very helpful. **Commissioner Levy** asked **LLM Considine** how the agency will address the adult protective

services issue if there is not agency request legislation because it seems like an important issue. **LLM Considine** indicated that staff likely needed to explore that issue a little more to identify what exact changes might be needed and that staff would bring something forward for 2021 agency request legislation, if needed.

For staff proposal (4): **LLM Considine** stated that staff is raising the issue because of recent proceedings before the commissioners and because of continued interest by some commissioners on this topic.

For staff proposal (5): **LLM Considine** indicated that HB 1159 (changing the definition of theft) would be helpful for cases where players/dealers steal chips/money but are caught before they leave the property. The retail association backed this bill last session and will check-in with the sponsor and stakeholders to see if the bill will be moved again next session.

For **Commissioner Stearns'** trade show proposal: **LLM Considine** indicated that staff still believed a statutory change to the Gambling Act was needed to allow for unlicensed manufacturers or equipment for unauthorized gambling activities (example: sports gambling) to be at a trade show.

For stakeholder request (1) and (2): **LLM Considine** and commissioners discussed what possible changes to raffle or fund raising event laws could occur. **LLM Considine** indicated that the nonprofit stakeholders were very focused on wanting online raffles and didn't have specific proposals; however, generally increasing wager revenue limits has been mentioned in the past. **Senator Conway** inquired about Idaho and Oregon raffle laws and that changes should be made to align Washington's laws with neighboring states' laws, if possible. **Chair Sizemore** suggested having staff put together a raffle work session in September or October so that the commissioners could review current rules and see if there are any changes they wish to make to update current nonprofit raffle requirements.

For stakeholder requests (3) and (4), **LLM Considine** informed the commissioners that he notified stakeholders during a recent legislative update meeting and conference call that agency request legislation should have a primary benefit to the agency for the Commission to move forward with a bill as agency request legislation. However, these proposals would be brought to the commissioners' attention so that they are aware of them and can discuss their possible support. **Commissioners Troyer** and **Levy** expressed support for raising the pull-tab limits to \$2/\$5 but wondered if it was feasible. **Diane Sperry** (WOW Distributing) confirmed that all of the major manufacturers currently manufacture the two and five dollar tickets. And, they distribute to other states. She also stated that, within Washington, distributors do not have two and five dollar tickets because they are not allowed. **Commissioner Troyer** asked if the distributors have access to the manufacturers. **Ms. Sperry** said yes.

Commissioners Troyer and **Sizemore** inquired about the possibility of raising pull-tab limits as agency request legislation. **LLM Considine** did not feel it had a primary benefit to the Commission and, therefore, would not typically be something the Commission would request. However, the commissioners had the ability to move it forward and see if the Governor's Office would approve it. Commissioners asked if it was something staff could work with stakeholders on if a stakeholder drafted a bill. **LLM Considine** stated that Gambling Commission staff members are a resource for stakeholders when they are trying to draft and lobby for a bill.

Commissioners asked **LLM Considine** to send a message to licensees and stakeholders letting them know that the commissioners would likely be supportive of a bill to raise the pull-tab limits if the industry brought a bill forward. **LLM Considine** will send a message informing licensees and stakeholders of the Commission's position and for them to contact staff as a resource, if needed.

After the discussion, the consensus was for staff to prepare two agency request bills for: (1) Amending RCW 9.46.0209 to ensure inclusion of certain additional charitable nonprofit organizations that may not be qualified under current law; and (2) Amending RCW 9A.83.030's money laundering forfeiture statute to allow forfeited proceeds to go to gambling-related law enforcement activities. Staff will also talk with the Chair about possibilities for a General Fund appropriation for the agency's criminal law enforcement functions and determine if that would be agency request legislation in 2020.

Tab 7

Sports Gambling Discussion

LLM Considine presented the materials for this tab. **LLM Considine** discussed the current sports gambling bills in the Legislature—House Bill 1975 and HB 1992. **LLM Considine** briefed commissioners on each bill's status and what sports gambling might look like in the state if either bill passed as currently written. **Senator Conway** asked if there was model legislation staff would recommend the Legislature look at or if there were specific states they should look to for best practices. **LLM Considine** stated that there is no model bill that states are using. However, staff continues to review regulatory frameworks both in law and rule to determine what regulatory policies might work best for the agency. **Chair Sizemore** proposed that **LLM Considine** and staff shouldn't be expected to write a model bill, but to be a resource for regulatory issues and questions when those arise.

Public Comment

Pat LePlay, President of the Horsemen's Benevolent and Protective Association, addressed the Commission and indicated that the Horsemen will work with whoever they need to so that they can be considered in the sports gambling conversation moving forward. According to **LePlay**, they know how to run sports gambling and are fine with the Gambling Commission regulating it. They know HB 1992 and the other bills were all imperfect, but would like to work with the Gambling Commission and stakeholders to find a solution that will allow sports gambling to occur at Emerald Downs.

Maureen Greeley, Director, Evergreen Council on Problem Gambling National Council on Problem Gambling, announced that they just published the National Survey of Gambling Attitudes and Gambling Experiences. In Washington, 500 adults responded in general, with an additional 200 sports bettors responding to the survey. She added that their national conference will be held in Denver next week.

Dolores Chiechi, Recreational Gaming Association, asked the Commission to continue to consider card rooms in the sports gambling discussion. Also, she believes there should be a general fund appropriation to the Gambling Commission for the cost of regulating sports gambling if the tribes are the only operators authorized to offer sports gambling. According to **Chiechi**, a general fund appropriation will ensure that card room licensees do not bear the cost of

regulating sports gambling if they are unable to offer it at their facilities. It is not a cost they should bear and it should be something dealt with in compact and through a general fund appropriation.

Bill Iyall, Chairman of the Cowlitz Tribe, welcomed everyone to Tacoma -- his hometown. He stated that he is looking forward to working with the Commission on government-to-government matters and that Sports Betting is a Tribal Consultation issue and that he will look forward to discussing further with Director Trujillo at a future consultation meeting. He also highlighted the canoe journey that would be taking place at Fort Vancouver on July 9. He invited everyone to come and visit Indian Heaven Wilderness.

Tab 8

Stars Group, Inc.

LLM Considine presented the materials for this tab. **LLM Considine** notified the commissioners that we received a Petition for Declaratory Order from The Stars Group, Inc. asking the Commission to enter a declaratory order stating that the company's Pokerstars VR game is not gambling under Washington State law. **LLM Considine** recommended the commissioners sign an order scheduling review of the petition at the Commission's August public meeting.

Public Comment

Chair Sizemore opened the meeting up for public comment.

Josh Herschlip, Buzz Inn Steakhouse, addressed the Commission. **Mr. Herschlip** said he wanted to go over the Spectrum Gaming Report that was delivered in 2016. In regards to the report, he said: "It's becoming reality when you look at that report. Very much of those things have come to fruition, just like it stated in the report. It was an unbiased report, identified the benefits for all in sports betting. So it's stated right in there that all, uh, the card rooms and the tribal that everyone could benefit from the sports betting. It also identifies the decline of the independent industry and the growth of tribal gaming. Projections are really close to reality now." He also said that the pull-tab business, as it currently sits, has been antiquated and is in need of modernization. According to **Herschlip**, there are currently 15,690 eating and drinking establishments in Washington as of 2018. There are less than 1,000 gambling licensees. **Director Trujillo** asked for clarification on whether or not he was requesting a modernization of pull-pull tabs. **Mr. Herschlip** said yes and with modernization, "it allows operators to have protection in place that will protect the integrity of all operations for individual locations. And it will also provide oversight for the Commission. While it'll help the controls of the labor for the Commission and the Commission's budget, I do support the increase to the ticket amount, but do not believe it will change the bottom line results." According to **Herschlip**, modernization of the pull-tab industry should be the number one objective. He also requested that the Commission help guide the Legislature into doing the right thing, which is modernizing pull-tabs. **Herschlip** requested the Commission move modernization of pull-tabs to the top of its list to bring before the Legislature. He thanked the Commission for its time.

Bill Tackitt, Owner and Operator of the Buzz Inn Houses, addressed the Commission. He thanked the Commission for its time. **Mr. Tackitt** has been a licensee since 1973. He spoke about the changes in the industry regarding pull-tabs. He said, "It's time to move forward." He

asked if the Commission could provide some direction for licensees to help them with language to modernize pull-tabs.

Chair Sizemore announced that the next commission meeting will be held at the Hampton Inn and Suites on August 8, 2019.

The Gambling Commission's public meeting adjourned at 1:15 p.m. **Chair Sizemore** announced that the commissioners will immediately go into Executive Session where they will discuss pending criminal investigations, tribal negotiations and litigations.

Executive Session adjourned at 2:55 p.m.



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
August 2019

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Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 21.

18

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**BINGO**

FOE 02797

00-00280 01-02791

608 N WYNNE ST

COLVILLE WA 99114

PERPETUAL HELP BOOSTERS CLUB

00-05722 01-01905

2619 CEDAR ST

EVERETT WA 98201-3137

WESTSIDE IMPROVEMENT CLUB

00-00091 01-00899

4109 E ST

BREMERTON WA 98312

RAFFLE

BENTON FRANKLIN FAIR & RODEO

00-16933 02-09294

812 W WASHINGTON ST

PASCO WA 99301

CHEHALIS BEARCAT ATHLETIC BOOSTER CLUB

00-21382 02-08830

342 SW 16TH ST

CHEHALIS WA 98532

DUNGENESS VALLEY LUTHERAN CHURCH

00-21832 02-08936

PO BOX 1916

SEQUIM WA 98382

EMBLEM CLUB 00473

00-07280 02-01827

11605 SE MCGILLVRAY BLVD

VANCOUVER WA 98668

FOE 02797

00-00280 02-21062

608 N WYNNE ST

COLVILLE WA 99114

GLEN GOODTIMERS ASSOCIATION

00-09912 02-02031

7159 MT BAKER HWY

MAPLE FALLS WA 98266

PERPETUAL HELP BOOSTERS CLUB

00-05722 02-01325

2619 CEDAR ST

EVERETT WA 98201-3137

PERRY TECHNICAL FOUNDATION

00-15743 02-02645

2011 W WASHINGTON AVE

YAKIMA WA 98903

RENTON REGIONAL COMMUNITY FNDN

00-24482 02-21060

1053 LAKE WA BLVD N

RENTON WA 98057

SEATTLE DERBY BRATS

00-22317 02-09068

1626 PALM AVE SW

SEATTLE WA 98116

SEATTLE UNIVERSITY

00-23238 02-09442

901 12TH AVE

SEATTLE WA 98122

SEATTLE YOUTH SYMPHONY ORCHESTRAS

00-20309 02-08583

11065 5TH AVE NE STE A

SEATTLE WA 98125

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**RAFFLE**

THE HUB YOUTH CENTRAL DBA THE HUB AFTER SCHOOL 00-24478 02-21058	301 ANTHES AVE LANGLEY WA 98260
VASHON ALLIED ARTS, INC. 00-24459 02-21050	9810 SW 148TH ST VASHON WA 98070
VASHON ISLAND PET PROTECTORS 00-24061 02-20811	18528 WESTSIDE HWY VASHON WA 98070
VFW 01135 00-00128 02-21063	407 7TH ST HOQUIAM WA 98550

AMUSEMENT GAMES NONPROFIT

PERPETUAL HELP BOOSTERS CLUB 00-05722 03-00737	2619 CEDAR ST EVERETT WA 98201-3137
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PUNCHBOARD/PULL-TAB NONPROFIT

BPOE 01604 00-00145 05-02908	2120 MARKET ST MOUNT VERNON WA 98273
FOE 02797 00-00280 05-02623	608 N WYNNE ST COLVILLE WA 99114
VFW 01135 00-00128 05-01762	407 7TH ST HOQUIAM WA 98550

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

BEACH COMBER 00-24224 05-21557	12623 RENTON AVE S SEATTLE WA 98178
CHANNEL MARKER 00-21165 05-20509	120 W DAYTON ST SUITE D-1 EDMONDS WA 98020
JO JO'S HARBOR LIGHT TAVERN 00-14934 05-08314	650 SE PIONEER WAY OAK HARBOR WA 98277-0000
LUCKY SILVER 00-17889 05-09773	2605 S TACOMA WY TACOMA WA 98409

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT**

PHOENIX GARDEN
00-24139 05-21536

20530 VIKING AVE NW
POULSBO WA 98370

PORTRHOLE PUB BAR & GRILL
00-19861 05-19874

893 POINT BROWN AVE NW
OCEAN SHORES WA 98569

THE HIDEAWAY
00-24456 05-21617

22540 NE STATE ROUTE 3
BELFAIR WA 98528-9303

VALLEY LANES
00-24449 05-21613

740 RIVERSIDE DR
OMAK WA 98841

VERA PIZZA VASHON LLC
00-24450 05-21614

17607 B VASHON HWY S
VASHON WA 98070

WELCOME INN BAR & GRILL
00-24477 05-21622

520 23RD ST
HOQUIAM WA 98550

MANUFACTURER

PLAY MORE YO LLC
20-00263 20-00263

1 PPG PLACE FLOOR 31
PITTSBURGH PA 15222

DISTRIBUTOR

CASINO OVER UNDER
21-00310 21-00310

12169 W LINEBAUGH AVE
TAMPA FL 33626

GAMBLING SERVICE SUPPLIER

POWER STRATEGIES LLC
00-24465 26-00356

6841 S EASTERN AVE STE 103
LAS VEGAS NV 89119

COMMERCIAL AMUSEMENT GAMES - CARNIVAL

D AND M CONCESSIONS
00-19781 52-20111

20216 NE 190TH AVE
BATTLE GROUND WA 98604

COMMERCIAL AMUSEMENT GAMES OPERATOR

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

COMMERCIAL AMUSEMENT GAMES OPERATOR

VALLEY LANES
00-24449 53-21534

740 RIVERSIDE DR
OMAK WA 98841

CARD GAME NON HOUSE-BANKED

FOE 02797
00-00280 60-00550

608 N WYNNE ST
COLVILLE WA 99114

GLEN GOODTIMERS ASSOCIATION
00-09912 60-00516

7159 MT BAKER HWY
MAPLE FALLS WA 98266

SENIOR CITIZENS CLUB/PROSSER
00-06601 60-00549

1231 DUDLEY AVE
PROSSER WA 99350

NON HOUSE-BANKED CARD GAME

THE GETAWAY CASINO
00-23485 65-07440

411 ASH ST
WALLA WALLA WA 99362

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

ALEJANDRO, MARK K
23-02964

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

BEYKO, TIMOTHY S
23-02971

VIDEO KING
OMAHA NE 68154

BRISCOE, RYAN D
23-02966

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

BRUHN, SCOTT L
23-02967

VIDEO KING
OMAHA NE 68154

DHALIWAL, GAGANDEEP S
23-02960

ANGEL PLAYING CARDS MFG KYOTO C
HIGASHIOMI NA 527-0232

DORSEY, STEPHEN L JR
23-02972

VIDEO KING
OMAHA NE 68154

FINLEY, GUY H
23-02969

VIDEO KING
OMAHA NE 68154

FEAHERTY, AMANDA N
23-02963

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

GARZA, OBED M
23-01197

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

GLENNY, MARCELLE A
23-02959

ANGEL PLAYING CARDS MFG KYOTO C
HIGASHIOMI NA 527-0232

HERNANDEZ ROBLEDO, JOSE S
23-02978

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

KEHN, AUSTIN J
23-02970

VIDEO KING
OMAHA NE 68154

LEATI, JESSICA
23-02976

IGT
LAS VEGAS NV 89113

PIERCE, BRIAN R
23-00910

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

POWERS, RICHARD D
23-02968

VIDEO KING
OMAHA NE 68154

RODRIGUEZ, JUSTIN L
23-02962

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

SPRAGUE, JEFFERY D
23-02965

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

TABBERT, RICHARD L
23-02974

VIDEO KING
OMAHA NE 68154

TOLBERT, RICHARD L
23-02961

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

WALLACE, DAVID J
23-02975

VIDEO KING
OMAHA NE 68154

YBARRA, DAVID J
23-02958

ANGEL PLAYING CARDS MFG KYOTO
HIGASHIOMI NA 527-0232

ZICCARDI, DANIEL T
23-02973

VIDEO KING
OMAHA NE 68154

NON-PROFIT GAMBLING MANAGER

GILL, MELODY M
61-03522

FOE AUX 03862
SHELTON WA 98584

ROSS, ELIZABETH J
61-04709

FOE 02681
KIRKLAND WA 98083

RUBIO, ROBBI L
61-04601

LOOM 01925
QUINCY WA 98848

TUPPER, PATRICIA A
61-04712

40 & 8 00135
SHELTON WA 98584

WITHERS, KENNETH E
61-04708

FOE 00002
SPOKANE WA 99208

SERVICE SUPPLIER REPRESENTATIVE

BAKER, RONALD G
63-00866

POWER STRATEGIES LLC
LAS VEGAS NV 89119

KLINE, BRETT C
63-00871

MAVERICK GAMING
LAS VEGAS NV 89119

MADDOCKS, STEPHANIE L
63-00867

POWER STRATEGIES LLC
LAS VEGAS NV 89119

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

BAKER, VICTORIA D 68-35349	B	EMERALD DOWNS AUBURN WA 98001
BRAY, DANA L 68-32203	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
BUTTERMORE, DUANE E 68-35348	B	LANCER LANES/REST AND CASINO CLARKSTON WA 99403-2219
CARDEN, STEPHANIE L 68-35345	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802
COTTON, ELYSSIA G 68-35344	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
DAMDY, LAMYANG N 68-05420	B	FORTUNE CASINO - RENTON RENTON WA 98055
GOEHNER, CHRISTINA J 68-25168	B	HAWKS PRAIRIE CASINO LACEY WA 98516
GRIFFIN, JASON M 68-03621	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 98041
GUY, CHRISTOPHER D 68-22129	B	RC'S AT VALLEY LANES SUNNYSIDE WA 98944
HELLA, TRAVIS J 68-35368	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
HERNANDEZ, ULISES A 68-35370	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
HIPP, CHLOE J 68-34893	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
HUANG, MEILING 68-35346	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
HUBER, CLARA C 68-35380	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
ISHIKATA, MELVIN H 68-35374	B	CASINO CARIBBEAN KIRKLAND WA 98034
JAVIER, MELITO S 68-35336	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

KIESEL, KAITLYNN M 68-35371	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
KIRBY, JAMISON C 68-35352	B	ALL STAR CASINO SILVERDALE WA 98383
LANDERVILLE, CRYSTAL D 68-09297	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
LIU, ZHIYU 68-35354	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
MANG, SAROM 68-35340	B	FORTUNE CASINO - TUKWILA TUKWILA WA 98168
MANGANO, LEALA M 68-33348	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
MAZARIEGOS, MARK J 68-35357	B	WILD GOOSE CASINO ELLENSBURG WA 98926
MC OUADE, BRIAN 68-35342	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 9804
MEDLIN, JAMES A 68-35361	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
MILLER, CHASE A 68-35365	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
MUNDAY, HALEY I 68-35360	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804
NGUYEN, THI HONG VAN 68-35347	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
NGUYEN, THUY B 68-35355	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
NOTO, KELLY M 68-35373	B	THE PALACE LA CENTER WA 98629
PELLETIER, MATTHEW J 68-29169	B	EMERALD DOWNS AUBURN WA 98001
PEREZ MONTANEZ, MARICELA 68-35353	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

REININGA, MARK A 68-18753	B	ROXY'S BAR & GRILL SEATTLE WA 98126
RICKMAN, PATRICK M 68-34904	B	WILD GOOSE CASINO ELLENSBURG WA 98926
RILEY, ASHLEY N 68-35366	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
ROEDL, AUSTIN M 68-35341	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
ROGERS, SASHIA E 68-35358	B	THE PALACE LA CENTER WA 98629
ROSEN, DANIEL M 68-35362	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
SAN NICOLAS, HILBERT HENRY C 68-35377	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
SANCHEZ, CELINE M 68-35367	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
SIPE, PAMELA M 68-19379	B	ROXY'S BAR & GRILL SEATTLE WA 98126
SOUTH, STEVEN L 68-35350	B	CLUB HOLLYWOOD CASINO SHORELINE WA 98133
STEELE, WILLIAM D 68-35351	B	FORTUNE CASINO - TUKWILA TUKWILA WA 98168
STROH, AUSTEN R 68-34329	B	ROYAL CASINO EVERETT WA 98204
SU, SAP U 68-35356	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
TAJALLE, TRICIA-LYNN N 68-34874	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
TAN, SHUFEN 68-35343	B	ROMAN CASINO SEATTLE WA 98178
TEP, TERRY 68-30524	B	MACAU CASINO LAKEWOOD WA 98499

PERSON'S NAME
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EMPLOYER'S NAME
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NEW APPLICATIONS

CARD ROOM EMPLOYEE

THAO, SARAH T 68-34133	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
TODD, ERIC A 68-34834	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
WALKER, ANDREW 68-35359	B	FORTUNE CASINO - RENTON RENTON WA 98055
WALKER, JACK D JR 68-10414	B	IRON HORSE CASINO AUBURN WA 98002
WHITMIRE, TATIANA L 68-35363	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
YU, XUEJIAO 68-34224	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
ZHEN, CAROL X 68-30989	B	SILVER DOLLAR CASINO/SEATAC SEATAC WA 98188

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

CARTER, PAI-NUA-NUH R
69-47090

COLE, SIDNEY A
69-47091

HADDOCK, BARBIE L
69-39685

WHITE, MATTHEW A
69-15987

COLVILLE CONFEDERATED TRIBES

BUFF, RITA F
69-47173

CABRERA, ANALUZ
69-47147

FABIAN, DOMINIC M
69-47174

FINLEY, KARA J
69-23796

GEORGE, ASHLEY K
69-29976

MILLER, KAREN M
69-47176

NICHOLS, WILLIAM C
69-47177

WALKER, TRAVIS L
69-47175

KALISPEL TRIBE

ALVARADO, ANTHONY A
69-47009

DAMON, MYCHAL T
69-47043

ESLICK-COOPER, ANTHONY J
69-47044

HAYNES, SAYDELE M
69-47134

HOISINGTON, TIFFANY D
69-47109

JACOBY-LORENZO, REBECCA H
69-47011

JAKOBETZ, TIMOTHY C
69-47108

KNAPP, MICHALA J
69-47133

MC INTYRE, DEBORAH M
69-47180

PENNOCK, MATTHEW R
69-47132

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

RUIZ, ALEX R
69-39756

SMITH, NEVYN M
69-47010

STICKA, TERRY L
69-47131

ULRICH, RIBAN W
69-47135

WYNECOOP, SHAELEEN M
69-47110

LUMMI NATION

FUENTES, DYLAN C
69-46995

PHILLIPS, THOMAS M
69-24584

MUCKLESHOOT INDIAN TRIBE

BETHEL, BRIAN A
69-47128

BIN, BRANDON N
69-47050

ESPIRITU, ROBERTO E
69-47164

NGET, MALY
69-40851

SOHAPPY-LARA, MICHELLE
69-47012

WESTON, CAM T
69-47129

YAMAMOTO, TRACY M
69-47130

NISQUALLY INDIAN TRIBE

AYOUB, AMIER T
69-47041

BRACERO, DESTINY C
69-47122

BRADLEY, WILLIAM R
69-47120

CHAPPELL, EMMY LEA
69-47121

DIVITO, THEODORE A
69-47040

GIFFORD, ISAAC W
69-47042

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NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NISQUALLY INDIAN TRIBE

HATCH, JOSEPH R
69-47124

JAMMES, NANCY M
69-47123

MEABON, JANICE J
69-47048

MIDDAUGH, BRYCE D
69-30376

PYLE, LYDIA M
69-47047

NOOKSACK INDIAN TRIBE

AHO, CLAYTON A
69-46964

ASENCIO, ERIKA Y
69-16216

BECKETT, WILLIAM R
69-26514

BODENSHOT, PATRICK M
69-47061

CAIN-STEPHENSON, THERESA A
69-28215

CHICORATICH, BRIAN C
69-47066

CLINE, STEVON A
69-20984

COOPER, WILLIAM
69-00457

CORONA, JOSHUA R
69-13185

CRUZ, ROSA M
69-46966

ELWOOD, TYLER L
69-47003

ENDICOTT, ARLENE N
69-26616

FAULKS, ROXANNE M
69-18833

FERRY, JACOB S
69-35254

FLORES, BRANDON C
69-47064

FORNSBY, JOHNEAN L
69-31739

GEORGE, ROY S
69-06382

HARWICK, TYANNA N
69-47056

PERSON'S NAME

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NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NOOKSACK INDIAN TRIBE

HATHAWAY, REBECCA J
69-18857

HAYES, JUDY C
69-47057

HOLLENBECK, SHAWNA R
69-46958

HOUGHTELING, GARY E
69-18752

HUFF, EDEN S
69-38923

HUNTER, ALEXANDRIA J
69-39075

JOHNSON, JILL J
69-47058

KENTNER, JENNIFER M
69-38277

KENTNER, MARTIN J
69-01379

KENTNER, SHANNON C
69-26448

LATHAM, MICHAEL J
69-26294

LEDOSCHUK, JUNA P
69-23938

LUKE, JAYNE E
69-33126

MARTIN, KENNETH T
69-29284

MCCOY, MARY E
69-46965

MERK, MARIA J
69-47059

MEYER, SUZANNA K
69-47068

MILLER, DOUGLAS L
69-47000

MONROE, JACQUELYN R
69-47005

NEFF, DIANE M
69-47054

NEISER, TIFFANY R
69-24088

PERKINS, VICTORYIA L
69-47067

PERRY, LANCE A
69-47159

PRATT, JEREMY D
69-47002

PERSON'S NAME

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NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NOOKSACK INDIAN TRIBE

ROBERTS, CASEY J
69-47148

ROBERTSON-JIMMY, TAMMY L
69-08650

SALAZAR, VIOLETTE A
69-47060

SEVERSON, TYLER W
69-47062

SEYMOUR, JOSHUA S
69-47063

VANDERHEIDE, ASHLEY A
69-47004

VINUP, TRISHA L
69-06950

WILSON, DARLENE E
69-35282

YATES, BRANDON E
69-31898

PORT GAMBLE S'KLALLAM TRIBE

AITON, MALISSA M
69-47053

MC GUIRE, KATHERINE A
69-47069

MILMINE, KAREN L
69-47052

SHELTON, JENNIFER L
69-47070

PUYALLUP TRIBE OF INDIANS

BAXLEY, CLARISSIA R
69-46996

CLAUSEN, ADAM C
69-47073

COOK, SHIOUAN O
69-47171

ERCANBRACK, JOSEPH S
69-47116

FALECKI, STEVEN J
69-47096

GABRIEL, MAILE M
69-07582

HAND, LUCCA A
69-47125

HAYWOOD, BREIONNE A
69-47162

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

HEDLUND, GLORIA G
69-39147

HENDERSON, ANNALISA A
69-47020

JENNINGS, STEVEN F
69-47049

KERSHUL, ANN E
69-46997

KNIGHT, DAWSON E
69-47014

LUTALI, MAHANA V
69-47170

PATHAMMAVONG, ROMEO N JR
69-47022

REVIERA, JAMES A
69-47126

SABLAN, JONATHAN HENRY S
69-47167

SALIMA, SARAI M
69-47115

TOATELEGESE, NIFAE
69-47075

WASTE', WAMBDE H
69-47172

WROLSON, JEFFREY E
69-05859

QUINAULT NATION

HAYES, JERALD M II
69-47102

HOBUCKET, ANTHONY L JR
69-47206

MCEVERS, AMANDA S
69-47101

MEISSNER, GLENN E
69-47103

SPOKANE TRIBE

EVANS, CECILIA A
69-47046

FLETT, JEFFREY M
69-44816

GARCIA, ALYSSA R
69-46986

HUEY, BRANDEE L
69-36298

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

KUCIRKA, MELISSA P
69-47160

LEPORE, PATRICK A
69-46917

MUNDAHL, CATHERINE S
69-46987

POWERS, JENNIFER L
69-47007

WANG, BILLY S
69-39941

SQUAXIN ISLAND TRIBE

BOE, HEATHER L
69-46985

DARDANO, JACOB T
69-47006

DOWNER, DAWN M
69-47027

ESCAMILLA, RICHARD A III
69-47018

GRIESS, JARED A
69-18464

HAND, CHRISTIPHER J
69-47028

HEARNDON, DRESEAN I
69-47089

HOLLOWAY, RICHARD R
69-03039

KNIGHT, DWAYNE K
69-46983

MICHALAK, EDWARD E
69-08073

VANDERWAL, MICAELA J
69-47087

WHETHAM, DAVID M
69-47156

STILLAGUAMISH TRIBE

CEREZO, DANIEL
69-47212

DIGIULIO, PETER J JR
69-47211

DURRETT, NANCY L
69-47185

FERREIRA, LEAANNE E
69-47021

PERSON'S NAME

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NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

STILLAGUAMISH TRIBE

FRIGARD, JOURDAN R
69-47023

GROHOSKE, JASON L
69-47163

HANSEN, BRANDON B
69-47094

HAYES, RYAN D
69-47093

HLEBECHUK, ANTHONY R
69-47105

KUNKEL, ANESHA L
69-47025

LEONARD, GARRETT B
69-47184

LINDSTRAND, CURTIS W
69-47024

MATHIS, TATE R
69-44430

MAYNARD, ZACHARY J
69-47179

PLATT, DYLAN T
69-39009

RIOS, RAMON A SR
69-47106

TOTI, JEFFREY M
69-47178

WHARTON, ANDREAN J
69-33438

WILMS, MACKENZIE E
69-47107

WILSON, RYAN S
69-47127

SUQUAMISH TRIBE

FLYNN, JEFFREY D
69-47029

FRYE, ROBERT E
69-47189

MORTON, LORRAINE D
69-47008

OLD COYOTE-BAGLEY, JOHNATHAN S
69-47161

SWINOMISH INDIAN TRIBAL COMMUNITY

ROSE, ANDREW J
69-47071

THE TULALIP TRIBES

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

AUGUST, JASMINE I
69-47085

BABCOCK, CHRISTOPHER M
69-47097

BENDER, BRANDY L
69-46998

BRADSHAW, STANLEY F
69-46971

CHEN, YANMEI
69-47118

CLIFFORD, RICHARD G
69-47035

CORANES, SARSI L
69-47084

CRONCE, KASSIDY R
69-46999

CURY BROWN, NADIM E
69-47078

DELGADO, ADRIAN S
69-47077

EDWARDS, LOREN M JR
69-28026

ELSTON, RACOUEL A
69-47079

ENICK, KANIM P
69-47166

ERVIN, JASON W
69-47038

FIELD, ROBERT P
69-47083

GUSS, ALIX K
69-47080

GUTHRIE, EDWARD J
69-37867

JONES-CHARLES, TRENTON D
69-42390

LY, HOA
69-47117

NAKASONE, KIKOLANI B
69-47082

NAPEAHI, MARLIAH L
69-47099

NESSINGER, DEVANI T
69-47037

NORWOOD, BRENDA L
69-47098

PARMELY, BYRON K
69-47100

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

PHAM, ROXANN B
69-47036

REAM, COLTON C
69-47165

RURUP, CHRISTIAN M
69-47081

SIMPSON, MICHAEL P
69-47031

SMITH, HANNAH G
69-47030

TUDORACHE, GABRIEL M
69-47086

ZHAO, CUILI
69-47119

UPPER SKAGIT INDIAN TRIBE

SLAUGHTER, WINDERIA M
69-47039

SUTHERLAND, JESSICA R
69-47157

SWANSON, RICK W
69-04520

THORNTON, ROBINLYNN G
69-46984

YAKAMA NATION

ALBERT, KATHLEEN A
69-07979

ALCARAZ MENDOZA, ANGELA C
69-47213

BILLY, THEODORE A
69-18294

HERT, DEBBORAH J
69-47145

JOHANN, DANIEL Z
69-10812

KISHWALK, JADEN L
69-47143

LEE, ANTHONY R
69-47142

LORA, ISAIAH T
69-47141

MILLER, SAMANTHA M
69-31190

OLNEY, ZACHARY A
69-47140

PERSON'S NAME

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NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

YAKAMA NATION

PEALL GADLEY, JESSICA J
69-35431

ROOT, JESSICA R
69-47138

SCHAAF, BILLIE DEE N
69-47139

SCHAAF, SHAWNOAH N
69-47137

STUBER, LYDIA A
69-47146

STWYER, FORREST B
69-31276

TEWEE, CARISSA L
69-34095

WOODWARD, JORDON T
69-47074

YAHTIN, LAVANDER J
69-47136



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Current House- Banked Locations Operating		44			
	City	Commission Approval Date	License Expiration Date	Org #	License #
ACES CASINO ENTERTAINMENT	SPOKANE VALLEY	Mar 13, 2014	Dec 31, 2019	00-23112	67-00325
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2020	00-18357	67-00058
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2019	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2019	00-11170	67-00183
CARIBBEAN CARDROOM	KIRKLAND	Aug 13, 2009	Mar 31, 2020	00-21882	67-00285
CASINO CARIBBEAN	KIRKLAND	Nov 15, 2005	Sep 30, 2019	00-20427	67-00238
CASINO CARIBBEAN	YAKIMA	Mar 14, 2002	Dec 31, 2019	00-17603	67-00093
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2019	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2019	00-24296	67-00339
CLUB HOLLYWOOD CASINO	SHORELINE	Sep 9, 2010	Jun 30, 2020	00-22132	67-00303
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2020	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2020	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2020	00-21847	67-00281
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2020	00-23814	67-00335
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2019	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2020	00-23465	67-00329
GOLDIE'S SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2019	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2019	00-19513	67-00194
GREAT AMERICAN CASINO/LAKEWOOD	LAKEWOOD	Aug 14, 2003	Jun 30, 2020	00-19258	67-00184
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2019	00-12554	67-00012
HAWKS PRAIRIE CASINO	LACEY	Jul 12, 2001	Jun 30, 2020	00-17579	67-00091
IRON HORSE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2019	00-19477	67-00192

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Current House- Banked Locations Operating

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	City	Commission Approval Date	License Expiration Date	Org #	License #
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2019	00-15224	67-00006
LANCER LANES/REST AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2019	00-21681	67-00276
LAST FRONTIER	LA CENTER	Feb 11, 1999	Sep 30, 2019	00-11339	67-00055
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2020	00-21305	67-00267
MACAU CASINO	TUKWILA	Jan 12, 2012	Sep 30, 2019	00-22573	67-00319
MACAU CASINO	LAKEWOOD	Jul 12, 2007	Mar 31, 2020	00-20428	67-00239
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2019	00-13069	67-00173
PALACE CASINO LAKEWOOD	LAKEWOOD	Jan 14, 1999	Dec 31, 2019	00-16542	67-00028
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2020	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2020	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2020	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2020	00-17613	67-00057
ROXY'S BAR & GRILL	SEATTLE	Nov 18, 2004	Jun 30, 2020	00-20113	67-00231
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2020	00-22130	67-00301
SILVER DOLLAR CASINO/MILL CREEK	BOTHELL	Sep 9, 2010	Jun 30, 2020	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2020	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2020	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2020	00-16759	67-00038
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2020	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2019	00-20009	67-00212
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2019	00-21998	67-00287
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2020	00-18777	67-00209

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Applications Pending		2			
	City	Commission Approval Date	License Expiration Date	Org #	License #
PALACE CASINO	LA CENTER			00-24447	67-00340
REGINA'S ON THE WATER	LONGVIEW			00-23997	67-00337



COMMISSION APPROVAL LIST
(Class III Gaming Employees)
August 2019

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SNOQUALMIE CLASS III GAMING EMPLOYEES.....	2

PAGES: 2

Based upon the licensing investigations, staff recommends approving all new Class III employees listed on pages 1- 2.

PERSON'S NAME

CERTIFICATION NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEES

COWLITZ INDIAN TRIBE

BARNES, CHRISTOPHER J
69-41665

BLESSING, BOBBI D
69-46993

BRIDGMAN, STEVEN R
69-46988

BROOKS, MACKENZIE P
69-47019

DOLGIKH, ROMAN R
69-46976

ESTLICK, ADELINA
69-46990

FARNWORTH, CALEB N
69-46979

HILL, PHILLIP H
69-46982

HOLLEY, KRISTIN E
69-46959

HUANG, HUNG-HAN
69-46975

HUANG, YI TING
69-46974

JAMES, BREEANA K
69-46961

JENSON, DUANGDI
69-46978

KRAVITZ, HILLARY E
69-47015

KUEHLEM, PATRICIA A
69-47112

LAL, NEHA N
69-46994

LUBICK, MATTHEW J
69-46960

MARIANO, MELANIE S
69-47026

MAURICIO, CONSUELO
69-47017

PECK, TRACI J
69-47111

PHAN, PHUONG T
69-47016

RAINIERI, MARC K
69-46977

ROBINSON, EMILY L
69-46980

ROSIER, BARBARA E
69-46962

PERSON'S NAME

CERTIFICATION NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEES

COWLITZ INDIAN TRIBE

SOTO, HIPOLITO JR
69-46981

VILDOSOLA, GILBERT A
69-46992

WASKAS, PRISCILLA B
69-46989

WESTLAKE, PATRICIA L
69-47113

WHITE, CHRISTIAN M
69-47114

XU, SHUHUI
69-46991

SNOQUALMIE TRIBE

CHEN, LING
69-47013

KALBFLEISCH, PETER J
69-47033

KANG, YOUNG TAE
69-47034

WEISSENFLUH, ANDREA D
69-47032



Washington State Gambling Commission

Pre-Licensing Report

Manufacturer

Part I Licensing/Organization Information

Type of Approval Manufacturer License	Premises/Trade Name/Address Play More Yo, LLC 1 PPG Place, Floor 31 Pittsburgh, PA 15222
Date of Application April 5, 2019	

APPLICANT INFORMATION

Name Play More Yo, LLC	License Application # 20-00263	Business Phone # (412) 722-7328
Address 1 PPG Place, Floor 31 Pittsburgh, PA 15222		

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Manufacturer License	Exp. Date 6/30/2020	License Number 20-00263
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COMMISSION STAFF

License Specialist Elizabeth O'Hara	Special Agent Tyson Wilson
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General Information:

Play More Yo, LLC, submitted a new game to the Washington State Gambling Commission. Included with their new game submission is a proprietary dice cup for use with the game. Play More Yo, LLC, is being licensed as a manufacturer because the dice cup is gambling equipment as defined in WAC 230-03-200(6)(e).

Ownership/corporate structure of Play More Yo, LLC:

Title	Name	% Ownership	Units
President	Billy Takacs	50%	65
Vice President	Dawn Takacs	50%	65
Total		100%	

Other Jurisdictions:

The owners were previously licensed individually in Pennsylvania and West Virginia.

Part II
Licensing Investigation Summary

A Special Agent from the Commission's Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation found:

- No unreported people or businesses involved (i.e. substantial interest holders);
- No undisclosed ownership or undisclosed involvement in other activities/businesses;
- No disqualifying administrative history;
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold a license.

Source of Funds:

The company's source of funds for the pre-licensing review was a small amount of money from the owner's other business.

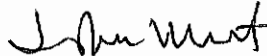
Part III
Staff Recommendations

Based upon the financial and criminal history background investigations, staff recommends licensing Play More Yo, LLC, as a Manufacturer.

Prepared By

Jennifer LaMont, Agent in Charge
Licensing Unit

Signature



Date

7/23/19



**STATE OF WASHINGTON
GAMBLING COMMISSION**

“Protect the Public by Ensuring that Gambling is Legal and Honest”

August 8, 2019

TO: COMMISSIONERS:
Bud Sizemore, Chair
Julia Patterson, Vice Chair
Christopher Stearns
Ed Troyer
Alicia Levy

FROM: Brian Considine, Legal and Legislative Manager
Legal and Records Division

**SUBJECT: Andrew Williams – CR 2018-00287
Petition for Review Materials – August 8, 2019 Commission Meeting**

Commission staff filed a Petition for Review to the Commissioners in the above-referenced case. Commission staff challenges the Administrative Law Judge’s Initial Order finding a violation occurred but reduced the penalty from revocation to a one-year suspension of the Licensees’ public card room employee license.

Enclosed in your Commission Meeting packet is the Petition for Review filed by Assistant Attorney General Kellen Wright. No response to staff’s Petition was received from Mr. Williams. For reference, the complete case record, including surveillance video and audio recordings and transcripts of the administrative hearings, was previously provided to you via USB thumb drives.

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BEFORE THE WASHINGTON STATE GAMBLING COMMISSION

In the Matter of:

ANDREW L. WILLIAMS,
Granger, Washington,

License No. 68-06699,

Licensee.

OAH No. 08-2018-GMB-00067
GMB No. CR 2018-00287

WASHINGTON STATE GAMBLING
COMMISSION STAFF'S PETITION
FOR REVIEW

I. INTRODUCTION

Andrew Williams, the Licensee in this case, was involved with an incident at the Red Dragon Casino in Mountlake Terrace. During the incident, the Licensee got into a dispute with a fellow poker player. The Licensee became so disruptive and angry that play at the poker table had to cease. The Licensee would not calm down, and was so unruly that he was told to leave by casino staff. The Licensee refused to do so. Despite being told that police would be called to remove him if he did not leave, the Licensee remained at the poker table, continued to act hostile toward the other player, and continued to disrupt play.

As promised, casino staff contacted the police. Police were able to get the Licensee to leave the poker table, but he still refused to leave the casino. Eventually, after asking the Licensee to leave multiple times with no effect, the police officer had to physically remove the Licensee. As he was being escorted out the door of the casino, the Licensee turned and deliberately shoved the police officer in the chest. The officer had to radio for backup to expedite their response.

1 Once outside, the Licensee remained unruly and hostile. Twice he approached the police
2 officer in a manner that made the officer fear for his safety. Only when the officer said he would
3 use force should the Licensee approach him again did the Licensee back away – at least
4 temporarily. When the backup officers arrived, the Licensee began yelling and approaching
5 them, and the original officer had to push the Licensee back to ensure that the arriving officers
6 were able to safely leave their vehicles. Finally, the Licensee was able to be calmed down. At
7 the request of the casino, he was trespassed from the Red Dragon.

8 These facts were largely undisputed. Despite this, the Administrative Law Judge (ALJ)
9 found that the Licensee had demonstrated, by clear and convincing evidence, that the Licensee
10 remained qualified for licensure. Additionally, the ALJ found that license revocation was too
11 significant a penalty for the Licensee’s conduct, and interposed a one-year suspension instead.
12 In so doing, the ALJ erred. The Licensee’s conduct falls unacceptably short of the standards
13 required of gambling licensees. Additionally, the Licensee’s conduct creates significant issues
14 for others involved in the gambling industry, including members of the Gambling Commission
15 Staff. In failing to recognize these concerns, and in departing from the penalty of license
16 revocation sought by the Gambling Commission Staff, the ALJ erred. The Gambling
17 Commission Staff therefore asks the Commission to review this case, and to reinstate the
18 revocation of the Licensee’s gambling license.

19 **II. FACTS UNDERLYING THE VIOLATION**

20 The Commission issued card room employee license 68-06699 to the Licensee,
21 Andrew Williams. The license was issued subject to the Licensee’s compliance with state
22 gambling statutes and Commission administrative rules.

23 During the early morning hours of December 3, 2017, the Licensee played poker at the
24 Red Dragon Casino. Ex. 10. While playing, the Licensee was loud and disruptive, and was
25 cursing at the table. Ex. 8. After losing a pot to another player, the Licensee began to yell at the
26 other patron. *Id.* At one point, the Licensee was reaching across the table to point in the face of

1 the other player. Ex. 11. The other player used her phone to knock the Licensee's hand away. *Id.*
2 The Licensee then began to claim that he had been assaulted. Ex. 1. The floor supervisor came
3 over and asked the Licensee to be quiet and to calm down. Ex. 8. The Licensee refused to do so,
4 and began to yell at the supervisor. *Id.* The supervisor told the dealer to deal the Licensee out of
5 the game, and asked the Licensee to leave, but the Licensee refused. Ex. 5. The supervisor then
6 called 911. *Id.*

7 Officer Jason Robinson of the Edmonds Police Department was close to the casino and
8 responded to the call. Ex. 1. Officer Robinson arrived at the casino and quickly identified the
9 Licensee. *Id.* The supervisor confirmed Officer Robinson had identified the correct patron and
10 said that the patron needed to leave the casino. *Id.*

11 Officer Robinson then contacted the Licensee. Ex. 1. Officer Robinson told the Licensee
12 that the casino wanted him to leave, and that it was time to cash out his chips. *Id.* The Licensee
13 said he wanted to file a report against one of the other players for bumping his hand with a
14 phone.¹ *Id.* The Licensee went to cash his chips out with the supervisor. *Id.* The Licensee,
15 however, also continued to yell about wanting to file a report. *Id.* Officer Robinson attempted to
16 explain to the Licensee that he could contact Mountlake Terrace police to file a police report. *Id.*
17 The Licensee would not listen, and refused to leave. *Id.*

18 During this interaction, the Licensee took a step around the counter that the supervisor
19 was using. Ex. 1. Officer Robinson was concerned that the Licensee was entering a restricted
20 area and that, given his anger at the supervisor, the Licensee could commit an assault. *Id.* Because
21 the Licensee appeared to be becoming more aggressive and was not leaving as directed,
22 Officer Robinson took Williams' arm and began to escort him out of the casino. ² *Id.* The

23 ¹ Officer Robinson, understandably, thought that the Licensee was asking for a *police* report to be filed.
24 At the hearing, however, the Licensee claimed that he was really asking for a *casino* report to be filed. In Finding
25 of Fact 4.19-.20, the ALJ says that the Licensee was seeking an incident report from the casino. Regardless of
26 what report the Licensee was upset about, he had no right to remain on the casino's property once he had been
told to leave, and no justification for refusing the officer's directives to leave the casino.

² The Licensee later claimed that, once he and the officer were out-of-view of the surveillance cameras,
the officer grabbed his throat and pushed him onto a poker table. Licensee's Exhibit 4. The ALJ found that the

1 Licensee continued yelling as he was removed from the building – including at the poker player
2 he had the original dispute with. *Id.* When Officer Robinson reached the door with the Licensee,
3 the Licensee turned and shoved Officer Robinson in the chest, causing the officer to move
4 backward.³ *Id.*

5 Out of concern for his – and the Licensee’s – safety, Officer Robinson asked Mountlake
6 Terrace police to hurry and respond to the casino. Ex. 1. Outside, the Licensee continued to act
7 hostile toward Officer Robinson. *Id.* He approached Officer Robinson and raised his hand toward
8 Officer Robinson as he did so. *Id.* Officer Robinson was concerned that he might be assaulted,
9 and so pushed the Licensee’s hand away and told the Licensee to back up. *Id.* The Licensee
10 initially did so, but continued to yell at Officer Robinson and then again stepped closer to him.
11 *Id.* Officer Robinson told the Licensee not to approach him again or he would have to use force.
12 *Id.* Officer Robinson feared that the situation could quickly become a fight. *Id.* Fortunately, the
13 Licensee took the order seriously and stepped back. *Id.*

14 Mountlake Terrace police arrived soon thereafter. Ex. 1. When they did, the Licensee
15 became animated again, and was yelling and waving his arms. *Id.* The Licensee began moving
16 toward the arriving officers, and Officer Robinson had to step in to move the Licensee away
17 from the other officers. *Id.*

18 Mountlake Terrace Police then took over interacting with the Licensee.⁴ Ex. 1. The
19 Licensee was yelling that Officer Robinson had grabbed him by the neck, even though one of
20 the arriving officers, Officer Carl Cronk, had observed Officer Robinson place his hand squarely
21 on the Licensee’s chest.⁵ Ex. 2. Only after “numerous efforts” was Officer Cronk able to get

22 _____
23 officer escorted the Licensee out of the casino while holding the Licensee’s triceps, thus rejecting the Licensee’s
implausible claim. Initial Order, ¶ 4.21-.22.

24 ³ This conduct could have been charged as a felony assault of a law enforcement officer. RCW
9A.36.031(g).

25 ⁴ Multiple Mountlake Terrace officers formed the impression that the Licensee had been drinking.
Officer Carl Cronk described the Licensee as “obviously intoxicated.” Ex. 2. Officer David Nguyen said that he
could “smell intoxicant[s]” when he contacted the Licensee. Ex. 4. The ALJ’s Finding of Fact 4.40 thus erred in
26 indicating that there was no evidence that the Licensee was under the influence.

⁵ The ALJ apparently did not find the Licensee’s claim credible – the ALJ only found that Officer
Robinson had put his hands on the Licensee’s triceps and upper chest. Finding of Fact 4.21, 4.24.

1 Williams to calm down. *Id.* At the request of the Red Dragon, Williams was criminally trespassed
2 from the casino. Ex. 4.

3 The Licensee was charged with violations RCW 9.46.075(1), and of
4 WAC 230-03-085(1) and (9)(a). Commission Staff also charged that the Licensee could not
5 establish, by clear and convincing evidence, that he was qualified for licensure as required by
6 RCW 9.46.153(1) and RCW 9.46.075(8).

7 III. PETITION FOR REVIEW

8 Pursuant to RCW 34.05.464, and WAC 230-17-090, any party, upon receipt of an initial
9 order, may file a Petition for Review within 20 days of service of the order. The reviewing officer
10 “shall exercise all the decision-making power that the reviewing officer would have had to
11 decide and enter the final order had the reviewing officer presided over the hearing[.]”
12 RCW 34.05.464(4).

13 The Gambling Commission Staff disagrees with the following portions of the Initial
14 Order and petitions for review as follows:

15 A. Findings of Fact 4.8-4.9

16 The ALJ largely noted facts that were consistent with the evidence and testimony
17 introduced at the hearing. It is primarily with the conclusions that the ALJ drew from these facts
18 that the Commission Staff is concerned. However, the ALJ did err in some instances with the
19 factual findings.

20 Findings of Fact (Finding) 4.8-4.9 are such an instance. In these findings, the ALJ found
21 that another player “assaulted” the Licensee during the course of their argument (Finding 4.8)
22 and that the poker dealer ignored the player striking the Licensee (Finding 4.9). These findings
23 are incorrect.

24 The Licensee in this case was not assaulted. The incident that the ALJ was referring to
25 appears to have occurred after Supervisor Ng was called over because of the Licensee’s
26 disruptive behavior. Ex. 8. After the Licensee refused to quiet down, and continued to yell,

1 Supervisor Ng asked the Licensee to leave, and told the dealer to deal him out. Ex. 11. The
2 Licensee continued to yell and to reach across the table to point at the woman he had been
3 arguing with. *Id.* He did this multiple times. *Id.* The woman remained leaning back in her chair
4 while the Licensee was pointing and gesticulating at her. *Id.* Eventually, after approximately
5 three minutes, the woman told the Licensee to stop pointing at her. Ex. 8. The Licensee continued
6 to do so, and leaned across the table to get closer to her. Ex. 11. Only at this point did the woman
7 reach out and knock his hand away. *Id.*

8 While some amount of contact may have occurred, it is unreasonable – and untenable –
9 to conclude that the Licensee was assaulted. He had been aggressively gesturing at her and
10 yelling for minutes. She only took any action in response when he leaned over the table to get
11 even closer to her while pointing. It appears that the woman may have a reasonable case of self-
12 defense, and, in any event, describing the interaction as an assault of the Licensee is simply not
13 an apt description of what occurred. For this reason, Finding 4.8 is improper and should be
14 corrected. So too should Finding 4.9, insofar as it implies that there was any action that the poker
15 dealer should have taken under the circumstances, save perhaps to hasten the departure of the
16 Licensee from the casino.

17 By discussing what occurred as an “assault,” the ALJ improperly, and inaccurately, alters
18 the context of what followed. The Licensee was not a victim of an assault, but rather instigated
19 and exacerbated a confrontation at the poker table. Indeed, the supposed assault happened *after*
20 the Licensee had already been so disruptive that he was being kicked out of the casino. The
21 Licensee’s demands to file a report based on the assault were not a legitimate response to being
22 attacked, but instead are properly seen as a tactic to delay his removal or to continue to harass
23 the woman that he had been arguing with. Because the Licensee continued to yell about an
24 assault during the remainder of the incident, it is important to recognize the triviality and
25 contrived nature of what the Licensee was referencing. In disregarding the weight of the
26

1 evidence, and in crediting the Licensee's self-serving description of what had occurred, the ALJ
2 altered the context of the subsequent events, and, in doing so, erred.

3 **B. Finding of Fact 4.36**

4 This Finding implies that the Licensee only used profanity once at the poker table. This
5 is incorrect. Although the Licensee did apologize after cursing at the table initially, he became
6 irate and continued to curse after that point. Ex. 8. The ALJ erred in finding to the contrary.

7 **C. Findings of Fact 4.39, 4.43**

8 These Findings either reference the Licensee's personal belief about how the poker dealer
9 and floor supervisor should have handled the situation (Finding 4.39), or about how others who
10 were not present during the incident support the Licensee (Finding 4.43). Both Findings are
11 accurate, as far as they go. Neither fact, however, is relevant to this case. However the Licensee
12 later believed the situation should have been handled by others, it does not change the
13 inappropriateness of his conduct, much less excuse it. Similarly, whatever the reactions of the
14 Licensee's co-workers to the Licensee's description of the incident, it changes nothing about
15 what actually occurred. To the extent that these Findings imply that they have some relevance
16 to the violation in this case, the ALJ erred by including them.

17 **D. Conclusions of Law 5.8-5.10**

18 It is "the affirmative responsibility of each applicant and licensee to establish by clear
19 and convincing evidence the necessary qualifications for licensure of each person required to be
20 qualified under this chapter." RCW 9.46.153(1). A licensee's failure to meet this burden is a
21 basis for the revocation of their gambling license. RCW 9.46.075(8). In Conclusions of Law
22 (Conclusions) 5.9-5.10, the ALJ concluded that the Licensee had met this burden. In doing so,
23 the ALJ applied an erroneous standard. In Conclusion 5.8, the ALJ determined that "with the
24 exception of the December 3, 2017 incident, the [Licensee] has no previous disciplinary actions
25 or sanctions against him in his 20 years in the gaming industry." Whether or not the Licensee
26 had prior administrative history, however, has no bearing on whether the December 3, 2017

1 incident disqualifies him from licensure. There is no requirement that the Licensee have prior
2 administrative history before license revocation becomes appropriate. Such a requirement would
3 undermine the Commission's ability to effectively regulate the gambling industry, as cases such
4 as the Licensee's demonstrate.

5 In this case, the Licensee began an altercation that disrupted casino operations. He
6 continued to disrupt the casino despite being asked by casino employees to stop. Instead of
7 stopping, the Licensee escalated the situation. When casino employees asked the Licensee to
8 leave the casino, he refused to do so. The Licensee had no legal right to refuse the lawful demand
9 to leave. Yet he continued to refuse to leave, even once police had been called. He did eventually
10 deign to leave the poker table, but refused the officer's commands to leave the casino. The
11 Licensee had to be physically removed from the building. During the course of his removal, the
12 Licensee intentionally shoved the police officer. Outside, the Licensee repeatedly approached
13 the officer in a threatening manner, despite the officer telling him to stay back. The Licensee
14 only stopped once the officer threatened to use force to defend himself. Even that respite was
15 only temporary, as the Licensee began yelling and approaching other officers as they arrived.

16 The Licensee thus disrupted casino operations; disobeyed lawful commands; created a
17 risk of an assault or other altercation inside the casino; shoved a police officer while the officer
18 was in the course of his duties; approached the officer aggressively multiple times outside of the
19 casino, again creating a risk of a physical altercation; and eventually required the intervention of
20 numerous police officers to defuse the situation. This conduct falls far below the standards
21 required of gambling licensees. It also raises significant concerns about future regulation of the
22 Licensee. He has demonstrated a willingness to ignore directives that he disagrees with, and to
23 react aggressively, if not violently, to attempts to regulate his conduct. Gambling Commission
24 Special Agents are unable to quickly call on the same resources that police officers can; the risk
25 to these agents when interacting with the Licensee is unacceptably high, and this is true
26 regardless of the Licensee's prior history. The ALJ erred by finding to the contrary, and in

1 finding that the Licensee has demonstrated his continuing fitness for licensure. The Gambling
2 Commission should reverse this determination, and find that the Licensee has failed to prove, by
3 clear and convincing evidence, that he remains qualified for a gambling license.

4 **E. Conclusions of Law 5.15, 5.17-5.19**

5 Pursuant to RCW 9.46.075, the Gambling Commission may “revoke any license or
6 permit issued by it, for any reason or reasons, it deems to be in the public interest.” Although the
7 Commission is empowered to determine what licensee conduct may implicate the public interest,
8 the Legislature has also enumerated certain grounds for revocation. One such ground is that a
9 licensee has violated a gambling rule. RCW 9.46.075(1). The Gambling Commission has
10 adopted rules regulating licensee conduct. Under WAC 230-03-085(9)(a), the Commission may
11 revoke a license when the applicant “[p]oses a threat to the effective regulation of gambling, or
12 creates or increases the likelihood of unfair or illegal practices, methods, and activities in the
13 conduct of gambling activities, as demonstrated by... [the licensee’s] [p]rior activities.”

14 Although the ALJ did not explicitly state that the Licensee had violated
15 WAC 230- 03- 085(9)(a), the Initial Order makes it clear that he did. This is because the ALJ
16 found that a year-long suspension of the Licensee’s gambling license was an appropriate
17 sanction. The ALJ could not have found this had he not first determined that the Licensee had
18 committed a violation. This determination is undoubtedly correct. As described *supra*, the
19 Licensee’ s conduct on December 3, 2017 raises serious concerns about the Licensee’s
20 compliance with Gambling Commission directives, and to the safety of the agents enforcing
21 those directives.

22 The ALJ did find otherwise, but instead determined that a suspension, rather than license
23 revocation, was the appropriate penalty. In Conclusion 5.15, the ALJ determined that this was
24 the Licensee’s first incident involving the Gambling Commission; that it occurred while the
25 Licensee was a patron, not an employee; that the Licensee did not benefit financially, and that
26 the incident did not impact players or the public at large. Based on this determination, in

1 Conclusions 5.17-19, the ALJ determined that license revocation was too harsh a penalty, and
2 that a one-year license suspension was the appropriate penalty. In reaching these conclusions,
3 the ALJ erred.

4 First, the Licensee's lack of prior incidents is not a particularly compelling mitigating
5 factor. While a lack of prior incidents is better than an abundance of them, it is very concerning
6 that, in what may be the Licensee's first experience of an adverse interaction with casino
7 management or being subject to an action with which he disagreed, the Licensee became so
8 disruptive that multiple police officers, from two different departments, had to respond. The
9 Licensee also shoved a police officer backward during the incident, and made the officer
10 concerned that he was going to be assaulted by the Licensee outside of the casino. Given this
11 troubling predicate, the Licensee's lack of prior history does not necessarily ensure his future
12 compliance with Gambling Commission rules and regulations, nor his compliance with
13 Gambling Commission agents.

14 For similar reasons, the Licensee's lack of a financial motive is not a mitigating factor.
15 For one thing, the Licensee claimed that he *did* have a financial motivation for his actions – he
16 claimed that he was worried he would be fired if he did not fill out a report at the casino. This
17 implies that, should the Licensee feel that his job or financial interest is at stake, he may be
18 willing to ignore lawful orders – or physically resist – in an attempt to, as he sees it, protect his
19 position. Moreover, to the extent that the Licensee did *not* have a financial interest in the incident
20 on December 3, 2017, it makes his actions even more inexplicable and potentially unpredictable
21 in the future. Therefore, whether the Licensee acted out of financial interest or not, it does not
22 mitigate his actions.

23 Finally, the ALJ also erred by determining that neither other patrons nor the public were
24 affected by the Licensee's actions. It is clear that other patrons were affected – the Licensee
25 disrupted casino operations and prevented the poker game he was participating in from
26 continuing until he was removed by police. Even when he was being physically removed by the

1 officer, the Licensee continued to harass the woman he had been arguing with at the poker table.
2 The Licensee's actions also impacted the general public. By requiring five police officers, in
3 four police cars, to respond to defuse the incident, the Licensee made it so that a substantial
4 number of police were not available for other, more significant, duties. Though the deprivation
5 was temporary, it did negatively impact public safety.

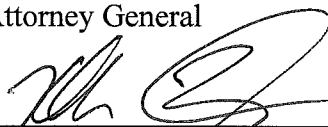
6 The Licensee's conduct was egregious, and raises significant concerns for his future
7 compliance with the Gambling Commission. The ALJ erred in determining that a suspension
8 was more appropriate than license revocation under these circumstances.⁶ The Gambling
9 Commission Staff properly sought license revocation based on the Licensee's actions. The
10 Gambling Commission should therefore reinstate the penalty of license revocation.

11 IV. CONCLUSION

12 The Licensee is not qualified for licensure, and cannot prove that he is qualified by clear
13 and convincing evidence. Based on the Licensee's conduct, license revocation is the appropriate
14 penalty. In finding otherwise, the ALJ committed error. The Gambling Commission Staff
15 respectfully asks that the Gambling Commission review the evidence in this case, that it issue a
16 Final Order finding that the Licensee committed the charged violations, and that it impose a
17 penalty of license revocation for those violations.

18 DATED this 6th day of June, 2019.

19
20 ROBERT W. FERGUSON
Attorney General

21 
22 _____
KELLEN WRIGHT, WSBA #46826
23 Attorneys for Washington State Gambling
Commission Staff

24
25 ⁶ The ALJ also erred by failing to explain why a one-year suspension, and not some other suspension-
26 length, was the appropriate penalty. When an ALJ modifies a recommended penalty pursuant to WAC 230-17-
025(3) and WAC 230-17-137, the ALJ should include specific findings as to why the modified penalty is
warranted. While the ALJ in this case noted some potential mitigating factors and found that revocation was too
harsh a penalty, he failed to explain why the alternative penalty he proposed was correct.

PROOF OF SERVICE

I certify that I served a true and correct copy of this document on all parties or their counsel of record on the date below as follows:

ANDREW L. WILLIAMS
21920 86TH PLACE WEST
EDMONDS, WA 98026

U.S. Mail via state Consolidated Mail Service (with proper postage affixed)

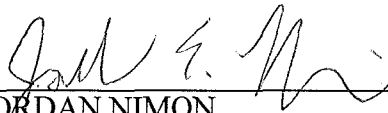
Courtesy copy via facsimile:
(xxx) xxx-xxxx

Courtesy copy via electronic mail:

ABC/Legal Messenger

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 6th day of June, 2019, at Olympia, Washington.



JORDAN NIMON
Legal Assistant



**STATE OF WASHINGTON
GAMBLING COMMISSION**

"Protect the Public by Ensuring that Gambling is Legal and Honest"

August 8, 2019

TO: COMMISSIONERS:
Bud Sizemore, Chair
Julia Patterson, Vice Chair
Christopher Stearns
Ed Troyer
Alicia Levy

FROM: Jim Nicks, Special Agent in Charge, Regulatory Unit

**SUBJECT: National Rifle Association Foundation, Inc. Request to Exceed \$300,000
Limit in Raffle Prizes Paid during License Year October 1, 2019 to
September 30, 2020**

Background:

Our rules require licensees to get your approval prior to offering a raffle prize that exceeds \$40,000 and/or offering raffle prizes that exceed \$300,000 in a license year, WAC 230-11-067.

To seek approval, the licensee must submit a raffle plan that includes:

- (a) The organization's goals for conducting raffles; and
- (b) A brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served; and
- (c) Plans for selling raffle tickets; and
- (d) Brief overview of prizes awarded; and
- (e) Estimated gross gambling receipts, expenses, and net income for the raffles; and
- (f) Any other information that we request or any information the licensee wishes to submit.

Request for Your Approval:

National Rifle Association is seeking your approval to offer raffle prizes exceeding \$300,000 during their license year October 1, 2019 to September 30, 2020.

Staff recommends you approve National Rifle Association's request to exceed the annual raffle prize limit of \$300,000 for their license year October 1, 2019 to September 30, 2020.

Attachments

NRA Foundation Inc./State Fund Committee (00-22598)
Raffle plan to exceed \$300,000.00 prizes
10/1/19 – 9/30/2020

- **Goals for conducting raffle:**

Maximize funds raised through dinners, auctions and raffles in order to support the Foundation's charitable and educational mission.

- **Overview of Mission and Vision**

Funds raised by the NRA Foundation are used to make grants to support qualified groups and activities such as competitive shooting teams, youth firearm safety and educational programs, hunter education, range development and improvement, women's training seminars, law enforcement, Boy and Girl Scouts, 4-H and wildlife conservation efforts among others. A further breakdown of how 2018 funds were disbursed is attached.

- **Specific details of the Raffle**

Committees will sell raffle tickets face to face and at banquets pursuant to the Washington Gambling Commission's rules and regulations. The dates of drawing will be throughout the licensing year. Raffle tickets will sell between \$10-50 and will not exceed the state's threshold of \$100.00. Raffle prizes will include a wide variety of firearms as well as a variety of outdoor and other related merchandise. Prizes will be both donated and purchased merchandise. All merchandise and firearms are secured at all times pursuant to state and federal laws and all firearms will be transferred in full compliance of the law.

Raffles are overseen by the Gaming Manager and all raffle tickets have an equal opportunity to be drawn. At no time will a ticket purchaser draw the winning ticket.

Raffles are set up to be a successful fundraiser by taking into account prior year's raffle ticket sales and adjusting ticket cost and prizes offered based on this as well as the attendance at a dinner.

- **Estimated Numbers**

The NRA Foundation estimates gross gambling receipts for the 2019-2020 licensing year of \$1,000,000.00, estimated prizes of \$500,000.00 and estimated additional costs (printing, supplies) of \$13,500.00, for an estimated net of \$486,500.00. At this time, we do not have a minimum number of projected ticket sales or prizes available as we adjust the number of raffles conducted, price of tickets and prizes throughout the year, based on current sales and the number of donated prizes received.

- **Additional Information**

The NRA Foundation is a 501(c)(3) public charity and is apolitical. It does not engage in political or lobbying activities. Instead funds raised are used to make grants to support qualified groups and activities. Allowing the Foundation to increase the prize amounts will also increase grants to such qualified groups and activities in the state of Washington.

RECORDS

JUL 18 2019

MSG

July 12, 2019

Washington State Gambling Commission
4565 7th Avenue SE
Lacey, WA 98503

RE: NRA Foundation Inc/State Fund Committee (00-22598) request for additional prizes for license year 10/1/2019 – 9/30/2020

Dear Sir/Madam:

Please accept this letter as The NRA Foundation's request to exceed the \$300,000.00 prize limits pursuant to WAC 230-11-067(3) for the license year October 1, 2019 through September 30, 2020. Each year the NRA Foundation's goal is to maximize funds raised through dinners, auctions, and raffles in order to continue to support the Foundation's charitable and educational mission. The Foundation is a 501(c)(3) public charity and is apolitical. It does not engage in political or lobbying activities. Instead, funds raised by the Foundation are used to make grants to support qualified groups and activities such as competitive shooting teams, youth firearm safety and educational programs, hunter education, range development and improvement, women's training seminars, law enforcement, Boy and Girl Scouts, 4-H, and wildlife conservation efforts among many others.

Committees will continue to sell raffle tickets face to face and at banquets pursuant to the Washington Gambling Commission's rules and regulations. Raffle prizes will include a wide variety of firearms as well as a variety of outdoor and other related merchandise. Prizes will include both donated and purchased merchandise. The Foundation expects estimated gross gambling receipts for the 2019-2020 licensing year of \$1,000,000.00, estimated prizes of \$500,000.00, and an estimated net of \$500,000.00.

Thank you very much for your consideration in approving this requested increase. Allowing the Foundation to increase the prize amounts will also increase grants to qualified groups and activities in the State of Washington.

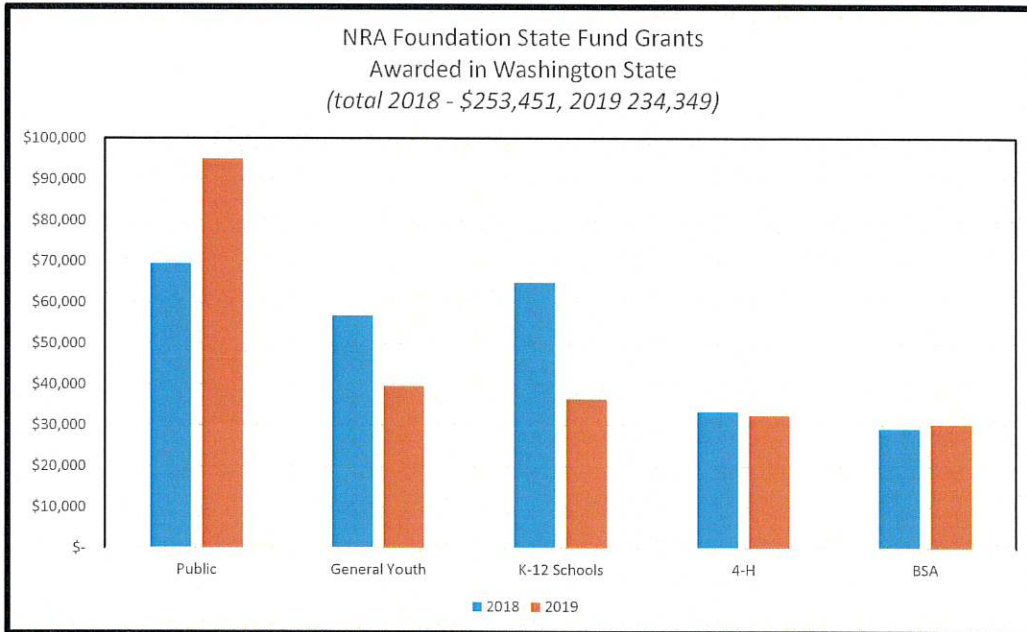
Should you need anything additional or have any questions, please do not hesitate to contact me at (703) 267-1349 or by email kbratsch@nrahq.org.

Sincerely,



Kimber Bratsch
Compliance Manager

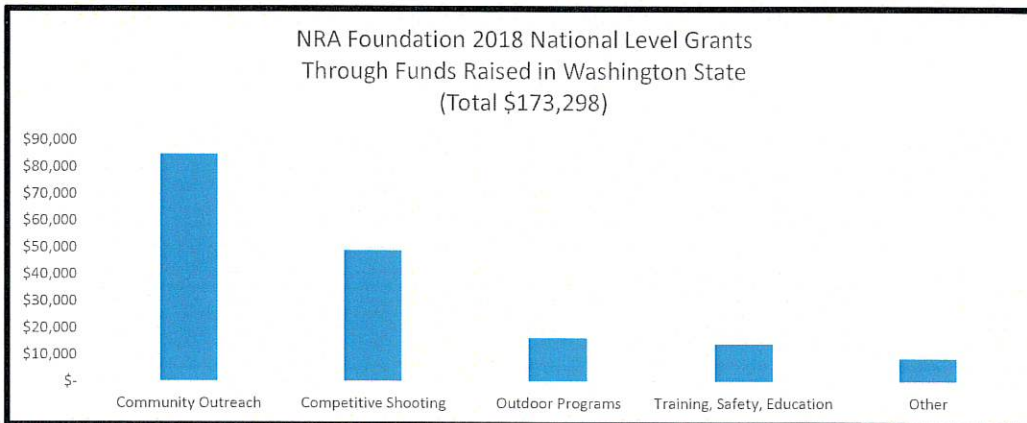
The NRA Foundation has awarded over \$4.25 million in grants directly to local Washington State area programs since inception in 1990, through its State Fund Grant program. Funds raised at events held in Washington State also provide funding for national level grants. The charts below provide grant details for the two most recent years. (Notes: 2019 State Fund is YTD 6/30; the distribution of national level grants is completed at year-end and is not yet available for 2019.)



Public - includes a broad spectrum of programs that promote firearms safety and education with access to the public at large

General Youth - includes programs that promote firearms safety and education designed specifically for youth, including Young Marines, marksmanship teams, FFA, YHEC and others

K-12 Schools - includes JROTC, scholastic clays and other team programs held through K-12 public and private school systems, teaching safety, responsibility and discipline



Community Outreach - includes Eddie Eagle GunSafe® program, Refuse to be a Victim®, National Firearms Museum, Second Amendment education and preservation, media outreach programs, law enforcement awards and scholarships

Competitive Shooting - includes tactical police competitions, disabled shooting tournaments, collegiate competitions and other competitive shooting programs

Outdoor Programs - includes a broad spectrum of outdoor programs that promote firearms safety and education with access to the public at large

Training, Safety, Education - includes law enforcement and general training programs

WSGC

JUL 18 2019

RECORDS



**STATE OF WASHINGTON
GAMBLING COMMISSION**

"Protect the Public by Ensuring that Gambling is Legal and Honest"

August 8, 2019

TO: COMMISSIONERS:
Bud Sizemore, Chair
Julia Patterson, Vice Chair
Christopher Stearns
Ed Troyer
Alicia Levy

FROM: Bill McGregor, Special Agent Supervisor, Regulatory Unit

SUBJECT: Perry Technical Foundation's Request to offer a raffle prize that exceeds \$40,000 and exceed \$300,000 Limit in Raffle Prizes Paid during the License Year

Background:

Our rules require licensees to get your approval prior to offering a raffle prize that exceeds \$40,000 and/or offering raffle prizes that exceed \$300,000 in a license year, WAC 230-11-067.

To seek that approval, the licensee must submit a raffle plan that includes:

- (a) The organization's goals for conducting raffles; and
- (b) A brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served; and
- (c) Specific details of the raffle rules including:
 - (i) Date of the drawing; and
 - (ii) Cost of the raffle tickets; and
 - (iii) Prizes available; and
 - (iv) Security of prizes; and
 - (v) Plans for selling raffle tickets; and
 - (vi) Description of how the licensee protects the integrity of the raffle; and
- (d) An explanation of how the proceeds from the raffle will be used; and
- (e) A plan to protect the licensee in the event of low ticket sales and other risks; and
- (f) An explanation of how the licensee will purchase the prize(s) for the raffle; and
- (g) A projected budget including:
 - (i) Estimated gross gambling receipts, expenses, and net income for the raffle; and
 - (ii) Minimum number of projected ticket sales to break even; and
 - (iii) Corresponding sales and prize levels with projected revenues and expenses for each level; and
 - (iv) Minimum and maximum prizes available; and

(h) Any other information that we request or any information the licensee wishes to submit.

Request for Your Approval:

Perry Technical Foundation is a new licensee and is seeking your approval to offer a raffle prize in excess of \$40,000. They are also seeking approval to offer raffle prizes over \$300,000. Although they are estimating the house to cost \$300,000 they would like approval in case the value exceeds \$300,000.

Staff recommends you approve Perry Technical Foundation to offer a raffle prize in excess of \$40,000 and to exceed the annual raffle prize limit of \$300,000 for their license year ending June 30, 2021.

Attachments

Perry Technical Foundation Raffle Plan to exceed a \$40,000 prize and \$300,000/year

Organization's goals for conducting the raffle:

The role of the Perry Technical Foundation is to assist in reducing the cost of an education at Perry Technical Institute by providing scholarship opportunities to students. This raffle would be dedicated to raise funds in order to enhance student learning by lessening the burden of student loans and debt. Perry Technical Institute is a financially stable institution operating since 1939.

Brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served:

The Perry Technical Foundation is committed to helping students obtain a quality education that is financially attainable. This includes fundraising to support student achievement, developing partnerships to benefit students, and advocating on behalf of students and the institution.

Perry Technical Institute currently offers thirteen programs of certification:

- Agricultural Equipment Technician
- Automotive Technician
- *Business Technology & Accounting
- Construction
- Electrical Technology
- Heating, Ventilation, Air Conditioning & Refrigeration
- *Information Technology & Communication Systems
- Instrumentation & Industrial Automation
- Medical Assisting
- Medical Office Administration & Coding
- Plumbing Technician
- Precision Machining & Manufacturing
- Welding

*Associate of Applied Science Degree

Date of the drawing: Drawing to be held Wednesday, September 2, 2020 at 6:00pm at Perry Technical Institute: 2011 W. Washington Avenue, Yakima WA 98903

Cost of raffle tickets: \$100 (Only 6,000 tickets available)

Prizes available: House at 1003 Brynna Place, Yakima, WA (Built by Perry Technical Institute at an estimated cost of \$300,000). If under 4,000 tickets are sold an alternative cash prize will be paid. See below for details.

Security of prizes: The house will be secured.

Plans for selling raffle tickets:

Sales will be conducted on the campus of Perry Technical Institute, local businesses, as well as at events within Washington State, beginning September 7, 2019 and concluding on August 28, 2020 at 6:00pm.

Ticket sales will be managed by Tressa Shockley (Foundation Director). All sales will be conducted face-to-face. Tressa Shockley will be the primary person overseeing offsite sales and training of volunteers. Special events with locally owned home improvement, grocery stores and community gatherings will be scheduled. Examples of locations: Ace Hardware, Wrays Thriftway, Standard Paint, Helliesen Lumber, McKinney Glass, Country Farm and Garden) Tressa Shockley will provide management and oversight of volunteers selling tickets as well as collection of sales revenue and remaining tickets, following each event session.

Description of how the licensee protects the integrity of the raffle: Tickets will be numbered 1 - 6,000 and issued in bundles of 20 tickets (300 bundles). Bundles of numbered tickets will be assigned to a representative and recorded on the tracking sheet. All tickets of that bundle will be sold and stubs turned into the office each week, before more tickets will be issued to the representative.

Tickets not out for sale/circulation will be kept in a locked safe and will only be removed as needed. Cathy Sterbenz and Tressa Shockley are the only individuals who will have access to the safe.

All ticket tracking information will be recorded on the distribution log, provided by the Washington State Gambling Commission and kept on file for three years.

Each Monday, all monies collected from the previous week will be submitted with a copy of each person's sales report. Data will be entered into a master database. All sales will be audited and tallied for a weekly deposit into a separate bank account that has been established solely for ticket sales. If Monday is a holiday, sales reports and money will be tallied on the next business day. If a discrepancy is found, it should be easy to identify and track who it was. If there is a ticket in question, that stub will be pulled from the group sales until issue is resolved or deemed void. Stubs will then be stored in the safe.

An explanation of how the proceeds from the raffle will be used: The net income from the raffle will be invested by Morgan Stanley to ensure that future earnings would be available to provide a continuous revenue stream for student scholarships.

A plan to protect the licensee in the event of low ticket sales and other risks: An alternative prize will be offered if ticket sales do not exceed 4,000 tickets.

An explanation of how the licensee will purchase the prize(s) for the raffle: Perry Technical Foundation has purchased the land and will pay all costs. Students enrolled in the Construction, HVAC/R, Electrical Technology, and Plumbing programs at Perry Technical Institute are working together with area contractors to build a prize home valued at over \$300,000. The home will be located in a desirable neighborhood of Yakima, WA, located at 1003 Brynna Place.

The practice and techniques learned throughout building this home is of the utmost importance to the preparedness of our students in their respected programs. Perry Technical has a strong reputation for superior skills and training of our graduates.

Projected budget fees based on ticket sales:

	6,000	4,001	4,000	400
Marketing	\$17,000	\$17,000	\$17,000	\$17,000
License Fee	\$2,000	\$2,000	\$2,000	\$2,000
Card Processing	\$12,250	\$8250	\$8250	\$1050
Terminals/Payment Fees	\$2,150	\$2,150	\$2,150	\$2,150
Misc. (booth & event fees, travel costs,	\$2,500	\$2,500	\$2,500	\$2,500
Total Estimated Expenses	\$35,900	\$31,900	\$31,900	\$24,700

Minimum number of projected ticket sales to break even: 290

Corresponding sales and prize levels with projected revenues and expenses for each level:

Ticket sales	6000	4001	4000	290
Gross Receipts	\$600,000	\$400,100	\$400,000	\$29,000
Prize	\$300,000	\$300,000	\$184,500	\$5,000
Expenses	\$35,900	\$31,900	\$31,900	\$23,680
Net Income	\$264,100	\$68,200	\$183,600	\$320

Minimum prize available: Sell 1 – 4,000 tickets for the winner to receive a cash prize equal to 50% of the ticket sales after expenses with a minimum prize of \$5,000.

Maximum prize available: Sell 4,001 - 6,000 raffle tickets for the winning ticket to receive the house valued over \$300,000.

Any other information that we request or any information the licensee wishes to submit:

RULES (to be printed on tickets)

- 6,000 maximum tickets to be sold at \$100 each.
- Grand prize will be a home built by Perry Technical Institute, valued at over \$300,000. (sales must be greater than 4,000 tickets)
- IRS Notice 1340 - Winner is responsible to pay 25% of the fair market value of the prize.
- Alternative prize will be a cash payout of 50% of ticket sales, less expenses (sales must be fewer than 4,000 tickets) with a minimum prize of \$5,000.
- Drawing to be held Wednesday, September 2, 2020 at 6:00pm at Perry Technical Institute
- 2011 W. Washington Avenue, Yakima WA 98903
- Need not be present to win.
- Participants must be 18 years or older.
- Tickets are non-refundable.
- Per IRS regulations, as a game of chance, raffle tickets are not tax deductible.

Marketing Plan

MEDIUM	DETAILS	EST. COST	EST. TOTAL
Radio	Kickoff event- live remote/DJ host On-air mentions/commercials Drawing – live remote/DJ host	\$750 \$2,000 \$750	\$3,500
Social Media	Boost Posts (monthly x 12)	\$100	\$1,200
Print Materials	Posters (11x17) distribute locally Direct Mail to Alumni & Donors Postage Banners Raffle Tickets	\$500 \$3,000 \$1,000 \$1,500 \$1,000	\$7,000
Print Advertising	Yakima Magazine (2 issues) Newspaper/Business Times	\$3,000 \$1,000	\$4,000
Web	Link on perrytech.edu to detail the raffle and rules	\$1300	1300
	Total estimated expenses		\$17,000



Rule Petition to Amend

WAC 230-11-067- Requesting commission approval prior to offering raffle prizes exceeding forty thousand dollars per prize or three hundred thousand dollars in a license year.

August, 2019 – Petition to Initiate Rule-Making

Tab 5: AUGUST, 2019 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Rocky Mountain Elk Foundation, Missoula, Montana	
Background	
<p>Rocky Mountain Elk Foundation is proposing to amend WAC 230-11-067, Requesting commission approval prior to offering raffle prizes exceeding forty thousand dollars per prize or three hundred thousand dollars in a license year, to increase the annual raffle prize limit that a licensee can reach before needing to request Commission approval from three hundred thousand dollars to five hundred thousand dollars.</p>	
<p>Under current rules, raffle prizes must not exceed forty thousand dollars per prize or three hundred dollars in total raffle prizes in a license year except as authorized in WAC 230-11-067, which allows the commissioners to vote to approve a licensee to exceed raffle prize limits if a licensee shows good cause in writing. WAC 230-11-067 was adopted in May, 2010 and established guidelines for raffle licensees to follow if their organization wishes to offer prizes exceeding forty thousand dollars per prize or eighty thousand dollars annually. The annual limit was raised to three hundred thousand dollars in February, 2012 after a petition was submitted to eliminate the annual limit altogether.</p>	
<p>Rocky Mountain Elk Foundation feels this change is needed because they have exceeded this annual raffle prize limit the past few years and have obtained a waiver but feel it would be more efficient to have a higher annual raffle prize limit. Additionally, they feel that implementing this change would allow greater flexibility for nonprofits like Rocky Mountain Elk Foundation to conduct raffles and raise funds for charitable purposes and avoid having to regularly request a waiver under current rules.</p>	
<p>If these changes are accepted, WAC 230-11-065(3)(c) will also have to be amended to be consistent.</p>	
<p>Attachments:</p>	
<ul style="list-style-type: none"> • Petition Documents • WAC 230-11-067 	
Staff Recommendation	
<p>Under the requirements of the Administrative Procedure Act, the Commission must take action on a petition within 60 days of receiving it. Your options are:</p>	
<ol style="list-style-type: none"> 1) Initiate rule-making proceedings by filing the rule as proposed for further discussion; or 2) Deny the petition in writing, a) stating the reasons for the denial and specifically address the concerns stated in the petition, or b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. 	

Staff recommends accepting the petition and filing initial rule-making to allow for further review and analysis.

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request a Rule Change Submission from wsgc.wa.gov
Date: Wednesday, July 17, 2019 7:18:43 AM

Submitted on Wednesday, July 17, 2019 - 7:18am
Submitted by anonymous user: 69.146.225.203
Submitted values are:

Petitioner's Name: Rocky Mountain Elk Foundation
Mailing Address: 5705 Grant Creek Road
City: Missoula
State: MT
Zip Code: 59808
Phone: 406-523-4524
Email: grant@rmef.org

Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.

==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: WAC 230-11-067

I am requesting the following change: The Rocky Mountain Elk Foundation is requesting that WAC 230-11-067 be modified to increase the annual raffle prize limit that a licensee can reach without requesting Commission approval for a waiver from \$300,000 to \$500,000.

This change is needed because: RMEF has exceeded this annual raffle prize limit the past few years and has worked with the Commission and obtained permission to exceed the \$300,000 limit. RMEF appreciates the Commission's willingness to provide annual waivers, but believes that it would be more efficient for RMEF, the Commission and potentially other nonprofit organizations to have a higher annual raffle prize limit cap.

The effect of this rule change will be: The proposed rule change would allow nonprofit organizations in Washington, like RMEF, greater flexibility to conduct raffles and raise funds for charitable purposes. In Washington RMEF supports activities including elk research, youth days to help get kids outdoors, funding efforts to stop poachers, and improving and protecting habitat for elk and other wildlife. The proposed rule change would also be more efficient for both RMEF and the Commission as it would avoid having RMEF regularly apply for a waiver of the current \$300,000 limit in raffle prizes offered during a license year.

The results of this submission may be viewed at:
<https://www.wsgc.wa.gov/node/18/submission/1026>

ROCKY MOUNTAIN ELK FOUNDATION

Proposed Revisions to WAC § 230-11-067 – Requesting commission approval prior to offering certain raffle prizes

CONCISE EXPLANATORY STATEMENT

Changes to WAC § 230-11-067 are proposed in order to increase the annual amount of raffle prizes licensees are allowed to offer without having to seek commission approval prior to exceeding such amounts. Currently licensees must seek commissioner approval prior to offering a raffle prize that exceeds forty thousand dollars, and prior to offering total raffle prizes that exceed three hundred thousand dollars in any year. The proposal is to increase the amount of total raffle prizes allowed to be offered in any one year from three hundred thousand to five hundred thousand dollars.

Reasons for Proposed Rule Change

In 2017 and 2018 the Rocky Mountain Elk Foundation requested a commission waiver in order to exceed the three hundred thousand dollar limit in raffle prizes offered during a license year. Those requests were granted, and RMEF appreciates the commission's consideration and approval of RMEF's requests. RMEF anticipates seeking approval to exceed the three hundred thousand dollar threshold in 2019 as well.

RMEF respectfully suggests that having higher raffle prize limits will allow more charitable funds to be raised that can benefit Washington State, as well as providing efficiencies for the commission, RMEF and other licensees.

WAC 230-11-067 Requesting commission approval prior to offering raffle prizes exceeding forty thousand dollars per prize or ~~three~~five hundred thousand dollars in a license year.

(1) The commissioners may vote to approve a licensee to exceed raffle prize limits if a licensee shows good cause in writing.

(2) Prior to offering raffle prizes that exceed forty thousand dollars per prize, the licensee must submit a raffle plan to us that includes at least the following information:

(a) The organization's goals for conducting the raffle; and

(b) A brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served; and

(c) Specific details of the raffle rules including:

(i) Date of the drawing; and

(ii) Cost of raffle tickets; and

(iii) Prizes available; and

(iv) Security of prizes; and

(v) Plans for selling raffle tickets; and

(vi) Description of how the licensee protects the integrity of the raffle; and

(d) An explanation of how the proceeds from the raffle will be used; and

(e) A plan to protect the licensee in the event of low ticket sales and other risks; and

(f) An explanation of how the licensee will purchase the prize(s) for the raffle; and

(g) A projected budget including:

(i) Estimated gross gambling receipts, expenses, and net income for the raffle; and

(ii) Minimum number of projected ticket sales to break even; and

(iii) Corresponding sales and prize levels with projected revenues and expenses for each level; and

(iv) Minimum and maximum prizes available; and

(h) Any other information that we request or any information the licensee wishes to submit.

(3) Prior to offering raffle prizes that exceed ~~three~~five hundred thousand dollars in a license year, the licensee must submit a raffle plan that includes:

(a) The organization's goals for conducting raffles; and

(b) A brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served; and

(c) Plans for selling raffle tickets; and

(d) Brief overview of prizes awarded; and

(e) Estimated gross gambling receipts, expenses, and net income for the raffles; and

(f) Any other information that we request or any information the licensee wishes to submit.

[Statutory Authority: RCW 9.46.070 and 9.46.0277. WSR 12-05-067 (Order 677), § 230-11-067, filed 2/15/12, effective 3/17/12.

Statutory Authority: RCW 9.46.070. WSR 10-11-086 (Order 668), § 230-11-067, filed 5/17/10, effective 7/1/10.]



**STATE OF WASHINGTON
GAMBLING COMMISSION**

“Protect the Public by Ensuring that Gambling is Legal and Honest”

August 8, 2019

TO: COMMISSIONERS:
Bud Sizemore, Chair
Julia Patterson, Vice Chair
Christopher Stearns
Ed Troyer
Alicia Levy

FROM: Brian Considine, Legal and Legislative Manager
Legal and Records Division

**SUBJECT: Jocelyn Baker, CR 2019-00571
Final Order – August 8, 2019 Commission Meeting**

Ms. Jocelyn Baker has a gambling certification authorizing Class III Employee activity at Lucky Eagle Casino in Rochester, Washington. Her certification expired on July 9, 2019.

On February 4, 2019, the Chehalis Tribal Gaming Agency (CTGA) launched an investigation of the possible theft of promotion and point offers by Ms. Baker. Upon CTGA’s review of monthly reports on player ratings and visits, it was discovered that on January 25, 2019, an out-of-state player had: 1) changed the PIN on his account and made a Player’s Club Card, 2) downloaded a “free play” promotion to his account, and 3) cashed out his “free play” using a machine without any rated play. A review of video surveillance and computer login information discovered that Ms. Baker had taken the above-listed steps for 23 player accounts total. Using this process, CTGA determined Ms. Baker had stolen approximately \$6,700 worth of player offers. Ms. Baker’s tribal gaming license was revoked and her employment terminated on February 8, 2019.

Director Trujillo issued Ms. Baker a Notice of Administrative Charges on May 24, 2019, by regular and certified mail to her last known address on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by June 17, 2019. To date, the Commission has received no communication from Ms. Baker.

Ms. Baker’s failure to respond to the charges or timely request a hearing is a waiver of Ms. Baker’s right to a hearing in Case No. CR 2019-00571. You may take final action against her gambling certification. Based on her conduct, Ms. Baker cannot show by clear and convincing evidence that she is qualified to keep her gambling certification. Therefore, staff recommends that the Commission sign the proposed final order and revoke Jocelyn Baker’s gambling certification, Number 69-38464.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

7 In the Matter of:

NO. CR 2019-00571

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JOCELYN M BAKER,
License No. 69-38464,

FINAL ORDER OF THE
GAMBLING COMMISSION

Class III Employee.

This matter having come before the Washington State Gambling Commission (Commission) on August 8, 2019, the Commission makes the following Findings of Fact, Conclusions of Law, and issues its Final Order:

I. FINDINGS OF FACT

1. The Washington State Gambling Commission issued a Class III Certification to Jocelyn M Baker, number: 69-38464, authorizing Class III Employee activity at Lucky Eagle Casino in Rochester, Washington.

2. This certification, which expired on July 9, 2019, was issued subject to Ms. Baker's compliance with state gambling laws and Commission rules in accordance with the Confederated Tribes of the Chehalis Reservation Tribal-State Gaming Compact.

3. On February 4, 2019, Chehalis Tribal Gaming Agency was made aware of a possible theft of promotion and point offers.

4. During the Chehalis Tribal Gaming Agency's review of monthly reports on player ratings and visits, they discovered that an out-of-state player had the following unusual transactions on his account for January 25, 2019:

- a. The personal identification number (PIN) on his account was changed and a Players Club Card was made;
- b. A “free play” promotion offer was downloaded to the account; and
- c. The “free play” was downloaded onto a machine and cashed out without any rated play.

5. Chehalis Tribal Gaming Agency contacted the player to inquire about his visit. He explained he had not visited the casino on the above date.

6. An investigation was opened and Chehalis Tribal Gaming Agency discovered that 23 player accounts had been affected by the same criteria.

7. A review of video surveillance and computer login information determined that Ms. Baker, who was working as a Player’s Club Supervisor, was inserting Player’s Club Cards into machines, entering a PIN, loading promotion points to the accounts, and either playing the “free play” or cashing out the ticket.

8. It was determined that Ms. Baker stole approximately \$6,700 worth of player offers, some of which was converted to cash.

9. On February 8, 2019, Ms. Baker’s tribal gaming license was revoked and her employment was terminated. Ms. Baker had ten days to appeal the revocation. She did not request an appeal and therefore the revocation of her tribal license was upheld.

10. As of June 17, 2019, Ms. Baker has not reported the revocation of her tribal gaming license to the Washington State Gambling Commission.

11. Director David Trujillo issued administrative charges on May 24, 2019 alleging that Ms. Baker’s actions constituted a violation of RCW 9.46.075 and WAC 230-03-085. Further, that she could not show by clear and convincing evidence that she was qualified for certification as required by RCW 9.46.153 (1), and that her actions warranted revocation of her certification pursuant to RCW 9.46.075(1), (7) and (8), and WAC 230-03-085(1), (8), and (9)(a),

1 and in accordance with Section V.C. (1) and (3) of the Confederated Tribes of the Chehalis
2 Reservation Tribal-State Gaming Compact.

3 12. Ms. Baker was sent the charges by regular and certified mail on May 24, 2019 to
4 the last address the Gambling Commission had on file.

5 13. Pursuant to WAC 230-17-010, a response was required to be received by the
6 Commission by June 17, 2019. To date, the Commission has received no communication from
7 Ms. Baker.

8 II. CONCLUSIONS OF LAW

9 1. Ms. Baker received proper notice of the May 24, 2019 charges via regular and
10 certified mail on May 24, 2019 pursuant to RCW 34.05.431, RCW 34.05.434, WAC 230-17-
11 005, WAC 230-17-010, and WAC 10-08-130.

12 2. The Commission can take final action against Ms. Baker's gambling certification
13 under Case Number CR 2019-00571 pursuant to RCW 9.46.075, RCW 34.05.440(1), RCW
14 34.05.461, and WAC 230-03-085.

15 3. Ms. Baker's certification should be revoked under Case Number CR 2019-00571
16 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC
17 230-03-085.

ORDER

This matter having come before the Commission at its August 8, 2019, Commission meeting, the Commissioners having heard arguments, been given the chance to review the administrative record, and being fully advised in this matter, now therefore:

It is hereby **ORDERED** that Jocelyn Baker’s gambling certification, Number 69-38464, is **REVOKED**.

DATED this 8th day of August, 2019.

BUD SIZEMORE, Chair

JULIA PATTERSON, Vice Chair

CHRISTOPHER STEARNS

ED TROYER

ALICIA LEVY

NOTICE

Reconsideration: RCW 34.05.470 and WAC 230-17-140 provide that a party may file a petition for reconsideration of a final order. A petition for reconsideration must be received no later than thirteen (13) days after the date this final order is mailed. Any motion for reconsideration must state the specific grounds supporting the party's request for reconsideration.

Stay of Final Order: Filing for reconsideration does not stay the effectiveness of this Order. WAC 230-17-145 provides that a party may petition the Commission for a stay of a final order. Any petition for a stay should be received by the Commission within thirteen (13) days after the date this final order is mailed.

Judicial Review: RCW 34.05.542 provides that a party may appeal this final order by filing a petition for judicial review within thirty (30) days after service of this order. A petition for judicial review must be filed with the appropriate superior court and served upon both the Commission and the Office of the Attorney General.

Service: This Order was served on you three days after it was deposited in the United States Postal Service regular mail, excluding the date of mailing. WAC 230-17-035.

Any motions or petitions for judicial review should be served on or mailed to:

Washington State Gambling Commission
Legal and Records Division
4565 7th Avenue S.E., Lacey, WA
P.O. Box 42400
Olympia, WA 98504-2400

Kellen Wright
Attorney General's Office
1135 Washington St. SE
P.O. Box 40100
Olympia, WA 98504-0100

CERTIFICATE OF SERVICE

I certify that on the date below I served a copy of the foregoing document on all parties and/or their counsel by United States Postal Service regular mail to the following:

JOCELYN M BAKER
17904 CHARLOTTE PL SW
ROCHESTER, WA 98599-9469

EXECUTED this ____ day of August, 2019, at Lacey, Washington.

Ashlie Laydon
Rules Coordinator



STATE OF WASHINGTON
GAMBLING COMMISSION

“Protect the Public by Ensuring that Gambling is Legal and Honest”

August 8, 2019

TO: **COMMISSIONERS**
Bud Sizemore, Chair
Julia Patterson, Vice-Chair
Christopher Stearns
Ed Troyer
Alicia Levy

EX OFFICIO MEMBERS
Senator Steve Conway
Representative Brandon Vick

FROM: Brian J. Considine, Legal and Legislative Manager

SUBJECT: 2020 Agency Request Legislation

We discussed six possible staff topics and four stakeholder requests for agency request legislation at our July 2019 Commission Meeting. The six staff topics that were discussed were: (1) General Fund appropriation for agency’s criminal law enforcement functions; (2) Amending RCW 9.46.0209 to ensure inclusion of certain additional charitable nonprofit organizations that may not be qualified under current law; (3) Amending RCW 9A.83.030’s money laundering forfeiture statute to allow forfeited proceeds to go to gambling-related law enforcement activities; (4) Creating regulations related to social online casinos, loot boxes, and/or skin gambling; (5) Amending the Gambling Act to allow for unlicensed and unauthorized gambling companies and activities at a tradeshow; and (6) Amending the definition of theft as was done in HB 1159, Changing the Definition of Theft.

The four stakeholder requests were: (1) Amending the Gambling Act to allow online raffles; (2) Modernizing raffle and fund raising event limits; (3) Amending the current pull-tab tax requirements in RCW 9.46.110 to only authorizing taxation on net receipts; and (4) Increasing the \$1 pull-tab wager limit in RCW 9.46.110 to a \$2/\$5 pull-tab limit.

After our discussion, the consensus was for staff to move forward with preparing two agency request bills for: (1) Amending RCW 9.46.0209 to ensure inclusion of certain additional charitable nonprofit organizations that may not be qualified under current law; and (2) Amending RCW 9A.83.030’s money laundering forfeiture statute to allow forfeited proceeds to go to gambling-related law enforcement activities. Staff would also talk with the Chair about possibilities for a General Fund appropriation for the agency’s criminal law enforcement functions and determine if that would be agency request legislation in 2019.

I have attached draft amendments for two agency proposals. The goal for our August meeting is to review these statutory changes and determine if you have additional edits you wish to make. We are currently conducting stakeholder outreach for our possible agency request legislation and I will let you know of any feedback we receive.

Amendment to RCW 9.46.0209

Qualifications to be a bona fide charitable or non profit organization

RCW 9.46.0209 - "Bona fide charitable or nonprofit organization."

(1)(a) "Bona fide charitable or nonprofit organization," as used in this chapter, means:

(i) Any organization duly existing under the provisions of chapter 19.09, 24.12, 24.20, or 24.28 RCW, any agricultural fair authorized under the provisions of chapters 15.76 or 36.37 RCW, or any nonprofit corporation duly existing under the provisions of chapter 24.03 RCW for charitable, benevolent, eleemosynary, educational, civic, patriotic, political, religious, scientific, social, fraternal, athletic or agricultural purposes only, or any nonprofit organization, whether incorporated or otherwise, when found by the commission to be organized and operating for one or more of the aforesaid purposes only, all of which in the opinion of the commission have been organized and are operated primarily for purposes other than the operation of gambling activities authorized under this chapter; or

(ii) Any corporation which has been incorporated under Title 36 U.S.C. and whose principal purposes are to furnish volunteer aid to members of the armed forces of the United States and also to carry on a system of national and international relief and to apply the same in mitigating the sufferings caused by pestilence, famine, fire, floods, and other national calamities and to devise and carry on measures for preventing the same.

(b) An organization defined under (a) of this subsection must:

(i) Have been organized and continuously operating for at least twelve calendar months immediately preceding making application for any license to operate a gambling activity, or the operation of any gambling activity authorized by this chapter for which no license is required; and

(ii) Demonstrate to the commission that it has made significant progress toward the accomplishment of the purposes of the organization during the twelve consecutive month period preceding the date of application for a license or license renewal. The fact that contributions to an organization do not qualify for charitable contribution deduction purposes or that the organization is not otherwise exempt from payment of federal income taxes pursuant to the internal revenue code of 1954, as amended, shall constitute prima facie evidence that the organization is not a bona fide charitable or nonprofit organization for the purposes of this section.

(c) Any person, association or organization which pays its employees, including members, compensation other than is reasonable therefor under the local prevailing wage scale shall be deemed paying compensation based in part or whole upon receipts relating to gambling activities authorized under this chapter and shall not be a bona fide charitable or nonprofit organization for the purposes of this chapter.

(2) For the purposes of RCW 9.46.0315 and 9.46.110, a bona fide nonprofit organization can be licensed by the Commission and ~~also~~ includes:

(a) A credit union organized and operating under state or federal law. All revenue less prizes and expenses received from raffles conducted by credit unions must be devoted to purposes authorized under this section for charitable and nonprofit organizations; and

(b) A group of executive branch state employees that:

(i) Has requested and received revocable approval from the agency's chief executive official, or such official's designee, to conduct one or more raffles in compliance with this section;

(ii) Conducts a raffle solely to raise funds for either the state combined fund drive, created under RCW 41.04.033; an entity approved to receive funds from the state combined fund drive; or a charitable or benevolent entity, including but not limited to a person or family in need, as determined by a majority vote of the approved group of employees. No person or other entity may receive compensation in any form from the group for services rendered in support of this purpose;

(iii) Promptly provides such information about the group's receipts, expenditures, and other activities as the agency's chief executive official or designee may periodically require, and otherwise complies with this section and RCW 9.46.0315; and

(iv) Limits the participation in the raffle such that raffle tickets are sold only to, and winners are determined only from, the employees of the agency.

(3) For the purposes of RCW 9.46.0277, a bona fide nonprofit organization also includes a county, city, or town, provided that all revenue less prizes and expenses from raffles conducted by the county, city, or town must be used for community activities or tourism promotion activities.

[2017 c 133 § 1; 2009 c 137 § 1; 2007 c 452 § 1; 2000 c 233 § 1; 1987 c 4 § 4. Formerly RCW 9.46.020(3).]

Amendment to RCW 9A.83.030

Money Laundering Seizure and Forfeiture

RCW 9A.83.030 - Seizure and forfeiture.

(1) Proceeds traceable to or derived from specified unlawful activity or a violation of RCW 9A.83.020 are subject to seizure and forfeiture. The attorney general or county prosecuting attorney may file a civil action for the forfeiture of proceeds. Unless otherwise provided for under this section, no property rights exist in these proceeds. All right, title, and interest in the proceeds shall vest in the governmental entity of which the seizing law enforcement agency is a part upon commission of the act or omission giving rise to forfeiture under this section.

(2) Real or personal property subject to forfeiture under this chapter may be seized by any law enforcement officer of this state upon process issued by a superior court that has jurisdiction over the property. Any agency seizing real property shall file a lis pendens concerning the property. Real property seized under this section shall not be transferred or otherwise conveyed until ninety days after seizure or until a judgment of forfeiture is entered, whichever is later. Real property seized under this section may be transferred or conveyed to any person or entity who acquires title by foreclosure or deed in lieu of foreclosure of a security interest. Seizure of personal property without process may be made if:

(a) The seizure is incident to an arrest or a search under a search warrant or an inspection under an administrative inspection warrant issued pursuant to RCW 69.50.502; or

(b) The property subject to seizure has been the subject of a prior judgment in favor of the state in a criminal injunction or forfeiture proceeding based upon this chapter.

(3) A seizure under subsection (2) of this section commences proceedings for forfeiture. The law enforcement agency under whose authority the seizure was made shall cause notice of the seizure and intended forfeiture of the seized proceeds to be served within fifteen days after the seizure on the owner of the property seized and the person in charge thereof and any person who has a known right or interest therein, including a community property interest. Service of notice of seizure of real property shall be made according to the rules of civil procedure. However, the state may not obtain a default judgment with respect to real property against a party who is served by substituted service absent an affidavit stating that a good faith effort has been made to ascertain if the defaulted party is incarcerated within the state, and that there is no present basis to believe that the party is incarcerated within the state. The notice of seizure in other cases may be served by any method authorized by law or court rule including but not limited to service by certified mail with return receipt requested. Service by mail is complete upon mailing within the fifteen-day period after the seizure.

(4) If no person notifies the seizing law enforcement agency in writing of the person's claim of ownership or right to possession of the property within forty-five days of the seizure in the case of personal property and ninety days in the case of real property, the property seized shall be deemed forfeited. The community property interest in real property of a person whose spouse or domestic partner committed a violation giving rise to seizure of the real property may not be forfeited if the person did not participate in the violation.

(5) If a person notifies the seizing law enforcement agency in writing of the person's claim of ownership or right to possession of property within forty-five days of the seizure in the case of personal property and ninety days in the case of real property, the person or persons shall be afforded a reasonable opportunity to be heard as to the claim or right. The provisions of RCW 69.50.505(5) shall apply to any such hearing. The seizing law enforcement agency shall promptly return property to the claimant upon the direction of the administrative law judge or court.

(6) Disposition of forfeited property shall be made in the manner provided for in RCW 69.50.505 (8) through (10) and (14), or RCW 9.46.231 (6) through (8) and (10).
[2008 c 6 § 630; 2001 c 168 § 2; 1992 c 210 § 3.]

Commissioner Sports Gambling Update

August 2019

Page 2

Additionally, Colorado, Iowa, Indiana, Illinois, New Hampshire, Maine, Montana, North Carolina, Oregon, Tennessee, and Washington, D.C. have authorized sports gambling and most are looking to begin operations by the end of 2019. Therefore, 20 states and our nation's capital could have sports gambling operating within their borders by 2020. Ohio, Massachusetts, and Michigan are the remaining states considering passage of sports gambling bills in 2019.

Here is an update for current operating states (all numbers are approximate):

Delaware – Sports gambling started in the state on June 5, 2018. The state Lottery is the primary regulator. Sports gambling is only offered at three land-based racetracks and casinos, and these are joint operations by the state through a vendor. The allocation of net revenues are 12.5% to the vendors (Scientific Games, William Hill, and StadiumTech) and the remaining 87.5% of net revenues are allocated 50% to the state, 40% to the racetrack/casinos, and 10% to horse racing purses. June revenue information was unavailable at this time.

New Jersey – Sports gambling started in the state on June 14, 2018. The Casino Control Commission is the primary licensing authority and Attorney General's Division of Gaming Enforcement (DGE) is the primary regulator. There are currently 10 land-based and 13 online operators offering sports gambling. Its land-based gross revenues are taxed at 9.75% and mobile and online revenues are taxed at 13%. In June, \$273.2 million was wagered resulting in \$9.7 million in gross revenue. There was \$1.25 million in tax revenue.

Mississippi – Sports gambling started in the state on August 1, 2018. The Gaming Commission is the primary regulator, and gross revenues are taxed at 12%. 23 of the 28 state casinos currently offered sports gambling. In June, \$15.1 million was wagered resulting in \$1.6 million in gross revenue. There was \$195,014 in tax revenue.

West Virginia – Sports gambling started in the state on September 1, 2018. The state Lottery is the primary regulator for that state's five licensed race racetrack/casinos, and gross revenues are taxed at 10%. In June, \$7.7 million was wagered for \$423,539 in gross revenue. There was \$42,353 in tax revenue.

Rhode Island – Sports gambling started in the state on November 26, 2018. The state lottery operates sports betting at two state-run operations using IGT and William Hill as vendors. The allocation of net revenues are 51% to the state; 32% to the Vendor (IGT); and 17% to the casino. In June, \$14.7 million was wagered resulting in \$2.1 million in gross revenue.

Pennsylvania – Sports gambling started in the state in December 2018. The state gaming control board is the primary regulator. There are 8 casino locations with 3 online operators currently. Pennsylvania has a \$10 million sports wagering licensing fee and gross revenue are taxed at 36%. In June, there was \$46.3 million wagered for \$3.1 million in gross revenue. There was \$740,455 in tax revenue.

States (continued)

Nevada – The Gaming Control Board is the primary regulator. Gross revenues are taxed at 6.75% and sports gambling can occur at the state’s approximately 190 licensed locations and through mobile and internet platforms. In June, there was approximately \$322.4 million wagered resulting in \$16.6 million in gross revenue. There was \$1.1 million in tax revenue.

Oregon – The Oregon Lottery is the primary regulator. The state lottery selected SB Tech as their sports betting vendor. The lottery expects to launch its online mobile sports gambling app in September and a person must be 21 years or older to download the app. All professional sports in the U.S. and overseas will be offered but no collegiate games at launch. Emergency rules should be published by the end of August, if not earlier.

Montana – The Montana Lottery is the primary regulator. The state lottery’s vendor Intralot will run the sports gambling operations through lottery-branded kiosks and an online platform available only when a mobile device is within range of a kiosk. The lottery plans to start offering sports gambling by the beginning of the 2019 football season.

Tribal Governments

As stated last month, Tribes in New Mexico and New York continue plans to offer sports gambling or are already offering it at their Tribal casinos. Additionally, North Carolina’s law only authorizes retail sports gambling at two Eastern Band of Cherokee Indian casinos. Mobile/online sports gambling is not authorized at this time.

Commercial Operators

Eldorado resorts and William Hill recently announced they will open sportsbooks at two casinos in Iowa. Additionally, there are now two open sportsbooks in upstate New York. Rivers Casino sportsbook, operated by Rush Street Interactive, and FanDuel sportsbook at Tioga Downs are now operating. Additionally, three Pennsylvania operators are now operating online sports gambling apps and 40 percent of all wagers in June came through sportsbook apps or websites. In New Jersey, 83 percent of all wagers in June were placed through sportsbook apps or websites.

Lastly, DraftKings announced on July 25, 2019 that it finalized a deal with Major League Baseball (MLB) to be an “Authorized Gaming Operator.” This deal allows DraftKings to use the league’s logos and trademarks along with access to their official data feed. DraftKings already was an official daily fantasy partner of MLB and has partnerships with many MLB teams.



North American Gaming Regulators Association: Sports Betting

August 8, 2019

Tina Griffin, Assistant Director



Regulating Sports Betting

Cannot treat like other wagering

More difficult to regulate



Wagering Methods



Teller



Kiosk



Mobile

Accepted Wagers



Approved Events



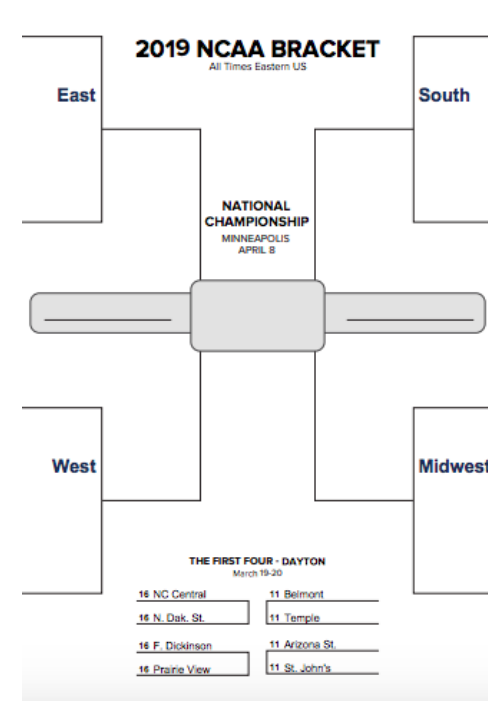
eSports



Virtual Sports

Player	Position	Game	Score
A. JUDGE	OF	NY Yankees @ Minnesota	13.91 FPPG
K. BRYANT	3B	Chicago Cubs @ Atlanta	10.94 FPPG
C. BLACKMON	CF	San Diego @ Colorado	12.43 FPPG
N. ARENADO	3B	San Diego @ Colorado	11.42 FPPG
G. SPRINGER	RF	Seattle @ Houston	10.87 FPPG
D. FREESE	3B	Milwaukee @ Pittsburgh	6.97 FPPG

Fantasy Sports



Brackets & Tourneys

EXCEPTIONS: In-state college games, Olympic events, Minor or development leagues

Integrity

NJ Operators must use Integrity Monitoring Providers (SWIMA) to receive and report unusual activity and to identify suspicious activity

Regulator has direct access to the Integrity Monitoring Provider's monitoring system

MS Vendors responsible for monitoring for unusual activity

Geolocation

Verifies bettor's location

Allows mobile wagering
(in-venue or online)

Effective for VPN users

Identifies device, entry denials

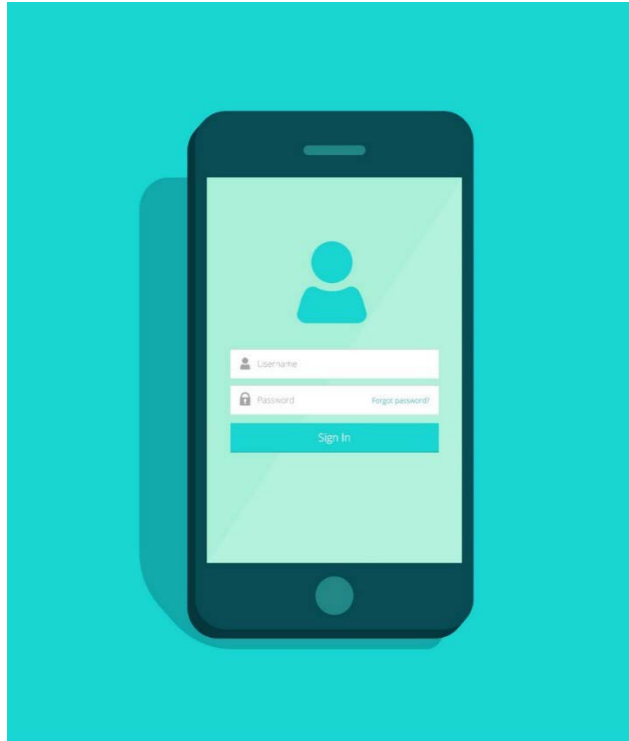
Q: When to verify location?

Data goes to regulators and operators

Use data for fraud investigations



Other Mobile Device Vendors



Know Your Customer



Marketing Affiliates



Payment Providers

Complaints

Sports betting = increased complaints

Process:

Complainant works with operator to address complaint

Regulator gets involved based on nature of complaint or if it can't be resolved at operator level

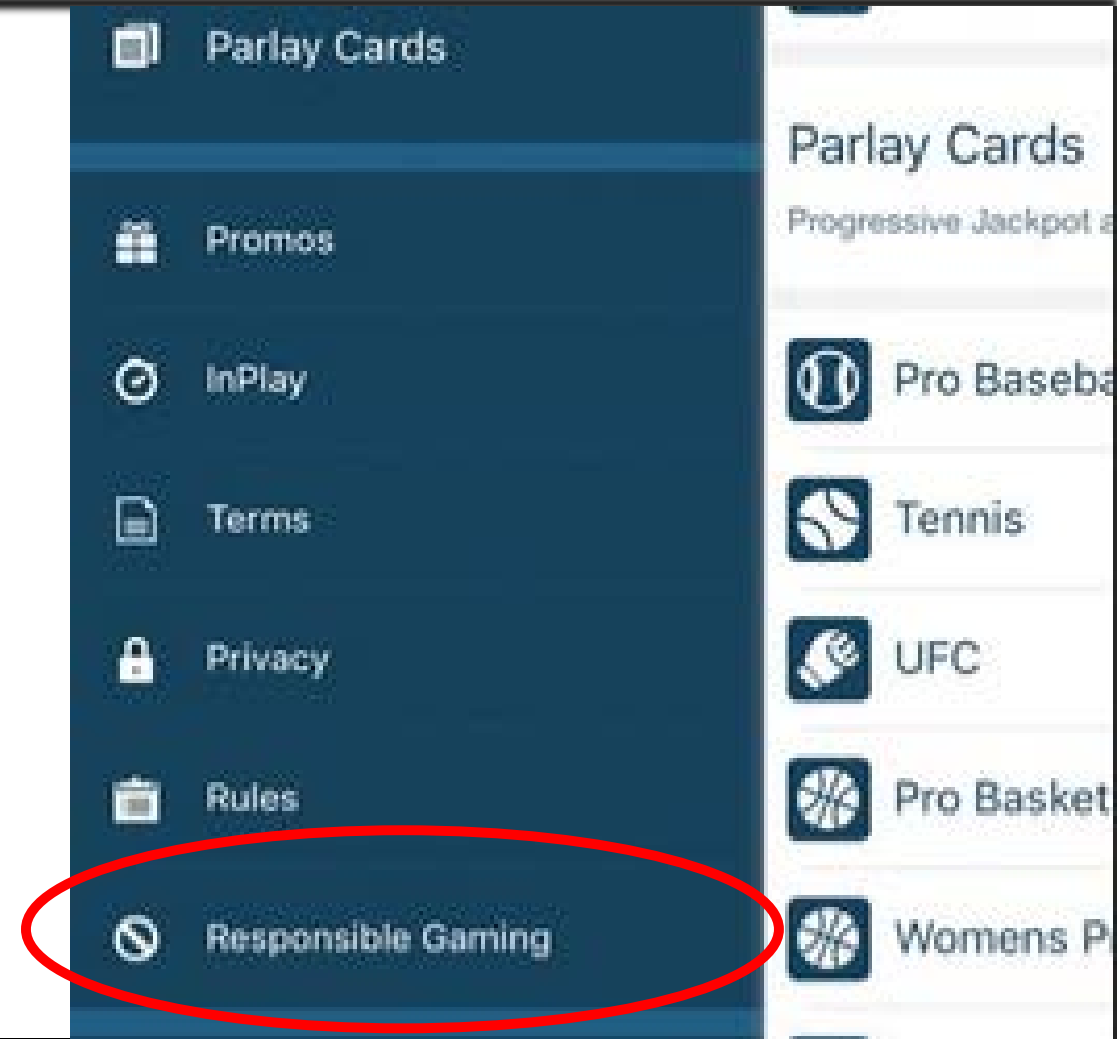


Responsible Gaming for Mobile

Identity verification

In-app responsible gaming info

Set player account limits





Questions?

Tina Griffin, Assistant Director



JUL 25 2019

RECORDS

BEFORE THE WASHINGTON STATE GAMBLING COMMISSION

In the Matter of the Petition of The Stars
Group, Inc. for an Order of Declaratory
Judgment

MOTION TO CONTINUE

Now comes Petitioner, The Stars Group, Inc., and respectfully requests a continuance of the hearing of its Petition in the above-captioned matter to the next Washington State Gambling Commission meeting date of September 12, 2019. After filing of the petition and scheduling of the hearing before this Commission on August 8, 2019, Petitioner has encountered a scheduling conflict that cannot be avoided. In order to be available to the Commission for this hearing, Petitioner respectfully requests that hearing be rescheduled for the September 12, 2019.

Petitioner waives any time requirements under the Washington State Administrative Procedures Act, RCW 34.05, to allow the Petition to be reviewed in September 2019.

Dated: July 25, 2019

Respectfully Submitted,

/s/ Jeff Ifrah

A. Jeff Ifrah

Jessica A. Feil

Ifrah Law PLLC

1717 Pennsylvania Ave. NW

Suite 650

Washington, DC 20006

jeff@ifrahlaw.com

jfeil@ifrahlaw.com

MOTION TO CONTINUE

BEFORE THE WASHINGTON STATE GAMBLING COMMISSION

IN THE MATTER OF THE PETITION
OF THE STARS GROUP, INC. FOR A
DECLARATORY ORDER

ORDER CONTINUING PETITION FOR
SEPTEMBER 12, 2019 COMMISSION
MEETING

The Washington State Gambling Commission (Commission) received a petition for declaratory order from The Stars Group, Inc. on July 2, 2019, at the agency's headquarters in Lacey, Washington. The Commissioners scheduled review of this petition for the Commission's August 8, 2019 public meeting. The Commission then received the Petitioner's motion to continue review of its petition on July 25, 2019. The undersigned Commissioners, having received and reviewed the Petitioner's motion to continue review of its Petition for the Commission's September 12, 2019 public meeting, now grant the Petitioner's motion.

Therefore, it is ORDERED that the Petitioner's petition for declaratory order be re-scheduled for the Commission's September 12, 2019, Commission Meeting pursuant to RCW 34.05.240(5)(b) and WAC 230-17-180(3)(b). The September meeting will be held at the Hampton Inn, 4301 Martin Way E., Olympia, Washington, 98516 and Commissioners will review the petition and received public testimony from the Petitioner and the public, if any.

DATED this 8th day of August, 2019.

BUD SIZEMORE, Chair

JULIA PATTERSON, Vice Chair

CHRISTOPHER STEARNS

ED TROYER

ALICIA LEVY

ORDER SCHEDULING PETITION
FOR SEPTEMBER 12, 2019
COMMISSION MEETING