



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

Hotel Murano
1320 Broadway Plaza
Tacoma, Wa 98402



STATE OF WASHINGTON

GAMBLING COMMISSION

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

Hotel Murano 1320 Broadway Tacoma, WA 98402

Thursday, July 11, 2019

Please note, agenda times are estimates only. Items may be taken out of sequence at the discretion of the Chair.

Commissioners may take action on business items.

Administrative Procedures Act Proceedings are identified by an asterisk (*)

PUBLIC MEETING

9:00 AM	Call to Order Welcome and Introductions	<i>Bud Sizemore, Chair</i>
	<ul style="list-style-type: none"> <i>Moment of Silence</i> 	
Tab 1	Consent Agenda	(Action)
	<ul style="list-style-type: none"> May 9 & 10, 2019 Commission Meeting Minutes June 13, 2019 Special Commission Meeting Minutes New Licenses and Class III Employees* 	
	Class III Employees/Snoqualmie & Cowlitz Tribes*	(Action)
	Director’s Report	<i>David Trujillo, Director</i>
Tab 2	Presentation-Commissioner Stearns	
	<ul style="list-style-type: none"> Focus on the Future conference “Free by The Sea” Inpatient Treatment Center 	<i>Chris Stearns, Commissioner</i>
Tab 3	RULES UP FOR FINAL ACTION	(Action)
	*Service Supplier/Distributor License Rules	<i>Ashlie Laydon, Rules Coordinator</i>
Tab 4	RULES UP FOR FINAL ACTION	(Action)
	*Card Shuffler Cellular Network Rules	<i>Ashlie Laydon, Rules Coordinator</i>
Tab 5	*Defaults	(Action)
	<ul style="list-style-type: none"> Tola Nhet; CR 2019-00764; license 68-30633 revocation Saroeung Seum; CR 2019-00765; license 68-25131 revocation Kenneth M Gash; CR 2018-02006; license 68-33003 revocation Savy S Nuon; CR 2019-00065; license 68-07679 revocation/certification 69-46177 revocation Andrew Young; CR 2019-00564; license 68-22492 revocation Tina G Kuahiwini; CR 2019-00433; certification 69-40156 revocation Su-Zhen Wu; CR 2019-00620; license 68-19478 revocation 	<i>Brian Considine, Legal and Legislative Manager</i>
Tab 6	2020 Agency Request Legislation Discussion	<i>Brian Considine, Legal and Legislative Manager</i>
Tab 7	Sports Gambling Discussion	<i>Brian Considine, Legal and Legislative Manager</i>
Tab 8	Stars Group, Inc. Petition for Declaratory Order	
	<ul style="list-style-type: none"> Schedule Petition for August Commission Meeting 	<i>Brian Considine, Legal and Legislative Manager</i>
	Public Comment	
	Executive Session - Closed to the Public	<i>Bud Sizemore, Chair</i>
	Discuss Pending Criminal Investigations, Tribal Negotiations, and Litigation	



STATE OF WASHINGTON
GAMBLING COMMISSION

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

May Gambling Commission Meeting Minutes

The Heathman

7801 NE Greenwood Drive Vancouver, WA 98662

Public Meeting

May 9th and 10th, 2019

Commissioners Present:

Bud Sizemore, Chair

Julia Patterson, Vice Chair

Chris Stearns

Ed Troyer

Alicia Levy

Ex Officio Members Present:

Senator Steve Conway

Representative Derek Stanford

Staff Present:

David Trujillo, Executive Director; Tina Griffin, Assistant Director; Christopher Stanley, Chief Financial Officer; Brian Considine, Legal and Legislative Manager; Julie Lies, Tribal Liaison; Heather Songer, Public Information Officer; Julie Anderson, Executive Assistant; and Suzanne Becker, Assistant Attorney General.

Public Meeting Call to Order

Chair Bud Sizemore called day one of the Gambling Commission meeting to order at 9:30 a.m. He announced that the commissioners would be going into executive session and that the estimated time for the public meeting to start was 1:30 p.m. In executive session, the commissioners will discuss litigation, pending criminal investigations and tribal negotiations.

At 1:40 p.m., **Chair Sizemore** welcomed everyone to the Heathman Lodge. He asked for a moment of silence to recognize law enforcement officers across the country and in this state who were lost in the line of duty since we last met.

Commissioner Patterson gave a tribute to Senator Margarita Lopez Prentice, former state legislator. Senator Prentice passed away April 2, 2019. Commissioner Patterson highlighted her career in the legislature and the time she served the Gambling Commission. She first served as an Ex Officio and then later she was named Commissioner for a short time.

Senator Conway, Commissioner Stearns and Chair Sizemore all shared their memories of Senator Prentice. A celebration of life for the Senator will be held on May 10th.

Commissioner Patterson asked for a moment of silence for Senator Prentice.

There were 18 people in attendance.

Tab 1

Commissioner Patterson moved to approve the consent agenda as presented by staff.

Commissioner Stearns seconded the motion.

The motion was passed 5:0

Commissioner Levy moved to approve the Cowlitz and Snoqualmie certifications as presented by staff.

Commissioner Troyer seconded the motion.

The motion was passed 4:0

Commissioner Stearns abstained from the vote.

Election of Officers

Chair Sizemore asked for nominations for Chair of the Gambling Commission.

Commissioner Patterson moved to nominate Bud Sizemore as Chair of the Gambling Commission for the term beginning at the conclusion of this meeting.

There were no further nominations.

The motion passed unanimously.

Chair Sizemore asked for nominations for Vice Chair.

Chair Troyer moved to nominate Commissioner Patterson as Vice Chair of the Gambling Commission for the term beginning at the conclusion of this meeting.

There were no further nominations.

The motion passed unanimously.

Director's Report

Director Trujillo gave a brief update on the agency move. He reminded everyone that the administrative offices are located on the third floor and no longer on the fourth floor. He announced Public Service Recognition Week started on Monday. He invited commissioners to fill out "I serve because..." signs that Heather Songer will be posting on our social media.

Tab 2

Budget Discussion

Chief Financial Officer Christopher Stanley (CFO Stanley) presented the material for this tab. CFO Stanley provided budget information and asked commissioners to approve the 2020 budget as presented.

Senator Conway reminded the commission that service contracts will be higher in the coming year due to increased prices across the economic spectrum.

Chair Sizemore commented on the level of caution regarding the budget and doubling the working capital balance target to four months of reserve rather than two.

Commissioner Troyer moved to approve the 2020 Fiscal Year Budget as presented by staff.

Commissioner Levy seconded the motion.

The motion was passed 5:0

Tab 3

Petition for Poker “no limits”

Ashley Laydon, Rules Coordinator, presented the materials for this tab. Mr. Alexander Olsen (petitioner) would like to amend WAC 230-15-135, wagering limits for non-house banked card games, by removing wagering limits for poker. Mr. Olson feels that removing wagering limits on poker will attract more professional and amateur poker players to the state and increase overall casino attendance.

Chair Sizemore asked if Mr. Alexander Olsen was present. He was not.

Commissioner Stearns followed up with concerns that removing the limits for this particular class would affect the structure that we have in the state. According to Commissioner Stearns, this would essentially reclassify tribal casino card games from Class III to Class II.

Commission Troyer stated that he becomes concerned when he hears the concept of professional poker players coming into the area with no limits. He is concerned that it would cause a shift away from poker being a social game.

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

Commissioner Troyer moved to deny the petition for reasons discussed by staff.

Commissioner Stearns seconded the motion.

The motion passed unanimously.

Tab 4

Service Suppliers/Distributor License Rules

Ashley Laydon, Rules Coordinator, presented the materials for this tab. In October 2018, W.O.W. Distributing requested the repeal of WAC 230-03-225, which prohibits licensed manufacturers and distributors of punch boards and pull-tabs from also being a licensed gambling service supplier. Stakeholder meetings were convened in January and February 2019. Stakeholders are supportive of W.O.W. Distributing’s petition. Staff recommended filing the proposed language for further discussion. The petitioner was in the audience. Petitioner had nothing further to add.

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

Commissioner Stearns moved to file the proposed rule language for further discussion as presented by staff.

Commissioner Levy seconded the motion.

The motion passed unanimously.

Tab 5

Card Shuffler Cellular Network Rules

Brian Considine, Legal and Legislative Manager (LLM), and **Ashley Laydon**, Rules Coordinator, presented the materials for this tab. Bally Scientific Games (the petitioner) moved to initiate rule-making to amend current rules to allow card-shuffling devices to connect to a secure cellular network for billing purposes. This change would offer a new billing option for card shufflers in licensed card rooms. Stakeholder meetings were convened in March and April 2019. Stakeholder feedback indicated that there may be an interest in broadening the scope of this rule language once the current rule-making is finalized. However, the petition only focused on card shufflers, a cellular network, and billing data. Anything else may have Wire Act implications. Therefore, staff recommended filing the proposed language for further discussion.

Chair Sizemore asked if house-banked card room stakeholders were included in the meetings that were held. Staff indicated that they were.

Commissioner Troyer asked a clarifying question regarding billing.

LLM Considine said that the argument in the petition was that the licensee would only be billed for successful shuffles. When the shuffler is not in use, or when there are unsuccessful shuffles, the licensee wouldn't be billed. **Chair Sizemore** asked if Bally was in the audience. They were not.

Chair Sizemore asked for public comment.

Victor Mena, Owner, Washington Gold Casinos, said, “This was an idea that was brought forth by Bally to the operators several years ago as a way to offer a less expensive shuffling devices on games that don't have shufflers. There are games where we lose efficiency, time and motion in the business without the shuffler, but it becomes very cost prohibitive for smaller operators and smaller card rooms that can't afford \$600 or \$700 a month per shuffler.”

Chair Sizemore asked **Mr. Mena** if he was in support of the petition. **Mr. Mena** said, “I'd be supportive of this. I think it's something that could help.”

Commissioner Patterson moved to file the proposed rule language for further discussion as presented by staff.

Commissioner Stearns seconded the motion.

The motion passed unanimously.

Tab 6

Trade Show Rules

Ashley Laydon, Rules Coordinator, presented the materials for this tab. In January 2019, the Commission moved to initiate rulemaking to clarify the rule regarding trade shows. In February, staff identified two areas that need clarification. The first is whether devices that have not been approved by the gambling commission, but would be used for authorized activities, can be displayed at trade shows. The second is whether devices used for unauthorized activities can be displayed at trade shows. In March, commissioners moved to file draft language to address the first area needing clarification. No further comments or feedback were received and no changes have been made to that language. Staff recommended taking final action on the language, which would amend WAC 230-16-005 (transporting displaying and selling gambling equipment at trade shows) and WAC 230-16-005 (review of electronic or mechanical gambling equipment). **Chair Sizemore** asked for public comment. There was no public comment.

Commissioner Stearns moved to file the proposed rule language for further discussion as presented by staff.

Commissioner Patterson seconded the motion.

The motion passed unanimously.

Tab 7

Defaults

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

Vincent Johnson, public card room employee license revocation. Commissioners voted unanimously to revoke Vincent Johnson's public card room employee license.

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

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

Commissioner Levy seconded the motion.

The motion passed unanimously. 5:0

Panya Praseuth, public card room employee license revocation. Commissioners voted unanimously to revoke Ms. Praseuth's public card room employee license.

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

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

Commissioner Levy seconded the motion.

The motion passed unanimously. 5:0

Marcus Shin, Class III Employee Certification Revocation. Commissioners voted unanimously to revoke Mr. Marcus Shin's Class III employee certification as presented by staff.

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

Commissioner Levy seconded the motion.

The motion passed unanimously. 5:0

Tab 8

Legislative Wrap Up

LLM Considine presented the materials for this tab. LLM Considine highlighted the 2019 legislative session with first announcing that the self-exclusion bill passed unanimously and was signed by the governor April 30. Commissioners Patterson and Stearns were present at the signing. Expect rulemaking to begin in August or September 2019. LLM Considine thanked Representative Kloba for being the prime sponsor on the bill. Commissioner Stearns thanked LLM Considine for all his hard work during the 2019 legislative session. Commissioner Stearns also mentioned that Representative Kloba was recognized at the "Focus on the Future" Problem Gambling conference he attended.

House Bill 1880, the problem gambling task force bill, was not passed but was in the budget.

House Bill 1919, the animal fighting bill passed almost unanimously and it was also signed into law. Commissioner Stearns, LLM Considine, Heather Songer, and some stakeholders were present at the signing.

House Bill 1356 concerning privileged communication with peer support group counselors passed and was signed into law. House Bill 1064 didn't pass, but LLM Considine anticipates working on the bill next session.

House Bill 1253 required additional classes at CJTC. We thought it was clearly beneficial for all law enforcement, and more classes means more opportunities for our agents to enroll. The bill wasn't passed, but it was funded in the budget. There are nine new classes, which were funded at 75% and requirements that each class have 30 members in the class. The agency plans to talk with the CJTC to get our agents in for training along with our brother and sister agencies.

LLM Considine wrapped up the 2019 legislative session with talking about the problem gambling taskforce. Chief Financial Officer (CFO) Christopher Stanley and LLM Considine were successful in getting \$100,000 in the budget for the taskforce. CFO Stanley gave a short update on the budget, he stated that there weren't any sweeps. The agency has about \$300,000 in increased central service costs and an impact of approximately \$1 million in compensation costs. The Office of the Chief Informational Officer (OCIO) says we are subject to oversight on our IT Modernization Project, as well as a feasibility study that they want us to complete this year. As part of the last-minute putting together of the budget, somehow the feasibility study dropped.

LLM Considine segued into the 2020 session and cycle. The 2020 legislation will be a short session, typically 60 days long. LLM Considine asked Commissioners to bring any topics they would like to discuss for agency request legislation to the July commission meeting. Staff will give the commissioners a list of items that they recommend for possible legislative topics. Sports betting will be a priority but unlikely to be any agency request legislation. **Chair Sizemore** announced that he would like staff to begin preparing a budget package that requests a general fund appropriation for the agency's law enforcement activities.

Other Business/General Discussion/Public Comment

Chair Sizemore announced that day two of this meeting will start at 9:00 a.m. with Sports Betting Discussion.

Gambling Commission meeting day one adjourned at 4:02 p.m.

Public Meeting Reconvened

The Gambling Commission meeting reconvened and Chair Sizemore called the Gambling Commission meeting to order at 9:12 AM.

Staff Present for Day 2:

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

Tab 9

Sports Gambling Discussion

LLM Considine presented the material for this tab, including a PowerPoint presentation. LLM Considine provided an update on recent bills that have passed in other states and what is currently happening in states where sports gambling is now legal, including Oregon and Montana. LLM Considine also covered regulatory policy considerations, including: sport integrity laws in RCW, betting method, cost to the agency, operational models, licensing requirements, geo-fencing, and problem gambling for discussion by the commissioners and ex officio members.

There was a conversation amongst the commissioners and ex officio members about implementation of policy considerations identified during the presentation, and what House Bill 1975 and others would have accomplished if passed into law.

At the end of the discussion, **Chair Sizemore** stated that he, Director Trujillo and LLM Considine would get together to establish a sports gambling work plan for the remaining 2019 commission meetings.

Public Comment

Chair Sizemore opened the meeting up for public comments on sports gambling.

Dolores Chiechi from the Recreational Gaming Association stated that she hopes the Legislature will take a broader view on sports gambling to ensure the card room industry is included in any sports gambling legislation because they have experience in operating gambling establishments and sports gambling, including the use of kiosks, which are a good opportunity for their industry to bring people into the card rooms.

Chair Sizemore announced that a special commission meeting will be held on June 13, 2019 for executive session only. The commissioners will be discussing tribal negotiations only.

Gambling Commission meeting day two adjourned at 11:06 AM.



STATE OF WASHINGTON
GAMBLING COMMISSION

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

Gambling Commission June Special Meeting Minutes

Gambling Commission 501 S. 336th Street Suite 210

Federal Way, WA 98003

June 13, 2019

Commissioners Present:

Bud Sizemore, Chair
Julia Patterson, Vice Chair
Chris Stearns
Ed Troyer
Alicia Levy

Ex Officio Members Present:

Staff Present:

David Trujillo, Executive Director; Brian Considine, Legal and Legislative Manager; Julie Lies, Tribal Liaison; Kelly Main, Special Agent Supervisor; Jeanine Sugimoto, Special Agent; Keith Kam, Special Agent Supervisor; Julie Anderson, Executive Assistant; and Suzanne Becker, Assistant Attorney General.

Other attendees:

Sharon M. James, Assistant Attorney General

Public Meeting Call to Order

Chair Bud Sizemore called the Gambling Commission meeting to order at 10:15 a.m. He announced that the commissioners would be going into executive session for about four hours to discuss tribal negotiations only.

At 2:15 Julie Anderson announced that executive session would continue for another 30 minutes.

Meeting adjourned at 2:45.



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Current House- Banked Locations Operating					45
	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, 2019	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, 2019	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, 2019	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	00-19613	67-00194
GREAT AMERICAN CASINO/LAKEWOOD	LAKEWOOD	Aug 14, 2003	Jun 30, 2019	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, 2019	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

45

	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, 2019	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, 2019	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, 2019	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, 2019	00-20113	67-00231
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2019	00-22130	67-00301
SILVER DOLLAR CASINO/MILL CREEK	BOTHELL	Sep 9, 2010	Jun 30, 2019	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2019	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2019	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2019	00-16759	67-00038
THE GETAWAY CASINO	WALLA WALLA	Mar 11, 2016	Jun 30, 2019	00-23485	67-00332
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2019	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

Licensed, But Not Operating					1
	City	Commission Approval Date	License Expiration Date	Org #	License #
LUCKY 21 CASINO	WOODLAND	Oct 8, 2013	Jun 30, 2019	00-22918	67-00322

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



Washington State Gambling Commission

Pre-Licensing Report

Manufacturer

Part I Licensing/Organization Information

Type of Approval Manufacturer License Distributor License	Premises/Trade Name/Address Gaming Partners International USA 3945 W. Cheyenne, STE 208 N. Las Vegas, NV 89032
Date of Application February 4, 2019	

APPLICANT INFORMATION

Name Gaming Partners International USA	License Application # 20-00262 21-00313	Business Phone # (702) 384-2425
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Address
3945 W. Cheyenne, STE 208
N. Las Vegas, NV 89032

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Manufacturer License Distributor License	Exp. Date 03/31/2020	License Number(s) 20-00262 21-00313
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COMMISSION STAFF

Licensing Specialist Michelle Davis	Special Agents Tyson Wilson Julie Sullivan
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Background/Structure

General Information:

Gaming Partners International USA (GPI) is a manufacturer and supplier of playing cards, chips, dice, and other related gambling equipment. They have been licensed with us and in good standing since 2003. In 2019, GPI was acquired by Angel Holdings GK. This was a 100% stock purchase and will result in GPI being delisted as a publically traded company on the NASDAQ exchange (GPIC). Angel Holdings GK is 100% owned by Mr. Yasushi Shigeta.

Organizational/Ownership Structure:

Gaming Partners International USA

Title	Name	% Ownership *
Owner*	Gaming Partners International Corp.	100%
	Total	100%

Gaming Partners International Corp. (GPIC)

Title	Name	% Ownership
Owner*	Angel Holdings GK	100%
	Total	100%

Angel Holdings GK

Title	Name	% Ownership
Owner*	Yasushi Shigeta	100%
	Total	100%

* Mr. Shigeta is the lone officer and director at all levels of ownership, as well as, the ultimate 100% owner of all entities

Affiliated Company:

Angel Playing Cards Mfg. Kyoto., Ltd., a sister company with Angel Holdings GK, is the largest manufacturer of casino playing cards in Asia. They will be applying for a manufacturer license in the future. It is also 100% owned by Mr. Shigeta.

Other Jurisdictions Licensed:

Gaming Partners International Corp. has been licensed throughout North America. Angel Playing Card USA, Inc. and Angel Playing Cards Mfg. Kyoto., Ltd are licensed in Nevada and Ontario with pending applications in Pennsylvania.

Part II Licensing Investigations Summary

Special Agents 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. Staff went on-site to Kyoto, Japan, to conduct their investigation, which included verifying the ownership structure, reviewing financial and business records, and conducting interviews. 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 ultimate source of funds for the purchase of GPIC was bank loans from regulated financial institutions.

Part III Staff Recommendations

Based upon the criminal history and financial background investigations, staff recommends licensing Gaming Partners International USA with manufacturer and distributor licenses.

Prepared By Jennifer LaMont, Agent in Charge Licensing Unit	Signature 	Date 5/22/19
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Washington State Gambling Commission

Pre-Licensing Report Manufacturer

Part I Licensing/Organization Information

Type of Approval Manufacturer	Premises/Trade Name/Address Gamblit Gaming, LLC 700 N. Central Ave Floor 7 Glendale, CA 91203
Date of Application August 15, 2018	

APPLICANT INFORMATION

Name Gamblit Gaming	License Application # 20-00252 21-00307	Business Phone # (818) 956-7011
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Address
700 N. Central Ave Floor 7
Glendale, CA 91203

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Manufacturer	Exp. Date 03/31/2020	License Number(s) 20-00252
Distributor		21-00307

COMMISSION STAFF

License Specialist Cathee Gottfryd	Special Agents Donna Khanhasa Tyson Wilson
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General Information:

Gamblit Gaming, LLC (Gamblit Gaming) was founded in 2011. They developed games that incorporate video games and skill-based games with gambling. The company is headquartered in Glendale, California.

Ownership/corporate structure: Gamblit Gaming, LLC:

Title	Name	Spouse	% of Ownership
President/CEO/ LLC Manager	Eric Meyerhofer	N/A	0
LLC Manager	Miles Arnone	Lisa Marie Arnone	0
CFO	William Rudat	Guadalupe Rudat Ayala	0
Independent Manager	Robert Del Rossi	Melissa Adams	0
LLC Member	Hard 8 Games, LLC	N/A	100
		Total	100

Hard 8 Games, LLC:

Title	Name	Spouse	% of Ownership
LLC Manager	Eric Meyerhofer	N/A	0
LLC Manager	Miles Arnone	Lisa Marie Arnone	0
CFO	William Rudat	Guadalupe Rudat Ayala	6.28
LLC Member	Frank Cire	Pamela Eversole-Cire	6.93
LLC Member	Clifford Kaylin	Milena Kaylin	7.92
LLC Member	Marcus Yoder	Joey Leanne Yoder	2.08
LLC Member	Gamestocks, LLC	N/A	40.69
Independent Manager	Robert Del Rossi	Melissa Adams	0
LLC Members	Non-substantial interest holders	N/A	36.10
		Total	100

Gamestocks, LLC:

Title	Name	Spouse	% of Ownership
LLC Manager	Eric Meyerhofer	N/A	100

Other Jurisdictions:

Gamblit Gaming is licensed in several jurisdictions, including Nevada, California, Alberta and Indiana.

Part II Licensing Investigation Summary
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Special Agents 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. Staff went on-site to Glendale, California, to conduct their investigation, which included verifying the ownership structure, reviewing financial and business records, conducting interviews and observing the manufacturing and development process. The investigation found:

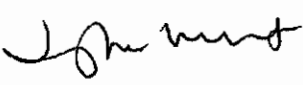
- No unreported people or businesses involved (i.e. substantial interest holders);
- No undisclosed ownership or undisclosed involvement in other activities/businesses;
- No disqualifying administrative history;
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold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

Source of Funds:

The company's source of funds was cash on hand from operations to expand into Washington State.

Part III Staff Recommendations

Based upon the financial and criminal history background investigations, staff recommends licensing Gamblit Gaming, LLC, as a Manufacturer and Distributor.

Prepared By Jennifer LaMont, Agent in Charge Licensing Unit	Signature 	Date 5/31/19
--	---	------------------------



Washington State Gambling Commission

Pre-Licensing Report

Manufacturer

Part I Licensing/Organization Information

Type of Approval Manufacturer License	Premises/Trade Name/Address Sunset Graphics, LLC 10275 El Capitan Real El Cajon, CA 92021
Date of Application March 29, 2019	

APPLICANT INFORMATION

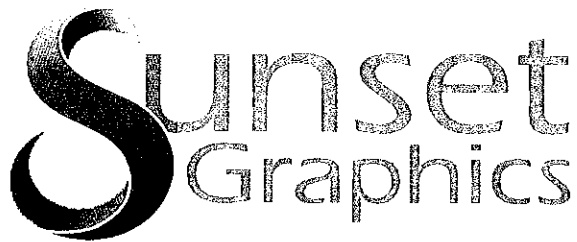
Name Sunset Graphics, LLC	Licensed Application # 20-00264	Business Phone # (619) 654-1090
Address 10275 El Capitan Real El Cajon, CA 92021		

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Manufacturer License	Exp. Date 3/31/2020	License Number 20-00261
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COMMISSION STAFF

License Specialist Alec Sorensen	Special Agent Julie Sullivan
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General Information:

Sunset Graphics, LLC (Sunset Graphics), is a small husband and wife printing company that operates out of their home. The majority of their business is signs and promotional material. They also print graphical game layouts for table games, which are defined as gambling equipment in WAC 230-03-200(6) (e).

Ownership/corporate structure of Sunset Graphics:

Title	Name	% Ownership
Member	James Burton	50%
Member	Mary Burton	50%
Total		100%

Other Jurisdictions:

Sunset Graphics is licensed through various Tribal entities in California and have applied for a state license in California.

Part II Licensing Investigation Summary
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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. Staff went on-site to El Cajon, California, to conduct their investigation, which included verifying the ownership structure, reviewing financial and business records, conducting interviews and observing the printing process. The investigation found:

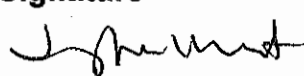
- No unreported people or businesses involved (i.e. substantial interest holders);
- No undisclosed ownership or undisclosed involvement in other activities/businesses;
- No disqualifying administrative history;
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold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

Source of Funds:

The company's source of funds for the pre-licensing review was a loan from family.

Part III Staff Recommendations

Based upon the financial and criminal history background investigations, staff recommends licensing Sunset Graphics, LLC, as a Manufacturer.

Prepared By Jennifer LaMont, Agent in Charge Licensing Unit	Signature 	Date 6/6/19
--	---	-----------------------



COMMISSION APPROVAL LIST
(Class III Gaming Employees)
July 2019

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Based upon the licensing investigations, staff recommends approving all new Class III employees listed on pages 1- 3.

OK

PERSON'S NAME

CERTIFICATION NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEES

COWLITZ INDIAN TRIBE

ALMEIDA, FRANK D
69-46656

BERGQUIST, MELONIE A
69-46765

BRANDEBERRY-Q, DONIVAN L
69-42101

BROWNING, LIMMIE W
69-46886

BUSH, ANDREA L
69-44149

CARLSON, JOSHUA A
69-46925

CAYAN, GARRET M
69-46764

CLONTZ, JOHN A
69-46798

CONE, JESSICA A
69-46684

CONE, ZACHERY L
69-46643

CORNELL, JASON W
69-46640

DIVER, JOSEPH W
69-46735

DOAK, ETHAN D
69-46805

HANTHO, JOSEPH D
69-46803

HEBNER, ERIC W
69-46923

HIGGINS, EDWARD K
69-46652

HOOD, GERALD S
69-46804

KITTEL, ALLAN B
69-46706

KUANG, YANNA
69-46926

LI, YANHONG
69-46927

MAI, KHOA N
69-46691

MCAVOY, CLIFTON P
69-46781

MILES, SHARIESE K
69-46683

NEIN, LUCAS B
69-46730

UK

PERSON'S NAME

CERTIFICATION NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEES

COWLITZ INDIAN TRIBE

NORRIS, NATHANIEL I
69-46736

PAGE, CHRISTINA R
69-44441

PAULSEN, DEVIN P
69-46799

POINTER, ERICKA B
69-46800

REED, BRENTON N
69-46737

ROSS, PATRICIA C
69-42062

SCHROEDER, TYLER D
69-46924

SERRANO, VANESSA M
69-44247

SIZER, KEVIN R
69-46642

SMITH, SCOTT W
69-46763

SOUTHERLAND, KATI L
69-46738

STEELE, HEATHER D
69-43177

STEIN, STEVEN W
69-46802

STONE, COLIN J
69-46801

SWEET, MICHELLE D
69-46780

VANDERWEIDE, THERESA L
69-46856

VIRAY, FREDERICK V
69-46835

WALKER, STACY R
69-46865

YASU, MELFORT
69-46740

YORK, KYLEE J
69-46641

SNOQUALMIE TRIBE

BRADY, MATTHEW A
69-46938

BURR, LISA L
69-46820

CARSON, LEONA M
69-46754

DENG, HUIXIA
69-46937

PERSON'S NAME

CERTIFICATION NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEES

SNOQUALMIE TRIBE

DIUMINA, SVETLANA
69-46860

DON, VUM N
69-46861

HOLLOWAY, AMBER L
69-46936

HWANG, YEONGMI
69-46863

KIM, JOOHEE
69-46858

LAI, XIAOQIAO
69-46862

LICHTY, RAYMOND G
69-46751

MCELLIGOTT, CODY R
69-46857

VU, JIMMY
69-40967

WATKINS, JEREMY L
69-46647

WILLOUGHBY, SEAN D
69-46821

XU, SNOW
69-46859



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
July 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 31.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**BINGO**

CENTENNIAL ELEM SCHOOL BOOSTER ASSN
00-13993 01-02474

2637 45TH AVE SE
OLYMPIA WA 98501

ST JOSEPH'S PARISH
00-07524 01-02788

901 W 4TH AVE
KENNEWICK WA 99336

THE VALLEY GRANGE 01048
00-24431 01-02786

3091 WAITTS LAKE RD
VALLEY WA 99181

RAFFLE

ARLINGTON LACROSSE
00-24460 02-21051

PO BOX 2972
ARLINGTON WA 98223

BEYOND PINK SPOKANE INC
00-23487 02-09580

4119 S CUBA ST
SPOKANE WA 99223

BIG BROTHERS/BIG SISTERS OF SOUTHWEST WASHINGTO
00-12470 02-02259

1802 BLACK LK BLVD SW STE 102
OLYMPIA WA 98501

CASCADE KOMBIS VINTAGE VOLKSWAGEN CLUB
00-24468 02-21054

19515 FREMONT AVENUE NORTH
SHORELINE WA 98133

CASTLE ROCK CHAMBER OF COMMERCE
00-24445 02-21048

PO BOX 72
CASTLE ROCK WA 98611

CEDARCREST HIGH SCHOOL GIRLS LADY REDWOLVES
00-24412 02-21031

29000 NE 150TH ST
DUVALL WA 98019

COLUMBIA BASIN CANCER FOUNDATION
00-22100 02-09019

1031 W. BROADWAY AVE.
MOSES LAKE WA 98837

CRUSH KIDS CANCER GUILD
00-24441 02-21044

93001 US HIGHWAY 2
SKYKOMISH WA 98107

CYT SEATTLE
00-24381 02-21015

1717 MAPLE VALLEY HWY
RENTON WA 98057

DISTRICT 751 CHARITY FUND
00-24420 02-21035

9125 15TH PL S
SEATTLE WA 98108

EDMONDS ELEMENTARY STARS FOUNDATION
00-24430 02-21039

1215 OLYMPIC AVENUE
EDMONDS WA 98026

LAKE CHELAN BOATING CLUB
00-21324 02-08814

144 E JOHNSON AVE
CHELAN WA 98816

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

RAFFLE

MERCER ISLAND EASTSIDE ORPHANS & WAIFS
00-24421 02-21036

PO BOX 58
KIRKLAND WA 98083

MONTESSORI SOCIETY OF YAKIMA
00-24436 02-21040

511 N 44TH AVE.
YAKIMA WA 98908

RICHARD HUGO HOUSE
00-24128 02-20845

1634 11TH AVE
SEATTLE WA 98122

RIKKOLE CREE CANOE CLUB
00-24003 02-20778

2884 GOSHEN ROAD
BELLINGHAM WA 98226

ROTARY CLUB OF YAKIMA
00-23652 02-09654

1600 RIVER RD
YAKIMA WA 98902

ROTARY CLUB/YAKIMA SW
00-17278 02-02865

2206 S 52ND AVE
YAKIMA WA 98908

SEEL TRI CITIES
00-24444 02-21047

146 HILLS WEST WAY
RICHLAND WA 99352

SEHOME PTSA 8.3.100
00-24413 02-21032

2700 BILL MCDONALD PKWY
BELLINGHAM WA 98225

SOUTH SNOHOMISH LITTLE LEAGUE
00-24402 02-21023

11705 51ST DR SE
EVERETT WA 98208

ST. CATHERINE OF SIENA PARISH SCHOOL
00-23907 02-20727

8524 8TH AVENE
SEATTLE WA 98115

SUCCESS FOUNDATION
00-24267 02-20935

14220 INTERURBAN AVE SOUTH#134
TUKWILA WA 98168

TORNADOES SWIM TEAM
00-24472 02-21057

21508 NW 61ST AVE
VANCOUVER WA 98666

TRI TOWN EVENTS
00-24442 02-21045

P O BOX 436
METALINE FALLS WA 99153

WALLA WALLA VALLEY CHAMBER OF COMMERCE
00-24411 02-21030

29 E SUMACH
WALLA WALLA WA 99362

WHATCOM HOSPICE FOUNDATION
00-24439 02-21042

2901 SQUALICUM PARKWAY
BELLINGHAM WA 98225

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

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

CARRIAGE SQUARE BAR & GRILL
00-24407 05-21603

25626 102ND PL SE
KENT WA 98030-6410

EL TORO I
00-24424 05-21608

12914 PACIFIC HWY SW
LAKEWOOD WA 98499

EL TORO II
00-24423 05-21607

5716 N 26TH ST
TACOMA WA 98407

LARRY JR BIGFOOT PUB & EATERY
00-24432 05-21611

9115 N DIVISION
SPOKANE WA 99218

MAC'S CIGAR STORE
00-08933 05-04162

210 E HERON ST
ABERDEEN WA 98520

RIVERSIDE TAVERN
00-24392 05-21601

33729 SE REDMOND-FALL CITY RD
FALL CITY WA 98024

RUBY SLIPPER BAR & GRILL
00-17062 05-09375

3995 BETHEL RD SE SUITE 5
PORT ORCHARD WA 98366

SILOS
00-24379 05-21594

12125 W CLEARWATER AVE STE B
KENNEWICK WA 99338

SILVERS SALOON
00-22706 05-21118

2752 PACIFIC AVE SE
OLYMPIA WA 98501-2037

SURE SHOT ALEHOUSE
00-24429 05-21610

101 E NORTH BEND WAY
NORTH BEND WA 98045

THE BRICK PUB & GRILL
00-24410 05-21604

1190 SUNSET BLVD NE E
RENTON WA 98056

UGGIE BOO'S BASIN STREET BISTRO
00-24387 05-21598

48 BASIN ST NW
EPHRATA WA 98823

UNCLE DAVES CAFE
00-24419 05-21606

3280 SE LUND AVE
PORT ORCHARD WA 98366

WOODY'S SPORTS BAR
00-24400 05-21602

19508 AURORA AVEN
SHORELINE WA 98133

COMBINATION LICENSE

AMERICAN LEGION 00024
00-01254 08-00306

211 E MAIN STREET
GARFIELD WA 99130

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

COMBINATION LICENSE

LAKE VIEW PTA AUBURN COUNCIL 6S.2.18
00-18442 08-00073

16401 SE 318TH
AUBURN WA 98092

MANUFACTURER

GAMBLIT GAMING
20-00252 20-00252

700 N CENTRAL AVE 7FL
GLENDALE CA 91203

GAMING PARTNERS INT'L USA
20-00262 20-00262

3945 W CHEYENNE STE 208
NORTH LAS VEGAS NV 89032

SUNSET GRAPHICS LLC
20-00264 20-00264

10275 EL CAPITAN REAL RD
EL CAJON CA 92021

DISTRIBUTOR

GAMBLIT GAMING
21-00307 21-00307

700 N CENTRAL AVE 7TH FLR
GLENDALE CA 91203

GAMING PARTNERS INT'L USA
21-00313 21-00313

3945 W CHEYENNE STE 208
NORTH LAS VEGAS NV 89032

GAMBLING SERVICE SUPPLIER

BULLETPROOF SOLUTIONS II
00-24324 26-00353

25 ALISON BLVD
FREDERICTON NA E3C 2N5

HARBORTECH MOBILITY INC
00-24373 26-00354

22030 20TH AVE SE 101
BOTHELL WA 98021

COMMERCIAL AMUSEMENT GAMES OPERATOR

PARADISE FAMILY FUN CENTER
00-24415 53-21532

767 MINARD AVE
OCEAN SHORES WA 98569

CARD GAME NON HOUSE-BANKED

F & A M 00027 / UNION CITY LODGE
00-24438 60-00547

19331 N HWY 101
SHELTON WA 98584

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

NON HOUSE-BANKED CARD GAME

MAC'S CIGAR STORE
00-08933 65-01287

210 E HERON ST
ABERDEEN WA 98520

SPIKES RESTAURANT GROUP
00-24340 65-07499

718 E FRANCIS AVE
SPOKANE WA 99208

THE LOUNGE AT NEW WAY VAPORS
00-23759 65-07498

1551 PIPERBERRY WAY STE 101 A-B
PORT ORCHARD WA 98366

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

ANDERSEN, ANTHONY G
 23-02934

MASQUE PUBLISHING INC
 LONE TREE CO 80124

BACHMEIER, FRANK L JR
 23-02935

IGT
 LAS VEGAS NV 89113

BURTON, JAMES L
 23-02933

SUNSET GRAPHICS LLC
 EL CAJON CA 92021

BUSTAMANTE, MICHAEL D
 23-02265

IGT
 LAS VEGAS NV 89113

CARTY, CALVIN J
 23-01828

ARISTOCRAT TECHNOLOGIES INC
 LAS VEGAS NV 89135

CHADWELL, DERRICK G
 23-02943

VGT
 FRANKLIN TN 37067

COLICCI, MICHAEL A
 23-02955

IGT
 LAS VEGAS NV 89113

COOK, CHRISTOPHER J
 23-01079

GAMBLIT GAMING
 GLENDALE CA 91203

CUIZON, DONNY L
 23-02940

IGT
 LAS VEGAS NV 89113

DALE, KELLEN C
 23-02952

BALLY TECHNOLOGIES
 LAS VEGAS NV 89119

DALY, THERESA C
 23-02938

ARISTOCRAT TECHNOLOGIES INC
 LAS VEGAS NV 89135

DATLA, LAKSHMI B
 23-01338

BALLY TECHNOLOGIES
 LAS VEGAS NV 89119

DIAZ, LAWRENCE A
 23-02947

ARISTOCRAT TECHNOLOGIES INC
 LAS VEGAS NV 89135

DOWNARD, NATHAN W
 23-02245

BALLY TECHNOLOGIES
 LAS VEGAS NV 89119

DUNKLE, JASON W
 23-02941

IGT
 LAS VEGAS NV 89113

EDWARDS, DAMIEN M
 23-01852

IGT
 LAS VEGAS NV 89113

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

FAHER, JOSEPH R
23-02936

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

FRIESNER, JARED M
23-02957

BONANZA PRESS
WOODINVILLE WA 98072-8432

HENSLEY, ROBERT A
23-02939

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

KRENZ, VICTORIA A
23-01922

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

OMAN, KEVIN T
23-02954

EVERI GAMES INC.
AUSTIN TX 78746

RAO, MUHAMMED A
23-02956

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

RYAN, GINGER M
23-02937

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

SALVO, KENNETH S
23-02949

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

SCHAFFNER, MICHAEL J
23-02942

VGT
FRANKLIN TN 37067

SCHMIDT, CODY C
23-02946

IGT
LAS VEGAS NV 89113

SCHMIDT, MICHAEL R
23-02953

GALAXY GAMING
LAS VEGAS NV 89119

SHADE, RONALD G
23-02944

VGT
FRANKLIN TN 37067

STEWART, JEREMY G
23-02435

EVERI GAMES INC.
AUSTIN TX 78746

VALENZUELA, ROMALDO P JR
23-02820

GAMBLIT GAMING
GLENDALE CA 91203

VELEZ, JACOB D
23-01445

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

WELCH, DAVID C JR
23-02951

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

WILGAR, DOUGLAS A
23-01125

IGT
LAS VEGAS NV 89113

WOOTEN, JONATHAN J
23-02945

VGT
FRANKLIN TN 37067

YANG, QIAOFENG
23-02950

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

NON-PROFIT GAMBLING MANAGER

BRYANT, SHAWNA L
61-04704

SPOKANE YOUTH SPORTS ASSN
SPOKANE WA 99201

DECKER, STEFANIE R
61-04705

BPOE 01204
ANACORTES WA 98221

EDLIN, MICHELLE L
61-04703

BPOE 02524
FORKS WA 98331

FARNSWORTH, KAREN C
61-04706

LOOM 00996
PORT ANGELES WA 98362

GARDINER, THELMA M
61-04146

VFW 01135
HOQUIAM WA 98550

HANSEN, NATHAN C
61-04707

FOE 03865
OROVILLE WA 98844-0000

HARVEY, LISA R
61-04701

FOE 02809
GIG HARBOR WA 98332

HECKENKAMP, ERIK J
61-04293

SEATTLE JUNIOR HOCKEY ASSN
MOUNTLAKE TERRACE WA 9804

HOLDERMAN, TERRY W
61-04244

VFW 00224
ABERDEEN WA 98520

KEIM, MARY C
61-04699

VFW 00239
BREMERTON WA 98312

KUNING, KELLI
61-04396

FOE 01555
KELSO WA 98626

MORASH, REBEKAH L
61-04700

SPOKANE YOUTH SPORTS ASSN
SPOKANE WA 99201

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

NON-PROFIT GAMBLING MANAGER

TOBEY, LISA M
61-04702

SISTER REBECCA BERGHOFF FDN
UNION GAP WA 98903

SERVICE SUPPLIER REPRESENTATIVE

AGUILAR, ARMANDO
63-00859

DALLMEIER ELECTRONIC USA
LAS VEGAS NV 89102

AUSTIN, AARON T
63-00865

SALISHAN-MOHEGAN LLC
VANCOUVER WA 98660

CHIPCHASE, RYAN J
63-00868

DALLMEIER ELECTRONIC USA
LAS VEGAS NV 89102

KIGHTLINGER, AARON P
63-00864

NORTH AMERICAN VIDEO
BRICK NJ 08723

LEAUNVANKHAM, DAENG
63-00808

DALLMEIER ELECTRONIC USA
LAS VEGAS NV 89102

LEGER, JEAN P
63-00860

BULLETPROOF SOLUTIONS II
FREDERICTON NA E3C 2N5

RONAN, BRIAN C
63-00863

BULLETPROOF SOLUTIONS II
FREDERICTON NA E3C 2N5

RONNING, GARRETT F
63-00862

BULLETPROOF SOLUTIONS II
FREDERICTON NA E3C 2N5

ROSASCO, NICHOLAS M
63-00861

BULLETPROOF SOLUTIONS II
FREDERICTON NA E3C 2N5

RUDD, DAVID D
63-00869

NORTH AMERICAN VIDEO
BRICK NJ 08723

WARNER, HANNAH A
63-00870

WG-AIRWAY HEIGHTS LLC
LAS VEGAS NV 89119

CARD ROOM EMPLOYEE

AGUILAR, ANGELICA D
68-34328

B

SILVER DOLLAR CASINO/SEATAC
SEATAC WA 98188

ALLEN, CHAD M
68-20141

B

CASINO CARIBBEAN
KIRKLAND WA 98034

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

AMMAR, BENJAMIN W 68-18570	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
ANDERSON, KARL C 68-22136	B	SILVER DOLLAR CASINO/SEATAC SEATAC WA 98188
BAILEY, JERAMIE A 68-35303	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
BALAYANTS, MIKHAIL G 68-06055	B	MACAU CASINO TUKWILA WA 98188-2437
BAM, SOPHOL 68-35266	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
BICKNELL, KALIJHA L 68-35283	B	THE GETAWAY CASINO WALLA WALLA WA 99362
BROWN-JONES, COLETON C 68-32720	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
BURCKHARD, GAGE D 68-35317	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
CABILING, JOSELITO B 68-03644	B	ROXY'S BAR & GRILL SEATTLE WA 98126
CAI, XIAOZHU 68-35320	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
CAMPAGNA, LEON R 68-32115	B	THE PALACE LA CENTER WA 98629
CASTLE, TRINA E 68-35285	B	LAST FRONTIER LA CENTER WA 98629-0000
CATHCART, MICHAEL R 68-35318	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
CHEN, YAN 68-35327	B	RIVERSIDE CASINO TUKWILA WA 98168
CHO, RANDY H 68-19757	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
CHOEUNG, SOPHAN 68-34744	B	EMERALD DOWNS AUBURN WA 98001

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

CHUA, PAUL A 68-17569	B	FORTUNE CASINO - RENTON RENTON WA 98055
CHUM, CHANTHY 68-33778	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
COPE, CYNTHIA J 68-35310	B	LANCER LANES/REST AND CASINO CLARKSTON WA 99403-2219
CORONA LOPEZ, ALBERTO 68-35328	B	CASINO CARIBBEAN YAKIMA WA 98901
CRAWFORD, CHRISTOPHER R 68-35314	B	MACAU CASINO TUKWILA WA 98188-2437
CROWDER, AMANDA R 68-35339	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
CUTARAN, ROLAND C 68-35326	B	ALL STAR CASINO SILVERDALE WA 98383
DAVIDSON, SHAUNASEY M 68-35308	B	CASINO CARIBBEAN KIRKLAND WA 98034
DE GUZMAN, PEDRO S JR 68-35267	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
DELEON, JOHN J 68-35296	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
DOAN, HOA P 68-35297	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
DOUGLAS, AARON A 68-35290	B	CLUB HOLLYWOOD CASINO SHORELINE WA 98133
DRESSEL, CHRISTINA A 68-35312	B	HAWKS PRAIRIE CASINO LACEY WA 98516
DUONG, PHUONG T 68-35321	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
FISHER-DORSEY, KERI J 68-35305	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
FITZGERALD, CHRISTOPHER J 68-19559	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

FRAGALL, MARCELLIA R 68-35299	B	LAST FRONTIER LA CENTER WA 98629-0000
GAGNON, JONATHAN H 68-35292	B	HAWKS PRAIRIE CASINO LACEY WA 98516
GARDNER, MATTHEW A 68-35261	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
GARRY, TREVONNE D 68-32388	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
GORNEY, JESSE A 68-24776	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
HARN, EVAN A 68-35281	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
HATTON, CHRISTOPHER R 68-30604	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
HERSCH, DAVID J JR 68-35268	B	PAPAS CASINO RESTAURANT & LOUN MOSES LAKE WA 98837
HICKMAN, CRISTA D 68-35307	B	NOB HILL CASINO YAKIMA WA 98902
HUDSON, DARIN M 68-30792	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
ISBELLE, RANDY B 68-26382	B	LANCER LANES/REST AND CASINO CLARKSTON WA 99403-2219
JANSEN, NATHANIEL S 68-35316	B	JOKER'S CASINO SPORTS BAR & FIEST RICHLAND WA 99352-4122
KELLY, RAEANNE 68-18790	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
KOWALSKI, JOEY H 68-35260	B	ALL STAR CASINO SILVERDALE WA 98383
LAMB-GARCIA, ORLANDO R 68-35257	B	IRON HORSE CASINO AUBURN WA 98002
LANNING, ANNETTE D 68-35333	B	LANCER LANES/REST AND CASINO CLARKSTON WA 99403-2219

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

LE, VINH Q 68-16140	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
LEAL, JOHNNY A JR 68-35265	B	THE GETAWAY CASINO WALLA WALLA WA 99362
LEE, HORACE V 68-35315	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
LYNN, SHERRI 68-35304	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
MA, YANFEN 68-35288	B	RIVERSIDE CASINO TUKWILA WA 98168
MARROQUIN, ANTHONY J 68-35293	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
MARTINEZ DIAZ, JUAN M 68-35258	B	RC'S AT VALLEY LANES SUNNYSIDE WA 98944
MARVIN, JACOB J 68-32841	B	IRON HORSE CASINO AUBURN WA 98002
MCCUIEN, JARROD M 68-35331	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
MCGOVERN, SANDRA L 68-33002	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
MCLAUGLIN, SARAH E 68-35309	B	HAWKS PRAIRIE CASINO LACEY WA 98516
MCNEIL, JAMES N JR 68-13473	B	BLACK PEARL RESTAURANT & CARD SPOKANE VALLEY WA 99206-471
MOLINA, EDERY E 68-35319	B	NOB HILL CASINO YAKIMA WA 98902
NELSON, GREGORY E 68-16986	B	EMERALD DOWNS AUBURN WA 98001
NGUYEN, HOA T 68-09381	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
NGUYEN, MICHAEL T 68-35325	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

NHEM, DOMINIC L 68-35259	B	MACAU CASINO LAKEWOOD WA 98499
NIX, REBECCA J 68-35295	B	SILVER DOLLAR CASINO/MILL CREEK BOTHHELL WA 98012
NOA, ALVIN J 68-35275	B	RIVERSIDE CASINO TUKWILA WA 98168
NOA, LOTOLEAGA J 68-35276	B	RIVERSIDE CASINO TUKWILA WA 98168
ORTIZ BENITEZ, VANESSA 68-35329	B	CASINO CARIBBEAN YAKIMA WA 98901
OWENS, KENNETH G 68-35278	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
PASTRO, DAVID A 68-35334	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804
PHANRUENSKAW, SELENA 68-35294	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
PHAT, SOKHA 68-35311	B	ROMAN CASINO SEATTLE WA 98178
POTTORFF, MICHAEL L 68-16224	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
RILEY, TAMIA T 68-35338	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
RUFFIN, LEON C 68-22822	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
SAECHAO, SONYA 68-31361	B	ROMAN CASINO SEATTLE WA 98178
SALYER, CHRISTOPHER M 68-35254	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
SAMPLE, JOSHUA S 68-35262	B	WILD GOOSE CASINO ELLENSBURG WA 98926
SANCHEZ, MELISSA D 68-16182	B	PAPAS CASINO RESTAURANT & LOUN MOSES LAKE WA 98837

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

SEARCY, MARVIN L 68-35287	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
SHAFER, LEAH A 68-35286	B	NOB HILL CASINO YAKIMA WA 98902
SMITH, CHRISTINA A 68-05099	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
SNOW, RONALD S 68-35263	B	JOKER'S CASINO SPORTS BAR & FIEST RICHLAND WA 99352-4122
SO, KUNNARY 68-35289	B	FORTUNE CASINO - RENTON RENTON WA 98055
STABENOW, ADALYN E 68-35298	B	ALL STAR CASINO SILVERDALE WA 98383
THAI, HAI T 68-13625	B	ROXY'S BAR & GRILL SEATTLE WA 98126
THOMAS, CHRISTOPHER C JR 68-32661	B	LAST FRONTIER LA CENTER WA 98629-0000
TO, VINH K 68-35324	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
TRACEY, LAUREN F 68-35335	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
TREJO, ALEC D 68-35277	B	LANCER LANES/REST AND CASINO CLARKSTON WA 99403-2219
TRUEMAN, ANDREW C 68-34470	B	LANCER LANES/REST AND CASINO CLARKSTON WA 99403-2219
VANGEL, LAUREN H 68-35279	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
VO, QUY D 68-34175	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
VU, THUY D 68-35322	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
WANG, MENG JIA 68-35332	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804

PERSON'S NAME

EMPLOYER'S NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**CARD ROOM EMPLOYEE**WARLEN, DENISE L
68-31046

B

GREAT AMERICAN CASINO/LAKEWOOD
LAKEWOOD WA 98499WATERMAN, JESSE E
68-35269

B

SILVER DOLLAR CASINO/RENTON
RENTON WA 98057WINTER, JESSICA A
68-17877

B

CRAZY MOOSE CASINO II/MOUNTLAK
MOUNTLAKE TERRACE WA 9804WOODRUFF, KERRIE A
68-10911

B

IRON HORSE CASINO
AUBURN WA 98002YE, MICHELLE T
68-35323

B

GOLDIE'S SHORELINE CASINO
SHORELINE WA 98133ZINGELMAN, WILLIAM N
68-23772

B

GREAT AMERICAN CASINO/LAKEWOOD
LAKEWOOD WA 98499

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS**CLASS III GAMING EMPLOYEE****CHEHALIS CONFEDERATED TRIBES**ALBILLAR, JAMEY F
69-43927CARTER, RICHARD K
69-46661COGGINS, CHRISTOPHER D
69-46759COLLINS, STEVEN O
69-40307HAMILTON, RUSSELL S
69-46899HILEMAN, MELISSA R
69-46645JONES, CRYSTAL R
69-44478KELLY, SAMANTHA M
69-46761KLATUSH, TAMMY J
69-30842LAVALLIE, KAYLA R
69-46760MEDINA, ALICIA N
69-09176RODOCKER, EMILY S
69-46941ROWLANDS, JACKIE L JR
69-46728SANCHEZ, JANET A
69-35477SCOTT, BRANDON C
69-46669SHARP, ADAM T
69-46729STETSON, NANCY J
69-46898STRONG, MICHELE M
69-41642THORNTON, AMANDA B
69-46831WEISS, ARTHUR H
69-46867WHITE, JANET L
69-46897WITWER, CAMMI R
69-19288**COLVILLE CONFEDERATED TRIBES**CISNEROS, CELENE G
69-46776CRUZ FARIAS, BERNAL
69-46956

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COLVILLE CONFEDERATED TRIBES

DIAZ, MARCOS L
69-46757

GORR, KYLER J
69-46784

HALL, DUANE E JR
69-46786

HALL, JESSICA M
69-46775

LINDSEY, DARIAN M
69-43688

LOUIE, JOLENE F
69-46694

MARCHAND, SADIE M
69-46777

MATT, NICHOLAS R
69-42071

MILLS, LORNARAE R
69-46840

MORRISON, ANTHONY J
69-46785

PHILLIPS, LARRY J
69-46855

PICARD, AIYANA P
69-46702

SAM, RANDI RAE L
69-46774

THOMPSON, MEADOW R
69-40648

KALISPEL TRIBE

BOREN, JENNA R
69-46892

BRINNON, DUSTIN W
69-46943

CARO, TRICIA L
69-36891

CLAASSEN, SHELBY M
69-46918

CLIBY, PAUL L
69-46734

COWLEY, MICHAEL J
69-46670

FARMER, MATTHEW C
69-46664

GENTILE, ERIK E
69-46718

GERING, ROBERT A
69-46945

GREEN, DARIUS L
69-46779

PERSON'S NAME

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NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

HARLAN, LEANN K
69-46770

MOORE, BRANDON E
69-27266

MORAN, SHEILA R
69-25675

MURPHY, KATHLEEN A
69-46944

NELSON, CRYSTAL L
69-46791

OWENS, JESSICA S
69-46746

RODENBOUGH, JACOB R
69-46797

ROES, BRITTANY A
69-46671

SMITH, ROBIN P
69-46796

SNARSKI, CHRISTEL C
69-46905

SOLLIE, RITA A
69-46891

WACHTEL, SKYLER N
69-46731

WARD, DAVID M
69-46877

LUMMI NATION

CONTRERAS-HERNANDEZ, MONICA J
69-46896

MORLAN, TYLER H
69-46895

PAVELI, ROXANA M
69-46916

PHAIR, SIMONA G
69-24597

QUIROGA, KELLI A
69-46972

RADWANSKI, MEREDITH L
69-26832

RODRIGUEZ, CHRISTINA S
69-46668

VICTOR, DIANA A
69-09175

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

MUCKLESHOOT INDIAN TRIBE

BINGHAM, DAVID M
69-46747

CARRANZA, TONI K
69-46689

CRAFT, ANGELA L
69-46911

ESPITIA, ARMANDO R
69-46968

FERRY, STEPHANIE C
69-46748

HAGSTROM, JORDAN-KELLY L
69-46749

HARTMANN, ANDREAS H
69-46663

HOUSTON, JIMMEY L
69-46970

HUBLEY, COZETTA L
69-46662

MARES, ELIZABETH M
69-46636

NGUYEN, PHUONG T
69-46969

OKOYE, UCHE J
69-46955

QUIOCHO, CHRISTOPHER S
69-46904

SICADE, SANDRA W
69-46792

SOLIAI, ABEL T
69-46954

SOLIAI, ISABEL M
69-19585

WELLS, EARL B
69-46910

WILLIAMS, CECELIA C
69-46953

NISQUALLY INDIAN TRIBE

ANDREOFF, STEVEN A III
69-46623

BLACK, CLINTON J
69-39176

BYARS, JEREMY R
69-46772

CURRIE, DEBRA S
69-46771

DAVIS, JUSTIN L
69-46930

FALOON, DENISE M
69-46827

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NISQUALLY INDIAN TRIBE

FARRELL, MICHELLE S
69-46931

FOX, TAELENE M
69-46826

JOSE, DUANE F
69-15757

KATHE, RONALD E
69-46783

KONG, NARAT
69-46627

LOOMIS, MORGAN B
69-46929

MACK, SHELLY A
69-46782

MARTINEZ, ERIKA M
69-29565

MORITZ, ERIK E
69-46705

NIHEM, ERIK R
69-26676

PHILLIPS, RICHARD A
69-46626

RIVAS, VICTOR A
69-46829

SOEUN, PAULA
69-39261

STEPETIN, TIFFANY M
69-35405

STEPETIN, TOMMY P
69-39579

STUBLEY, SCOTT C JR
69-46828

NOOKSACK INDIAN TRIBE

AMES, ELIZABETH-ANNE Y
69-46811

ANDREW-CHESS, LIZETTE
69-46809

CARYL, MICHAEL W
69-46939

COMPTON, ROY M
69-25207

HABIG, LEONARD W
69-25289

HABIG, MICHELE L
69-10442

JOHNNY, TONY R
69-07793

KENTNER, MICHAEL T
69-01037

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NOOKSACK INDIAN TRIBE

MCCAULEY, RICHARD D
69-46810

MCKINNEY-BOYD, TERI L
69-46935

NIBLOCK, LAUREL A
69-30888

RAMOS, JOEL A
69-25629

WEST, DEBRA A
69-46934

PORT GAMBLE S'KLALLAM TRIBE

BAUCH, KELLY JO C
69-46912

BUNDALIAN, ROBIE S
69-46711

CURLEY, LEE M
69-46714

DAHLGREN, RANDALL S
69-46907

FAAITA, STELLA M
69-32985

FISHER, CATHERINE S
69-46914

HAILEY, CHRISTIE L
69-46712

KANDOW, ALEXANDER M
69-37136

KEELING, EMMA P
69-46713

LEGGETT, CURTIS D
69-46906

MCARDLE, KATHLEEN A
69-46915

MCLAIN, JOHN J
69-35451

TANDY-GUERRERO, DIANE L
69-46913

TUFT, JESSICA C
69-46908

WILLIAMS, GLENDA G
69-35655

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

AILPORT, IVY M
69-46846

AVITIA, CELIA A
69-46773

BUSH, MOSHE L
69-46732

CAREZ, TAYLOR J
69-46696

CHO, CHARLES C
69-46676

CLARK, THOMAS E
69-46847

COE, MARY M
69-46813

CRUZ, BRIAN C
69-46637

CURTIS, ROBERT H
69-46755

DELE, SHENAYA M
69-38614

DONA, JESSICA L
69-46701

FAAOLO, GABRIEL K
69-46743

FRANKLIN, CURTIS L
69-46830

GRIM, DAVID L
69-46883

HARDY, JOSEPH R
69-46733

HERNANDEZ, MARISELA
69-46890

HOOD, TONY W
69-46722

HUMPHREY, AUDREY G
69-38628

LINVILLE, STEVEN S
69-46622

MAIN, APRIL V
69-19923

MARTELL, PORSHIA T
69-46756

MARTIN, MILDRED F
69-14157

MEEKER, MELISSA M
69-46766

NELSON, HEATHER S
69-46723

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

PARIZO GONZALEZ, ELIO A
69-46909

PEREZ SOTO, ASHLEY M
69-46845

PHETH, SARN
69-46849

RABON, JARRETT J
69-46675

RIOS, KRISTINA M
69-46848

ROSARIO, CHRISTOPHER R
69-46677

SMITH, MONICA J
69-46616

TUIGAMALA, PESEFEA JR
69-46688

WHITE, JUSTIN R
69-46660

WINN, ROBERT L
69-46884

QUINAULT NATION

ESTAVILLO, DAVID J
69-40694

JARVIS, SAMANTHA I
69-46692

LAW, PETER A
69-02279

LUNCEFORD, MARCELINA A
69-46653

MONTGOMERY, MELANIE S
69-46703

SANCHEZ, MICHAEL J
69-10927

SIEGEL, MATTHEW J
69-46824

SMITH, RICHARD L JR
69-46825

STANTON, WILLIAM M
69-35058

TILCOCK, CASEY J
69-46902

SKOKOMISH TRIBE

HARRELL, BRIAN S
69-46880

LONGSHORE, ALISHA M
69-46879

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

BAKER, RYAN M
69-46839

DU, JOHN Z
69-46654

DUNN, JOSHUA M
69-46717

HAPP, JONATHAN H
69-46903

HARRIS, DEEJAY M
69-46634

HOLVEN, MELISSA R
69-46882

LOUIE, CALEM R
69-33331

MILLS, CHRISTOPHER B
69-46854

NELSON, TAMMY M
69-46644

ROSE, KAMI M
69-46769

SAMUELS, DAVID R
69-46700

SAMUELS, FREDDIE E
69-46806

SANBROTTI, DANIEL F
69-46699

SEYLER, THOMAS W
69-46655

STANGER, LEONA L
69-46838

TRUEBLOOD, DONALD M
69-46621

SQUAXIN ISLAND TRIBE

BIRKHIMER, HANNAH L
69-46812

BRINES, JENNIFER A
69-46836

CHUM, SOTHA
69-19769

CRUICKSHANK, ANDREA B
69-24710

DOMINGUEZ, RHEA L
69-10324

EVANS, KERI L
69-46881

GILLESPIE, STACEY L
69-46901

HUGHES, JEREMIE J
69-39523

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SQUAXIN ISLAND TRIBE

JOBLONSKI, ISAAH D
69-46546

LANDSAW, CHARLES C
69-46940

NICKLE, RANDY W
69-46745

PARKER, MEGAN R
69-46853

PERALTA, JASMINE U
69-35266

PERKINS, SALLY J
69-46741

RIOUX, LOUISE A
69-08117

ROY, JOSHUA J
69-46658

SQUIEMPHEN, JOANNE E
69-08749

STILLAGUAMISH TRIBE

BENSON, GRAY D
69-46716

BERWICK, ERIK V
69-46875

BLAKE, BILLIE J
69-46893

BROOKS, RENA R
69-46815

DESMOND, ANDREW P
69-46889

GARCIA, STEVE H
69-40084

GLENN, JOHN K
69-46687

GOSHORN, ELISSA M
69-46742

JENSEN, IAN K
69-46888

KONING, JAYCI M
69-46686

LAVERDURE, DORIS J
69-46715

ZERTUCHE HONORATO, HECTOR O
69-46942

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS**CLASS III GAMING EMPLOYEE**

SUQUAMISH TRIBE

AGUERO, JACOB R
69-46922ARNESON, TYLER A
69-46673BOLDWIN, JACOB M
69-46758CUMMINGS, VAN N
69-46725DELGADO, TRAVIS M
69-39862DUGAN, MAARIYAH K
69-46967GRAY, JOSEPH E
69-46952KACK, DANIELLE M
69-46793KAWASAKI, JENEVA A
69-36669LEDESMA, JOHN A JR
69-25790ORTEN, AARON L
69-46928OXFORD, KEVIN J
69-46659PINZA, JOSEPH A
69-46693PIOTROWSKI, GAVIN C
69-46744PRETIGER, WILLIE JR
69-46727RAINES, JENNIFER R
69-46921RENEAU, LUKE S
69-46674RIOS, ALEXANDRA J
69-46724SEQUAK, MARK D
69-46919STRUM, ETHAN G
69-46951TODD, NATANA K
69-46794WAKEFIELD, DAVID W JR
69-46672WELCH, ALEXANDRA N
69-46950WERBELO, MASON A
69-46842

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SWINOMISH INDIAN TRIBAL COMMUNITY

ALDRIDGE, FELICIA K
69-46933

BAKER, BRANDI F
69-46704

BENJAMIN, CHRISTINA M
69-40682

BISCHOFF, JADON T
69-44132

CHESLEY, JONATHAN D
69-46885

CISNEROS, MAYRA
69-46851

COATES, JAMES D
69-46900

GORHAM, DEJUAN C
69-46787

HANSEN, BLAKE K
69-46852

SKEEN, MARAEA S
69-46932

STOLLE, GLENN T
69-17306

THE TULALIP TRIBES

ALBIN, GERRIT P
69-41700

ALLEN, CAREY S
69-46868

ALLEN, TALL E
69-46605

AMES, RACHAEL E
69-46709

ARRO, STEPHANIE F
69-46869

BENDIXEN, CASEY J
69-46707

BENITEZ VALDOVINOS, OSVALDO
69-46753

CARPENTER, KANDI K
69-46708

CHOW, NAPAPON P
69-23619

CLIMACOSA, MARY ANN E
69-46789

CYR, DORA F
69-46823

DEXTER, NICHOLAS R
69-46894

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

DYER, STEVEN G
69-37382

ENICK, ROMAN S
69-12155

FRYBERG, TREVOR A
69-46739

GADDIS, SUSAN S
69-40469

GEORGE, LAURIE E
69-09576

GRUBB, JESSICA L
69-46649

HECKATHORN, KIMBERLY M
69-46844

HENRY, TASHEINA R
69-32872

IKE, LOIS F
69-28097

JOSE, ROSEMARIE S
69-39106

KUNADILOK, PUTTARAPORN
69-46790

KURTZENACKER, JILLIAN M
69-46947

MCCANN, SALLY Z
69-10001

MOSES, AARON R JR
69-46618

NEGRI, MATTEO J
69-22020

NEWLAND, MARK D
69-46843

NORMAN, JONATHAN H
69-36538

OHARA, DALTON K
69-46597

OSTLUND, TRISTAN E
69-46726

PATIO, ROMEO S
69-16664

PAUL, WILLIAM T
69-46571

SAM, MARY F
69-09594

SMITH, RACHEL A
69-46666

SZYMUSIAK, BRANDON E
69-46946

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

VENTURA, RESHELLE G
69-46650

WILLIAMS-FLORES, NICHOLAS D
69-46870

YONKOSKE, MICHAEL A
69-46651

UPPER SKAGIT INDIAN TRIBE

DAVIS, STEVEN J
69-46816

DUGGER, MARRIAH A
69-03734

HIEB, ALYSHA M
69-46887

MARCYES, JEFFERY M
69-46721

SHERMAN, TESS J
69-46720

SIDES, ROBERT S
69-46639

YAKAMA NATION

BILL, SHAYLA E
69-40415

BRAVO, KRYSTAL M
69-46874

CAMACHO GALVAN, JACQUELINE
69-46871

ELI, LEROY I
69-46680

GARDEE, VICTOR N II
69-46876

GREGG, TIERA L
69-27686

HERN, EVA S
69-46682

HERNANDEZ, ANTHONY J JR
69-36364

HILL, SHARON J
69-15424

JAMES, MERRISSA L
69-46873

JEFFERSON, EVELYN J
69-46681

JIM, NAOMI C
69-46679

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

YAKAMA NATION

JUNEBY, SHEKINAH M
69-37734

MARTINEZ, MYRNA Y
69-46678

NELSON, BENJAMIN L
69-44578

OLIVA, LUIS J
69-46505

QUILT, JAMES L
69-34232

TEWEE, ANDREA K
69-18185

VELASQUEZ-MORALES, DIANA
69-46832

WILSON-BARNEY, NACOBI C
69-46788



Rule Petition to Amend

WAC 230-03-210- Applying for a gambling service supplier license.
 WAC 230-03-190- Applying for a distributor license.

July, 2019 – Final Action

May, 2019 – Discussion and Filing

October, 2018 – Petition to Initiate Rule-Making

Tab 3: JULY, 2019 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Wendy Winsor, W.O.W. Distributing, Mukilteo, Washington	
Background and Policy Considerations	
<p>Bold = Changes made after the May 2019 Commission Meeting.</p> <p>W.O.W. Distributing originally requested the repeal of WAC 230-03-225 (marketing level restrictions for punch board or pull-tab gambling service suppliers), which prohibits licensed manufacturers or distributors of punch boards/pull-tabs from also being a licensed gambling service supplier, so that it could charge a fee for training and assistance it is already providing to new and existing customers. A service supplier license is required to carry out these activities for compensation. Staff opposed the repeal and the Commission accepted the petition in October 2018 and entered into rule-making to amend current rules to allow W.O.W. to carry out these activities without a repeal of any rule.</p> <p>Commission staff conducted stakeholder outreach, including in-person or telephonic meetings, to discuss changes to our service supplier rules. Staff and stakeholders who participated in the meetings agreed that it was best to amend our current distributor rules and service supplier rule, to achieve the petitioner’s request to provide training and assistance to new and current customers for a fee.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Petition • WAC 230-03-210 • WAC 230-03-190 	
Stakeholder Feedback and Outreach	
<p>Stakeholder meeting was convened on January 17, 2019 and February 22, 2019. Stakeholders are supportive of petitioner’s wishes to provide education, training, and assistance with licensing for new and existing punch boards and pull-tab licensees, but are resistant to repealing or amending WAC 230-03-225 (marketing level restrictions for punch board or pull-tab gambling service suppliers). Stakeholders have agreed on the proposed changes to WAC 230-03-210 and WAC 230-03-190 in order for the petitioner to achieve this.</p>	
Staff Recommendation	
Final Action.	
Effective Date	
31 days after filing with the Code Reviser’s Office – expected to be on or about August 12, 2019.	

Petitioner's Name: Wendy Winsor

Mailing Address: 4424 Chennault Beach Road Suite B

City: Mukilteo

State: WA

Zip Code: 98275

Phone: 4258709741

Email: Wendyw@wowdistributing.com

Rule Petition Type: Repeal Rule – I am requesting WSGC to eliminate an existing rule.

==Repeal Rule – I am requesting WSGC to eliminate an existing rule.==

List rule number (WAC) if known: WAC 230-03-225

Reason for repeal:

- It does not do what it was intended to do
- It is no longer needed because
- It imposes unreasonable costs
- It conflicts with another federal, state or local law or rule

Explain in more detail the reason for repeal:

WAC 230-03-225 “is no longer needed” and “imposes unreasonable costs” and “conflicts with another rule” and therefore, should be repealed because:

- A distributor of pull-tabs, and its representatives, must inform and educate perspective and established pull-tab licensees in order to perform the activities for which it is licensed and;
- Unreasonable costs (i.e., photo copying, labor, transportation) are incurred by a distributor in the course of performing these licensed activities and;
- WAC 230-03-210 requires anyone who performs these activities for compensation must apply for a “gambling service supplier license” but WAC 230-03-225 does not allow a distributor to hold both licenses.

Repeal of WAC 230-03-225 will allow a distributor to perform its licensed activities and remain compliant. Repeal of WAC 230-03-225 is within the RCW’s and WAC’s and if repealed, poses no conflict.

Wendy Winsor

WAC 230-03-210 Applying for a gambling service supplier license.

(1) You must apply for a gambling service supplier license if you perform any of the following gambling-related services for compensation:

(a) Consulting or advisory services regarding gambling activities; or

(b) Gambling management services; or

(c) Financing for more than one licensee for purchases or leases of gambling equipment or financing for providing infrastructure or facilities, or equipment that supports gambling operations:

(i) Once you have financed more than one licensee, you must be a licensed gambling service supplier until all loans with licensees or previous licensees are paid.

(ii) Once you have been a licensed gambling service supplier, you must be licensed as a gambling service supplier again before financing purchases or leases for any licensee; or

(d) Acting as a lending agent, or loan servicer, or placement agent; or

(e) Providing the assembly of components for gambling equipment under a contract with a licensed manufacturer or entering into an ongoing financial arrangement for gambling related software with a licensed manufacturer; or

(f) Installing, integrating, maintaining, or servicing digital surveillance systems that allow direct access to the operating system; or

(g) Training individuals to conduct authorized gambling activities; or

(h) Providing any other service or activity where influence may be exerted over any gambling activity licensed by the commission; or

(i) Performing the testing and certification of tribal lottery systems in meeting requirements specified in the tribal-state compact; or

(j) Providing nonmanagement-related recordkeeping or storage services for punch board and pull-tab operators, when the combined total gross billings from such services exceed thirty thousand dollars during any permit period or license year.

(2) You do not need a gambling service supplier license if you are:

(a) A bank, mutual savings bank, or credit union regulated by the department of financial institutions or any federally regulated commercial lending institution; or

(b) A university or college regulated by the Washington state board of community and technical colleges and the higher education coordinating board that trains individuals to conduct authorized gambling activities; or

(c) An attorney, accountant, or governmental affairs consultant whose primary business is providing professional services that are unrelated to the management or operation of gambling activities; or

(d) A person who only provides nonmanagement-related recordkeeping or storage services for punch board and pull-tab operators, when the combined total gross billings from such services do not exceed thirty thousand dollars during any permit period; or

(e) A person who provides names, images, artwork or associated copyrights, or trademarks, or patent use, or other features that do

not affect the results or outcome of the game, for use in gambling equipment; or

(f) Regulated lending institutions; or

(g) A licensed distributor who provides any of the following services for compensation:

(i) Training to licensed and potential punch board/pull-tab operators; or

(ii) Providing assistance to gambling license applicants or licensees seeking gambling license renewal ~~for compensation.~~

WAC 230-03-190 Applying for a distributor license. You must apply for a distributor license if you:

(1) Buy or otherwise obtain a finished piece of gambling equipment for use in authorized gambling activities from another person and sell or provide that gambling equipment to a third person for resale, display, or use; or

(2) Are a manufacturer who sells or provides gambling equipment you do not make to any other person for resale, display, or use; or

(3) Service and repair authorized gambling equipment. However, distributors must not add, modify, or alter the gambling equipment; or

(4) Modify gambling equipment using materials provided by manufacturers to upgrade equipment to current technology(~~(-)~~); or

(5) Buy or lease a group 12 amusement game from another licensee and sell or lease the group 12 amusement game to an amusement game licensee; or

(6) Provide training to licensed and potential punch board/pull-tab operators for compensation; or

(7) Provide assistance to gambling license applicants or licensees seeking gambling license renewal for compensation.



Rule Petition to Amend

WAC 230-16-152 Card shuffling devices connecting to a secure cellular network for billing purposes.

July, 2019 – Final Action

May, 2019 – Discussion and Filing

February, 2019 – Petition to Initiate Rule-Making

Tab 4: JULY, 2019 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Bo Zarach, Bally Technologies/Scientific Games, Las Vegas, Nevada	
Background and Policy Considerations	
<p>Bold = Changes made after May 2019 Commission Meeting.</p> <p>Bally Technologies/Scientific Games requested WAC 230-16-151 be amended allowing card shufflers to be connected to a secure cellular network for billing purposes only. Currently, gambling equipment can only be connected to external tools for standard maintenance through a closed network.</p> <p>This change would allow licensed manufacturers to offer a new billing option for card shufflers found in licensed card rooms. Bally Technologies/Scientific Games states that this change will allow it to only bill for the shuffler when it is in use. It states that this change may save on costs for card rooms because a card room would be charged only for the amount of successful shuffles rather than paying a standard set price for the use of the shuffler. Card shuffling devices connecting to a secure cellular network have already been tested by the Electronic Gaming Lab and approved for use in tribal facilities.</p> <p>The proposed rule addresses card shufflers, billing information, and cellular networks based on the petition request received in February. Stakeholder feedback received by staff indicates that some stakeholders may be interested in broadening the scope of this rule language once the current rule-making is finalized. Staff will discuss additional proposals with stakeholders once this rule is finalized and bring those proposals to the Commissioners for review later this year, if needed.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Letter from Bo Zarach, Bally Technologies/Scientific Games • Petition • Shuffler Flex Cellular System Overview • WAC 230-16-152 	
Stakeholder Outreach and Feedback	
<p>Stakeholder meetings were convened on March 20, 2019 and April 26, 2019. We discussed adopting a new rule that allows card shuffling devices to connect to a secure cellular network for billing purposes instead of amending WAC 230-16-151. We also discussed other types of gambling equipment, connecting to other types of secure networks, and connecting for purposes other than billing, such as diagnostic purposes. These concerns are outside the scope of this petition but can be addressed in the future. On April 26, 2019, stakeholders agreed to move forward with language to allow for card shuffling devices to connect to secure cellular network for billing purposes only and to address other concerns at a later date.</p> <p>Victor Mena, Washington Gold Casinos, testified at May 2019 Commission Meeting in support of this proposal.</p>	
Staff Recommendation	

Final Action.
Effective Date
31 days after filing with the Code Reviser's Office – expected to be on or about August 12, 2019.



December 26, 2018

VIA UPS

Washington State Gambling Commission
ATTN: Ashlie Laydon, Rules Coordinator
4565 7th Avenue SE
Lacey, WA 98503

RE: Rule Amendment Petition for WAC 230-16-151

Dear Ms. Laydon:

Bally Gaming is respectfully requesting your review and adoption of our Rule Amendment Petition. This petition is requesting a modification to WAC 230-16-151 - gambling equipment being connected to external tools for standard maintenance. Currently, Item #1 within this WAC, states that gambling equipment can only be connected to a closed network. We would like this WAC amended to allow our gaming equipment to connect to a secure cellular network for billing purposes only.

We have developed a new billing option that allows Card Rooms/Casinos to pay for the shuffler based on the amount it is used. This option is targeted for locations that have table game pits that are only open part time but still want the security of using a shuffler. Rather than paying a standard lease price they will only pay for the number of successful shuffles. This is accomplished by adding a secure cellular modem to our approved shufflers. This modem will transmit the shuffler data to our server a set number of times during the day. This information will then be used to bill the Card Room/Casino. The shuffler data that is sent to our server is historical information only and does not include real time information for the games in progress. The shuffler data that is transmitted includes:

- Equipment statistics such as software versions, serial numbers, network information, hard count meters and shuffler configuration information.
- Usage information such as hard count meters, successful and unsuccessful shuffles, shuffles completed for service purposes, number of card sorts and the number of cards in each shuffle.
- History logs such as shuffler malfunctions, card recognition errors and maintenance logs.
- Test messages used for setup.

Enclosed for your consideration of this request are the following:

- Washington Petition Form
- Shuffler Flex Cellular System Overview
- Proposed Rule Change Wording

6601 S. Bermuda Road
Las Vegas, NV 89119
Las Vegas Office: 702.532.7700, Fax 702.532.7582
Reno Office: 775.532.1500, Fax 702.532.9045

www.BallyTech.com



We welcome the opportunity to meet with the Washington State Gambling Commission directly on this matter. If you have any questions regarding this request, please contact me at 702-532-7140 or Bo.Zarach@scientificgames.com.

Sincerely,

A handwritten signature in blue ink that reads "Bo Zarach".

Bo Zarach
Compliance Product Manager

6601 S. Bermuda Road
Las Vegas, NV 89119
Las Vegas Office: 702.532.7700, Fax 702.532.7582
Reno Office: 775.532.1500, Fax 702.532.9045

www.BallyTech.com



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE

Print Form

In accordance with [RCW 34.05.330](#), the Office of Financial Management (OFM) created this form for individuals or groups who wish to petition a state agency or institution of higher education to adopt, amend, or repeal an administrative rule. You may use this form to submit your request. You also may contact agencies using other formats, such as a letter or email.

The agency or institution will give full consideration to your petition and will respond to you within 60 days of receiving your petition. For more information on the rule petition process, see Chapter 82-05 of the Washington Administrative Code (WAC) at <http://apps.leg.wa.gov/wac/default.aspx?cite=82-05>.

CONTACT INFORMATION *(please type or print)*

Petitioner's Name Bo Zarach

Name of Organization Bally Gaming

Mailing Address 6601 S. Bermuda Road

City Las Vegas State NV Zip Code 89119

Telephone 702-532-5857 Email Bo.Zarach@ScientificGames.com

COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClst.htm>.

INFORMATION ON RULE PETITION

Agency responsible for adopting or administering the rule: Washington State Gaming Commission

1. NEW RULE - I am requesting the agency to adopt a new rule.

The subject (or purpose) of this rule is: _____

The rule is needed because: _____

The new rule would affect the following people or groups: _____

2. AMEND RULE - I am requesting the agency to change an existing rule.

List rule number (WAC), if known: 230-16-151, Gambling equipment connecting to external tools for standard maintenance.

- I am requesting the following change: Gambling equipment can connect to a secure cellular network when being used for billing purposes only.
- This change is needed because: Current rule states "The following gambling equipment can be connected to external tools for standard maintenance only through a closed network".
- The effect of this rule change will be: This will allow the Card Rooms to pay for the amount the gaming equipment is used rather than paying a flat rate monthly lease.
- The rule is not clearly or simply stated: _____

3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.

List rule number (WAC), if known: _____

(Check one or more boxes)

- It does not do what it was intended to do.
- It is no longer needed because: _____
- It imposes unreasonable costs: _____
- The agency has no authority to make this rule: _____
- It is applied differently to public and private parties: _____
- It conflicts with another federal, state, or local law or rule. List conflicting law or rule, if known: _____
- It duplicates another federal, state or local law or rule. List duplicate law or rule, if known: _____
- Other (please explain): _____

Shuffle Flex Cellular System

System overview

The Shuffle Flex Cellular System connects casino card shufflers to Bally's data collection server. The primary purpose of the system is to track shuffler usage in order to provide flexible leasing plans to the casinos. In addition to usage, software version numbers and history logs are sent to the server.

All communication is single direction, initiating at the shuffler and received by the server. The shufflers receive no external communication, except a reply from the server that a message has been received. Unlike a progressive cellular link, no game or prize dependent messages are sent. The data is historical, no real time information is sent. The shufflers connect to the server over a private, secure network.

Wireless Security Architecture

The shuffler connects to either a GSM or CDMA cellular network via a cellular modem. The connection is to a private Access Point Name (APN) managed by the cellular network. The APN is connected to Bally's Virtual Private Network (VPN). The VPN connects to a Bally local network that includes the collection server.

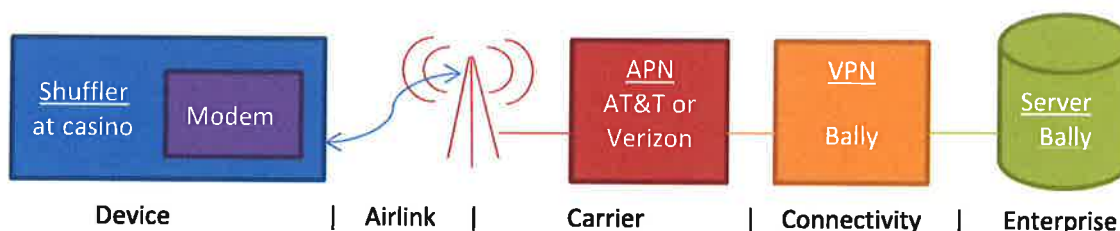


Figure 1

The Airlink connection between the modem and the carrier is data only. The Airlink segment uses A5/1 encryption or A5/2 encryption in some global locations if export restrictions apply.

The APN and VPN convey data from the shuffler to the Bally local network through secure and private access. There is no public or internet access to the shufflers or server. All the shufflers are assigned local IP addresses in the 10.6X.xxx.xxx range.

Details of the messages

Refer to the document "Shuffle Flex Message Protocol" for specific field names and type of data.

All messages are formatted using the JavaScript Object Notation (JSON) which is a lightweight data-interchange format. The format is described at www.json.org.

Message header

All messages contain the shuffler serial number, time the message was created, a message ID, the shuffler type (MD3, DM2, etc.) and the type of message being sent. Depending on the type of message, other fields are included as indicated below. Even though the protocol describes other message types, only these four message types are implemented in the Shuffle Flex system.

Message type: Power up

When the shuffler is turned on, a power up message is sent to the server that includes the version numbers of the firmware, the SIM card and Modem serial numbers, the network connected to, the hard count meter, game, deck type, number of cards in a shuffle and whether card recognition is enabled.

Message type: Usage

Periodically, a usage message is sent to the server that includes the hard count meter, good shuffles, failed shuffles, service shuffles, sorts and number of cards in a shuffle. The frequency of these messages is determined by the rate set in the Setup/Modem/Usage Update rate screen. Typically, the rate is set at 4 to 6 times per day.

Message type: Log

The history log contains records of shuffler malfunctions, card recognition errors and service related entries such as when the machine is cleaned. The message includes a Log type field, a description of what happened and the hard count meter at the time of the log entry.

Message type: Test

A test message can be sent using the shuffler service menu. It contains the hard count meter and a unique key to verify that communication with the server is successful.

The Billing System

A SQL database connects with the collection server and retrieves the usage messages. These are processed by the database to generate billing reports that are fed into SHFL's Accounting system to produce invoices.

Web server

The GoBally web site allows casino customers to track the usage on the shufflers within their property.

System summary

The Shuffle Flex Cellular System is a secure, unidirectional, usage collection system for the purpose of tracking the amount of shuffler usage by Bally's customers. This data is collected in order to offer flexible leasing plans to the casinos. No real time data is sent to the collection server. Usage is uploaded a few times per day. In addition to usage, the shuffler's firmware version numbers are uploaded at power up and its history logs are uploaded to track maintenance issue.

Components of the Shuffle Flex Cellular System

- Shuffler
 - Deck Mate 2 or MD3
 - RS422 or RS232 serial communication with modem
- Cellular modem
 - Attached to shuffler
 - Dual network capable
 - GSM
 - CDMA
- Cellular Network
 - Towers
 - Microcells
 - Access Point Name (APN)
- Enterprise network
 - Router
 - Virtual Private Network (VPN)
 - Collection server
 - SQL database
 - Billing system

WAC 230-16-151

Gambling equipment connecting to external tools for standard maintenance.

(1) The following gambling equipment can be connected to external tools for standard maintenance only through a closed network, unless connecting to a cellular network for billing purposes:

- (a) Card shuffling devices; and
- (b) Ace finders or no peek devices; and
- (c) Similar gambling equipment that has been approved by us.

(2) For purposes of this rule:

(a) A closed network includes only the gambling equipment and the external tool.

(b) Standard maintenance means:

(i) Reviewing event logs on gambling equipment, which can consist of card and software errors.

(ii) Installing and uninstalling card libraries and card calibration files.

(iii) Configuring touch screen calibration.

(iv) Gathering diagnostic information.

(v) Verifying the hardware board type(s).

(vi) Reviewing the number of times the equipment has been powered up.

(vii) Reviewing the total number of operating cycles.

(c) External tools may only include laptops, tablets, USB products, or similar products approved by us, containing troubleshooting programs, which will connect to the gambling equipment via their Ethernet or USB ports.

(3) For purposes of this rule:

(a) A cellular connection includes the gambling equipment and a cellular modem that is used to transmit information via a secure cellular network.

(b) Billing purposes mean:

(i) Transmitting historical shuffler data that is used when billing is based on the number of successful shuffles.

(c) Shuffler data means:

(i) Equipment statistics such as software versions, serial numbers, network information, hard count meters and shuffler configuration information.

(ii) Usage information such as hard count meters, successful and unsuccessful shuffles, shuffles completed by service, number of card sorts and the number of cards in each shuffle.

(iii) History logs such as shuffler malfunctions, card recognition errors and maintenance logs.

(iv) Test messages used for setup.

~~(3)~~ (4) The following requirements apply when using external tools:

(a) A functional replica of the external tools and their troubleshooting programs must be tested and approved by us before they are first used; and

(b) During standard maintenance, the gambling equipment must not be in play or have access to live gaming data; and

(c) Wireless capabilities must not be used when an external tool is connected to gambling equipment. If an external tool has wireless capabilities, it must be tested by us to ensure wireless capabilities are disabled when connected to the gambling equipment; and

(d) There must be no access to the internet; and

(e) The connection for maintenance must only exist while the manufacturer representative or distributor representative is performing maintenance; and

(f) When standard maintenance is performed, the operator must keep a log in the format we require and access to the gambling equipment must be recorded by surveillance; and

(g) The external tools must only be in possession of a manufacturer representative or distributor representative.

(5) For purposes of billing, the following requirements apply when using a cellular modem:

(a) A functional replica of the gaming equipment with cellular option must be tested and approved by us before they are used; and

(b) The transmitted data must not include the card specific information or live gaming data; and

(c) A cellular modem may only have one way communication from the gaming equipment to a secure cellular network.

(i) Excluding the confirmation notification from the network that the shuffler data was successfully received.

NEW SECTION

WAC 230-16-152 Card shuffling devices connecting to a secure cellular network for billing purposes. Card shuffling devices can be connected to a secure cellular network for billing purposes.

(1) For the purposes of this rule:

(a) A secure cellular network includes the card shuffling device and a cellular modem that is used to transmit information via a secure cellular network.

(b) Billing purposes means transmitting historical shuffler data that is used when billing is based on the number of successful shuffles. Shuffler data includes:

(i) Equipment statistics such as software versions, serial numbers, network information, hard count meters, and shuffler configuration information; and

(ii) Usage information such as hard count meters, successful and unsuccessful shuffles, shuffles completed by service, number of card sorts, and the number of cards in each shuffle; and

(iii) History logs such as shuffler malfunctions, card recognition errors, and maintenance logs; and

(iv) Test messages used for setup.

(2) The following requirements apply when connecting card shuffling devices to a secure cellular network for billing purposes:

(a) An identical or substantially similar card shuffling device connected to a secure cellular network must be tested and approved by us, as outlined in WAC 230-06-050, before it can be used; and

(b) The transmitted data must not include card specific information, live gaming data, or any other gambling information; and

(c) Except for a confirmation notification from the network that the shuffler data was successfully received, there may only be one-way communication from the card shuffling device to the secure cellular network; and

(d) Transmitted information may only be accessed by the licensee or licensed manufacturer; and

(e) A record must be kept of all information transmitted and made available to us upon request.



**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

June 26, 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: Tola Nhet, CR 2019-00764
Final Order – July 11, 2019 Commission Meeting**

Ms. Tola Nhet has a gambling license authorizing Public Card Room Employee activity at Macau Casino in Tukwila, Washington. Her license expired on June 14, 2019.

On April 11, 2019, card room surveillance staff observed Ms. Nhet stealing cash from player buy-ins while working as a card dealer at Macau Casino. A review of the video surveillance from April 1, 2019 through April 11, 2019, revealed 54 instances where Ms. Nhet stole buy-in money totaling approximately \$45,350. Ms. Nhet was interviewed by Gambling Commission special agents and confessed to stealing cash several times over the past month, totaling \$14,000 to \$15,000. Ms. Nhet’s employment was suspended on April 12, 2019 and terminated on May 8, 2019.

Director Trujillo issued Ms. Nhet 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. Nhet.

Ms. Nhet’s failure to respond to the charges or timely request a hearing is a waiver of Ms. Nhet’s right to a hearing in Case No. CR 2019-00764. You may take final action against her gambling license. Based on her conduct, Ms. Nhet cannot show by clear and convincing evidence that she is qualified to keep her gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Tola Nhet’s gambling license, Number 68-30633.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2019-00764

TOLA NHET,
License No. 68-30633,

FINAL ORDER OF THE
GAMBLING COMMISSION

Licensee.

This matter having come before the Washington State Gambling Commission (Commission) on July 11, 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 Tola Nhet a gambling license, License Number 68-30633, authorizing Public Card Room Employee activity at Macau Casino in Tukwila, Washington.

2. This license, which expired on June 14, 2019, was issued subject to Ms. Nhet’s compliance with state gambling laws and Commission rules.

3. On April 11, 2019, surveillance staff observed Ms. Nhet stealing cash from player buy-ins while working as a card dealer at Macau Casino.

4. Ms. Nhet was observed taking the player buy-in, turning the cash vertically, and then angling it through the money slot on the top of the gaming table so that it bypassed the drop box altogether.

1 5. Ms. Nhet did not use the paddle to push the cash through the money slot as
2 required by internal controls.

3 6. The cash rested between the drop box and the drop box sleeve. Ms. Nhet then
4 reached her hand underneath the table, took the cash, and put it somewhere on her person.

5 7. A review of the video surveillance from April 1, 2019 through April 11, 2019,
6 revealed 54 incidences where Ms. Nhet angled the cash through the money slot and later
7 retrieved the cash from underneath the table. There were 10 incidences where she was not
8 successful in retrieving the cash.

9 8. The total amount of buy-ins for the 54 incidences in which she took money from
10 underneath the table was \$45,350.

11 9. Video surveillance also showed that after Ms. Nhet would retrieve the cash from
12 underneath the table, she would always move her hand near her boots or waistband.

13 10. On April 25, 2019, Ms. Nhet was interviewed by Gambling Commission special
14 agents. She confessed to stealing cash several times over the past month, totaling \$14,000 to
15 \$15,000.

16 11. When asked why she took the money, Ms. Nhet said that she owed loan sharks
17 approximately \$40,000.

18 12. Ms. Nhet's employment was suspended on April 12, 2019 and terminated on May
19 8, 2019.

20 13. Director David Trujillo issued administrative charges on May 24, 2019 alleging
21 that Ms. Nhet's actions constituted a violation of RCW 9.46.075 and WAC 230-03-085. Further,
22 that she could not show by clear and convincing evidence that she was qualified for licensure as
23 required by RCW 9.46.153(1), and that her actions warranted revocation of her license pursuant
24 to RCW 9.46.075(1), (8), and (10) and WAC 230-03-085(1), (3), and (9)(a), (c), (d), and (e).

25 14. Ms. Nhet was sent the charges by regular and certified mail on May 24, 2019 to
26 the last address the Gambling Commission had on file.

ORDER

This matter having come before the Commission at its July 11, 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 Tola Nhet’s gambling license, Number 68-30633, is **REVOKED**.

DATED this 11th day of July, 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:

TOLA NHET
2820 S. 148th St.
SEATTLE, WA 98168

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

Ashlie Laydon
Rules Coordinator



STATE OF WASHINGTON
GAMBLING COMMISSION

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

June 26, 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: Saroeung Seum, CR 2019-00765
Final Order – July 11, 2019 Commission Meeting

Ms. Saroeung Seum has a gambling license authorizing Public Card Room Employee activity at Macau Casino in Tukwila, Washington. Her license expired on June 14, 2019.

On April 12, 2019, the Gambling Commission received information from Macau Casino that surveillance staff observed Ms. Seum stealing cash from player buy-ins while working as a card dealer. A review of video surveillance from March 25, 2019 through April 9, 2019, revealed 105 instances where Ms. Seum stole buy-ins for a total of approximately \$59,412. Ms. Seum was interviewed by Gambling Commission special agents and she confessed to stealing cash several times over the past three weeks, totaling \$5,000. Ms. Seum’s employment was suspended on April 12, 2019 and terminated on May 8, 2019.

Director Trujillo issued Ms. Seum 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. Seum.

Ms. Seum’s failure to respond to the charges or timely request a hearing is a waiver of Ms. Seum’s right to a hearing in Case No. CR 2019-00765. You may take final action against her gambling license. Based on her conduct, Ms. Seum cannot show by clear and convincing evidence that she is qualified to keep her gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Saroeung Seum’s gambling license, Number 68-25131.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2019-00765

SAROEUNG SEUM,
License No. 68-25131,

FINAL ORDER OF THE
GAMBLING COMMISSION

Licensee.

This matter having come before the Washington State Gambling Commission (Commission) on July 11, 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 Saroeung Seum a gambling license, License Number 68-25131, authorizing Public Card Room Employee activity at Macau Casino in Tukwila, Washington.

2. This license, which expired on June 14, 2019, was issued subject to Ms. Seum’s compliance with state gambling laws and Commission rules.

3. On April 12, 2019, the Gambling Commission received an email from the Chief Operating Officer of Macau Casino that surveillance staff observed Ms. Seum stealing cash from player buy-ins while working as a card dealer.

4. Ms. Seum was observed taking the player buy-in, turning the cash vertically, and then angling it through the money slot on the top of the gaming table so that it bypassed the drop box altogether.

1 5. Ms. Seum did not use the paddle to push the cash through the money slot as
2 required by internal controls.

3 6. Instead, the cash rested between the drop box and the drop box sleeve. Ms. Seum
4 then reached her hand underneath the table, took the cash, and put it somewhere on her person.

5 7. A review of video surveillance from March 25, 2019 through April 9, 2019,
6 revealed 105 instances where Ms. Seum angled the cash through the money slot and later
7 retrieved the cash from underneath the table.

8 8. There were at least 19 incidences where she was not successful in retrieving the
9 cash.

10 9. The total amount of buy-ins for the 105 incidences in which she took money from
11 underneath the table was \$59,412.

12 10. Video surveillance also showed that after Ms. Seum would retrieve the cash from
13 underneath the table, she would always move her hand near her boots or waistband.

14 11. On May 1, 2019, Ms. Seum was interviewed by Gambling Commission special
15 agents. She confessed to stealing cash several times over the past three weeks, totaling \$5,000.

16 12. When asked why she took the money, Ms. Seum said that she owed loan sharks
17 approximately \$13,000.

18 13. Ms. Seum's employment was suspended on April 12, 2019 and terminated on
19 May 8, 2019.

20 14. Director David Trujillo issued administrative charges on May 24, 2019 alleging
21 that Ms. Seum's actions constituted a violation of RCW 9.46.075 and WAC 230-03-085.
22 Further, that she could not show by clear and convincing evidence that she was qualified for
23 licensure as required by RCW 9.46.153(1), and that her actions warranted revocation of her
24 license pursuant to RCW 9.46.075(1), (8), and (10) and WAC 230-03-085(1), (3), and (9)(a),
25 (c), (d), and (e).
26

1 **ORDER**

2 This matter having come before the Commission at its July 11, 2019, Commission
3 meeting, the Commissioners having heard arguments, been given the chance to review the
4 administrative record, and being fully advised in this matter, now therefore:

5 It is hereby **ORDERED** that Saroeung Seum’s gambling license, Number 68-25131, is
6 **REVOKED.**

7
8 DATED this 11th day of July, 2019.

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10 _____
BUD SIZEMORE, Chair

_____ JULIA PATTERSON, Vice Chair

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CHRISTOPHER STEARNS

_____ ED TROYER

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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:

SAROEUNG SEUM
10840 6th Ave S Apt B
SEATTLE, WA 98168

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

Ashlie Laydon
Rules Coordinator



**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

June 26, 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: Kenneth M Gash, CR 2018-02006
Final Order – July 11, 2019 Commission Meeting**

Mr. Kenneth M Gash has a gambling license authorizing Public Card Room Employee activity at Palace Casino in Lakewood, Washington. His license expires on July 21, 2019.

The Palace Casino notified the Washington State Gambling Commission that a theft occurred on December 24, 2018. On this date, Mr. Cash took a roll of cash, approximately \$1,000, dropped onto the floor by a patron as the patron exited the card room. Video surveillance shows Mr. Gash, who works at the casino as a Security Officer, found the cash on the floor, picked it up, and placed it in his pocket as he watched the patron search for it. When confronted by card room management, Mr. Gash admitted to taking the cash but disputed the amount. He later returned all of the cash to card room management. Mr. Gash’s employment was terminated on December 26, 2018.

Director Trujillo issued Mr. Gash a Notice of Administrative Charges on April 29, 2019, by regular and certified mail to his last known address on file. The certified mail was delivered on May 1, 2019. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by May 21, 2019. To date, the Commission has received no communication from Mr. Gash.

Mr. Gash’s failure to respond to the charges or timely request a hearing is a waiver of Mr. Gash’s right to a hearing in Case No. CR 2018-02006. You may take final action against his gambling license. Based on his conduct, Mr. Gash cannot show by clear and convincing evidence that he is qualified to keep his gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Kenneth M Gash’s Public Card Room Employee license, Number 68-33003.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

7 In the Matter of:

NO. CR 2018-02006

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KENNETH M GASH,
License No. 68-33003,

FINAL ORDER OF THE
GAMBLING COMMISSION

Licensee.

This matter having come before the Washington State Gambling Commission (Commission) on July 11, 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 Kenneth M Gash License No.: 68-33003, authorizing Public Card Room Employee activity at Palace Casino in Lakewood, Washington.

2. This license, which expires on July 21, 2019, was issued subject to Mr. Gash's compliance with state gambling laws and Commission rules.

3. On December 27, 2018, the General Manager of the Palace Casino sent an email to the Washington State Gambling Commission reporting that a theft had occurred on December 24, 2018.

4. On December 24, 2018, a casino patron dropped a roll of cash, approximately \$1,000, onto the floor as he exited the card room.

1 5. Mr. Gash, who works at Palace Casino as a Security Officer, noticed the roll of
2 cash on the floor, picked it up, placed it in his jacket pocket, and walked out to the parking lot.

3 6. The patron reentered the card room, approached card room staff about his lost
4 money, and then circled the card room looking for the lost roll of cash.

5 7. Mr. Gash reentered the card room at the same time as the patron but remained
6 near the door and watched the patron search for the cash.

7 8. The patron left the card room after he could not find the roll of money.

8 9. Video surveillance confirms the allegations in the above-referenced paragraphs.

9 10. Mr. Gash never informed card room management that he found the money on the
10 floor of the card room. Instead, he took the money with him when his shift ended.

11 11. Mr. Gash was confronted by card room management the next day about the
12 missing roll of money and he admitted to taking the roll of cash.

13 12. Mr. Gash disputed the amount of money he took from the patron.

14 13. However, Mr. Gash returned the roll of money he took from the card room patron
15 and gave it to card room management.

16 14. Mr. Gash's employment was terminated on December 26, 2018.

17 15. Director David Trujillo issued administrative charges on April 26, 2019 alleging
18 that Mr. Gash's actions constituted a violation of RCW 9.46.075 and WAC 230-03-085. Further,
19 that he could not show by clear and convincing evidence that he was qualified for licensure as
20 required by RCW 9.46.153(1), and that his actions warranted revocation of his license pursuant
21 to RCW 9.46.075(1), and (8), and WAC 230-03-085(1), (3), and (9)(a).

22 16. Mr. Gash was sent the charges by regular and certified mail on April 29, 2019 to
23 the last address the Gambling Commission had on file. The certified mail was delivered on May
24 1, 2019.

1 **ORDER**

2 This matter having come before the Commission at its July 11, 2019, Commission
3 meeting, the Commissioners having heard arguments, been given the chance to review the
4 administrative record, and being fully advised in this matter, now therefore:

5 It is hereby **ORDERED** that Kenneth M Gash's gambling license, Number 68-33003, is
6 **REVOKED**.

7
8 DATED this 11th day of July, 2019.

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BUD SIZEMORE, Chair

_____ JULIA PATTERSON, Vice Chair

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CHRISTOPHER STEARNS

_____ ED TROYER

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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:

KENNETH M GASH
3218 S 45TH ST
TACOMA, WA 98409

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

Ashlie Laydon
Rules Coordinator



STATE OF WASHINGTON
GAMBLING COMMISSION

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

June 26, 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: Savy S Nuon, CR 2019-00065
Final Order – July 11, 2019 Commission Meeting

Ms. Savy S Nuon has a gambling license authorizing Public Card Room Employee activity at Palace Casino in Lakewood, Washington and a certification authorizing Class III Employee activity at Muckleshoot Casino in Auburn, Washington. Her license and certification expired on May 28, 2019.

On December 24, 2018, Ms. Nuon was working as a Floor Supervisor in the gaming pit at Palace Casino. Ms. Nuon illegally used 16,250 player points, or \$65, from a player’s account to pay for the food. On December 25, 2018, while working as a Floor Supervisor, Ms. Nuon again illegally used 6,500 player points, or \$26, from a player’s account to pay for food. When confronted by the General Manager and Casino Manager, Ms. Nuon admitted taking player tracking system points from player’s accounts to pay for food. Her employment was terminated on January 28, 2019.

Director Trujillo issued Ms. Nuon a Notice of Administrative Charges on May 7, 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 May 30, 2019. To date, the Commission has received no communication from Ms. Nuon. Once charges were issued, Puyallup Tribal Gaming Agency revoked Ms. Nuon’s license and terminated her employment at Emerald Queen Casino on May 28, 2019.

Ms. Nuon’s failure to respond to the charges or timely request a hearing is a waiver of Ms. Nuon’s right to a hearing in Case No. CR 2019-00065. You may take final action against her gambling license and certification. Based on her conduct, Ms. Nuon cannot show by clear and convincing evidence that she is qualified to keep her gambling license and certification. Therefore, staff recommends that the Commission sign the proposed final order and revoke Savy S Nuon’s gambling license, Number 68-07679 and Class III Employee certification, Number 69-46177.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2019-00065

SAVY S NUON,
License Nos. 68-07679
69-46177,

FINAL ORDER OF THE
GAMBLING COMMISSION

Licensee/Class III Employee.

This matter having come before the Washington State Gambling Commission (Commission) on July 11, 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 Savy S Nuon License No.: 68-07679, authorizing Public Card Room Employee activity at Palace Casino in Lakewood, Washington, and Certification No: 69-46177, authorizing Class III Employee activity at Emerald Queen Casino in Fife, Washington.

2. This license and certification, which expired on May 28, 2019, were issued subject to Ms. Nuon’s compliance with state gambling laws and Commission rules in accordance with the Puyallup Tribe of Indians Tribal-State Gaming Compact.

3. On December 24, 2018, Ms. Nuon was working as a Floor Supervisor in the gaming pit at Palace Casino.

1 4. Ms. Nuon ordered food for a player who was not in the casino that day, using
2 16,250 player points, or \$65, from the absent player to pay for the food. She asked the server to
3 put the food in a “to-go” bag for her and her adult daughter.

4 5. Ms. Nuon manipulated the Sonoma Player Tracking System to issue the absent
5 player more points and offered the difference to the server.

6 6. On December 25, 2018, while working as a Floor Supervisor, Ms. Nuon again
7 ordered food for a player that was not in the casino at that time. She took 6,500 player points, or
8 \$26, to pay for the food.

9 7. When confronted by the General Manager and Casino Manager, Ms. Nuon
10 admitted that she had comped herself food without the players’ permission.

11 8. Ms. Nuon’s employment was terminated on January 28, 2019.

12 9. Director David Trujillo issued administrative charges on May 7, 2019 alleging
13 that Ms. Nuon’s actions constituted a violation of RCW 9.46.075 and WAC 230-03-085. Further,
14 that she could not show by clear and convincing evidence that she was qualified for licensure as
15 required by RCW 9.46.153(1), and that her actions warranted revocation of her license pursuant
16 to RCW 9.46.075(1) and (8), WAC 230-03-085(1), (3), and (9)(a) and (d), and in accordance
17 with Section V. E. (1) of the Puyallup Tribe of Indians Tribal-State Gaming Compact.

18 10. Once charges were issued, Puyallup Tribal Gaming Agency revoked Ms. Nuon’s
19 license and terminated her employment at Emerald Queen Casino on May 28, 2019.

20 11. Ms. Nuon was sent the charges by regular and certified mail on May 7, 2019 to
21 the last address the Gambling Commission had on file.

22 12. Pursuant to WAC 230-17-010, a response was required to be received by the
23 Commission by May 30, 2019. To date, the Commission has received no communication from
24 Ms. Nuon.

1 **II. CONCLUSIONS OF LAW**

2 1. Ms. Nuon received proper notice of the May 7, 2019 charges pursuant to RCW
3 34.05.431, RCW 34.05.434, WAC 230-17-005, WAC 230-17-010, and WAC 10-08-130.

4 2. The Commission can take final action against Ms. Nuon’s gambling license and
5 certification under Case Number CR 2019-00065 pursuant to RCW 9.46.075, RCW
6 34.05.440(1), RCW 34.05.461, and WAC 230-03-085.

7 3. Ms. Nuon’s license and certification should be revoked under Case Number CR
8 2019-00065 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW
9 34.05.461, and WAC 230-03-085.

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1 **ORDER**

2 This matter having come before the Commission at its July 11, 2019, Commission
3 meeting, the Commissioners having heard arguments, been given the chance to review the
4 administrative record, and being fully advised in this matter, now therefore:

5 It is hereby **ORDERED** that Savy S Nuon’s Public Card Room Employee license,
6 Number 68-07679 and Class III certification, Number 69-46177, is **REVOKED**.

7
8 DATED this 11th day of July, 2019.

9
10 _____
BUD SIZEMORE, Chair

_____ JULIA PATTERSON, Vice Chair

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CHRISTOPHER STEARNS

_____ ED TROYER

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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:

SAVY S NUON
9812 WALLER RD E
TACOMA, WA 98446

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

Ashlie Laydon
Rules Coordinator



STATE OF WASHINGTON
GAMBLING COMMISSION

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

June 26, 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 Young, CR 2019-00564
Final Order – July 11, 2019 Commission Meeting

Mr. Andrew Young has a gambling license authorizing Public Card Room Employee activity at Fortune Casino in Renton, Washington. His license expires on March 18, 2020.

On March 12, 2019, Mr. Young completed his renewal application online. Mr. Young’s gambling license application requires him to disclose all possible criminal history. The gambling license application also requires a signature indicating that all information is submitted under penalty of perjury.

On January 14, 2019, criminal charges were filed in King County Superior Court alleging that Mr. Young violated the Uniform Controlled Substances Act by unlawfully and feloniously manufacturing marijuana, and Defrauded a Public Utility 1st Degree, using or receiving the direct benefit of a utility service without authorization. When Mr. Young submitted his gambling license application, he did not disclose these pending felony charges involving moral turpitude and theft.

Director Trujillo issued Mr. Young a Notice of Administrative Charges on April 18, 2019, by regular and certified mail to his last known address on file. The certified mail was delivered on April 29, 2019. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by May 20, 2019. A timely request for hearing was received and a prehearing conference was set for May 28, 2019. Mr. Young failed to appear at his prehearing conference.

Mr. Young’s failure to appear at the prehearing conference is a waiver of Mr. Young’s right to a hearing in Case No. CR 2019-00564. You may take final action against his gambling license. Based on his conduct, Mr. Young cannot show by clear and convincing evidence that he is qualified to keep his gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Andrew Young’s Public Card Room Employee license, Number 68-22492.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2019-00564

ANDREW YOUNG,
License No. 68-22492,

FINAL ORDER OF THE
GAMBLING COMMISSION

Licensee.

This matter having come before the Washington State Gambling Commission (Commission) on July 11, 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 Andrew Young License No.: 68-22492, authorizing Public Card Room Employee activity at Fortune Casino in Renton, Washington.

2. This license, which expires on March 18, 2020, was issued subject to Mr. Young's compliance with state gambling laws and Commission rules.

3. On March 12, 2019, Mr. Young completed his renewal application online.

4. Mr. Young's gambling license application requires him to disclose all possible criminal history.

5. The gambling license application also requires a signature indicating that all information is submitted under penalty of perjury.

6. Mr. Young did not disclose any criminal history.

1 2. The Commission can take final action against Mr. Young’s gambling license
2 under Case Number CR 2019-00564 pursuant to RCW 9.46.075, RCW 34.05.440(1), RCW
3 34.05.461, and WAC 230-03-085.

4 3. Mr. Young’s license should be revoked under Case Number CR 2019-00564
5 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC
6 230-03-085.

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ORDER

This matter having come before the Commission at its July 11, 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 Andrew Young’s gambling license, Number 68-22492, is **REVOKED**.

DATED this 11th day of July, 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:

ANDREW YOUNG
10318 55TH AVE S
SEATTLE, WA 98178

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

Ashlie Laydon
Rules Coordinator



**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

June 26, 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: Tina G Kuahiwinui, CR 2019-00433
Final Order – July 11, 2019 Commission Meeting**

Ms. Tina G Kuahiwinui has a gambling certification authorizing Class III Employee activity at Muckleshoot Casino in Auburn, Washington. Her certification expires on July 21, 2019.

On December 31, 2018, Ms. Kuahiwinui attempted to defraud Key Bank by claiming someone took her debit card and withdrew or attempted to withdraw \$4352 from her account using an ATM at Muckleshoot Casino. The Muckleshoot Tribal Gaming Agency opened an investigation and concluded, after reviewing surveillance video and talking with Ms. Kuahiwinui, that Ms. Kuahiwinui was the person who conducted the ATM transactions and was in debt to creditors and had lost approximately \$8,600 to the casino in 2018. On January 23, 2019, Ms. Kuahiwinui was notified that her tribal gaming license was revoked effective immediately. Ms. Kuahiwinui has not reported the revocation of her tribal gaming license to the Washington State Gambling Commission.

Director Trujillo issued Ms. Kuahiwinui a Notice of Administrative Charges on April 23, 2019, by regular and certified mail to her last known address on file. The certified mail was delivered on April 25, 2019. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by May 16, 2019. To date, the Commission has received no communication from Ms. Kuahiwinui.

Ms. Kuahiwinui’s failure to respond to the charges or timely request a hearing is a waiver of Ms. Kuahiwinui’s right to a hearing in Case No. CR 2019-00433. You may take final action against her gambling certification. Based on her conduct, Ms. Kuahiwinui 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 Tina G Kuahiwinui’s Class III Employee certification, Number 69-40156.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2019-00433

TINA G KUAHIWINUI,
License No. 69-40156,

FINAL ORDER OF THE
GAMBLING COMMISSION

Class III Employee.

This matter having come before the Washington State Gambling Commission (Commission) on July 11, 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 Tina G Kuahiwinui Certification No.: 69-40156, authorizing Class III Employee activity at Muckleshoot Casino in Auburn, Washington.

2. This certification, which expires on July 21, 2019, was issued subject to Ms. Kuahiwinui's compliance with state gambling laws and Commission rules in accordance with the Muckleshoot Tribal-State Gaming Compact.

3. On January 8, 2019, Muckleshoot Tribal Gaming Agency opened an investigation after Key Bank contacted them regarding possible fraudulent activity committed by Ms. Kuahiwinui at the casino.

1 4. Ms. Kuahiwinui reported to Key Bank that someone had used her debit card to
2 withdraw cash from her account without her permission between the hours of 1305 on December
3 30, 2018 and 0054 on December 31, 2018.

4 5. These transactions consisted of attempted withdrawals totaling in \$4,000 and
5 successful withdrawals totaling in \$352.

6 6. Surveillance showed that Ms. Kuahiwinui was present and participated in the
7 transactions that took place during the above times.

8 7. A review of Ms. Kuahiwinui's credit report noted that she had over \$9,000 in
9 collections and owed an additional amount closer to \$10,000 to creditors. The investigation also
10 revealed that Ms. Kuahiwinui's 2018 win/loss at the Muckleshoot Casino was negative \$8,652.

11 8. When interviewed, Ms. Kuahiwinui denied using her Key Bank Debit Card at the
12 Muckleshoot Casino. She admitted to conducting transactions at the above times, but claimed
13 she used her Wells Fargo account. She also denied that she made a disputed charge claim to Key
14 Bank.

15 9. When informed that there was video surveillance of the above transactions, she
16 admitted that she did conduct the transactions and later chose to dispute them. She explained that
17 she was having financial issues and was the sole provider. She apologized for her actions in
18 attempting to defraud Key Bank by making a false claim.

19 10. On January 23, 2019, Ms. Kuahiwinui was sent a letter notifying her that her
20 tribal gaming license was revoked effective immediately.

21 11. Ms. Kuahiwinui has not reported the revocation of her tribal gaming license to
22 the Washington State Gambling Commission.

23 12. Director David Trujillo issued administrative charges on April 23, 2019 alleging
24 that Ms. Kuahiwinui's actions constituted a violation of RCW 9.46.075 and WAC 230-03-085.
25 Further, that she could not show by clear and convincing evidence that she was qualified for
26 licensure as required by RCW 9.46.153(1), and that her actions warranted revocation of her

1 license pursuant to RCW 9.46.075(1), (7), and (9), WAC 230-03-085(1), (8), and (9)(a), and in
2 accordance with Section V. C. (1) and (3) of the Muckleshoot Tribal-State Gaming Compact.

3 13. Ms. Kuahiwinui was sent the charges by regular and certified mail on April 23,
4 2019 to the last address the Gambling Commission had on file. The certified mail was delivered
5 on April 25, 2019.

6 14. Pursuant to WAC 230-17-010, a response was required to be received by the
7 Commission by May 16, 2019. To date, the Commission has received no communication from
8 Ms. Kuahiwinui.

9 II. CONCLUSIONS OF LAW

10 1. Ms. Kuahiwinui received proper notice of the April 23, 2019 charges via regular
11 and certified mail on April 23, 2019 pursuant to RCW 34.05.431, RCW 34.05.434, WAC 230-
12 17-005, WAC 230-17-010, and WAC 10-08-130.

13 2. The Commission can take final action against Ms. Kuahiwinui's gambling
14 certification under Case Number CR 2019-00433 pursuant to RCW 9.46.075, RCW
15 34.05.440(1), RCW 34.05.461, and WAC 230-03-085.

16 3. Ms. Kuahiwinui's certification should be revoked under Case Number CR 2019-
17 00433 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and
18 WAC 230-03-085.

ORDER

This matter having come before the Commission at its July 11, 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 Tina G Kuahiwinui's Class III certification, Number 69-40156, is **REVOKED**.

DATED this 11th day of July, 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:

TINA G KUAHIWINUI
210 174TH ST E
SPANAWAY, WA 98387

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

Ashlie Laydon
Rules Coordinator



STATE OF WASHINGTON
GAMBLING COMMISSION

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

June 26, 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: Su-Zhen Wu, CR 2019-00620
Final Order – July 11, 2019 Commission Meeting

Ms. Su-Zhen Wu has a gambling license authorizing Public Card Room Employee activity at Fortune Casino in Renton, Washington. Her license expires on April 11, 2020.

Ms. Wu has been licensed since 2004. On March 27, 2019, Ms. Wu completed her renewal application online. On January 31, 2019, criminal charges were filed in King County Superior Court alleging that Ms. Wu violated the Uniform Controlled Substances Act by unlawfully and feloniously manufacturing marijuana. On February 14, 2019, Ms. Wu was arraigned on these charges. When Ms. Wu submitted her gambling license application, she chose not to disclose the above pending felony charge involving moral turpitude. Ms. Wu’s gambling license application requires her to disclose all possible criminal history. The gambling license application also requires a signature indicating that all information is submitted under penalty of perjury.

Director Trujillo issued Ms. Wu a Notice of Administrative Charges on April 18, 2019, by regular and certified mail to her last known address on file. The certified mail was returned on May 17, 2019. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by May 13, 2019. To date, the Commission has received no communication from Ms. Wu.

Ms. Wu’s failure to respond to the charges or timely request a hearing is a waiver of Ms. Wu’s right to a hearing in Case No. CR 2019-00620. You may take final action against her gambling license. Based on her conduct, Ms. Wu cannot show by clear and convincing evidence that she is qualified to keep her gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Su-Zhen Wu’s Public Card Room Employee license, Number 68-19478.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

7 In the Matter of:

NO. CR 2019-00620

8
9 SU-ZHEN WU,
License No. 68-19478,

FINAL ORDER OF THE
GAMBLING COMMISSION

10
11 Licensee.

12 This matter having come before the Washington State Gambling Commission
13 (Commission) on July 11, 2019, the Commission makes the following Findings of Fact,
14 Conclusions of Law, and issues its Final Order:

15 **I. FINDINGS OF FACT**

16 1. The Washington State Gambling Commission issued Su-Zhen Wu License No.:
17 68-19478, authorizing Public Card Room activity at Fortune Casino in Renton, Washington.

18 2. This license, which expires on April 11, 2020, was issued subject to Ms. Wu's
19 compliance with state gambling laws and Commission rules.

20 3. Ms. Wu has been licensed since 2004.

21 4. On March 27, 2019, Ms. Wu completed her renewal application online.

22 5. Ms. Wu's gambling license application requires her to disclose all possible
23 criminal history.

24 6. The gambling license application also requires a signature indicating that all
25 information is submitted under penalty of perjury.

26 7. Ms. Wu did not disclose any criminal history.

FINAL ORDER OF THE
GAMBLING COMMISSION

1 3. Ms. Wu’s license should be revoked under Case Number CR 2019-00620
2 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC
3 230-03-085.
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1 **ORDER**

2 This matter having come before the Commission at its July 11, 2019, Commission
3 meeting, the Commissioners having heard arguments, been given the chance to review the
4 administrative record, and being fully advised in this matter, now therefore:

5 It is hereby **ORDERED** that Su-Zhen Wu's gambling license, Number 68-19478, is
6 **REVOKED**.

7
8 DATED this 11th day of July, 2019.

9
10 _____
BUD SIZEMORE, Chair

_____ JULIA PATTERSON, Vice Chair

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12 _____
CHRISTOPHER STEARNS

_____ ED TROYER

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15 _____
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:

SU-ZHEN WU
3302 S BRANDON ST
SEATTLE, WA 98118

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

Ashlie Laydon
Rules Coordinator



STATE OF WASHINGTON
GAMBLING COMMISSION

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

July 3, 2019

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

EX OFFICIO MEMBERS
Senator Steve Conway
Representative Derek Stanford
Representative Brandon Vick

FROM: Brian J. Considine, Legal and Legislative Manager

SUBJECT: 2020 Agency Request Legislation

We will begin discussing possible topics for 2020 agency request legislation. On behalf of Commission staff, I will discuss the following five topics for agency request legislation:

- General Fund appropriation for agency’s law enforcement functions;
- Amending RCW 9.46.0209 to ensure inclusion of 501(c)(3) nonprofit organizations that may not be qualified under current law;
- Regulations related to social online casinos, loot boxes, and/or skin gambling;
- Clarity of agency law enforcement authority for Adult Protective Services, Money Laundering, and Sports Integrity cases; and
- Requesting the change in HB 1159, Changing the Definition of Theft, if the current supporters do not move the bill in 2020.

Additionally, Commission staff held a stakeholder forum on June 24th to preview possible agency request topics and seek input on topics stakeholders would like the Commission to take on in 2020. The following topics were requested by stakeholders:

- Modernize non-profit laws (bingo/raffles), including allowing nonprofits to advertise and sell raffle tickets online and increase fund raising event limits in RCW 9.46.0233;
- Modernize current pull-tab tax requirements in RCW 9.46.110 to only authorize local taxes on net receipts instead of gross gambling receipts;
- Increase \$1 pull-tab limit in RCW 9.46.110 to allow for \$2/\$5 pull-tabs.

I will also seek input from you if there are any additional topics you wish to add to this list. Then, we will work to try and identify our top three agency request legislative priorities at the July Commission. This will ensure we do not overextend ourselves and set us up for a successful 2020 legislative session. Once the three priorities are identified, then I will then begin stakeholder and legislative outreach on these three topics and have any draft legislation for our August Commission Meeting.

States (continued)

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. In April and May, \$12 million was wagered and there was \$1.02 million in net proceeds. There was \$511,034 in revenue to the state.

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 April and May, \$632.6 million was wagered resulting in \$36.7 million in gross revenue. There was \$4.49 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 April and May, \$36.6 million was wagered resulting in \$3.2 million in gross revenue. There was \$389,976 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 April and May, \$19 million was wagered resulting in \$1.21 million in gross revenue. There was \$121,079 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 April and May, \$35.7 million was wagered resulting in \$2.86 million in gross revenue.

Pennsylvania – Sports gambling started in the state in December 2018. The state gaming control board is the primary regulator. Currently, 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 April and May, there was \$72.7 million wagered for \$7.08 million in gross revenue. There was \$2.55 million in tax revenue.

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 April and May, there was approximately, \$645.4 million wagered resulting in \$32.9 million in gross revenue. There was \$2.2 million in tax revenue.

States (continued)

Oregon – The Oregon Lottery is the primary regulator. The state lottery selected SB Tech as their sports betting vendor. The Lottery estimates that the sports gambling revenue will be between \$332 and \$722 million over the first three years with its vendor receiving compensation up to \$26.8 million over this time. Sports gambling will be offered through an online/mobile platform and kiosks located at lottery retailers, restaurants, and bars. Operations should begin prior to the 2019 football season.

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

Currently, there are three Tribes outside of Nevada offering sports gambling at their operations—Choctaw in Mississippi and Pueblo of Santa Ana and Pueblo of Pojoaque in New Mexico.

The Pueblo of Isleta in New Mexico (USBookmaking) and Oneida Indian Nation (Caesars) in New York previously announced plans to open sportsbooks later this year. In June, The Mescalero Apache Tribe in New Mexico announced they are partnering with William Hill and will open a sportsbook before the 2019 football season begins.

Commercial Operators/Media

ESPN and Caesars announced a new sports gambling partnership. The deal will place an ESPN-branded studio in Caesar's LINQ Hotel and Casino in Las Vegas where sports betting-themed content will be created, along with segments for ESPN's recently launched sports betting-related show, *Daily Wager*. Caesars' data and branding will also be integrated across ESPN programming within the coming weeks for use across ESPN's content.

Turner Sports and Caesars announced a new sports gambling partnership earlier this year. The deal will place a Bleacher Report studio at Caesars Palace in Las Vegas where gambling-related sports content will be created. Caesars will also serve as a gaming and sponsorship partner with Bleacher Report as part of the agreement and gambling-related content will be accessible through the Bleacher Report mobile app.

Lastly, Caesars has agreed to merge with Eldorado Resorts in a deal valued at \$17.3 billion. The new company would own 60 properties in 16 states, and has sports gambling impacts considering both companies' emerging partnerships with sportsbook operators, leagues, teams, broadcasters (see above).



Sports Betting

July 11, 2019

Brian Considine, Legal & Legislative Manager
Legal & Records Unit



Washington State Law

Additional Relevant Gambling Laws:

RCW 67.04 – Baseball match-fixing laws

RCW 67.24 – Sporting contest match-fixing laws

RCW 67.16 – Horse Racing Act

RCW 67.70 – State Lottery Act

Sports Gambling Bills

HB 1975

- Only authorized at Tribal Casinos

HB 1992

- Horse Track
- OTB
- Tribal Casinos

SB 5965

- Title-only Bill

HB 1975

Title: “An act relating to authorizing sports wagering subject to the terms of tribal-state gaming compacts”

Sponsors: Representatives Pettigrew (prime), Walsh, Kirby, Riccelli, Fitzgibbon, Stonier, Tharinger, Pollet

Committee History:

- Introduced on Feb. 8th
- Hearing on Feb. 14th
- Executive Action on Feb. 21st (8-2-1 vote passing bill)
- Referred to Appropriations (no hearing)

HB 1975

Authorizes federally recognized Indian Tribes to operate sports gambling through Class III gaming compacts.

Authorizes the use of internet for sports gambling provided that the wager be placed and accepted only while the player is on the Tribal Casino premises.

Provides that sports gambling pursuant to a Class III compact is not bookmaking under state law.

HB 1975

Defines sports wagering as:

- A professional sport or athletic event;
- A collegiate sport or athletic event;
- An Olympic or international sports competition or event; or
- A combination of sporting events, athletic events, or competitions.

HB 1975 - WSGC Impact

Regulatory cost:

Fiscal Note for HB 1975 – Min of \$1.2 million per year as we scale up – Once it is a mature stable market, then likely we can scale down.

Licensing, Regulation, Tribal Gaming, Electronic Gambling Lab, Criminal Enforcement, Legal, and Business Units within agency will be impacted.

Will need to write new rules for new activities/licensees and work with Tribes and Tribal Gaming Regulators to establish new sports gambling regulatory structure.

HB 1975

Result:

All 29 federally recognized Indian Tribes could negotiate a Class III gaming compact with the state to operate a sportsbook at their casino properties prior to operating a sportsbook at a Tribal Casino.

On-premise and on-premise mobile sports gambling.

WSGC and Tribes would work out details of sports gambling operational details (types of wagers, activities to wager on, licensing, player disputes, etc.) in compact.

HB 1992

Title: “An act relating to sports wagering”

Sponsors: Representative Schmick

Committee History:

- Introduced on Feb. 11th
- No Hearing on bill

HB 1992

Excludes “sports wagering” from current definition of gambling.

Instead, defines “sports wagering” in the Horse Racing Act (RCW 67.16) as placing wagers on the outcome of professional and collegiate sports contests at authorized sports wagering facilities.

Sports wagering facility defined as the “physical property of a class 1 racing association, authorized off-track betting location, and Tribal casino.

HB 1992

Under the Horse Racing Act (RCW 67.16):

Class 1 racing associations may conduct sports wagering handicapping contests.

WSGC will:

- (1) be the state regulator;
- (2) adopt rules and regulations for sports gambling; and
- (3) regulate sports wagering at Class 1 racing and off-track betting properties, and Tribal casinos per Class III compacts.

HB 1992

Adopts current off-track betting structure in Horse Racing Act:

One off-track betting location for each county and two for King County

- Total of 40 possible locations
- Currently 10 commercial locations (current HB card rooms or pull-tab operators)
 - Also 3 Tribal casino locations
- Locations must be 20 miles from Emerald Downs and 60 miles from other racing facilities conducting a live race meet

Does not authorize internet sports gambling/advanced deposit wagering

HB 1992 – State Impact

There will be a regulatory cost but WSGC and WHRC did not prepare fiscal notes – WSGC minimum cost likely higher because more operators.

Bill allocates 15% of gross receipts, in equal percentages, to: WHRC, WSGC, HCA's Problem Gambling Account, WA Breeder Awards Account, WA bred owners' bonus fund, and Class C Purse Fund Account.

Remaining 85% of gross receipts divided equally between Class 1 racing association and Class C Purse Fund Account.

HB 1992

Result:

All 29 federally recognized Indian Tribes could negotiate a Class III gaming compact with the state to operate a sportsbook at their casino properties.

Emerald Downs could have a licensed sportsbook and 40 additional possible sports gambling locations.

Land-based only operations – no internet or mobile authorized.

New rules for new activities/licenses before activities could begin.

Regulatory Policy Issues

Licensing Requirements

Equipment Testing & Approval

Criminal Investigation & Enforcement

Installations & Inspections

New Admin Cases

Payout Disputes

Geo-fencing

Process for authorizing activities

Official Data / Sports Data

Process for authorizing unique events (fantasy sports, esports, Oscars)

Problem Gambling

Self-exclusion – Horse Racing Act not included in HB 1302 but can still cover if we are the state regulator.

Problem Gambling Task Force – Review and analyze sports gambling impact to current state problem gambling structure.



Questions?

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