



STATE OF WASHINGTON

GAMBLING COMMISSION

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

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

Thursday, October 10, 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	
9-11:30	Executive Session - Closed to the Public <i>Bud Sizemore, Chair</i> Discuss Pending Criminal Investigations, Tribal Negotiations, and Litigation
11:30-12:30	Break/Lunch
Tab 1 12:30	Call to Order <i>Bud Sizemore, Chair</i> Welcome and Introductions <ul style="list-style-type: none"><i>Moment of Silence</i> Consent Agenda (Action) <ul style="list-style-type: none">September 12, 2019 Commission Meeting MinutesNew Licenses and Class III Employees* Class III Employees/Snoqualmie & Cowlitz Tribes* (Action) Director’s Report <i>David Trujillo, Director</i>
Tab 2	Sports Gambling Discussion and Presentation <i>Marquest Meeks, Senior Counsel, Major League Baseball</i> <i>Fred Rivera, General Counsel, Seattle Mariners</i> <i>Brian Considine, Legal and Legislative Manager</i>
Tab 3	*Petition for Review Saechin (Action) <i>Kellen Wright, Assistant Attorney General</i>
Tab 4	*Petition for Review Yan Li agreed order presentation (Action) <i>Brian Considine, Legal and Legislative Manager</i>
Tab 5	*Rocky Mountain Elk Foundation (Action) <ul style="list-style-type: none">Request to exceed 300k limit in raffle prizes <i>Jim Nicks, Agent in Charge</i>
Tab 6	*Staff Proposed Rule Changes (Action) <ul style="list-style-type: none">Fee Simplification Amendments <i>Ashlie Laydon, Rules Coordinator</i>
Tab 7	*Staff Proposed Rule Changes (Action) <ul style="list-style-type: none">Fee Simplification Repeals <i>Ashlie Laydon, Rules Coordinator</i>
Tab 8	*Staff Proposed Rule Making (Action) <i>Brian Considine, Legal and Legislative Manager</i>
Tab 9	Raffle Work Session <i>Sonja Dolson, Special Agent Supervisor</i> <i>Dan Frey, Special Agent Supervisor</i>

	Public Comment
	Adjourn

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

Please silence your cell phones for the public meeting



STATE OF WASHINGTON
GAMBLING COMMISSION

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

September Gambling Commission Meeting Minutes

Hampton Inn and Suites
4301 Martin Way E.
Olympia, WA 98516
Public Meeting
September 12, 2019

Commissioners Present:

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

Ex Officio Members Present:

Senator Steve Conway

Staff Present:

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

Public Meeting Call to Order

Chair Bud Sizemore called the Gambling Commission meeting to order at 9:07 a.m. and welcomed everyone to the Hampton Inn. He asked for a moment of silence to recognize law enforcement officers who were lost in the line of duty since we last met. He also read a message that was sent out from Director Trujillo, in honor of Patriot Day. Chair Sizemore announced that Commissioner Stearns would be a little late.

There were 46 people in attendance.

Tab 1

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

Commissioner Troyer seconded the motion.

The motion was passed 4:0

Commissioner Stearns was not present for the vote.

Director's Report

Director Trujillo read a thank you note from the Nooksack Tribal Council. In late July, Charles Hurt, Jr., Senior Tribal Attorney for Nooksack Indian Tribe was asked by the Tribal Council to "thank [our] agency staff for all their hard work. Without their efforts and good will, the Tribe would be worse off." This is in regards to the pre-operational review associated with the offering of Class III table games at Northwood Casino. Director Trujillo mentioned that Special Agent Dan Wegenast was in attendance, and it was his team that worked with the Nooksack Tribe.

Director Trujillo also shared an update on the strategic plan and the four goals the commissioners approved one year ago. The first goal is to “*Help People Suffering with Gambling Disorders.*” He stated that the Gambling Commission and the Healthcare Authority staff are working together as a team to finalize a request for proposal for a project facilitator. The Legislature will soon assign members to this task force, and once the facilitator has been secured, the work can begin. The second goal is to “*Strengthen Legislative Relationships,*” and that work has also begun. Director Trujillo said that the Gambling Commission staff are preparing to answer legislative questions regarding sports wagering and any other areas of concern. He said that staff met with the Oregon State Lottery Commission recently to discuss how they are doing in implementing a new formal sports wagering program. Staff is also planning to visit more states that are in initial phases of implementing a sports wagering program. The third goal is “*Staff Continuity and Succession Planning.*” Director Trujillo mentioned that at the last agency conference, all employees were asked the question, “What are the behavioral competencies that you would want to see in your colleagues?” All staff members were given the opportunity to provide input. Agency supervisors and managers formalized that input into a set of Gambling Commission behavioral competencies in early 2019, which were formally incorporated into the agency’s employee interim review process. The fourth goal is to “*Strengthen Stakeholder Relationships.*” Director Trujillo explained that this can be demonstrated by the agency’s increased effort to communicate externally. Over the last 12 months, there have been more stakeholder meetings regarding rule development and increased staff attendance at licensee, tribal and public events and meetings. Staff continue to place a high value on consulting with tribes on government-to-government issues.

Tab 2

Petition for Reconsideration Su-Zhen Wu

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

Chair Sizemore asked if Ms. Susan Wu was present or if she had a representative in the audience. She was not present and she didn’t have representation. **LLM Considine** addressed the Commission and presented the case. **Chair Sizemore** called for a short recess so that the commissioners could go into closed session to discuss the case.

After a 10-minute closed session, the meeting reconvened. Chair Sizemore asked if Ms. Wu had joined the meeting while the commissioners were in closed session. She had not.

Chair Sizemore announced that in the case 2019-00620, the Commission denies the petition and affirms the final order.

Tab 3

40 et 8 Voiture 99 Program Review

Special Agent (SA) Roger Sauve presented the materials for this tab. Based on the review and the licensee’s request for a waiver, staff determined that 40 et 8 Voiture 99 is suitable for continued licensure. SA Sauve was joined by 40 et 8 Voiture 99’s treasurer, Marc Lacey and its vice president, Ann Beaton, for questions. **Commissioner Stearns** inquired about the amount of bingo games held per week. **SA Sauve** said that the licensee offers eight bingo games per week.

Tab 2

Petition for Reconsideration Su-Zhen Wu continued

Ms. Su-Zhen Wu was late to the meeting. Commissioners had already voted to deny her motion and to affirm the final order revoking her license. Upon her arrival, Chair Sizemore took into consideration the traffic and allowed Ms. Wu to present her case to the Commission. **Ms. Su-Zhen Wu** represented herself in her case before the Commission. Commissioners heard testimony from Ms. Wu that she never received notice of the charges in this matter. After hearing testimony from Ms. Wu, the commissioners recessed for another closed session. After a short closed session, the meeting reconvened. **Chair Sizemore** announced that the Commission would: 1) grant her request for reconsideration; 2) vacate the order revoking her license; 3) reinstate her license; and 4) remand her case for an administrative hearing.

Tab 4

Tribal Compact Contribution

Special Agent Supervisors (SAS) Dan Wegenast and Keith Kam presented the materials in this tab. The agents presented the tribal community contributions for 2017. The revenues were accrued in 2017, the tribes made payments in 2018, and agents verified the info in 2019. In 2017, tribal contributions to the community totaled \$22,163,064.

Tab 5

Rules Up for Discussion and Possible Filing-Credit Union Raffle Packet

Rules Coordinator Ashlie Laydon presented the material for this tab. The commissioner first heard about this rule change in February 2019. At that time, staff was directed to draft rules to allow credit unions to obtain a raffle license. Current raffle and licensing rules do not distinguish credit unions from other non-profits, even though there are some differences in organizational structure. Staff has conducted stakeholder outreach efforts to draft rule language for this discussion. Staff recommends filing the proposed language for further discussion. There was no public comment.

Commissioner Stearns moved to file the proposed language for further discussion.

Commissioner Patterson seconded the motion.

The motion passed. 5:0

Tab 6

Rules Up for Discussion and Possible Filing-Credit, Loans or Gifts Prohibited

Rules Coordinator Ashlie Laydon presented the material for this tab. Ms. Laydon was joined by the petitioner, Mr. Berven, a restaurant owner and licensee from Richland, Washington. He is proposing that WAC 230-06-035 be amended to allow for the use of credit cards as another method of payment, and to allow pull-tab operators to extend credit up to \$200. Commission staff recommended initiation of rulemaking to review the use of credit cards for all licensed gambling activities. Staff recommended denying the extension of any amount of credit by operators. There was discussion by staff and the commissioners as to how credit cards and an extension of credit could be used. **Mr. Berven** explained how his proposed rule change would allow him to mirror what he does for food and beverage: waiting to run a credit card until a customer is ready for their bill, or until he is owed \$200. Staff also reminded commissioners that acceptance of the petition is not acceptance of the petitioner's proposed amended rule. Instead, they can initiate rulemaking, then, through the rulemaking process, choose how they wish to proceed. There was no public comment.

Commissioner Levy moved to accept the petition for filing and enter into rulemaking for further discussion.

Commissioner Stearns seconded the motion.

The motion passed. 5:0

Tab 7

Rocky Mountain Elk Foundation

Agent in Charge (AIC) Jim Nicks presented the materials for this tab. Grant Parker, general counsel, and Doug Doherty, Western WA regional director, for Rocky Mountain Elk Foundation (RMEF) joined AIC Nicks for the presentation. RMEF is requesting to exceed its \$300,000 annual raffle limit, for its license year ending December 2019. Gambling Commission rules require licensees to get commissioner approval prior to the end of the licensing year, as stated in WAC 230-11-067. **Mr. Parker** summarized the request and asked the commissioners to approve it. Staff recommended that commissioners approve RMEF's request to exceed the annual raffle prize limit of \$300,000.

Chair Sizemore asked for public comment. There was no public comment. Chair Sizemore requested time for closed session to discuss this issue with council. After a short recess and deliberation, the Commission reconvened. Chair Sizemore announced that the Commission would continue this request, until the certain information could be obtained, reviewed by staff, and presented to the Commission. Commissions asked to receive verification that the awarding of firearms through RMEF raffles during the previous license year complied with all applicable state and federal laws. Chair Sizemore announced that the orders would be drafted by AAG Suzanne Becker and signed shortly.

Tab 8

2020 Agency Request Legislation

LLM Considine, presented the materials in this tab. Commissioners went over the proposed agency request legislation: 1) Amending laws regarding qualified charitable nonprofit organizations; and 2) Amending the money laundering forfeiture statute to allow forfeited proceeds to be used for gambling-related law enforcement activities instead of just drug enforcement. Commissioners voted and unanimously agreed to file the 2020 agency request legislation.

Tab 9

Sports Betting Discussion and Presentation

Assistant Director (AD) Tina Griffin and LLM Considine presented the materials for this tab. AD Griffin and LLM Considine explained what types of licenses other states are issuing and explained how different types of companies fit into the sports gambling arena. They discussed upcoming travel to other states that are starting up sports betting operations. LLM Considine announced that Commissioners will see a presentation from Major League Baseball at the October commission meeting.

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

Chair Sizemore announced that the next commission meeting would be a two-day meeting and will be held at the Hampton Inn and Suites on October 10 & 11, 2019. At 1:43 pm, Chair

Sizemore announced that the commissioners would go into executive session for the purpose of discussing pending criminal investigations, tribal negotiation and litigation, and that the public meeting is expected to reconvene at 3:15 p.m.

Executive Session

At 3:15 **Julie Anderson** announced to the public that executive session would be extended 15 minutes.

Public Meeting

At 3:31 p.m., the public meeting resumed.

Chair Sizemore welcomed everyone back to the meeting and the meeting adjourned at 3:32 p.m.



HOUSE-BANKED PUBLIC CARD ROOM REPORT

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

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Current House- Banked Locations Operating					44
	City	Commission Approval Date	License Expiration Date	Org #	License #
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2019	00-15224	67-00006
LANCER LANES/REST AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2019	00-21681	67-00276
LAST FRONTIER	LA CENTER	Feb 11, 1999	Sep 30, 2019	00-11339	67-00055
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2020	00-21305	67-00267
MACAU CASINO	TUKWILA	Jan 12, 2012	Sep 30, 2019	00-22573	67-00319
MACAU CASINO	LAKEWOOD	Jul 12, 2007	Mar 31, 2020	00-20428	67-00239
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2019	00-13069	67-00173
PALACE CASINO LAKEWOOD	LAKEWOOD	Jan 14, 1999	Dec 31, 2019	00-16542	67-00028
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2020	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2020	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2020	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2020	00-17613	67-00057
ROXY'S BAR & GRILL	SEATTLE	Nov 18, 2004	Jun 30, 2020	00-20113	67-00231
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2020	00-22130	67-00301
SILVER DOLLAR CASINO/MILL CREEK	BOTHELL	Sep 9, 2010	Jun 30, 2020	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2020	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2020	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2020	00-16759	67-00038
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2020	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2019	00-20009	67-00212
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2019	00-21998	67-00287
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2020	00-18777	67-00209

Applications Pending		5			
	City	Commission Approval Date	License Expiration Date	Org #	License #
CARIBBEAN CARDROOM	KIRKLAND			00-24515	67-00343
CASINO CARIBBEAN	KIRKLAND			00-24512	67-00341
CASINO CARIBBEAN	YAKIMA			00-24513	67-00342
MACAU CASINO	TUKWILA			00-24514	67-00344
MACAU CASINO	LAKEWOOD			00-24516	67-00345



COMMISSION APPROVAL LIST
(Class III Gaming Employees)
October 2019

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

PERSON'S NAME

CERTIFICATION NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEES

COWLITZ INDIAN TRIBE

ALZUETA, KARLEY N
69-47385

ANGELATOS, STATHIS I
69-47380

BAILEY, EVAN H
69-47376

BARRACLOUGH, KORY M
69-47335

BAUER, CAMERON B
69-47386

BISHOP, AUCHE J
69-47337

BURGESS, ALICIA A
69-47447

ESCOBAR, CHANDRA L
69-47362

ESTORES, MARIO M
69-47361

EVERSAUL, LYNDIA S
69-47336

FASSETT, SCOTT R
69-47411

GOLDING-REETZ, CHRISTOPHER D
69-47387

HANTHO, BENJAMIN D
69-47400

HARTZELL, MICHELLE D
69-47381

HEYER, MIKALI A
69-47359

HUMPHRIES, JEREMY L
69-47307

JARDIM, ELISANGELA
69-47357

JONES, JAMIE L
69-47360

JONES, TRUDI M
69-47358

KISOR, APRIL C
69-47364

LAFAVE, BRITTNEY N
69-47377

LAMBERT, BRENTON A
69-47378

LIU, JIA X
69-47379

MATHYS, JOSHUA S
69-47305

JL

PERSON'S NAME

CERTIFICATION NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEES

COWLITZ INDIAN TRIBE

MCCABE, KASANDRA L
69-47388

MILLER, SHELLY M
69-47429

MISNER, KRISTI L
69-47408

POOLE, RYAN S
69-47434

SAEED, SAOUIB
69-47389

SCARDINO, FELIPE S
69-47405

SHADLE, JORDAN M
69-47406

TOLEDO REYES, BETHLEHEM B
69-47407

TROXEL, KELSEY L
69-47410

WALSH BUNTROCK, CARLI
69-47409

WHALEN, JEFFERY S
69-47428

WHITTUM, SHELLY L
69-47363

YIN, HAOYUN
69-47433

SNOQUALMIE TRIBE

BROMBERG, KEVIN M
69-47338

GOMEZ VALDIVIA, CARLOS A
69-47382

GONZALEZ, YURITZI O
69-47339

JUNGEN, GREYCYN C
69-47462

KRISS, HANNA N
69-47383

LEITNER, MAX G
69-47461

MACDONALD, JENNIFER D
69-47460

VEGA, SIERRA A
69-47341

XUE, JOLEEN B
69-47459



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
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Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 18.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

BINGO

OKANOGAN AREA SENIOR CITIZENS
00-09954 01-02787

1300 S 2ND AVE
OKANOGAN WA 98840

SAVE A FORGOTTEN EQUINE
00-24335 01-02796

10407 192ND AVE NE
REDMOND WA 98053

SENIOR CITIZENS CLUB/ENTIAT COMM
00-09326 01-02245

1920 ENTIAT WAY
ENTIAT WA 98822

RAFFLE

CASA LATINA
00-24507 02-21071

317 17TH AVE S
SEATTLE WA 98144

CASCADIA ART MUSEUM
00-24496 02-21066

23426 WOODWAY PARK RD
WOODWAY WA 98020

LAKE VIEW PTA AUBURN COUNCIL 6S.2.18
00-18442 02-20991

16401 SE 318TH
AUBURN WA 98092

PROJECT ID
00-24510 02-21073

404 N HAVANA 1
SPOKANE WA 99212

SKUNKWORKS ROBOTICS BOOSTER CLUB
00-24524 02-21080

1500 SW SHOREBROOK DR
NORMANDY PARK WA 98166

SUNRISE MARYSVILLE ROTARY
00-24485 02-21061

PO BOX 723
MARYSVILLE WA 98270

THE VALLEY GRANGE 01048
00-24431 02-21075

3091 WAITTS LAKE RD
VALLEY WA 99181

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

GREAT AMERICAN CASINO/LAKEWOOD
00-19258 05-19601

10117 S TACOMA WAY
LAKEWOOD WA 98499

HONG KONG GARDEN RESTAURANT
00-24506 05-21630

9324 SR 525
CLINTON WA 98236

JP'S TAVERN
00-24458 05-21618

32925 1ST AVES
FEDERAL WAY WA 98003

SOUTHRIDGE DUGOUT
00-24473 05-21620

48140 W HILDEBRAND BLVD
KENNEWICK WA 99337

ck

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

STEILACOOM PUB & GRILL
00-24486 05-21624

1202 RAINIER ST
STEILACOOM WA 98373

COMMERCIAL AMUSEMENT GAMES OPERATOR

PORT ANGELES ARCADE LLC
00-24504 53-21536

115 RAILROAD AVE E
PORT ANGELES WA 98362

CARD GAMES NON HOUSE-BANKED

STEILACOOM PUB & GRILL
00-24486 65-07501

1202 RAINIER ST
STEILACOOM WA 98373

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

BECKER, NEAL W
23-03010

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

CALDERON, SOFIA
23-02998

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

CHILIPKA, SEAN M
23-01493

IGT
LAS VEGAS NV 89113

DAVIS, STEPHANIE E
23-03005

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

ELLSWORTH, JAMES F III
23-03008

IGT
LAS VEGAS NV 89113

FERGUSON, ROBERT L II
23-03009

EVERI GAMES INC.
AUSTIN TX 78746

FLORES, MARYJEAN B
23-03004

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

GOVINDAN NAIR, JIJO
23-03000

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

HUGHES, MICHAEL P
23-02996

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

LININGER, KRISTINA M
23-02997

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

LUTTRELL, GREGORY S
23-02294

ARIES TECHNOLOGY LLC
GROVE OK 74344-6251

MARTINEZ, DANIEL D
23-02995

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

MOHAMMED ASLAM, MOHAMED R
23-03002

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

SAVOY, KEVIN B
23-03011

AGS LLC
LAS VEGAS NV 89118

SCHMOOK, ERIC S
23-03007

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

SEXTON, TIMOTHY R
23-02994

AGS LLC
LAS VEGAS NV 89118

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

VISHNUMOHAN, GOUTHAM
23-03001

BALLY TECHNOLOGIES
LAS VEGAS NV 89119

NON-PROFIT GAMBLING MANAGER

BEAUCHAMP, WAYNE A
61-04713

FOE 03433/SPOKANE VALLEY
SPOKANE VALLEY WA 99037

BOTSFORD, MICHELLE L
61-04716

FOE 03242
BURLINGTON WA 98233

BYRD, JEFFREY S
61-04715

VFW 02224
PUYALLUP WA 98372-3026

DELEON, FELIX S
61-04714

FOE 02229
TOPPENISH WA 98948

MCKELVIN, STEVEN L
61-04717

SEATTLE JUNIOR HOCKEY ASSN
MOUNTLAKE TERRACE WA 9804

THOMPSON, PATTY L
61-04718

BPOE 00186
OLYMPIA WA 98506

SERVICE SUPPLIER REPRESENTATIVE

SUNGEUN, KIM
63-00872

MAVERICK GAMING
LAS VEGAS NV 89119

CARD ROOM EMPLOYEE

AQUINO, VINCENT M JR
68-35416

B

GOLDIE'S SHORELINE CASINO
SHORELINE WA 98133

ARCHER, NICOLE R
68-35436

B

BUZZ INN STEAKHOUSE/EAST WENAT
EAST WENATCHEE WA 98802

BARNES, AARON D
68-21102

B

COYOTE BOB'S CASINO
KENNEWICK WA 99336

BIRD, MICHAEL D
68-35402

B

CLEARWATER SALOON & CASINO
EAST WENATCHEE WA 98802

PERSON'S NAME

EMPLOYER'S NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**CARD ROOM EMPLOYEE**

BO, SOPHAVY 68-26100	B	MACAU CASINO LAKEWOOD WA 98499
BOSINGER-GOSS, JACQUILYNN R 68-34948	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802
BOYD, ALDEN M 68-35413	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
BRYANT, GREGORY G 68-35428	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804
CAZAREZ, JOSE G 68-35435	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802
CERVANTES PEREDO, RODRIGO ARTURO 68-35444	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
CHEN, HSIANG-CHI 68-20115	B	CASINO CARIBBEAN KIRKLAND WA 98034
CHIM, BUNTHOEUN 68-16075	B	FORTUNE CASINO - RENTON RENTON WA 98055
COPELAND, CHARLES E 68-35431	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
CORDOVA, GENTRY J 68-35457	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
DUNCAN, EMMETT J 68-35455	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
FLETCHER-JONES, JERELL L 68-30270	B	MACAU CASINO LAKEWOOD WA 98499
FLORES, ELINA A 68-24314	B	MACAU CASINO LAKEWOOD WA 98499
FRANKEL, ROBERT W 68-35433	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
GENTRY, JANINE D 68-21581	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
GLOVER WEEKS, TYLER M 68-34591	B	MACAU CASINO LAKEWOOD WA 98499

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

GRANVILLE, NICHOLAS A 68-29434	B	ALL STAR CASINO SILVERDALE WA 98383
HE, YUEJU Z 68-35408	B	FORTUNE CASINO - RENTON RENTON WA 98055
HURD, ARLAND J 68-35445	B	RIVERSIDE CASINO TUKWILA WA 98168
ISAACKSON, CODY J 68-35412	B	HAWKS PRAIRIE CASINO LACEY WA 98516
IVANOV, VLADIMIR Y 68-19439	B	MACAU CASINO TUKWILA WA 98188-2437
JAMIE, JAMES M 68-35414	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
JANG, MICHELLE C 68-11577	B	CASINO CARIBBEAN KIRKLAND WA 98034
JOHNSON, ANNE K 68-35453	B	IRON HORSE CASINO AUBURN WA 98002
JONES, TRAVIS M 68-35409	B	FORTUNE CASINO - RENTON RENTON WA 98055
KERNAN, ERIK T 68-35424	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
KHANSE, KAYALA N 68-35401	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
KI, PETER S 68-35451	B	HAWKS PRAIRIE CASINO LACEY WA 98516
KITISUNTORN, ANGKANA 68-35418	B	RIVERSIDE CASINO TUKWILA WA 98168
KOPPING, ZACKERY A 68-35437	B	ZEPOZ PULLMAN WA 99163
KRENTKOWSKI HALL, BRIANNA K 68-35432	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
LANE, ANTHONY E 68-13779	B	IRON HORSE CASINO AUBURN WA 98002

PERSON'S NAME

EMPLOYER'S NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**CARD ROOM EMPLOYEE**

LAO, QIYA 68-35410	B	RIVERSIDE CASINO TUKWILA WA 98168
LE, LIEN B 68-35442	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
LERMAN, JASON R 68-33790	B	FORTUNE CASINO - RENTON RENTON WA 98055
LETOS, CRYSTINE H 68-25816	B	HAWKS PRAIRIE CASINO LACEY WA 98516
LINDENMUTH, SAVANNA J 68-35407	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
LIU, XIAOYU 68-35411	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
MACKLIN, WILLIAM L 68-35425	B	HAWKS PRAIRIE CASINO LACEY WA 98516
MANDE, WILLIAM A III 68-35443	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
MCENTIRE, AMBER E 68-33125	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
MEACH, PHALLY 68-35460	B	MACAU CASINO LAKEWOOD WA 98499
MEUNSAVENG, KHAMPHOU J 68-17357	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
MUELLER, ADAM R 68-35438	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802
PEREZ, LEAH M 68-09119	B	ROYAL CASINO EVERETT WA 98204
PRUM, KANHA S 68-07087	B	HAWKS PRAIRIE CASINO LACEY WA 98516
REY, PATRICK J 68-21544	B	ALL STAR CASINO SILVERDALE WA 98383
SAEPHANH, KOI M 68-35441	B	WIZARDS CASINO BURIEN WA 98166-2524

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

SAKIN, ISHAQ L JR 68-34712	B	ROYAL CASINO EVERETT WA 98204
SCHRAG, KENNAN J 68-35459	B	ZEPPOZ PULLMAN WA 99163
SCOTT, JASON J 68-29482	B	CASINO CARIBBEAN YAKIMA WA 98901
SENG, NASEAR C 68-35448	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
SMITH, KARSON M 68-35458	B	THE PALACE LA CENTER WA 98629
STRONG, CHELSEA L 68-35415	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
TRAN, TUAN N 68-35450	B	RIVERSIDE CASINO TUKWILA WA 98168
URIBE, JIMMY 68-35429	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
VANG, DARA 68-35439	B	ROMAN CASINO SEATTLE WA 98178
VIBOCH LUCAS, TOSHA R 68-35462	B	EMERALD DOWNS AUBURN WA 98001
VICKERS, MINORETTA J 68-35456	B	SILVER DOLLAR CASINO/SEATAC SEATAC WA 98188
WEED, MICHAEL E 68-33291	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
WEST, EDMUND S 68-35427	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
WICKHAM HOBBS, TRACY L 68-35446	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
WILLIAMS, ANDREW D 68-35423	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
WILLIAMS, DEANGELO L 68-35426	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

WOLF, AMANDA H
68-25129

B

FORTUNE POKER
RENTON WA 98057

WOOLLEY, MATTHEW A
68-35420

B

ALL STAR CASINO
SILVERDALE WA 98383

YANN, SOPAUL
68-21816

B

CHIPS CASINO/LAKEWOOD
LAKEWOOD WA 98499

ZHANG, XI
68-35452

B

RIVERSIDE CASINO
TUKWILA WA 98168

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

DOCHERTY, DAKOTA E
69-47366

HALL, BRITTANY R SR
69-47425

MCGREW, JAMIE L
69-47427

SOLEM, PAITYN S
69-47343

SUMMERS, SHANNON G
69-47424

COLVILLE CONFEDERATED TRIBES

ACUNA PAMATZ, YOHANA
69-47442

BOUCHER, MICHAEL R
69-47444

DAVIS, DOMINIC R
69-30761

JAMES, STEPHANIE M
69-47458

MARCHAND, NICOLE C
69-47457

MICHEL, LANAE L
69-47320

MICHEL, MARYLOU L
69-47413

MONAGHAN, FEATHER A
69-40292

OPPENHEIMER, TONY L
69-42074

PENA, MARCOS F
69-47445

KALISPEL TRIBE

AVINA, JACOB A
69-47492

BLACK CROW, KYLE J
69-47356

CLARK, BRENDA A
69-47355

FRY, JADIN L
69-47494

HARRINGTON, CHAD D
69-47354

JOLIN, ALEC D
69-47322

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

KINZEL, HALLIE M
69-47365

LEE, PAO-SHANG M
69-47423

MURRAY, BRIAN D
69-47402

SACCOMANNO, LAURIE R
69-47426

SAUNDERS, KAITLYNN R
69-47493

LUMMI NATION

CLEAVELIN, CHANCE M
69-47340

DAVIS, REX T
69-47450

EICHER, SEAN J
69-47392

GENSAW, KATHLEEN R
69-03841

HULL, BLAKE A
69-47451

NOLAND, DANA L
69-47505

WASHINGTON, AMANDA C
69-47384

WITCRAFT, KIARA D
69-44971

MUCKLESHOOT INDIAN TRIBE

BECKER, PHILLIP R
69-47452

CAUDILL, LARRY J
69-47497

DUOK, DANNY O
69-47453

EL, CHAMROEUN
69-47375

FLORENDO, ROMEO J
69-47500

MEZZANO, JASON A
69-47374

PEREZ, SHERRILEE L
69-47417

SHICK, MARY J
69-47418

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

MUCKLESHOOT INDIAN TRIBE

TORRES, CATLIN E
69-47498

WELCH, AMY L
69-47416

WILLIAMS, JACOB P
69-47499

WILSON, JAMAL D
69-47454

NISQUALLY INDIAN TRIBE

BULLARD, RAYMOND B
69-47397

CHEIDA, MILY M
69-47394

COLYER, AARON G
69-47395

CRANDALL, WAYNE G
69-18435

DAQUIP, CONSTANCE M
69-21700

HOLMES, SHAWNNA L
69-47488

MAYNOR, ROGER D JR
69-43851

OGDEN, ROBYN P
69-31168

OSBORNE, AMANDA N
69-30780

PACHECO, BETTY J
69-05133

PARKS FOREMAN, BEATRICE A
69-00808

POWELL, NATHAN W
69-47396

NOOKSACK INDIAN TRIBE

ARESTAD, JAMIE M
69-47469

BURNS, SEAN-PATRICK N
69-47317

GAONA, STEPHANIE R
69-24781

MOON, PATRICIA A
69-43178

PRICE, ZION N
69-47432

REYNOLDS, ZACKERY S
69-47435

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NOOKSACK INDIAN TRIBE

RICHARDSON, KEVIN W
69-47318

SMITH, AMANDA M
69-25593

SOLOMON, ROBERT R
69-25951

PORT GAMBLE S'KLALLAM TRIBE

ASHMORE, MARRISA L
69-47294

EVALT, JENNIFER D
69-47468

FROTHINGHAM, ELINOR M
69-47292

HENNINGER, SARAH D
69-47466

HOGeweIDE, ERICA L
69-47467

LINGER, ALICIA I
69-47463

MCPHAUL, GIOVANNI D
69-47464

MELENCIO, BRANDON G
69-47295

SMITH, BRANDON L
69-47293

TEETERS, HEATHER J
69-47465

PUYALLUP TRIBE OF INDIANS

BRANCH, CHANNING B
69-47439

CAMPBELL, SHANEIKA R
69-47353

CHU, AARON Z
69-47393

COE, JOSEPH J
69-47440

DEVI, PRITIKA
69-47398

FARNSWORTH, NATHAN L
69-47419

GILL, MARK W
69-47487

HALL, SHANIA R
69-47478

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

HASSETT, ELIJAH M
69-47319

HEIM, JAMES R
69-47486

JUAREZ, ADAM B
69-47443

KON, THEAMARA S
69-39808

LARMAN, LANY S
69-47485

MEDEIROS, MELANIE A
69-47346

MORILLO, MARY GRACE V
69-47347

NAVONG, BRANDON B JR
69-47373

PANAUM, WIPAWAN
69-47372

PARKER, BENJAMIN J
69-47477

PEEL, ALICE M
69-47302

PFINGSTON, ERIC J
69-47437

PHILLIPS, COREY M
69-47351

RIVERA, DARNELL T
69-47314

ROERICK, SHERRIL
69-15047

RYAN, BLAKE P
69-47415

SEAR, KYLE T
69-47446

SPERLE, DARREN W
69-47301

ULRICH, KYLE P
69-47345

YANDALL, MARIA K
69-28960

YANG, JIAHUI
69-47438

ZHENG, MING G
69-47412

QUINAULT NATION

FALLON, DIANE E
69-47436

FRANK, STEPHEN R
69-47326

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

QUINAULT NATION

SMITH, BRAEDEN M
69-47470

SKOKOMISH TRIBE

STRETCHBERY, MELVIN R
69-47490

STRONG, KAYLA D
69-47369

SPOKANE TRIBE

GONZALEZ, BEVERLIE OCEANNENA I
69-30597

HERTEL, SHAWNNA M
69-47471

HINES, HARLEY S
69-47348

PAUKER, ELIZABETH B
69-47327

PHILP, KIERSTAN D
69-47431

STEVENS, FRANK J
69-47328

SQUAXIN ISLAND TRIBE

BROWNELL, EDWARD J
69-47484

CALLAHAN, MONIKA R
69-47448

CHURCH, ADAM R
69-47430

CLEMENS, DAVID L
69-47401

HAMILTON, LAURENA M
69-47449

KOTORAKOS, CATHERINE E
69-42592

MARIANO, TROY M
69-47496

NAUMAN, JACOB R
69-47483

ORTIZ, JOSEPH M
69-47342

STILLAGUAMISH TRIBE

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

STILLAGUAMISH TRIBE

LEFLER, CONNIE L
69-12550

PADILLA, JESSICA L
69-47422

POWELL, ANTHONY S
69-47476

SHARP, WALTER L
69-47421

WHITTENDALE, WESTON V
69-47344

SUQUAMISH TRIBE

BRIDGES, CASSANDRA I
69-47331

CARD, SEANANN D
69-41018

GLEASON, LOUISE A
69-47313

LA MERE, TANGIE E
69-47332

NANCE, KARLYN L
69-47420

PINE, DYLAN R
69-47489

RAMIREZ, RION J
69-47456

SMART, LEVI D
69-47334

SMITH, MATTHEW C
69-47329

THOMAS, AMANDA R
69-47333

SWINOMISH INDIAN TRIBAL COMMUNITY

AYER, ZACKARY T
69-38576

HANDY, RICHARD A
69-47517

HIGHSMITH, BRANDY M
69-47324

ILAGAN, ROWENA K
69-47349

KINSMAN, JACE C
69-47350

MOREAU, LUKE H
69-47352

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SWINOMISH INDIAN TRIBAL COMMUNITY

NAVA PEDROZA, LUIS E
69-47518

STUCKEY, SKYE M
69-47323

YEOMAN, PAIGE M
69-40993

THE TULALIP TRIBES

ARBUCKLE, JAMES M JR
69-00767

DARSON, SHEER M
69-47441

FLORES, MIKELYNN S
69-47368

JIMICUM, JOSEPH M
69-47325

REED, MICHAEL R
69-47390

SPENCER, KATIE V
69-27583

XUE, BIN
69-47370

UPPER SKAGIT INDIAN TRIBE

ALBERTO, DAVID F
69-47391

MENDELMAN, JOEL T
69-47371

MOSEY, TANNER W
69-47321

YAKAMA NATION

BUCK, TERESA J
69-34086

CYR, ESTHER M
69-47250

DELAROSA, RICHARD P
69-47312

ESTRADA, VANESSA R
69-47482

FERREIRA, KRIS M
69-47481

GALVEZ-FLORES, ERIKA
69-47472

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

YAKAMA NATION

GARCIA UMTUCH, ANDREW L
69-47480

GOMEZ, FRANCISCO
69-47249

GRIGGS, FENELIA
69-45320

HEATH, CHARISSE C
69-47479

HICKS, CRAIG A
69-47316

MARQUEZ, BENJAMIN C
69-36494

SAM, ELISSA D
69-32493

SMARTLOWIT, JULIANN M
69-23419

SMITH, ASHLEY M
69-47475

STWYER, HERBERT H III
69-27684

SWAN, COLETTE K
69-47473

SWAN, VIVIAN A
69-47474

Sports Leagues cont...

The deal makes TAB the exclusive wagering partner of the NFL in Australia. The deal will also bring the NFL Network and NFL RedZone to more than 4,400 venues and SkyChannel will broadcast NFL RedZone and the Sunday Night primetime game.

States

Arkansas, Delaware, Indiana, Iowa, Mississippi, New Jersey, New York, Nevada, New Mexico, Oregon, Pennsylvania, Rhode Island, and West Virginia currently offer opportunities for regulated sports gambling, including land-based and online offerings.

Additionally, Colorado, Illinois, New Hampshire, Maine, Montana, North Carolina, Tennessee, and Washington, D.C. have authorized sports gambling and most states are looking to begin operations in 2019-2020.

Ohio, Massachusetts, and Michigan are the primary states still considering passage of sports gambling bills in 2019. Here is an update, where possible, 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 3 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 August, \$4.4 million was wagered resulting in \$505,000 in gross revenue. There was \$252,504 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 August, \$293.5 million was wagered resulting in \$25.2 million in gross revenue. There was \$3.3 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 August, \$19.8 million was wagered resulting in \$2.8 million in gross revenue. There was \$346,122 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 5 licensed race racetrack/casinos, and gross revenues are taxed at 10%. In August, \$11.5 million was wagered for \$1.5 million in gross revenue. There was \$153,686 in tax revenue.

Rhode Island – Sports gambling started in the state on November 26, 2018. Online/mobile betting started September 4, 2019.

States cont...

The Rhode Island state lottery operates sports betting at 2 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 July, \$10 million was wagered resulting in \$851,788 in gross revenue. There was \$434,411 in revenue to the state.

Pennsylvania – Sports gambling started in the state in December 2018. The state gaming control board is the primary regulator. There are 9 casino locations with 4 online operators currently. Pennsylvania has a \$10 million sports wagering licensing fee and gross revenue are taxed at 36%. In August, there was \$109 million wagered for \$9.8 million in gross revenue. There was \$2.1 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 August, \$287.7 million was wagered resulting in \$18.7 million in gross revenue. There was \$1.2 million in tax revenue.

Iowa - The Iowa Racing and Gaming Commission is the primary regulator. Sports gambling started in the state on August 15, 2019. There are 19 commercial casinos, \$45,000 license fee, gross revenues are taxed at 6.75%, and both retail and online wagering is allowed. In August, \$8.7 million was wagered for \$2.1 million in gross revenue. There was \$145,914 in tax revenue.

Indiana – The Indiana Gaming Commission is the primary regulator. Sports gambling started in the state on September 1, 2019. There are 13 commercial casinos, \$100,000/\$50,000 initial license fee, gross revenues are taxed at 9.5%, and both retail and online wagering is allowed.

Oregon – The Oregon Lottery is the primary operator/regulator. The lottery aims to launch its online mobile sports gambling app named “Oregon Lottery Scoreboard” in September or early October. A person must be 21 years or older to download the app. All professional sports in the U.S. and overseas will be offered but no collegiate games at launch. Emergency rules will be published prior to the launch.

Tribal Governments

There are no new updates this month.

Commercial Operators

MGM and Buffalo Wild Wings announced a partnership. The multi-year partnership with MGM and its sports gambling venture, Roar Digital, will deliver sports gambling, where allowed, to Buffalo Wild Wings restaurants using the BetMGM gambling platform. The initial plan is to offer a free-to-play football contest through the Bet MGM app that will be available nationwide. The partnership also hopes to offer a sports gambling test product in New Jersey later this year with the goal of expanding to additional states as legislation is passed.



**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

September 23, 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: Nai C. Saechin – CR 2018-00133
Petition for Review Materials – October 10, 2019 Commission Meeting**

The Licensee, Nai C. Saechin filed a Petition for Review to the Commissioners in the above-referenced case. Ms. Saechin challenges the Administrative Law Judge’s Initial Order finding a violation occurred and revocation of her public card room employee license.

Enclosed in your Commission Meeting packet is the ALJ’s initial Order, Ms. Saechin’s Petition for Review and staff’s response filed by Assistant Attorney General Kellen Wright. For reference, the complete case record, including surveillance video and audio recordings and transcripts of the administrative hearings, was previously provided to you via USB thumb drives.

JUN 10 2019

WASHINGTON STATE
OFFICE OF ADMINISTRATIVE HEARINGS

GOVERNMENT COMPLIANCE
& ENFORCEMENT

In the matter of:

Docket No. 07-2018-GMB-00065

Nai C. Saechin,

INITIAL ORDER

Appellant/Licensee.

Agency: Washington State Gambling Commission
Program: Gambling Commission
Agency No. 2018-00133

1. ISSUES:

- 1.1. Whether, on or about January 15, 2018, the Appellant, Nai C. Saechin, engaged in unlawful activity constituting theft, as defined by Revised Code of Washington (RCW) 9A.56.020?
- 1.2. Whether the Appellant's acceptance of a \$100 poker chip from other players, which she returned after placing a winning bet, is a violation of Washington Administrative Code (WAC) 230-15-040(4)?
- 1.3. Whether the Appellant cannot show by 'clear and convincing evidence' she is qualified for licensure, as required by RCW 9.46.153(1)?
- 1.4. Whether the Gambling Commission is authorized to revoke the Appellant's gambling license, pursuant to RCW 9.46.075(1)&(8) and WAC 230-03-085(9)(a) and (d)?

2. ORDER SUMMARY:

- 2.1. On January 15, 2018, the Appellant, Nai C. Saechin, did not engage in unlawful activity constituting theft, as defined by RCW 9A.56.020. The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **REVERSED**.
- 2.2. The Appellant's acceptance of the \$100 poker chip from another player, which she returned after placing a winning bet, is a violation of WAC 230-15-040(4) and WAC 230-15-040(3)(c). The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **AFFIRMED**.
- 2.3. The Appellant cannot show by 'clear and convincing evidence' she is qualified for licensure, as required by RCW 9.46.153(1). The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **AFFIRMED**.
- 2.4. In accordance with RCW 9.46.075(1)&(8) and WAC 230-03-085(9)(a) and (d), the Appellant's gambling license is **REVOKED**.

[Continued]

3. HEARING:

- 3.1. Hearing Date: March 20, 2019
- 3.2. Admin. Law Judge: TJ Martin
- 3.3. Appellant: Nai C. Saechin (Appellant)
- 3.3.1. Representative: Nichole Fisher, Attorney
- 3.3.2. Witnesses: The Appellant did not call any witnesses.
- 3.4. Agency: Washington State Gambling Commission Staff
(Gambling Commission Staff)
- 3.4.1. Representative: Gregory J. Rosen, Senior Counsel
- 3.4.2. Witnesses: Kevin Maxwell, Gambling Commission Special Agent
- 3.5. Exhibits: Gambling Commission Staff's Exhibits 1 through 15 were admitted.
Appellant's Exhibits A through K were admitted.
- 3.6. Other: Gambling Commission Staff moved to strike (9)(c) from WAC 230-03-085 of 'Issue No. 4'. The Appellant did not object. The Gambling Commission Staff's motion was GRANTED.

4. FINDINGS OF FACT:

The undersigned administrative law judge finds the following facts by a preponderance of the evidence:

Jurisdiction-

- 4.1. On May 9, 2018, the Washington State Gambling Commission (Gambling Commission) filed 'Notice of Administrative Charges CR 2018-00133' against Nai C. Saechin (Appellant).
- 4.2. On May 21, 2018, the Appellant appealed the 'Notice of Administrative Charges'.

January 15, 2018 Incident-

- 4.3. The Appellant holds a Public Card Room Employee License. She has worked as a poker dealer in the gaming industry for over 17 years. *Testimony of Nai Saechin (Testimony of Saechin).*
- 4.4. On January 15, 2018, the Appellant worked a shift as a poker dealer at the Riverside Casino from 3:00 p.m. until getting off early around 9:00 p.m. *Testimony of Saechin.*

- 4.5. The Riverside Casino is located at 14060 Interurban Avenue South, Tukwila, Washington. *Testimony of Kevin Maxwell ('Testimony of Maxwell')*.
- 4.6. On January 15, 2018, after getting off of work around 9:00 p.m., the Appellant did not eat. Instead, she went to the bar and had three drinks with her friend, Tia Wu, a regular customer at the casino. *Testimony of Saechin*.
- 4.7. A short time later, Saechin and her friend played Pai Gow. During this time, she had another three drinks. *Testimony of Saechin*.
- 4.8. Due to her level of intoxication, the Appellant doesn't recall the events after beginning to play Pai Gow. She is only aware of the events based on what she was later told by Tiffany Stevens, the shift supervisor, and by watching video of the January 15, 2018 incident. *Testimony of Saechin*.
- 4.9. Later, the Appellant moved to Table 9 and began playing Dragon Bonus Mini-Baccarat. *Testimony of Maxwell and Ex. 1; Pg. 5*.
- 4.10. At 10:49 p.m., Chao Wu (Wu), a customer, went to Table 9 and also began playing Mini-Baccarat. *Testimony of Maxwell and Ex. 1; Pg. 5*.
- 4.11. At 11:17 p.m., Wu left the Table 9, leaving \$2,000 in poker chips at spot 5. *Testimony of Maxwell and Ex. 1; Pg. 5*.
- 4.12. At 11:22 p.m., the Appellant moved from her spot at Mini-Baccarat table, walked to spot 5, took Wu's \$2,000 in poker chips and placed \$1,500 in her pocket and continued playing with the remaining \$500. *Testimony of Maxwell and Ex. 1; Pg. 5*.
- 4.13. After taking Wu's poker chips, the Appellant remained at spot 5. *Testimony of Maxwell and Ex. 1; Pg. 5*.
- 4.14. During this time, the Appellant accepted a \$100 poker chip from another player, Wei Liang, who had received it from Jennifer Su. The Appellant placed the Liang/Su wager with her wager at her spot. After winning, she gave the winnings to Liang and Su and kept \$100 of the payout. *Testimony of Maxwell and Ex. 1; Pg. 5*.
- 4.15. The Appellant acknowledged accepting the \$100 poker chip and placing it with her bet to make a joint wager. *Testimony of Saechin*.
- 4.16. Mini-Baccarat rules only allow one player to place a wager on one spot, prohibiting multiple players from joining together to make a single wager. *Testimony of Maxwell and Ex. 6 (Same as Ex. J)*.
- 4.17. At 11:23 p.m., Wu returned to his spot at Mini-Baccarat Table 9 to find his poker chips missing. *Testimony of Maxwell and Ex. 1; Pg. 5*.
- 4.18. Wu confronted the Appellant regarding his missing poker chips. Without argument, the Appellant immediately pulled the poker chips from her pocket and returned them to Wu. *Testimony of Maxwell and Ex. 1; Pg. 5*.

- 4.19. The Appellant and Wu do know one another. *Testimony of Saechin.*
- 4.20. The Floor and/or Shift Manager did not have to intervene in the interaction between Wu and the Appellant. *Testimony of Maxwell and Ex. 2.*
- 4.21. The Appellant never obtained permission from Wu to use his poker chips. *Testimony of Saechin.*
- 4.22. The Riverside Casino conducted an investigation regarding the Appellant committing possible theft and making a joint wager with another player on January 15, 2018. *Testimony of Maxwell and Ex. 2 (Same as Ex. B).*
- 4.23. On July 10, 2018, the Riverside Casino, in a 'Performance Correction Notice: Final Written Notice', suspended the Appellant for four days and banned her for six months from drinking and gambling at the Riverside Casino, based on the January 15, 2018 incident. *Testimony of Saechi and Exs. 13 (later Ex. 14).*
- 4.24. As a part of her July 10, 2018 sanction, the Appellant also received copies of the Casino's internal controls and Washington State Gambling Commission Mini-Baccarat Game Rules and applicable state regulations. *Ex. F.*

Investigation of Appellant's January 15, 2018 Actions-

- 4.25. On January 17, 2018, the Riverside Casino filed a complaint with the Gambling Commission regarding the Appellant's actions on January 15, 2018. *Testimony of Maxwell and Ex. 2; Pg. 4 (Same as Ex. B).*
- 4.26. Gambling Commission investigated the complaint. *Testimony of Maxwell and Ex. 1 (Same as Ex. C).*
- 4.27. On March 13, 2018, Special Agent Maxwell went to the Riverside Casino to retrieve video of the January 15, 2018 incident. He reviewed the video footage two days later. *Ex. 1; Pg. 5 and Exs. 3, 4 & 7.*
- 4.28. On March 23, 2018, Special Agent Maxwell and Special Agent Richard Schulte met with the Appellant to discuss the January 15, 2018 incident. *Testimony of Maxwell and Ex. 1; Pg. 6 and Ex. E.*
- 4.29. During the March 23, 2018 interview, the Appellant acknowledged being wrong for taking Wu's poker chips. The Appellant asserted her extreme intoxication was to blame for her actions during the incident. *Testimony of Maxwell and Ex. 1; Pg. 6.*
- 4.30. During the interview, the Appellant could not recall sharing a wager with Wei Liang and/or Jennifer Su. *Testimony of Maxwell and Ex. 1; Pg. 6.*
- 4.31. The Appellant provided a written statement regarding the January 15, 2018 incident. She claimed to not recall much of the incident due to her level of intoxication. *Ex. D.*

- 4.32. The Appellant also acknowledged, on November 3, 2017, taking money from another player, Carla Garrett-Bailey, to place a joint wager. *Testimony of Maxwell and Ex. 1; Pg. 6.*
- 4.33. After the conclusion of his investigation, Special Agent Maxwell forwarded the matter to the Gambling Commission's Legal Division for possible charging against the Appellant regarding her actions on January 15, 2018. *Testimony of Maxwell and Ex. 1; Pg. 6.*

Appellant's Previous Warnings and Sanctions-

- 4.34. During regular briefings, Riverside Casino poker Shift managers remind poker dealers of the strict gaming rules, including prohibiting 'bet sharing' by players. *Testimony of Saechin.*
- 4.35. On May 21, 2016, the Casino counseled the Appellant regarding her failure to properly set a hand of Pai Gow, which could have resulted in a \$200 casino loss. *Ex. 8; Pg. 2 and Ex. 15.*
- 4.36. On October 14, 2017, the Appellant, while playing, slipped poker chips under the table to another player to bet on the player's spot. The Appellant's actions constituted a violation of Mini-Baccarat, casino and Gambling Commission rules. *Ex. 8; Pg. 2 and Exs. 9-11 (Ex. 12 pertains to this incident but is dated incorrectly).*
- 4.37. On November 3, 2017, Saechin gave \$75 in poker chips to Carla Garrett-Bailey to wager. The Appellant considered the \$75 to be 'lucky money', meaning, money given as a "gift", without an expectation of it being returned. *Ex. 1; Pgs. 5 & 6 and Ex. 5.*
- 4.38. However, Garrett-Bailey returned the \$75 to Saechin when she didn't win. *Ex. 1; Pg. 5 & 6.*
- 4.39. The Riverside Casino gave the Appellant a verbal warning for providing Garrett-Bailey with a loan or gift to place a wager, in violation of WAC 230-15-040(3)(c) and WAC 230-06-035(1). *Ex. 1; Pg. 5.*
- 4.40. The Gambling Commission also gave the Appellant a verbal warning. *Testimony of Maxwell and Exs. 5; Pg. 6, Ex. 8; Pg. 1, Ex. H & I.*
- 4.41. At the time of the Special Agent's verbal warning to the Appellant about providing chips to another player, he was unaware of the Appellant's counseling the previous month (October 2017) for the same activity. *Ex. 8; Pg. 2.*
- 4.42. Aside from the Gambling Commission's verbal warning to the Appellant, she has not received any other sanctions from the Gambling Commission during her 17 years in the gaming industry. *Testimony of Saechin.*

[Continued]

5. CONCLUSIONS OF LAW:

Based upon the facts above, the undersigned administrative law judge makes the following conclusions:

Jurisdiction-

5.1. The Office of Administrative Hearings (OAH) has jurisdiction over the persons and subject matter of this case under Revised Code of Washington (RCW) 9.46.140(2)&(4), Washington Administrative Code (WAC) 230-17-025 and Chapters 34.05 and 34.12 RCW.

Gambling Commission's Enforcement of Gaming Rules and Regulation-

5.2. RCW 9.46.010 establishes:

The public policy of the state of Washington on gambling is to keep the criminal element out of gambling and to promote the social welfare of the people by limiting the nature and scope of gambling activities and by strict regulation and control.

5.3. RCW 9.46.040 authorizes the Washington State Gambling Commission to enforce the rules and regulations relating to gambling activities in the State of Washington.

Burden of Proof-

5.4. The burden of proof is on the Gambling Commission Staff to prove the administrative charges by a 'preponderance of the evidence'. However, this burden shifts to the Appellant on 'Issue No. 3', requiring the Appellant to establish by 'clear and convincing evidence' she is qualified for licensure.

5.5. A 'preponderance of the evidence' is evidence which, when fairly considered, produces the stronger impression, has the greater weight, and is more convincing as to its truth when weighed against the evidence in opposition thereto. *Yamamoto v. Puget Sound Lbr. Co.*, 84 Wash. 411, 146 Pac. 861 (1915).

Lack of Intent to Steal Poker Chips-

5.6. RCW 9A.56.020 'Theft' makes it a crime to wrongfully exert unauthorized control over the property of another with intent to deprive the person of such property.

5.7. The Gambling Commission Staff alleges the Appellant committed theft on January 15, 2018, when she exerted unauthorized control over Chao Wu's poker chips when he left his spot at the Mini-Baccarat table and the Appellant placed his poker chips in her pocket and began playing.

- 5.8. In order to prove 'theft', the Gambling Commission Staff must demonstrate: (1) Unauthorized control over the property of another; and (2) Intent to deprive the individual of such property.
- 5.9. Neither the Gambling Commission Staff nor the Appellant disputes the Appellant exerted unauthorized control over Wu's poker chips. No evidence suggests Wu consented to the Appellant using his poker chips.
- 5.10. However, the element of the 'intent to deprive' is lacking. While the Appellant may have placed Wu's poker chips in her pocket, she remained at the table, playing in his position. When confronted about the missing poker chips, the Appellant immediately returned them without argument or intervention by casino staff. If the Appellant had denied taking the poker chips or attempted to leave the area with the poker chips, then the 'intent' element of the theft would have been established. Based on the facts of the January 15, 2018 incident, the 'intent to deprive' Wu of his poker chips has not been proven.
- 5.11. Therefore, on January 15, 2018, the Appellant, Nai C. Saechin, did not engage in unlawful activity constituting theft, as defined in RCW 9A.56.020. The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **REVERSED**.

Violation of Casino Rules & Gambling Regulations-

- 5.12. WAC 230-15-040(4) establishes the requirements for authorized card games, including Mini-Baccarat.
- 5.13. WAC 230-15-040(3)(c) prohibits players from placing wagers on any other player's or the house's hand or make side wagers with other players.
- 5.14. In the present case, the Gambling Commission Staff has established, by a preponderance of the evidence, on January 15, 2018, the Appellant accepted a \$100 poker chip from another player, Wei Liang. The Appellant then combined the wager with her own wager at her spot at the Mini-Baccarat table. After winning, she gave the winnings back to Liang, but retained \$100 of the payout. By combining the wagers, the Appellant 'cheated' her own casino, since it had to pay out more money due to the combined wager, than by two, individual wagers.
- 5.15. The Appellant does not dispute the facts, as asserted by the Gambling Commission Staff. Rather, she contends her extreme intoxication resulted in the bad decisions she made on January 15, 2018. However, such a defense does not negate the violation committed.

[Continued]

5.16. As a result, the Appellant's acceptance of the \$100 poker chip from Liang/Su to place with her own bet to make a joint wager is a violation of WAC 230-15-040(4) and WAC 230-15-040(3)(c). The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **AFFIRMED**.

Clear and Convincing Evidence-

5.17. RCW 9.46.153(1) establishes:

It shall be the affirmative responsibility of each applicant and licensee to establish by clear and convincing evidence the necessary qualifications for licensure of each person required to be qualified under this chapter, as well as the qualifications of the facility in which the licensed activity will be conducted;

5.18. In the present case, the burden is on the Appellant to establish 'by clear and convincing evidence' she is qualified for continued gaming licensure.

5.19. As the Gambling Commission Staff has established, on January 15, 2018, the Appellant's acceptance of a \$100 poker chip from another player to place with her wager resulted in a violation of WAC 230-15-040(4) and WAC 230-15-040(3)(c).

5.20. However, the January 15, 2018 incident is not the Appellant's first such violation of internal controls, casino rules and/or Gambling Commission rules and regulations regarding 'bet sharing'.

5.21. The Appellant's January 15, 2018 'bet sharing' violation is the Appellant's third, such violation in less than two years, demonstrating a clear disregard for gaming rules.

5.22. The Appellant previous violations of 'bet sharing' include: (1) On October 14, 2017 the Appellant slipped poker chips under the table to another player to bet share on the player's spot, a violation of WAC 230-15-040(3)(c); (2) On November 3, 2017, less than one month later, the Appellant gifted money to another player, a violation of WAC 230-06-035; and (3) The present January 15, 2018 incident, another bet share action, constituting a violation under WAC 230-15-040(3)(c).

5.23. In each of the above-cited instances, the Appellant, as a poker dealer with over 17 years experience, knew the casino and Gambling Commission rules and chose to repeatedly disregard them.

5.24. The Appellant had been repeatedly coached by the Riverside Casino and the Gambling Commission as a result of the violations as well as sanctioned, including suspension for the repeated violations. The Appellant failed to adhere to those coachings, verbal warnings and suspensions and continued with her blatant disregard for the Riverside Casino's internal rules, Mini-Baccarat rules and Gambling Commission rules and regulations.

5.25. For these reasons, the Appellant cannot show by 'clear and convincing evidence' she is qualified for continued licensure, as required by RCW 9.46.153(1). The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **AFFIRMED**.

Revocation of the Appellant's Gaming License-

5.26. RCW 9.46.075 establishes:

The commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the applicant or licensee, or any person with any interest therein:

- (1) Has violated, failed or refused to comply with the provisions, requirements, conditions, limitations or duties imposed by chapter 9.46 RCW and any amendments thereto, or any rules adopted by the commission pursuant thereto, or when a violation of any provision of chapter 9.46 RCW, or any commission rule, has occurred upon any premises occupied or operated by any such person or over which he or she has substantial control;...
- (8) Fails to prove, by clear and convincing evidence, that he, she or it is qualified in accordance with the provisions of this chapter;

5.27. WAC 230-03-085 authorizes the Gambling Commission to suspend or revoke a Licensee's gaming license for:

- (9) Poses a threat to the effective regulation of gambling, or creates or increases the likelihood of unfair or illegal practices, methods, and activities in the conduct of gambling activities, as demonstrated by:
 - (a) Prior activities; or
 - ...
 - (d) Habits;

5.28. In the present case, the Gambling Commission has established, by a preponderance of the evidence, the Appellant, on January 15, 2018, accepted a \$100 poker chip from another player and placed it with her own wager, a violation of WAC 230-15-040(4) and WAC 230-15-040(3)(c).

5.29. Further, the Appellant cannot prove by 'clear and convincing evidence' she is qualified for licensure, as required by RCW 9.46.153(1), due to her repeated violations of 'bet sharing' and 'gifting', despite 17 years in the gaming industry.

5.30. In accordance with RCW 9.46.075(1)&(8) and WAC 230-03-085(9)(a) and (d), the Appellant's gambling license is **REVOKED**.

[Continued]

6. INITIAL ORDER:

IT IS HEREBY ORDERED THAT;

- 6.1. On January 15, 2018, the Appellant, Nai C. Saechin, did not engage in unlawful activity constituting theft, as defined in RCW (Revised Code of Washington) 9A.56.020. The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **REVERSED**.
- 6.2. The Appellant's acceptance of a \$100 poker chip from another player, which she returned after placing a winning bet, is a violation of WAC 230-15-040(4) and WAC 230-15-040(3)(c). The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **AFFIRMED**.
- 6.3. The Appellant cannot show by 'clear and convincing evidence' she is qualified for licensure, as required by RCW 9.46.153(1). The Gambling Commission's 'Notice of Administrative Charges' regarding this issue is **AFFIRMED**.
- 6.4. In accordance with RCW 9.46.075(1)&(8) and WAC 230-03-085(9)(a) and (d), the Appellant's gambling license is **REVOKED**.

Issued from Tacoma, Washington on the date of mailing.



TJ Martin
Administrative Law Judge
Office of Administrative Hearings

CERTIFICATE OF SERVICE ATTACHED

PETITION FOR REVIEW

Any party to this proceeding may file a Petition for Review of this initial order. The written petition for review must be mailed to the Washington State Gambling Commission at:

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504

The petition for review must be received by the Commission within twenty (20) days from the date this initial order was mailed to the parties. A copy of the petition for review must be sent to all parties of record. The petition for review must specify the portions of the initial order with which the party disagrees, and must refer to the evidence in the record which supports the party's position. The other party's reply must be received at the address above, and served on all parties of record, within thirty (30) days from the date the petition for review was mailed.

Any party may file a cross appeal. Parties must file cross appeals with the Washington State Gambling Commission within ten days of the date the petition for review was filed with the Washington State Gambling Commission. Copies of the petition or cross appeal must be served on all other parties or their representatives at the time the petition or appeal is filed.

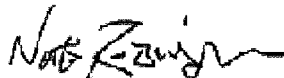
CERTIFICATE OF SERVICE FOR OAH DOCKET NO. 07-2018-GMB-00065

I certify that true copies of this document were served from Tacoma, Washington via Consolidated Mail Services upon the following as indicated:

<p>Nai C. Saechin 35737 26th Ave S Federal Way, WA 98003 Appellant</p>	<p><input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>
<p>David Otto & Nicole Fisher Martin Davis Law, PLLC 1200 Westlake Ave N Ste 802 Seattle, WA 98109 Appellant Representatives</p>	<p><input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail: dotto@martindavislaw.com nfisher@martindavislaw.com</p>
<p>Gregory Rosen, AAG Office of the Attorney General MS: 40100 PO Box 40100 Olympia, WA 98504 Agency Representative</p>	<p><input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input checked="" type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail: gregr@atg.wa.gov</p>
<p>Ashlie Laydon Washington State Gambling Commission MS: 42400 PO Box 42400 Olympia, WA 98504 Agency Contact</p>	<p><input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input checked="" type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>

Date: Friday, June 07, 2019

OFFICE OF ADMINISTRATIVE HEARINGS



Nathan Robinson
Legal Assistant 3

WSGC

Sir/Ma'am,

JUN 26 2019

RECORDS

I would like to file for a petition for review in my case which is docket number 07-2018-GMB-00065. I am asking that the decision to revoke my license is reversed due to it being excessive. I fully take responsibility for my actions on not adhering to WAC 230-15-040 (4 & 3c). I am truly sorry for my actions and as I have stated prior to these issues I have been in the gaming industry for 17 years and I have never had any infractions with the Gambling Commission before. And I would like to point out I have not had any since. I am a single mother that also supports my elderly parents. The lives of my parents and child would be negatively impacted as this is my sole means of income. I do not have another trade I can get into that could support them. I am humbly begging for another chance to keep my license. As I have stated that for 17 years prior and after the infraction I have not had any infractions, so I believe that I can be qualified for licensure. I have paid over \$50k in attorney's fees in defense of my license, and was suspended from my job, and went thru retraining on the rules pertaining to my job. I humbly ask the court to consider this as punishment enough. I don't mention this to try and make anybody feel sorry for my or think that I don't take accountability for my actions. I do and again I am truly sorry for the impact on my poor decision making has had on everybody involved. And again I would like to plead for one last chance to keep my license. Thank you for taking the time to read this letter and consider my Petition for Review.



Nai Saechin

6.22.19

06/22/19

Martin Davis PLLC

Martin Davis, PLLC
 1200 Westlake Ave N
 Suite 802
 Seattle, WA 98109
 (206) 906-9346
 admin@martindavislaw.com
 http://martindavislaw.com

Statement

TO

Nai C. Saechin
 10102 8th Ave S I-76
 Seattle, WA 98168

STATEMENT NO. 4417

DATE 03/31/2019

TOTAL DUE \$39,056.25

ENCLOSED

DATE	ACTIVITY	AMOUNT	BALANCE
12/31/2017	Balance Forward		0.00
06/06/2018	Payment #0232801954: FLAT FEE	-3,000.00	-3,000.00
06/30/2018	Invoice #3035	3,250.00	250.00
07/31/2018	Invoice #3068	1,737.50	1,987.50
08/31/2018	Invoice #3087	375.00	2,362.50
09/12/2018	Payment: Paid via QuickBooks Payments: Payment ID PG0181201793	-375.00	1,987.50
09/30/2018	Invoice #3121	1,406.25	3,393.75
10/12/2018	Payment: Paid via QuickBooks Payments: Payment ID PH0009654765	-500.00	2,893.75
10/31/2018	Invoice #3137	1,500.00	4,393.75
11/13/2018	Payment: Paid via QuickBooks Payments: Payment ID PK0188886623	-500.00	3,893.75
11/30/2018	Invoice #3182	1,312.50	5,206.25
12/21/2018	Payment: Paid via QuickBooks Payments: Payment ID PK0195984436	-500.00	4,706.25
12/31/2018	Invoice #3277	656.25	5,362.50
01/18/2019	Payment: Paid via QuickBooks Payments: Payment ID a0jnscbf	-500.00	4,862.50
01/31/2019	Invoice #3307	5,925.00	10,787.50
02/27/2019	Payment: Paid via QuickBooks Payments: Payment ID PG0208809164	-812.50	9,975.00
02/28/2019	Invoice #3328	16,743.75	26,718.75

Current Due	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	90+ Days Past Due	Amount Due
12,837.50	16,243.75	5,925.00	156.25	3,893.75	\$39,056.25

DATE	ACTIVITY	AMOUNT	BALANCE
03/30/2019	Payment: Paid via QuickBooks Payments: Payment ID an268t39	-500.00	26,218.75
03/31/2019	Invoice #3366	12,837.50	39,056.25

Current Due	1-30 Days Past Due	31-60 Days Past Due	61-90 Days Past Due	90+ Days Past Due	Amount Due
12,837.50	16,243.75	5,925.00	156.25	3,893.75	\$39,056.25

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WSGC

JUL 23 2019

RECORDS

BEFORE THE WASHINGTON STATE GAMBLING COMMISSION

In the Matter of:

OAH No. 07-2018-GMB-00065

Nai C. Saechin
License No. 68-14153

GMB No. CR 2018-00133

Licensee.

RESPONSE TO LICENSEE'S
PETITION FOR REVIEW

I. INTRODUCTION

Nai Saechin, the Licensee in this case, was licensed as a Card Room Employee (CRE). Based on an incident from January 15, 2018, in which Ms. Saechin placed a bet for another player, took a different player's chips, and continued to gamble while those chips were in her possession, the Gambling Commission Staff issued a Notice of Charges against Ms. Saechin on May 9, 2018. Ms. Saechin appealed these violations. On March 20, 2019, a hearing was held before an Administrative Law Judge (ALJ) on these violations. In an Initial Order issued on June 7, 2019, the ALJ found that Ms. Saechin had violated the rules and regulations of the Gambling Commission, and that she had done so repeatedly in the months preceding the January 15 incident. The ALJ therefore upheld revocation of Ms. Saechin's CRE license.

II. FACTS

On the night of January 15, 2018, Ms. Saechin was playing Mini-Baccarat at the Riverside Casino in Tukwila. Ex. 1. While playing, she accepted \$100 in chips from another player and combined those chips with her own to place a bet. *Id.* That bet won, and the result

1 was that the casino paid out more money on the combined bet than it would have on two
2 individual bets. Conclusion of Law 5.14.

3 Around the same time, Ms. Saechin picked up \$2,000 in chips belonging to a player that
4 had temporarily left the table. Ex. 1. She put the chips in her pockets, intermingling the chips
5 with her own. Ex. 7. She then placed a losing bet while his chips were intermingled in her pocket.
6 *Id.* Following that bet, Ms. Saechin pulled out and counted a stack of chips from her pocket,
7 pushing the chips towards the betting area. *Id.* When the player returned and demanded his chips,
8 Ms. Saechin pulled the chips back and returned the player's chips to him. Ex. 1.

9 Ms. Saechin had recently committed -- and been reprimanded for -- similar actions. Ex. 1.
10 On October 14, 2017, Ms. Saechin slipped poker chips under a gaming table to another player,
11 in order for the other player to place a bet on her behalf. Finding of Fact 4.36. Ms. Saechin shared
12 bets with another player "several times" while playing. Ex. 10. Ms. Saechin did this despite
13 having been "repeatedly told" that more than one player placing a bet was a violation of
14 Gambling Commission rules. Ex. 12. At the time of this incident, Ms. Saechin was told by
15 Riverside Casino staff that "should this behavior happen again, her license could be in jeopardy."
16 Ex. 11.

17 Nevertheless, on November 3, 2017, Ms. Saechin again committed a violation by giving
18 money to another player to gamble with. Ex. 1. Whether this money was a loan to the player, or
19 for the player to use to bet on Ms. Saechin's behalf, it was a violation. *Id.* Ms. Saechin received
20 both a verbal warning from the Gambling Commission and a suspension from her employer for
21 this conduct. Ex. 5. Ms. Saechin was specifically warned that "players must not place wagers on
22 any other player's or the house's hand." *Id.* At the time, Ms. Saechin said that it would never
23 happen again. *Id.*

24 Based on these actions, the Gambling Commission Staff moved to revoke Ms. Saechin's
25 CRE license pursuant to RCW 9.46.075(1) and (8), and WAC 230-03-085(8)(a), (c), and (d).
26

1 **III. PROCEDURAL FACTS**

2 On May 9, 2018, the Director of the Washington State Gambling Commission issued a
3 Notice of Administrative Charges against Ms. Saechin, which sought the revocation of her
4 gambling license. Ms. Saechin timely requested an administrative hearing. Commission Staff
5 filed a hearing brief in support of its request that Ms. Saechin’s gambling license be revoked.

6 On March 20, 2019, an administrative hearing was conducted before ALJ T.J. Martin.
7 On June 7, 2019, ALJ Martin issued an Initial Order that set out Findings of Fact and Conclusions
8 of Law. The Initial Order determined Ms. Saechin’s gambling license should be revoked.
9 Ms. Saechin timely filed a Petition for Review (Petition) of the Initial Order.

10 Commission Staff respectfully submits this response to Ms. Saechin’s Petition.

11 **IV. ARGUMENT**

12 **The Commission Should Affirm the ALJ’s Initial Order Because Ms. Saechin’s**
13 **Actions Fail to Establish by Clear and Convincing Evidence that She Is Qualified**
14 **to Be Licensed**

15 All Commission licensees bear a mandatory—and ongoing—burden to establish by clear
16 and convincing evidence that they are qualified for licensure under RCW 9.46.
17 *See* RCW 9.46.153(1). The Commission is legally authorized to revoke licensees’ gambling
18 licenses if they fail to meet that mandatory burden. *See* RCW 9.46.075(8). In Ms. Saechin’s case,
19 the Initial Order correctly found that, given her repeated violations of bet sharing and gifting in
20 spite of multiple warnings and numerous trainings, Ms. Saechin failed to meet her required
21 burden under RCW 9.46.153(1) to prove by clear and convincing evidence that she is qualified
22 for licensure. Initial Order at 9.

23 The ALJ’s Initial Order noted the following in pertinent part:

24 5.21 The Appellant’s January 15, 2018 ‘bet sharing’ violation is the Appellant’s
25 third, [sic] such violation in less than two years, demonstrating a clear disregard for
26 gaming rules.

5.22. The Appellant[’s] previous violations of ‘bet sharing’ include: (1) On
October 14, 2017 the Appellant slipped poker chips under the table to another
player to bet share on the player’s spot, a violation of WAC 230-15-040(3)(c); (2)
On November 3, 2017, less than one month later, the Appellant gifted money to

1 another player, a violation of WAC 230-06-035; and (3) The present January 15,
2 2018 incident, another bet share action, constituting a violation under WAC 230-
15-040(3)(c).

3 5.23. In each of the above-cited instances, the Appellant, as a poker dealer with
4 over 17 years experience, knew the casino and Gambling Commission rules and
chose to repeatedly disregard them.

5 5.24. The Appellant had been repeatedly coached by the Riverside Casino and the
6 Gambling Commission as a result of the violations as well as sanctioned, including
7 suspension for the repeated violations. The Appellant failed to adhere to those
8 coachings, verbal warnings and suspensions and continued with her blatant
disregard for the Riverside Casino's internal rules, Mini-Baccarat rules and
Gambling Commission rules and regulations.

9 Initial Order at 8 (emphasis added).

10 The Initial Order ultimately revoked Ms. Saechin's license based on RCW 9.46.075(1)
11 and (8) and WAC 230-03-085(9)(a) and (d). Initial Order at 10.

12 WAC 230-03-085(9)(a) and (d) authorize the Commission to revoke a license if a
13 licensee "[p]oses a threat to the effective regulation of gambling, or creates or increases the
14 likelihood of unfair or illegal practices, methods, and activities in the conduct of gambling
15 activities, as demonstrated by . . . [p]rior activities . . . or [h]abits" Given Ms. Saechin's
16 "repeated violations of 'bet sharing' and 'gifting'", and "blatant disregard for the Riverside
17 Casino's internal rules, Mini-Baccarat rules and Gambling Commission rules and regulations,"
18 her continued licensure clearly poses a threat to the effective regulation of gambling and
19 increases the likelihood of unfair or illegal practices, methods, and activities in the conduct of
20 gambling activities. Initial Order at 8-9.

21 Ms. Saechin's Petition contends that the ALJ's decision to revoke her license is
22 excessive. Her contention is incorrect. As the Initial Order noted, Ms. Saechin's bet sharing
23 violation was her third such violation in a short period. Initial Order at 8. The Initial Order noted
24 that as a poker dealer with over 17 years' experience, Ms. Saechin knew the rules of the casino
25 and Gambling Commission and chose repeatedly to disregard them. *Id.* The Initial Order also
26 noted that Ms. Saechin had been repeatedly coached by the Riverside Casino and the Gambling
Commission as a result of the violations as well as sanctioned, including suspension for the

1 repeated violations, but failed to adhere to those coachings, verbal warnings, and suspensions
2 and continued with her blatant disregard for the Riverside Casino's internal rules, Mini-Baccarat
3 rules and Gambling Commission rules and regulations. *Id.*


4 On January 15, 2018, for the third time in as many months, Ms. Saechin violated
5 Gambling Commission rules and regulations governing Mini-Baccarat and betting.¹ In light of
6 Ms. Saechin's repeated violations of the rules and regulations of the Gambling Commission,
7 coupled with her failure to meet her burden under RCW 9.46.153(1), the Initial Order's
8 revocation of her license was entirely appropriate.

9 **V. CONCLUSION**

10 Commission Staff request that the Commission affirm the ALJ's Initial Order in
11 Ms. Saechin's case and revoke her CRE License No. 68-14153.

12 DATED this 23rd day of July 2019.

13
14 ROBERT W. FERGUSON
Attorney General

15 
16 _____
KELLEN WRIGHT, WSBA #46826
17 Assistant Attorney General
Attorney for Washington State
18 Gambling Commission Staff

19
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23
24 ¹ This was not the only action of Ms. Saechin's on January 15, 2018 that raised concerns. As the ALJ
25 noted, "neither the Gambling Commission Staff nor the Appellant dispute[d that] that the Appellant exerted
26 unauthorized control" over thousands of dollars in another player's chips. Initial Order at 7. After picking up the
other player's chips, Ms. Saechin made one bet while her chips were intermingled with his, and had a second bet
interrupted when the other player returned and questioned her. Ex. 7. Ms. Saechin herself described this conduct as
"never ok." Ex. 1. While the ALJ did not find a theft had occurred – because Ms. Saechin hadn't yet left the area
and so demonstrated her intent to retain the chips – this conduct was clearly inappropriate.

1 **DECLARATION OF SERVICE**

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

4 LACHLAN HUCK
5 DAVID OTTO
6 MARTIN DAVIS LAW
7 1200 WESTLAKE AVE N STE 802
8 SEATTLE, WA 98109

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

courtesy copy via facsimile:

courtesy copy via electronic mail:
admin@martindavislaw.com

ABC/Legal Messenger

9
10
11 NAI SAECHIN
12 35737 26TH AVE S
13 FEDERAL WAY, WA 98003

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

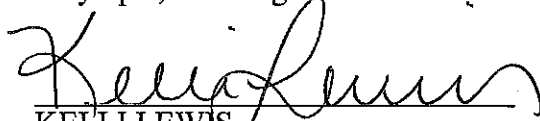
courtesy copy via facsimile:

courtesy copy via electronic mail:

ABC/Legal Messenger

14
15 I declare under penalty of perjury under the laws of the state of Washington that the
16 foregoing is true and correct.

17 DATED this 23rd day of July 2019 at Olympia, Washington.

18 
19 KELLI LEWIS
20 Legal Assistant

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

Yan F. Li
License No. 68-31603,

Licensee.

Docket No. 04-2019-GMB-00088
NO. CR 2019-00136

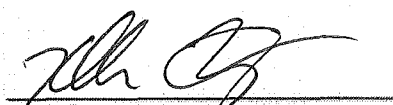
STIPULATION AND PROPOSED
FINAL ORDER

STIPULATION

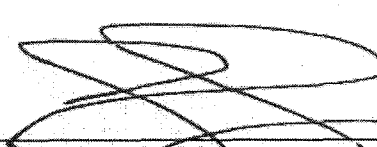
IT IS HEREBY STIPULATED AND AGREED by and between the Licensee, Yan Li, appearing by and through her attorney Steven Kim, and Washington State Gambling Commission (Commission) staff, by and through its attorneys of record, Robert W. Ferguson, Attorney General, Kellen Wright, Assistant Attorney General, that the parties in this case have reached an agreement on the terms of the penalty in the above-entitled action and request the Commission to enter the attached proposed final order reducing the initial order's penalty from revocation to a one-year suspension. The Licensee waives any further review of this case so long as the Commission signs and enters the proposed final order.

DATED this 21st day of September, 2019.

DATED this 21st day of September, 2019.



Kellen Wright, WSBA #46826
Assistant Attorney General
Attorney for Commission Staff



Steven Kim, WSBA #31051
Attorney for Licensee



STATE OF WASHINGTON
GAMBLING COMMISSION

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

October 10, 2019

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

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

SUBJECT: Rocky Mountain Elk Foundation Inc.'s, Order for Continuing Application to Exceed \$300,000 Limit in Raffle Prizes Paid during the License Year Ending December 31, 2019

During the regularly scheduled public meeting on September 12, 2019, the Rocky Mountain Elk Foundation requested approval to exceed the \$300,000 annual limit for raffle prizes paid during its license year ending December 31, 2019.

An Order Continuing Application to Exceed \$300,000 Raffle Limit was subsequently issued, which requested the following information be obtained, reviewed by staff, and presented to the Commission:

- 1) Verification that the awarding of firearms in Rocky Mountain Elk Foundation raffles, for at least the previous license year, complies with all applicable state laws and regulations, including but not limited to WAC 230-06-025

Staff contacted each Federal Firearms Licensed dealer (FFL) that processed a transfer of firearms for the winners of Rocky Mountain Elk Foundation raffles during its 2018 license year. The method of verification involved asking the following questions of each FFL:

- 1) Did (winner name) bring a certificate to you for a firearm?
- 2) Did you transfer a firearm to (winner name)?
- 3) Did you follow all applicable Washington State laws in the transferring of the firearm to (winner name)?

During this process, staff determined that 20 FFL's were involved in the transferring of firearms for 204 raffle winners.

- 17 FFL's (166 firearm transfers) answered "Yes" to each of the 3 questions.
- 1 FFL (9 firearm transfers) provided a general statement, "Yes, we follow all state and federal laws." They would not provide any other information, citing consultation with their representative ATF agent.
- 1 FFL (8 firearm transfers) asked for the questions to be submitted in writing. The corporate office responded back in writing stating that they are forbidden by law from releasing the requested information; however, they did state:
 - All firearms are delivered from our place of business, per federal law.
 - All firearms are delivered in accordance with all applicable state and federal laws, including transfers to an FFL in the state of residence, if the winner is not a Washington Resident and the item requires delivery to another state of residence only.
 - All firearms are released once the winner presents a certificate for that item, or the event provides a list of winners, and the winner provided positive identification, suitable for the Federal ATF 4473 background check form.
 - All denials are processed in accordance with State and Federal law, including reporting to the Washington Association of Sheriffs and Police Chiefs.
 - No semiautomatic rifles are delivered, transferred or otherwise conveyed to a Non Resident of the State of Washington in accordance with State law.
- 1 FFL (21 firearm transfers) is no longer in business and staff were unable to make contact with a representative. A Rocky Mountain Elk Foundation representative also attempted contact, with no success. Staff were unable to verify these firearm transfers.

In summary, 19 FFL's, responsible for 183 firearm transfers, acknowledged that they follow all applicable state laws and regulations in the transferring of firearms. Twenty-one firearm transfers could not be confirmed because the business has closed.



Staff Proposed Rule-making

- WAC 230-03-085- Denying, suspending, or revoking an application, license or permit
- WAC 230-03-265- Applying for a card room employee license
- WAC 230-05-112- Defining “gross gambling receipts”
- WAC 230-05-138- Returned payments
- WAC 230-05-142- Fees for review of gambling equipment, supplies, services, or games
- WAC 230-07-090- Keeping and depositing all gambling funds separate from other funds
- WAC 230-11-100- Recordkeeping requirements for raffle licensees

Tab 6: OCTOBER, 2019 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Washington State Gambling Commission Staff	
Background	
<p>In 2017-18, the Gambling Commission amended its rules to simplify its reporting and licensing fee structure. After a year of implementation, staff has reviewed our rules and believes there are some changes and modifications needed to the new fee and reporting structure. Therefore, staff recommends amending the following:</p> <ul style="list-style-type: none"> • WAC 230-03-085- Denying, suspending, or revoking an application, license or permit. Amend to include the failure to pay any late fees a licensee may have accumulated as a result of failing to file a quarterly license report and/or pay a quarterly license fee on time as a reason staff may deny, suspend, or revoke an application, license, or permit. • WAC 230-03-265- Applying for a card room employee license. Amend to clarify that a card room employee license is required if operating a commercial nonhouse-banked card room that is charging a fee to play, operation of a Class F endorsed nonhouse-banked card room, or operation of a house-banked card room. A card room employee license is not required for commercial establishments not charging a fee to play or for nonprofit organizations conducting card games. • WAC 230-05-112- Defining “gross gambling receipts.” Amend to include “bingo paper or bingo cards” in the list of authorized activities of which gross gambling receipts may be due. • WAC 230-05-138- Returned payments. Amend to ensure that administrative charges can be issued in the event that a quarterly license fee is returned after the due date for insufficient funds. • WAC 230-05-142- Fees for review of gambling equipment, supplies, services, or games. Amend to include language from repealed rule, WAC 230-05-005. • WAC 230-07-090- Keeping and depositing all gambling funds separate from other funds. Amend so that licensees must deposit all net gambling receipts which they are holding, pending pay out from raffles with gross gambling receipts over fifty thousand dollars in their initial license year, raffles with gross gambling receipts over fifty thousand dollars in their previous license year, or raffles offering prizes that require approval per WAC 230-11-067, at least once each week. 	

- WAC 230-11-100- Recordkeeping requirements for raffle licensees. Amend to combine WAC 230-11-095- Recordkeeping requirements for licensees with gross gambling receipts of fifty thousand dollars or less in their previous license year and unlicensed raffles- and WAC 230-11-100- Recordkeeping requirements for licensees with gross gambling receipts over fifty thousand dollars in their previous license year and raffles using alternatives drawing formats, as well as also adding recordkeeping requirements for licensees conducting raffles with gross gambling receipts over fifty thousand dollars in their initial license year and raffles offering prizes that require approval per WAC 230-11-067.

Staff Recommendation

Staff recommends initiating rule-making to amend the above-referenced rules.



Staff Proposed Rule Repeals

- WAC 230-05-001- Prorating or refunding of fees
- WAC 230-05-005- Fees for review of gambling equipment, supplies, services or games
- WAC 230-05-010- Returned payments
- WAC 230-05-015- Two-part payment plan for license fees
- WAC 230-05-016- Exceeding license class
- WAC 230-05-017- Failing to apply for license class upgrade
- WAC 230-05-018- Partial refund of license fees if gambling receipts limit not met
- WAC 230-05-020- Charitable or nonprofit organization fees
- WAC 230-05-025- Commercial stimulant fees
- WAC 230-05-030- Fees for other businesses
- WAC 230-05-035- Individuals license fees
- WAC 230-05-102- All licensed organizations report activity quarterly beginning with the July 1, 2018, through September 30, 2018, quarter
- WAC 230-06-124- Online filing required with waivers available upon request for good cause
- WAC 230-06-150- Defining “gross gambling receipts”
- WAC 230-06-170- Defining “net win”
- WAC 230-07-155- Reporting annual activity for raffles, enhanced raffles, amusement games, Class A, B, or C bingo, or combination licenses
- WAC 230-07-160- Reporting annual activity for agricultural fairs
- WAC 230-09-056- Activity reports for fund raising events
- WAC 230-10-331- Activity reports for Class D and above bingo licensees
- WAC 230-10-457- Activity reports for linked bingo prize providers
- WAC 230-13-169- Annual activity reports for commercial amusement game licensees
- WAC 230-14-284- Activity reports for punch board and pull-tab licensees
- WAC 230-15-200- Reporting card game activity
- WAC 230-15-205- Card tournament licenses
- WAC 230-16-220- Activity reports by manufacturers and distributors
- WAC 230-11-095- Recordkeeping requirements for licensees with gross gambling receipts of fifty thousand dollars or less in their previous license year and unlicensed raffles

Tab 7: OCTOBER, 2019 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Washington State Gambling Commission Staff	
Background	
<p>In 2017-18, the Gambling Commission amended its rules to simplify its licensing fee structure. All licensees have now completed the transition from the old fee structure to the new fee structure. As a result, the following rules related to the old fee structure are no longer relevant and should be repealed:</p>	

- [WAC 230-05-001](#) – Prorating or refunding fees
- [WAC 230-05-005](#) – Fees for review of gambling equipment, supplies, services, or games
- [WAC 230-05-010](#) – Returned payments
- [WAC 230-05-015](#) – Two-part payment plan for license fees
- [WAC 230-05-016](#) – Exceeding license class
- [WAC 230-05-017](#) – Failing to apply for license class upgrade
- [WAC 230-05-018](#) – Partial refund of license fees if gambling receipts limit not met
- [WAC 230-05-020](#) – Charitable or nonprofit organization fees
- [WAC 230-05-025](#) – Commercial stimulant fees
- [WAC 230-05-030](#) – Fees for other businesses
- [WAC 230-05-035](#) – Individuals license fees

In 2017-18, the Gambling Commission amended its rules to simplify its reporting structure. All licensees have now completed the transition from activity reporting to quarterly license reporting. As a result, the following rules related to activity reporting are no longer relevant and should be repealed:

- [WAC 230-05-102](#) – All licensed organizations report activity quarterly beginning with the July 1, 2018, through September 30, 2018 quarter
- [WAC 230-06-124](#) – Online filing required with waivers available upon request for good cause
- [WAC 230-06-150](#) – Defining “gross gambling receipts”
- [WAC 230-06-170](#) – Defining “new win”
- [WAC 230-07-155](#) – Reporting annual activity for raffles, enhanced raffles, amusement games, Class A, B, or C bingo, or combination licenses.
- [WAC 230-07-160](#) – Reporting annual activity for agricultural fairs
- [WAC 230-09-056](#) – Activity reports for fund-raising events
- [WAC 230-10-331](#) – Activity reports for Class D and above bingo licensees
- [WAC 230-10-457](#) – Activity reports for linked bingo prize providers
- [WAC 230-13-169](#) – Annual activity reports for commercial amusement game licensees
- [WAC 230-14-284](#) – Activity reports for punch board and pull-tab licensees
- [WAC 230-15-200](#) – Reporting card game activity
- [WAC 230-15-205](#) – Card tournament licenses
- [WAC 230-16-220](#) – Activity reports by manufacturers and distributors
- [WAC 230-11-095](#) – Recordkeeping requirements for licensees with gross gambling receipts of fifty thousand dollars or less in their previous license year and unlicensed raffles

Staff Recommendation

Staff recommends initiating rule-making to repeal these rules.

Staff Proposed Rule-Making
 Chapter 230-19 WAC- Self-Exclusion



Tab 8: OCTOBER, 2019 Commission Meeting Agenda. Statutory Authority 9.46.070; 9.46.071

Who Proposed the Rule Change?

Washington State Gambling Commission Staff

Background

The Gambling Commission has been directed by the legislature, through Substitute House Bill 1302, to draft rules establishing a statewide self-exclusion program. The Gambling Commission has discretion in establishing the scope, process, and requirements of the self-exclusion program, however it must comply with the following requirements: the program must allow persons to voluntarily exclude themselves from gambling at authorized gambling establishments that offer house-banked social card games and any individual registered with the self-exclusion program is prohibited from participating in gambling activities associated with this program and forfeits all moneys and things of value obtained by the individual or owed to the individual by an authorized gambling establishment as a result of prohibited wagers or gambling activities. The Gambling Commission may adopt rules for forfeiture of any moneys or things of value, including wagers, obtained by an authorized gambling establishment while an individual is registered with the self-exclusion program.

Staff Recommendation

Staff recommends initiating rule-making to adopt rules to establish a statewide self-exclusion program.



Work Session: Raffles

October 10, 2019

Special Agent Supervisor Dan Frey

Special Agent Supervisor Sonja Dolson

Regulation Unit



What is a raffle?

Pre-numbered tickets sold for \leq \$100 each

Prizes awarded by a drawing -- bona fide charitable or nonprofit organization

Only members can operate or manage raffle

Gambling receipts go to the benefit of the organization

Source: RCW 9.46.0277



Who can offer raffles?



BONA FIDE
CHARITABLE/
NONPROFIT
ORGANIZATIONS



COMMERCIAL
BUSINESSES



INDIVIDUALS

Source: RCW 9.46.0209

NPO Qualifications

ORGANIZED ONLY FOR PURPOSES:

Agricultural

Fraternal

Athletic

Patriotic

Charitable

Political

Civic

Social

Educational

OR

ONE OF THE FOLLOWING:

Agricultural Fair

Fraternal Society

Church

Grange

Source: RCW 9.46.0209

Unlicensed raffles

PUBLIC

NPOs may offer unlicensed bingo, raffles & amusement games. Up to 2 per calendar year

Combined gross receipts must be \leq \$5,000

Must follow raffle rules

Source: RCW 9.46.0321, RCW 9.46.0315, WAC 230-11-075

MEMBER

2 public raffles + unlimited members-only raffles each year

Members-only raffle combined gross receipts must be \leq \$5,000

Tickets sold ONLY to members and guests

Must follow raffle rules

When is a raffle license required?

Gross receipts will be > \$5,000

More than 2 public raffles per year

Certificates for firearms are awarded as a prize

Tickets bundled/sold at discount

Alternative drawing is used – i.e., duck race, poker run



Raffle restrictions

RCW

Ticket price may not exceed \$100 for the raffle drawing

No paid sales people; members only

Proceeds can't benefit an individual

Must provide physical ticket with unique number

WAC

No free tickets

Tickets must be consecutively numbered

If the winner is not required to be present to win, there must be a detachable stub to include name, address, and telephone number

Rules of raffle must be disclosed to participants

Must be 18 or older to purchase tickets

Credit cards may be used to purchase tickets

OTHER

The US Post Office has restrictions on mailing tickets

Discounted tickets

One discount plan per raffle

Plan must be established before selling any raffle tickets

Must be licensed

Single, non-discounted tickets must be available to all participants

Bundled into booklets containing a prescribed number of tickets for the discount scheme

Tickets in booklets may not be sold individually

Booklet cover will be imprinted with the discount scheme

Source: WAC 230-11-025

Free tickets & incentives



FREE RAFFLE
TICKETS



RAFFLE TICKETS
AS A PRIZE



NON-CASH
INCENTIVES FOR
TICKET SALES

Source: WAC 230-11-030, WAC 230-11-035



Standard Raffle Drawing

Alternative drawing formats

RAFFLE LICENSEES

Mock races

Bucket raffles

Duck races

Calendar raffles

Poker runs

Joker Poker

Ball drops

Queen of

Animal plops

Hearts

Multiple stage
drawings

MEMBERS ONLY

Mock animal races

Video races

Paddle wheel

Card deck raffles

Source: WAC 230-11-055, WAC 230-11-090

Joker Poker / Queen of Hearts



53 envelopes, each containing a card from a 52-card deck and one Joker

Raffle tickets are purchased

The person whose ticket is drawn gets to choose an envelope.

If the envelope has any card other than a Joker, they win a nominal prize.

Another raffle is conducted during a subsequent week. Pot grows as the amount of remaining cards diminishes.

Continues until someone selects a Joker. That person wins the posted prize.



\$1.00 a ticket and they are placed into the drawing. If your ticket is drawn, you get to pick one of the envelopes.
If you pick the QUEEN OF HEARTS, you win the jackpot. Each week one ticket is drawn, and one card comes off the board, so each week your chance gets better. Since this is a 50/50 split with the club, not only do you have fun, you are supporting the club too.
AKO
Any card 2 thru 10 gets \$50.00
any Face card gets \$75.00
any Ace or Joker gets \$100.00

Wa. State Gambling Laws prohibit any raffle prize payout to exceed \$40,000.
Therefore Queen of Hearts will be capped at that amount.
Each drawing is an individual raffle playing for a chance to win the posted amount. All money generated from the raffle is considered part of the Burien Eagles assets.

QUEEN OF HEARTS
1369 50

BURIEN EAGLES #3523

A wooden raffle board with a glass front. The board is divided into several vertical columns by metal dividers. Each column contains a stack of brown envelopes. On the right side, a fan of playing cards is visible, including the Ace, King, Queen, Jack, and 10 of hearts. A single 8 of clubs card is also visible in one of the envelopes on the right. The board is mounted on a wall.

Joker Poker / Queen of Hearts

Allowed under raffle rules

Rules must be posted

Proceeds are organization's money

Sales recorded as gross receipts,
regardless of prizes awarded.

Must keep records in format
prescribed by the Commission



Prize limits

\$40,000

Individual Prize Limit

\$300,000

Annual Prize Limit

Source: WAC 230-11-065, WAC 230-11-067

Prize rules

Merchandise prizes must be paid for in full prior to the drawing

Cash prizes must be available at the time of the drawing: cash or check

Liquor can only be offered as a prize in unlicensed members-only raffles with proper permit, unless otherwise authorized by the WSLCB

Firearms must be awarded using a certificate from a licensed firearm dealer; cannot award the firearm directly to the winner

Raffle records: Low volume

Licensees with gross receipts up to \$50,000, and unlicensed raffles, are required to keep records containing the following:

- Gross receipts
- Prizes paid
- Net income
- Documentation of expenses
- Documentation of how proceeds were used

Source: WAC 230-11-095

Licensee: Lake Side Club Date of Drawing: July 9, XXXX

1. Reconciliation of Ticket Sales

<u>4000</u>	(-)	<u>0001</u>	(+)	1	(-)	<u>450</u>	(=)	<u>3550</u>
Ending Ticket #		Beginning Ticket #				# of Returned Tickets		Total Tickets Sold

2. Activity Summary

Gross Receipts: Total Tickets Sold	<u>3550</u>	X Per Ticket \$	<u>5.00</u>	= \$	<u>17,750</u>
Less Prizes Paid (See Winners Register)				(-)	<u>10,000</u>
Equal Net Receipts				=	<u>7,750</u>

Expenses:

License Fees	\$	<u>315</u>
Local Taxes		<u>778</u>
State Taxes		<u>175</u>
Equipment Rental		<u>0</u>
Advertisement		<u>250</u>
Cash (Over) / Short ^(A)		<u>15</u>
Other		<u>817</u>
		<i>Supplies 440 Repair 377</i>
Total Expenses	\$	<u>2,330</u>
Net Income	\$	<u>5,400</u>

3. Other Required Information:

^(A) Cash (Over) / Short:

Gross Receipts \$	<u>17,750</u>	(-) Total Amount Deposited ^(B)	<u>17,735</u>	(=)	\$ <u>15.00 Short</u>
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Explanation of Cash (Over) / Short: * Three tickets lost. See log.

^(B) Schedule of Deposits:

Date	Amount	Date	Amount
<u>6/10/XX</u>	<u>\$ 1,125</u>	<u>7/1/XX</u>	<u>\$ 1,255</u>
<u>6/17/XX</u>	<u>3,250</u>	<u>7/2/XX</u>	<u>500</u>
<u>6/23/XX</u>	<u>4,850</u>	<u>7/3/XX</u>	<u>305</u>
<u>6/28/XX</u>	<u>6,450</u>		
Subtotal From Attached Schedule (If Needed)			\$ <u>17,735</u>

Raffle record: High volume & alt. format

Licensees with more than \$50,000 in gross receipts in their previous license year, and any raffle using an alternative drawing format, must prepare detailed records:

- Record all data required in the standard format we provide
- Maintain validated deposit receipts for each deposit of raffle proceeds
- All ticket stubs where participants were not required to be present at the drawing
- All winning raffle tickets
- A description of each prize, including the cost or FMV of donated prizes
- Name, address and telephone number of each winner of prizes valued at over \$20

Gambling account required

A separate gambling account is required for licensees with gross receipts above \$50,000

If the licensee already has a gambling acct for another activity, that acct may be used for raffle income

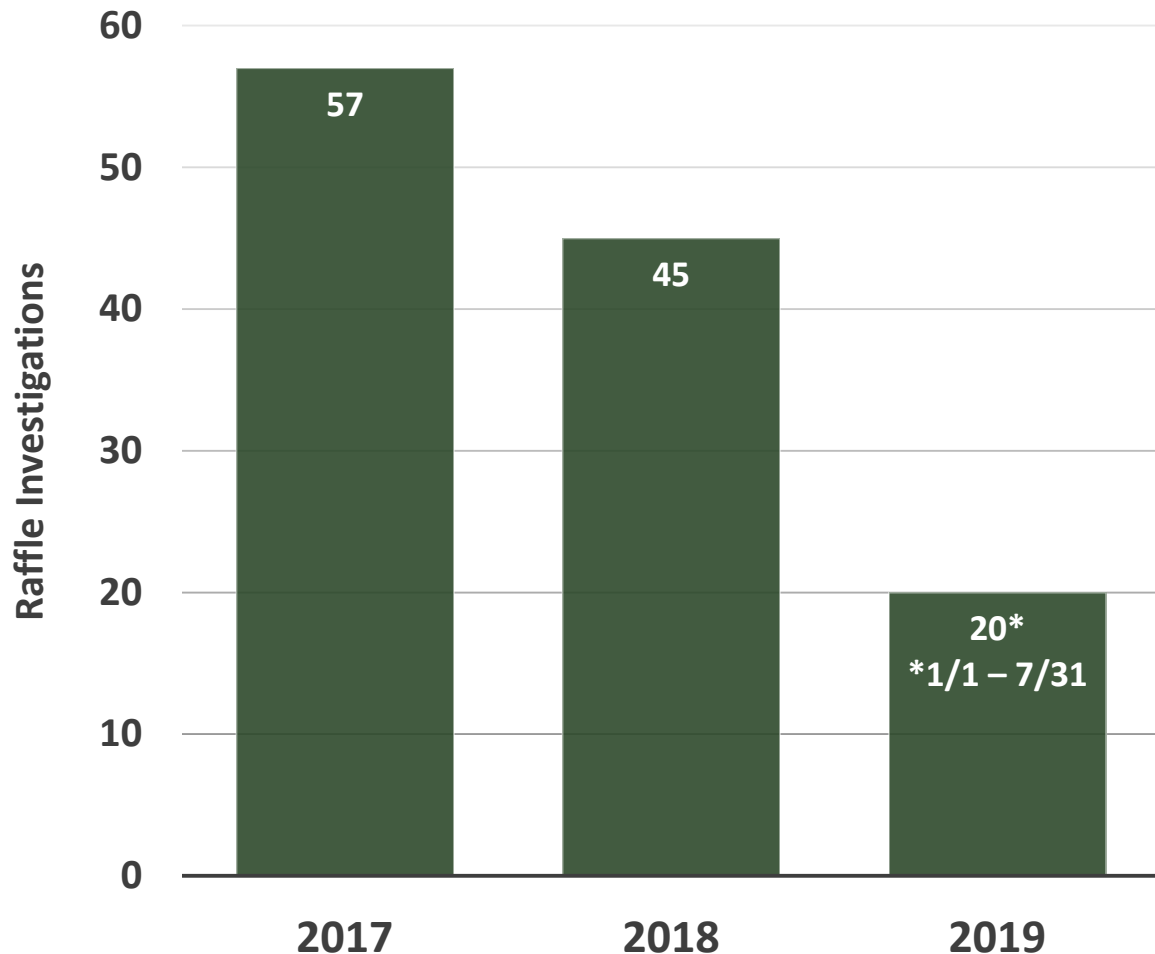
All receipts must be deposited in gambling receipts acct at least weekly for raffles over \$50,000

Only gambling deposits into gambling acct

Source: WAC 230-07-090



Raffle complaints/investigations



Types of complaints include:

- Operating without a license
- Commercial business operating a raffle
- Online/Facebook raffles
- Operating discount schemes without a license
- Drawing process
- Prizes not awarded
- Use of funds

Example: Online/Facebook raffles

Person holding raffle is not qualified or licensed

Advertising, selling tickets on Facebook

Discount ticket sales

Prizes (vehicles, horses, alcohol, etc.)

**Resolution: Education/cease activity; refund money; enforcement when necessary – cease & desist or criminal charges

Winner: Amy Smith [Raffle](#) Closed Arianna's [Raffle](#)
Ticket Donation \$5 Buy 5 get 1 free All names will be added to a randomizer and she will pick a winner live. Cup will be shipped within 48hours (getting its last clear tonight) [Raffle](#) will be pulled tomorrow at... [See More](#)



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36 Comments

Admin · May 28 at 3:29pm

Ari wants to have 1 auction and 1 raffle for her cup. Auction for the Glitter cup and Raffle for the Ink cup. You guys think that's fair?

Raffle tickets would be \$5 each

Auction starts at \$10 and goes up with \$1 increments.

All proceeds go to Ari for her Birthday.

34 Reactions 8 Comments

Like

Comment

34

Strengthen stakeholder relationships

Study raffle rules and strengthen relationships with non-profits

Agency request legislation to amend RCW 9.46.0209 to clarify which organizations are authorized to conduct gambling

Looking for potential WAC rule changes to assist non-profit organizations conducting raffles:

WAC 230-11-055 Authorized alternative drawing formats

WAC 230-11-025 Bundling and selling tickets at a discount

New rule to allow for progressive raffles (i.e. Joker Poker)



Thank you

Special Agent Supervisor Dan Frey
Special Agent Supervisor Sonja Dolson
Regulation Unit

