



**WASHINGTON STATE
GAMBLING COMMISSION
MEETING**

**JULY 11 & 12, 2024
OLYMPIA, WASHINGTON**

Commissioners



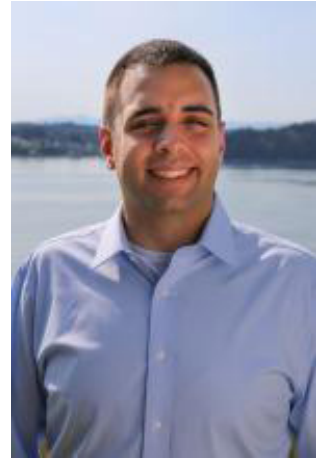
Alicia Levy
Chair



Bud Sizemore
Vice Chair

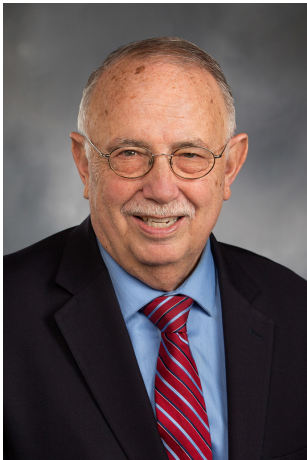


Sarah Lawson



Anders Ibsen

Ex Officios



Senator
Steve Conway



Senator
Jeff Holy



Representative
Shelley Kloba



Representative
Eric Robertson



Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
(360) 486-3469 | (800) 345-2529 | www.wsgc.wa.gov

Keeping gambling legal & honest.

 [WAGamblingCommission](https://www.facebook.com/WAGamblingCommission)

 [WAgambling](https://twitter.com/WAgambling)

 [wagambling](https://www.instagram.com/wagambling)



Washington State Gambling Commission

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

Gambling Commission Meeting

Thursday, July 11th, and Friday, July 12th, 2024

You can attend the meeting virtually: TEAMS meeting link

By phone: 360-726-3322, ID: 983 704 974#

In-Person: Liquor Cannabis Board, 1025 Union Ave SE, Olympia, WA

Public Comment can be provided by:

- Written comment by email no later than close of business the day before the commission meeting to askus@wsgc.wa.gov
- Virtually via Teams or
- In person

The Chair may take items out of order and the Commissioners may take action on business items. Administrative Procedures Act Proceedings are identified by an asterisk ()*

9:30 am	Call to Order	Alicia Levy, Chair
---------	---------------	--------------------

*Tab 1	Consent agenda May 9, 2024, Commission Meeting Minutes New Licenses & Class III Gaming Employees HBCR List	(Action) Pg. 6 Pg. 11 Pg. 21
---------------	--	---

Public Comment
 Director's Report Tina Griffin, Director

Tab 2	Budget update and FY25 Supplemental Budget Request	(Action)
--------------	---	-----------------

Public Comments Kriscinda Hansen, Chief Financial Officer

Executive Session – Closed to the Public
 The estimated time to discuss current and potential agency litigation with legal counsel, including tribal Negotiations will be announced at the meeting, but is anticipated to be up to 2 hours and to start between 10:30 and 11:30.

**RULE MAKING
 ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS**

*Tab 3	Rule Up for Discussion Only <ul style="list-style-type: none"> • Fee Increase Rules Adam Amorine, Interim Legal Manager and Rules Coordinator	Pg. 50
---------------	--	---------------

-
- *Tab 4 Rule up for Final Action** **(Action)**
Pg. 57
- Firearms as a Prize

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

-
- *Tab 5 Rule up for Discussion and Possible Filing** **(Action)**
Pg. 61
- Aligning License Expiration Date

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

-
- *Tab 6 Petition to Initiate Rulemaking** **(Action)**
Pg. 67
- No Limit Poker

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

-
- *Tab 7 Petition to Initiate Rulemaking** **(Action)**
Pg. 71
- Manufacturer and Distributor Fees

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

The Commission will reconvene tomorrow at 9:30 am

Gambling Commission Meeting

Friday, July 12th, 2024

You can attend the meeting virtually: TEAMS meeting [link](#)

By phone: 360-726-3322, ID: 983 704 974#

In-Person: Liquor Cannabis Board, 1025 Union Ave SE, Olympia, WA

9:30 am Call to Order - Reconvene Alicia Levy, Chair

Tab 8 Presentation – Self-Exclusion Annual Report **Pg. 82**

Tony Hughes, Acting Agent in Charge,
Regulation and Enforcement Unit

Tab 9 Presentation – Strategic Intelligence Analysis **Pg. 93**

Bryce Mack, Special Agent Supervisor, Intelligence Unit
Brennan Carrington, Special Agent, Intelligence Unit

***Tab 10** **Rule up for Discussion Only** **Pg. 112**

- Minimum Cash on Hand

Adam Amorine, Interim Legal Manager and Rules Coordinator

***Tab 11** **Default** **(Action)**
• Jeffrey T. Brown, CR 2023-01495 **Pg. 116**

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

Tab 12 Agency Request Legislation **Pg. 123**

Tina Griffin, Director

Public Comment

Adjourn

Updated: July 2, 2024

Next Meeting: August 8th & 9th, LCB

Public Meeting Accommodations:

Questions or comments pertaining to the agenda and requests for special accommodation should be directed to askus@wsgc.wa.gov



Washington State Gambling Commission

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

May 9, 2024

Gambling Commission Meeting Minutes

The meeting was held at the Liquor and Cannabis Board Building in Olympia, WA.

Commissioners:

Chair Alicia Levy – In person
Vice Chair Julia Patterson – In person
Bud Sizemore – In person
Sarah Lawson – In person
Anders Ibsen – In person

Ex Officio Members Present:

Senator Steve Conway – Virtual
Senator Jeff Holy – Excused
Representative Shelley Kloba – Virtual
Representative Eric Robertson – Virtual

Staff Present:

Tina Griffin, Executive Director; Gary Drumheller, Deputy Director; Kriscinda Hensen, Chief Financial Officer; Julie Lies, Tribal Liaison; Adam Amorine, Interim Staff Attorney and Rules Coordinator; Troy Kirby, PIO; George Schultz, IT; Julie Anderson, Executive Assistant; Damon Mentzer, Administrative Assistant; Suzanne Becker, Assistant Attorney General (AAG)

Staff Present Virtually:

Jim Nicks, Acting Assistant Director; Jess Lohse, Special Agent Supervisor; Bill McGregor, Special Agent Supervisor; and Nicole Frazer, Administrative Assistant

There were 7 people in the audience and 62 people attended virtually.

Chair Levy welcomed everyone to the Liquor and Cannabis Board and called the May meeting to order at 9:30 AM. She announced that the meeting would be recorded and took the roll.

Tab 1

Proposed Tribal Gaming Compact Amendment Hearing

Tina Griffin, Executive Director and Julie Lies, Tribal Liaison presented the materials for this tab. The Honorable Chairman Eric White, Stillaguamish Tribe of Indians gave a short presentation.

Chair Levy asked for public comment. There was none.

Commissioner Sizemore moved to forward the proposed compact amendment for the Stillaguamish Tribe of Indians to the governor for review and final execution. Commissioner Ibsen seconded the motion.

Chair Levy – aye

Commissioner Patterson – aye

Commissioner Sizemore – aye

Commissioner Lawson – aye

Commissioner Ibsen – aye

Senator Conway – aye

Senator Holy – excused

*Representative Kloba – aye
Representative Robertson – aye
The motion passed 8:0.*

Tab 2

Consent Agenda

Chair Levy asked the Commissioners if they had any changes to the consent agenda. They did not. She asked Commissioners if they had any questions. There were none.

Chair Levy asked for public comment. There was none.

*Commissioner Ibsen moved to approve the consent agenda including the approval of the September and October meeting locations as presented by staff.
Commissioner Patterson seconded the motion.
The motion passed unanimously. 5:0*

Election of Officers

Chair Levy asked if there were any nominations for Chair.

*Commissioner Sizemore moved to nominate Commissioner Levy as Commission Chair for the term to begin at the conclusion of the May 2024 meeting through the election of the new officers in 2025.
Commissioner Ibsen second the nomination.
Chair Levy asked if there were any other nominations for Chair. There were none.
The motion passed 5:0.*

Chair Levy asked for nominations for Vice Chair.

*Commissioner Ibsen moved to nominate Commissioner Sizemore as Commission Vice Chair, term to begin at the conclusion of the May 2024 meeting through to the election of the new officers in 2025.
Chair Levy asked if there were any other nominations for Vice Chair. There were none.
The motion passed 5:0.*

Chair Levy and Commissioners took a few minutes to recognize Vice Chair Patterson on her accomplishments while serving a Commissioner with the Gambling Commission; May 2024 will be her last Gambling Commission meeting.

Director's Report

Tina Griffin, Executive Director gave a brief update on the Problem Gambling Signage. The Gambling Commission has begun working with the Evergreen Council on Problem Gambling, the State Problem Gambling Program, the Horse Racing Commission, and the Lottery Commission to update the informational signs licensees are required to post. She also spoke about attending the Indian Gaming Association Tradeshow in Anaheim with Commissioner Lawson and staff. Staff that attended had an opportunity to meet with vendors to learn about the current trends and topics in the gaming industry. Lastly, she stated that the Gambling Commission has procured a records management system, which is a necessary component because of the current outdated IT systems. This project will begin soon and is expected to take staff six to eight months to complete.

Tab 3 Budget Update FY 2024

Kriscinda Hansen, Chief Financial Officer (CFO), presented the materials for this tab. At the

4565 7th Avenue SE
Lacey, WA 98503
wsgc.wa.gov

PO Box 42400
Olympia, WA 98504
360-486-3440

901 N Monroe St Suite 240
Spokane, WA 99201
509-325-7900

February commission meeting CFO Hensen presented a brief quarterly update on the agencies' revenue cycle. She gave a brief presentation on the revenue outlook since the February meeting. At the July meeting CFO Hensen will present a budget update as well as the supplemental budget request.

**RULE MAKING
ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS**

Tab 4 – Rule Up for Discussion Only – Fee Increase Rules

Adam Amorine, Interim Legal Manager (ILM), and Rules Coordinator, presented the materials for this tab. ILM Amorine briefed the commissioners on the Fee Increase rules package. While revenues did increase for the first quarter of 2024, staff recommend continuing the discussion into July to see what our needs are with supplement budget requests.

Chair Levy asked Commissioners if they had any comments. They had none. She asked for public comments. There was none.

Tab 5 – Rules up for Final Action – Problem Gambling Signage

Adam Amorine, Interim Legal Manager, and Rules Coordinator presented the materials for this tab.

Chair Levy asked Commissioners if they had any comments. They did not. She asked for public comments. There was none.

Commissioner Lawson moved to take final action on the problem gambling signage as presented by staff to be effective 31 days after filing.

Commissioner Ibsen seconded the motion.

The motion passed unanimously. 5:0

Tab 6 – Rules Up for Final Action – Adjacent Card rooms

Adam Amorine, Interim Legal Manager, and Rules Coordinator presented the materials for this tab.

Chair Levy asked Commissioners if they had any comments. Commissioner Sizemore asked for clarification on moving the rule into another section of the WAC, in which Director Griffin responded.

Chair Levy asked for public comments. There was none.

Commissioner Ibsen moved to take final action on the adjacent cardrooms rule as presented by staff to be effective 31 days after filing with the Code Revisors Office.

Commissioner Sizemore seconded the motion.

The motion passed. 5:0

Commissioners took a 10-minute break.

Tab 7 – Staff Initiate Rule Making – Polaris Rules

Adam Amorine, Interim Legal Manager (ILM), and Rules Coordinator presented the materials for this tab. This is our project to replace our current Legacy IT Systems. These rule changes will correspond to the new capabilities of the new IT system and will allow for more efficient processes for both staff, licensees, and applicants. These rule changes will likely affect several

4565 7th Avenue SE
Lacey, WA 98503
wsgc.wa.gov

PO Box 42400
Olympia, WA 98504
360-486-3440

901 N Monroe St Suite 240
Spokane, WA 99201
509-325-7900

different WAC chapters. Staff recommends initiating rulemaking proceedings that would be necessary to address changes associated with the IT Modernization Project.

Chair Levy asked Commissioners if they had any questions. They did not. She asked for Public Comment. There were none.

Commissioner Sizemore moved to initiate rulemaking language proceedings necessary to address changes associated with the IT Modernization project as presented by staff.

Commissioner Ibsen seconded the motion.

The motion passed unanimously. 5:0

Tab 8 – Staff Initiate Rule Making – Align License Expiration Dates

Adam Amorine, Interim Legal Manager (ILM), and Rules Coordinator presented the materials for this tab. Staff propose that the Commissioners initiate rulemaking to align all the organizational license expiration dates to June 30th. This will aid in revenue forecasting as well as simplifying the implementation when adjusting license fees in the future.

Chair Levy asked Commissioners if they had any questions. They did not. She asked for Public Comment. There were none.

Commissioner Patterson moved to initiate rulemaking language proceedings necessary to align organizational license expiration dates as presented by staff.

Commissioner Sizemore seconded the motion.

The motion passed unanimously. 5:0

Tab 9 – Rule up for Discussion and Possible Filing – Minimum Cash on Hand

Adam Amorine, Interim Legal Manager (ILM), and Rules Coordinator presented the materials for this tab. At the March 2024 Commission Meeting. Commissioners authorized initial rulemaking to amend WAC 230-15-050 and create new rules. Since the March 2024 Meeting, we have held a public feedback session on April 16th, where several individuals expressed their support for the changes to the minimum cash on hand requirements. Staff recommends filing the rule language for further discussion.

Chair Levy asked Commissioners if they had any questions. Commissioner Sizemore asked if the licensee could offer options to the winners of payouts such as a check, wire transfer or ACH, whichever method the winner chooses. She asked for Public Comment. Brooke Davies, Maverick Gaming made a public comment.

Commissioner Patterson moved to approve draft language for minimum cash on hand for further discussion as amended and presented by staff.

Commissioner Sizemore seconded the motion.

The motion passed unanimously. 5:0

Tab 10 – Rule up for Discussion and Possible Filing – Firearms as a Prize

Adam Amorine, Interim Legal Manager (ILM), and Rules Coordinator presented the materials for this tab. Staff recommend filing the amended rule for further discussion.

Chair Levy asked Commissioners if they had any questions. They did not. She asked for Public Comment. There were none.

Commissioner Patterson moved to approve amended language as presented by staff for further discussion.

Commissioner Ibsen seconded the motion.

The motion passed unanimously. 5:0

Tab 11 – Agency Request Legislation

Tina Griffin, Executive Director (ED), presented the materials for this tab. ED Griffin gave a summary of concepts staff was considering as agency request legislation for the 2025 Legislative Session.

Chair Levy asked Commissioners if they had any questions. Commissioners discussed the topics and weighed in with their opinions. Commissioner Sizemore added another topic for consideration, to have a method to ensure that a licensee pays their final quarterly payment after they are no longer in business.

Chair Levy asked for final public comment. There was none.

Chair Levy announced at 11:04 AM Commissioners would adjourn to Executive Session to discuss current and potential agency litigation with legal counsel, including tribal negotiations for approximately two and a half hours.

At 12:03 pm Chair Levy adjourned the meeting and stated that the agenda items are finished. If there are any public comments for anything from today, please submit it to askus@wsgc.wa.gov prior to our next meeting. The next Gambling Commission meeting will be held at the Liquor and Cannabis Board on July 11th and 12th, 2024.

Meeting adjourned at 12:03 PM



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
July 2024

Index

	<u>PAGE</u>
NONPROFIT ORGANIZATIONS & COMMERCIAL BUSINESSES.....	1-3
DISTRIBUTOR REPRESENTATIVE	4
MANUFACTURER REPRESENTATIVE	4-6
MAJOR SPORTS WAGERING REPRESENTATIVE.....	6-7
MID-LEVEL SPORTS WAGERING REPRESENTATIVE.....	7
NON-PROFIT GAMBLING MANAGER	7-8
SERVICE SUPPLIER REPRESENTATIVE	8
CARD ROOM EMPLOYEE	8-14
CLASS III GAMING EMPLOYEE	15-31

PAGES:31

Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 31.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**BINGO**

FOE 03418/LANGLEY
00-07594 01-02098

16691 STATE ROUTE 525
LANGLEY WA 98260

LOOM 00493/BELLINGHAM
00-00232 01-02840

150 W AXTON RD
BELLINGHAM WA 98226

LOOM 01210/MONTESANO
00-07287 01-02553

3 MONTE ELMA RD
MONTESANO WA 98563

ROTARY FOUNDATION OF KELSO
00-25147 01-02845

900 ASH ST
KELSO WA 98626

RAFFLE

ALL SAINTS SCHOOL
00-25345 02-21405

504 2ND ST SW
PUYALLUP WA 98371

ASSISTANCE LEAGUE OF SOUTHWEST WASHINGTON
00-25353 02-21408

HILTON VANCOUVER
VANCOUVER WA 98660

EASTSIDE ACADEMY
00-25309 02-21396

1800 100TH AVE NE
BELLEVUE WA 98004

ENDOWMENT FOR EQUAL JUSTICE
00-25343 02-21404

1325 FOURTH AVENUE
SEATTLE WA 98101

FLAMES BASEBALL CLUB
00-25387 02-21420

3371 RIVER VALLEY DR
RICHLAND WA 99534

FORWARD EDGE INTERNATIONAL
00-25337 02-21401

15121A NE 72ND AVENUE
VANCOUVER WA 98686

MOUNTAIN VIEW COMMUNITY CENTER
00-25370 02-21414

31510 PETE VON REICHBAUER WAY S
FEDERAL WAY WA 98003-5457

MT SPOKANE BANDSTAND
00-17911 02-02974

6015 E MT SPOKANE PARK DR
MEAD WA 99021

PRATT FINE ARTS CENTER
00-25074 02-21308

6310 NE 74TH ST
SEATTLE WA 98115

SEDRO-WOOLLEY LIONS CLUB FOUNDATION
00-25139 02-21413

1202 INDEPENDENCE BLVD
SEDRO WOOLLEY WA 98284

ST PATRICK'S CATHOLIC CHURCH
00-00134 02-00398

1016 N 14TH AVE
PASCO WA 99301

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

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

BACKYARD PUBLIC HOUSE
00-25289 05-21872

1811 W BROADWAY AVE
SPOKANE WA 99201

DESERT BLUFFS POKER ROOM
00-25207 05-21892

5215 CLEARWATER AVE, SUITE 111
KENNEWICK WA 99352

FIZZIE MULLIGANS
00-25288 05-21871

331 W HASTINGS RD
SPOKANE WA 99218

GREEN CITY SALOON
00-25275 05-21868

18221 E APPLEWAY AVE
SPOKANE VALLEY WA 99016

HONG KONG RESTAURANT
00-25298 05-21877

1300 RIVERSIDE DR
MOUNT VERNON WA 98273

IONE PUBLIC HOUSE
00-25342 05-21882

312 MAIN ST
IONE WA 99139

MCNAMARA'S PUB & EATERY
00-21911 05-20833

1595 WILMINGTON DR
DUPONT WA 98327

SOUTH BAY PUB AND EATERY
00-25365 05-21890

3323 SOUTH BAY RD NE
OLYMPIA WA 98506-2956

SPORTY'S BEEF & BREW
00-25291 05-21874

6503 EVERGREEN WAY
EVERETT WA 98203

ELECTRONIC RAFFLE

THUNDERBIRD COMMUNITY SPORTS FOUNDATION
00-21771 12-00007

625 W JAMES ST
KENT WA 98032

DISTRIBUTOR

QUEEN PLAYING CARD INC
21-00322 21-00322

13600 IMPERIAL HWY 7
SANTA FE SPRINGS CA 90670

GAMBLING SERVICE SUPPLIER

2 HH
00-25286 26-00386

600 N ATLANTIC BLVD 402
MONTEREY PARK CA 91754

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

GAMBLING SERVICE SUPPLIER

ASI CYBER SECURITY INDIA PVT LTD
00-25270 26-00384

D1-1204 NIRALA ASPIRE GH-03
SECTOR-16 NOIDA 20100

FRE EQUIP DISTRIBUTOR - PROFIT

BINGO-2GO
00-25354 28-00044

2332 110TH DR SE
LAKE STEVENS WA 98258

COMMERCIAL AMUSEMENT GAMES OPERATOR

MACHINE WIZARDS LLC
00-25265 53-21573

NON HOUSE-BANKED CARD GAME

BROWN SHACK TAVERN
00-24779 65-07551

155 SALKUM RD
SALKUM WA 98582

IONE PUBLIC HOUSE
00-25342 65-07550

312 MAIN ST
IONE WA 99139

MID-LEVEL SPORTS WAGERING VENDOR

ACCESSIT GROUP, INC.
10-00633 82-00033

2000 VALLEY FORGE CIRCLE
KING OF PRUSSIA 19406

NEOGAMES SOLUTIONS LLC
10-00545 82-00031

10 HABARZEL ST
TEL AVIV 6971014

ANCILLARY SPORTS WAGERING VENDOR

INNOVATION LABS LIMITED
10-00612 83-00041

GIG BEACH TRIQ ID-DRAGUNARA
ST.JULIANS STJ 3148

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

DISTRIBUTOR REPRESENTATIVE

ARRUDA, STEPHANY R
22-01367

INTERBLOCK USA LLC
LAS VEGAS NV 89118

AUMENTADO, CHRISTOPHER G
22-01363

INTERBLOCK USA LLC
LAS VEGAS NV 89118

BOCALBOS, EVANDER L
22-01365

JCM GLOBAL
LAS VEGAS NV 89119-3728

MCCLANAHAN, SEAN T
22-01364

JCM GLOBAL
LAS VEGAS NV 89119-3728

OTSUKA, ENGJO A
22-01353

QUEEN PLAYING CARD INC
SANTA FE SPRINGS CA 90670

PATTERSON, JONATHAN M
22-01080

MCCOYS DISTRIBUTING
KENNEWICK WA 99336

ROSOLOWSKI, ROBERT
22-01362

JCM GLOBAL
LAS VEGAS NV 89119-3728

TRUJILLO, ANTHONY N
22-01366

JCM GLOBAL
LAS VEGAS NV 89119-3728

MANUFACTURER REPRESENTATIVE

ARRINGTON, JOSHUA A
23-03920

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

BATES, JAMIE J
23-03934

LIGHT & WONDER
LAS VEGAS NV 89119

BRIMHALL, STEVEN G
23-03948

EVERI GAMES INC.
LAS VEGAS NV 89118

DARE, KEVIN A
23-03935

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

DEVI, RICHA
23-03938

LIGHT & WONDER
LAS VEGAS NV 89119

ESCOBAR, CESAR A
23-03943

IGT
LAS VEGAS NV 89113

FENWICK, MATTHEW S
23-03918

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

GARCIA, ADRIAN E
23-03924

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

GARRISON, JUSTIN C
23-03952

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

GATTO, ANTONIO
23-03947

AGS LLC
LAS VEGAS NV 89118

HAYWARD, ROBERT L JR
23-03944

IGT
LAS VEGAS NV 89113

KONA, YUGESH R
23-03919

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

KUMAR, PAWAN
23-03950

LIGHT & WONDER
LAS VEGAS NV 89119

MANNING, LOUIS F II
23-03941

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

MASON, CASEY J
23-03063

IGT
LAS VEGAS NV 89113

MORGAN, RONNIE J
23-03940

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

NO LAST NAME, SACHIN
23-03949

LIGHT & WONDER
LAS VEGAS NV 89119

RENGARAJ, PRAVIN
23-03923

LIGHT & WONDER
LAS VEGAS NV 89119

ROBINSON, VELVET K
23-03921

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

SANTOS, JAZPER N
23-03946

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

SHAH, KEVIN PARESHKUMAR
23-03939

LIGHT & WONDER
LAS VEGAS NV 89119

SHEPHERD, NATHAN C
23-03942

AGS LLC
LAS VEGAS NV 89118

SIMPSON, BRADLEY M
23-03925

PASSPORT TECHNOLOGY USA INC
GLENDALE CA 91203

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

SIVAPRAKASAM, AISWARYA
23-03321

LIGHT & WONDER
LAS VEGAS NV 89119

SRINIVASAN, JAYAMANI
23-03916

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

THOMPSON, MELIKA L
23-03936

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

VANORDEN, CHRISTOPHER L
23-03945

AGS LLC
LAS VEGAS NV 89118

VELASQUEZ, FRED
23-03917

IGT
LAS VEGAS NV 89113

VENKATASUBRAMANIYAN, SRIDHAR
23-03922

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

WILLIAMS, MARCUS C
23-03951

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

WILSON, KEJANAH L
23-03937

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

MAJOR SPORTS WAGERING REPRESENTATIVE

BREZOVAC, LUKA
33-00073

IGT
LAS VEGAS NV 89113

DESAI, SAURABH B
33-00414

IGT
LAS VEGAS NV 89113

GARG, HEMANT
33-00634

DRAFTKINGS
BOSTON MA 02116

GURSOY, OZAN
33-00633

DRAFTKINGS
BOSTON MA 02116

MASUTANI, VICTOR H
33-00631

DRAFTKINGS
BOSTON MA 02116

MEZHVIYNSKIY, OLEG
33-00252

GNOG WA LLC
BOSTON MA 02116

PAVLOVIC, MILOS
33-00473

IGT
LAS VEGAS NV 89113

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MAJOR SPORTS WAGERING REPRESENTATIVE

WILDER, JOSEPH C
33-00632

IGT
LAS VEGAS NV 89113

MID-LEVEL SPORTS WAGERING REPRESENTATIVE

BARR, CHAD M
34-00044

ACCESSIT GROUP, INC.
KING OF PRUSSIA 19406

MALONEY, JOHN F
34-00043

ACCESSIT GROUP, INC.
KING OF PRUSSIA 19406

NON-PROFIT GAMBLING MANAGER

BROWN, REID T
61-04881

FOE 03480/ORTING
ORTING WA 98360

CAMPBELL, COLIN N
61-04877

THUNDERBIRD COMMUNITY SPORTS FOUND
KENT WA 98032

CROOKS, ERIN A
61-04876

THUNDERBIRD COMMUNITY SPORTS FOUND
KENT WA 98032

FREDERICK, BLAIR S
61-04847

MARINERS CARE
SEATTLE WA 98134

GRANT, ELGIN D II
61-04883

MARINERS CARE
SEATTLE WA 98134

HUNT, MARY E
61-04878

RAVE FOUNDATION
SEATTLE WA 98134

KAY, NONA M
61-04874

LOOM 02362/OCEAN PARK
OCEAN PARK WA 98640

LUNDELL, NICHOLAS C
61-04882

FOE 03480/ORTING
ORTING WA 98360

MORONKOLA, IMANI L
61-04884

MARINERS CARE
SEATTLE WA 98134

RONISH, RICHARD D II
61-04875

THUNDERBIRD COMMUNITY SPORTS FOUND
KENT WA 98032

THIEL, WILLIAM J
61-04872

VFW 07392/OAK HARBOR
OAK HARBOR WA 98277

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

NON-PROFIT GAMBLING MANAGER

WILCOX, LEE M
61-04879

FOE 00649/CLE ELUM
CLE ELUM WA 98922-0000

SERVICE SUPPLIER REPRESENTATIVE

ANTONCICH, WALTER J
63-01145

E & S DEAD GAMES
MOUNT VERNON WA 98274

CHENUPATI, SHEELA C
63-01142

ASI CYBER SECURITY INDIA PVT LTD
NOIDA 20100

ELVIG, JACK F JR
63-01168

MAVERICK WASHINGTON
KIRKLAND WA 98034

SYKES, NICHOLAS R
63-00971

SURVEILLANCE SYSTEMS
ROCKLIN CA 95677

TANSILL, SHIELA F
63-01169

MAVERICK WASHINGTON
KIRKLAND WA 98034

CARD ROOM EMPLOYEE

ADAJAR, ROMUALDO D
68-18716

B

SILVER DOLLAR CASINO/RENTON
RENTON WA 98057

AGANA, JOSEPH A
68-37698

B

RIVERSIDE CASINO
TUKWILA WA 98168

ALLEN, THEODORE L
68-37644

B

ROMAN CASINO
SEATTLE WA 98178

ANDERSON, DESTINY F
68-37677

B

COYOTE BOB'S CASINO
KENNEWICK WA 99336

ANDERSON, KARL C
68-22136

B

IMPERIAL PALACE CASINO
TUKWILA WA 98188

ANGELES, ADRIAN J
68-37649

B

SILVER DOLLAR CASINO/RENTON
RENTON WA 98057

ARCHER, COURTNEY S
68-37681

B

BUZZ INN STEAKHOUSE/EAST WENATCHEE
EAST WENATCHEE WA 98802

BAHN, ANTHONY J
68-37700

B

ROMAN CASINO
SEATTLE WA 98178

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

BINKLEY, MICHAEL T 68-14285	B	CASINO CARIBBEAN YAKIMA WA 98901
BINKLEY, SHANNON J 68-13372	B	CASINO CARIBBEAN YAKIMA WA 98901
BOOKOUT NOEL, JEREMY L 68-37686	B	NOB HILL CASINO YAKIMA WA 98902
BRADLEY, DEAN A 68-35662	B	JAMESTOWN SALOON ARLINGTON WA 98223
BUSTOS, KAYTELYNN M 68-37670	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
CARROLL, STEPHANIE R 68-23513	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
CARSON, KAITLYN J 68-37694	B	ZEPPOZ PULLMAN WA 99163
CHANG, LYNA 68-37674	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
CHAU, CHESTER C 68-03711	B	LAST FRONTIER LA CENTER WA 98629-0000
COCCIA, FRANK D 68-19825	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
CORKERN, MEKLIT 68-37688	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
COY, DONALD A 68-37653	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719
CROUCH, SHAYLA K 68-37666	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
CUSTIS, LANCE E 68-37619	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
DIAMOND, JARED J 68-26357	B	THE PALACE LA CENTER WA 98629
DOLES, WILBUR S 68-37652	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

DUONG, SUNNY 68-29290	B	FORTUNE POKER RENTON WA 98057
EDMONDSON, KENNETH R 68-37672	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
ENGELHART, ERICA L 68-37695	B	CASINO CARIBBEAN KIRKLAND WA 98034
FLAGEL, RUSTY M 68-16231	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
GABEL, KAREN L 68-16205	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
GILL, MUNJORDYN S 68-36135	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225
GRAY, NOAH M 68-37654	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719
GRIM, TYLER M 68-37691	B	LANCER LANES AND CASINO CLARKSTON WA 99403-2219
GUARINO, JAMES C II 68-37684	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
GUEST, NATHAN R 68-36652	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
GUNDERSON, MONICA J 68-37660	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
HAASE, BEIGHLIN M 68-37667	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
HARPER, JESSICA N 68-37702	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
HATHCOCK, BUNLIAB 68-37673	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
HAYES, SAMANTHA R 68-37676	B	ACE'S POKER LAKEWOOD WA 98499
HOFFMAN, THOMAS P 68-24716	B	ALL STAR CASINO SILVERDALE WA 98383

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

HOLEMAN-BROWER, HUNTER L 68-37687	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
HUGULEY, VICTORIA M 68-37659	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
HUNTER, AMARIANNA E 68-37701	B	ROMAN CASINO SEATTLE WA 98178
HURTADO, LEONARDO 68-34319	B	DESERT BLUFFS POKER ROOM KENNEWICK WA 99352
JIMERSON, JENNIFER L 68-25232	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
JOHNSON, AUSTIN L 68-37704	B	IMPERIAL PALACE CASINO AUBURN WA 98002
JOHNSON, LEVI J 68-37693	B	THE PALACE LA CENTER WA 98629
JOHNSON, TEDDY J 68-25785	B	DRAGON TIGER CASINO MOUNTLAKE MOUNTLAKE TERRACE WA 98043-2461
JONES, KYLE C 68-32833	B	CASINO CARIBBEAN YAKIMA WA 98901
KOCH, ADRIAN A 68-37682	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
KOUNNAVONG, ANDREW K 68-33720	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
KRUEGER, CHRISTOPHER R 68-37697	B	CASINO CARIBBEAN YAKIMA WA 98901
LAVIN, RYAN J 68-37692	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
LAY, POU Z 68-21529	B	MACAU CASINO LAKEWOOD WA 98499-4457
LEE, DANNY H 68-37648	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
LOPEZ, KARMEN D 68-30237	B	RC'S AT VALLEY LANES SUNNYSIDE WA 98944

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

LOVEJOY, MICHAEL S 68-37669	B	LANCER LANES AND CASINO CLARKSTON WA 99403-2219
LYNCH, TYLER A 68-36578	B	ACE'S POKER TUKWILA TUKWILA WA 98188
MARTINEZ PAREDES, JOANNA 68-31763	B	IMPERIAL PALACE CASINO TUKWILA WA 98188
MARTINEZ, TANYA M 68-37685	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
MC MILLAN, JOSEPH D 68-37665	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
MCELHAUGH, DAVID C 68-37657	B	SILVER DOLLAR CASINO/MILL CREEK MILL CREEK WA 98012-6384
MEACHAM, BRIAN W 68-37683	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
MILLER, SAMANTHA L 68-37642	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719
MITCHELL, JASON A 68-37709	B	ACE'S POKER MOUNTLAKE TERRACE WA 98043
MOTA, BRENDA 68-37675	B	ACE'S POKER LAKEWOOD WA 98499
NEAL, TROY L JR 68-37679	B	IMPERIAL PALACE CASINO TUKWILA WA 98188
NEWTON, KYLE D 68-33222	B	THE PALACE LA CENTER WA 98629
NGUYEN, TRISH 68-37680	B	ROXBURY LANES AND CASINO SEATTLE WA 98126
OLIVER, KYLE R 68-37678	B	ZEPPOZ PULLMAN WA 99163
OSADCHIY, YURY 68-25491	B	SILVER DOLLAR CASINO/MILL CREEK MILL CREEK WA 98012-6384
PACE, SHANNON M 68-15221	B	JOKER'S CASINO SPORTS BAR & FIESTA CD RM RICHLAND WA 99352-4122

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

PENG, SHENGHONG 68-37696	B	ACE'S POKER MOUNTLAKE TERRACE WA 9804
PETERSON, CAMERON R 68-37638	B	ZEPOZ PULLMAN WA 99163
PROFFITT-JONES, SIERRA S 68-37708	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
RINARD, FRANK O 68-37668	B	LANCER LANES AND CASINO CLARKSTON WA 99403-2219
ROLON VAZQUEZ, NISYALIE I 68-37656	B	ZEPOZ PULLMAN WA 99163
SLY, AMANDA B 68-37650	B	LANCER LANES AND CASINO CLARKSTON WA 99403-2219
SMITH, KENNETH G 68-37651	B	CASINO CARIBBEAN YAKIMA WA 98901
SORRELL, ERNEST J 68-37663	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
STRAIGHT, ANGELA M 68-37707	B	CASINO CARIBBEAN KIRKLAND WA 98034
TAUMUA, JOSHUA N 68-36640	B	FORTUNE CASINO - RENTON RENTON WA 98055
TAYLOR, EDWARD R 68-37646	B	LANCER LANES AND CASINO CLARKSTON WA 99403-2219
TIAN, YAO 68-37671	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
VENG, JENNIFER D 68-37699	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
VO, QUY D 68-34175	B	MACAU CASINO LAKEWOOD WA 98499-4457
WITHERSPOON, CHRISTOPHER C 68-29853	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
YOUNG, JAYDON N 68-37382	B	THE PALACE LA CENTER WA 98629

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

ZHANG, QI
68-37705

B

IMPERIAL PALACE CASINO
TUKWILA WA 98188

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

COOPER, JACOB P
69-56994

EVANSON, SEVERN E
69-36655

KEMPF, EMMA L
69-56980

MCTIMMONDS, YOLANDA G
69-10863

MOELLER, GERALDINE M
69-57000

MONTGOMERY, SILAS A
69-56993

OLSEN, WILLIAM R JR
69-56974

PANYANOUVONG, PHET P
69-11184

PAUL, DAVID E
69-56995

SANDERS, SETH R
69-56973

WEIK, MATHEW D
69-56979

COLVILLE CONFEDERATED TRIBES

BUCHANAN, MADISON M
69-57117

DAVE, ANGELA M
69-56908

EDSALL, MICHELLE R
69-19783

FRANKLIN, ERIN B
69-57118

FULTON, RAENA L
69-56861

JIMENEZ ZAVALA, ANAISABEL
69-57189

MANJARES, LUPITA N
69-46586

MILLS, JALISA R
69-56998

ORNELAS-MORALES, ARON
69-49183

ORTEGA, CHRISTOFER H
69-57030

SCHMIDT, BEAU A
69-57078

SLIGER, KARLA R
69-57190

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COLVILLE CONFEDERATED TRIBES

THREEIRONS, SINCERE R
69-57191

COWLITZ INDIAN TRIBE

ABLANG, LIBERATO G
69-57209

ADAMS, TAYLOR P
69-56892

AGOSTO, AILEEN D
69-57067

BALDWIN, JEANIE M
69-57125

BARROW, KATIE S
69-57194

BELLINGAR, GARRETT R
69-57026

BENAVENTE, JEANETTE L
69-57208

BORGMAN, MATTHEW G
69-56901

BRITTON-OLSON, JENNIFER L
69-57086

BRITTON-OLSON, WILLIAM C
69-57068

BRUCE, CHRISTOPHER L
69-56918

BURROWS, KRISTA F
69-57153

BUSTER, SARAH J
69-57084

CHAPPELLE, DIANA L
69-57028

CLARK, SYDNEY A
69-57027

COWLING, HARISON W
69-56945

CURRY, LA SHONDA D
69-56902

DAVIS, BRIAN L
69-42120

DELANEY, KENDRA C
69-57021

DRIVER, ANNA K
69-57129

DURAND, ERIKA L
69-57003

EGAN, TREVOR J
69-57173

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

FANG, GARY
69-57169

FANG, NORMAN
69-57170

FORSMAN, ETHAN D
69-57025

GAINES, LEAH S
69-56917

GAMBLE, BRITTNY M
69-57041

GATES, ZACHARY T
69-57177

GRAEFF, AMY E
69-57166

GRAHAM, MARCUS A
69-57022

HAVLICEK, GERALD L
69-56970

HOLMES, PATRICIA J
69-57020

ILAR, GEONELL I
69-57126

KINGSLEY, JOSEPH R
69-56947

KLANDER, SETH D
69-57042

KLAUS, KARA L
69-57069

KNIGHT, TIMOTHY L
69-57120

KYGER, DEVIN S
69-38278

LANDSNES-ECKER, TOMAS C
69-57211

LANTIS, STACY A
69-57204

LAYTHAM-GOODEN, KENNETH L
69-57065

LLORENTE, LAWRENCE P
69-57002

LOVELL, ROBERT A
69-57202

LUPIN, SCOTT G
69-50450

MARXMILLER, CHRISTIAN W
69-54720

MCCRITE, DEAN L
69-57143

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

MENDIVEL, SARAH K
69-57024

PETROSIAN, ABRAM
69-56891

RIPPY, AMY L
69-57001

SANTOS, CHARLON RYAN R
69-56872

SATHER, KYLE J
69-57144

SEAY, CALEB M
69-57063

SPAHE, LIZA M
69-57039

SPARKS, MICHAEL A
69-57071

STEFANUT, DOMINIC
69-57207

STULTZ, DENNIS C
69-57192

TAWANPIY, JULIE ANA I
69-57119

THORNTON, CAMREN W
69-57019

TRINKLE, RICHARD W
69-57040

WALKO, JAMIE S
69-57070

WATSON, MARIE A
69-54517

WILLIAMS, STEVEN W
69-57168

WOOD, KYLE L
69-57210

XU, ZIOUAN
69-57176

YARBOROUGH, WHITNEY C
69-56874

KALISPEL TRIBE

ABDULLAHI, KAZIM
69-57130

ARTHUR-WYNECOOP, DEVINEY R
69-57095

ATWOOD, SHYANNE M
69-57072

BARIL, ANDREW M
69-56968

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

BARKMAN, KATHRYN M
69-57152

BERRY, MARK T
69-37512

BROOKS, RENE M
69-01135

BUCKMASTER, JEREMIAH J
69-57139

CAHILL, JESSE S
69-57226

CHAMBERS, GREGORY A
69-35101

CHEENEY, TRAVIS W
69-57227

CHURCH, ERICKA D
69-57136

DECOTEAU, JORDAN E
69-57057

GRUBER, ADELINE M
69-57052

HERNANDEZ, JUAN J
69-57203

HUNTER, RONALD R
69-56911

LOPEZ, ANTHONY A
69-57132

LORENZEN, JENNIFER L
69-57059

MARTIN, KAREENA K
69-56885

MCDONALD, PAUL E
69-56912

NYDEGGER, SHANTEL M
69-27464

PAGALING, BYSON S
69-38529

PARSANO, ROBERT G
69-57053

RENDON, LEANN R
69-56967

RUIZ, RAYMOND A
69-57149

SHABANI, LORENT
69-57224

SPOONHUNTER, THOMAS I
69-46170

STOFFEL, AMY L
69-57096

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

THORNE, TIA M
69-57223

WARREN, JACY J
69-45673

WEAVER, CAMERON M
69-56966

WIER, TRAVIS J
69-56999

ZABALZA-GALARZA, JESUS
69-56939

LUMMI NATION

ELAGUIZY, AMANDA J
69-57048

EVANS, ERIK W
69-57200

GALLEON, JAYLORD B
69-51832

HOPTOWIT, VANCE J
69-57044

HUERTA, DAVID M
69-57164

JAMES, LEROY B
69-56978

JEFFERSON, RALPH C
69-46535

JUAREZ, ANTHONY E
69-56977

LYDOLPH, CLAUDIA M
69-57199

MOORE, DILRAJ S
69-57043

NESSE, KAIN M
69-57201

NUNEZ-HERNANDEZ, MARIA G
69-33816

PASCUA, LINDA P
69-57045

PREMEAUX, MAKAYLA L
69-57047

RAMESH, JOTHI N
69-57093

RIDLEY-JAMES, JEWELL E
69-57049

WIRKKANEN, ALICE M
69-57094

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

MUCKLESHOOT INDIAN TRIBE

ALLENBAUGH, DANIEL L
69-56949

AVILA, EVAN J
69-52305

BLOOM, JAMES L
69-18174

BROWN, CLIFFORD J
69-10663

CHRISTIANSON, KELLY S
69-57031

DEATRY, CHASE M
69-56916

DRURY, JASON A
69-56915

LAN, JASON S
69-50974

LANDON, BRENT R
69-56951

MARSETTE, MARISSA A
69-56987

PAPATU, SAUFOI J JR
69-53757

PARONTEAU, BRETT G
69-57175

PRINGLE, SIMON R
69-56986

SEK, SOPHEAP
69-56953

SON, AMISHA T
69-27279

SPENCER, OUAYVON R
69-57032

SUTTON, ALYSSA K
69-56985

TAGATA, JIMMY
69-56954

TALAGA, FAATUATUA S
69-56955

TRINH, ANH O
69-57077

VANHORN, KORY E
69-45498

NISQUALLY INDIAN TRIBE

BOUCHARD, RANDY T
69-21832

BROCKWAY, SHEILA M
69-57075

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NISQUALLY INDIAN TRIBE

CAMACHO, STEPHANIE
69-57092

COLLINS, MICHAELINE J
69-56943

GANNIE, HAKEEM E
69-54151

HOLT, COLTON J
69-57060

KAHANA, JOHANNA L
69-57098

KALAMA-MAY, JASON L
69-57131

KUCHTA, ROBIN L
69-56971

MCKINNEY, ROBERT E
69-56938

MEADE, PHILLIP A
69-57206

MILLER, JASON D
69-57076

NELSON, LOGAN E
69-57174

PAK, NO K
69-57188

PARK, HWA C
69-57205

PREWITT, BETH A
69-57074

ROMAINE, CHRISTIAN A
69-57073

ROMERO, NATASHA N
69-09424

ROSAND, KENNETH W
69-56934

SANTIAGO, SALLY C
69-49285

THOMPSON, BRIAN S
69-57051

TORRES GUTIERREZ, ISAAC
69-57050

TORRES GUTIERREZ, MIGUEL A
69-56996

TORRES, LUIS A
69-56972

WHITE, KEVIN J
69-57127

WYLAND, MATTHEW G
69-57187

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NOOKSACK INDIAN TRIBE

DUMONT, ALBERT D
69-56948

MEECE, MATTHEW C
69-18662

RAYMOND, PAUL W
69-56997

RUDOLPH, RITA
69-56924

SMITH, ANN M
69-57018

PORT GAMBLE S'KLALLAM TRIBE

AKERS, KATHERINE S
69-56900

CURLEY, LEE M
69-46714

FANENE, SAFAALAGI C
69-56898

FORMBY, JALEN J
69-56896

HEWITT-OIE, CODY D
69-57103

HOFFMAN, GRACE E
69-56961

IVES, MARIAH F
69-57013

JOHNSON, LORA A
69-56897

KAZAR, ZACH T
69-56962

KWON, YONG K
69-57110

LAWRENCE, MARY B
69-38132

LEGGETT, DANIEL R
69-57109

MILLER, ADINO J
69-56960

PURSER, IRENE D
69-45790

RICHARDSON, JENNY R
69-57112

SCOTT, FA'ASASAU
69-56963

VILLANUEVA, RAYVIN C
69-37839

WALLACE, CHARLES T
69-57111

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PORT GAMBLE S'KLALLAM TRIBE

WOODRUFF, HAILEY R
69-56899

PUYALLUP TRIBE OF INDIANS

ANDREWS, JAMES N
69-36565

BURLEIGH, SHEENA E
69-37354

BURRELL, LUTHER
69-57101

CAREZ, TAYLOR J
69-46696

CASTRO, KIMBERLY R
69-15117

CERVANTES, AMALIA D
69-57102

JACOBSEN, JACK R
69-57148

JAMES, SANDRA L
69-06529

MARTINEZ CASTRO, ROCKY
69-55057

MCCURRY, MICHAEL A
69-57147

MOON, ROY J
69-54172

MOWAT, SAYER D
69-57100

NEWBERRY, TRISTAN A
69-45609

NICOLAI, JAMES J JR
69-52214

VOONG, WILLIAM A
69-57099

QUINAULT NATION

ARCHER, CHARLES F
69-57061

CONKLIN, SARABETH N
69-57141

EVANS, JILLIAN M
69-57140

LAMBERT, CHASITY N
69-56914

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

QUINAULT NATION

MARTINEZ, ALBERTO M
69-57062

SANCHEZ, MALCOLM I
69-13242

SOBOLEFF, IMMANUEL M
69-57097

SQUIEMPHEN, BYRON T I
69-56975

STEWART, ANDREW J
69-56944

SHOALWATER BAY TRIBE

MILLER, JENNIFER M
69-56983

PHELPS, AMBER L
69-56982

STINGLEY, LANA M
69-32206

SKOKOMISH TRIBE

BOUCHER, JOHN F
69-50328

HARDIE, NATHAN R
69-57017

MCCAFFERTY, TAELYNNE M
69-57213

SPARR, CHINOOK S
69-56884

SNOQUALMIE TRIBE

AGVAANDORJ, BAYASGALAN
69-57178

ALLEN, JAMES J
69-57123

BARDOT, DEVIN J
69-56919

BARNETT, BROOK M
69-57064

BENT, ROBINSON A
69-56921

BRAMBACH, BLAKE W
69-57179

BRIGHT, AARON S
69-57121

CEN, YAOOIANH
69-55564

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SNOQUALMIE TRIBE

CHEN, GUANYU
69-57157

CHOI, YO H
69-56957

COHEN, VICKY S
69-57186

ENG-REISENAUER, ROBERT A
69-57184

FETUUAHO, IUNA S
69-57088

GALINDO, JUSTIN R
69-57182

GOODEN, JERBEZ T
69-56991

HAKAVYI, YAROSLAV
69-57220

HAVAS, JOSEPH E
69-57181

HULTBERG, POLLY L
69-57183

HUNTER, ISAAH A
69-56920

INJETI, RADHIKA C
69-57163

KELLY, GARRETT P
69-57180

KNEISEL, JAMES B
69-57159

KOCH, CAMERON T
69-49540

KUTSE, ANTHONY I
69-57087

MAJOR, DANIEL E
69-57122

MEDEARIS, LISA M
69-56956

NUNEZ, CHELSEY L
69-57156

PETERSON, MELODY J
69-57162

PHAN, QUANG V
69-41347

SALTZSIEDER, COLLEEN M
69-56990

SARCENO, MARIA M
69-57124

SITU, JINGZHOU
69-57161

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SNOQUALMIE TRIBE

VERDIYAN, YELENA
69-35272

WALLEN, JADEN N
69-57158

WINGLER, BRANDON M
69-57155

YOUCKTON, GERALDINE G
69-51812

SPOKANE TRIBE

ANDRIKE, COREEN
69-57114

AVA, SHAWN R
69-57115

BLACKWOOD, BRIANA D
69-56942

BROWNING, RYAN L
69-56922

BRUEGGEMAN, DANTE M
69-43499

DEAN, KATELYN L
69-57008

EVERS, WYATT M
69-57005

FRANKLIN, DERRICK J
69-57007

HARRIS, DUKE W
69-57012

HINSON, MIKAYLA R
69-57004

MCDONALD, CODY J
69-56923

NOYES, RENEE A
69-29170

REEL, MONTANA V
69-57010

RHEA, LILLIAN M
69-56913

ROBBINS, CHELSEA M
69-57006

RODRIGUES, ARIEL P
69-57011

SCHEIBE, TRAVIS G
69-56937

SMITH, PEYTON E
69-57145

SUMMERS, ROBERT L
69-57146

WAGNER, MARIAH D
69-51397

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

WALKER, TAWNYA L
69-57113

WYNNE-MATHEWS, CALEB J
69-56927

YZAGUIRRE, ANTHONY J
69-57009

SQUAXIN ISLAND TRIBE

HANSEN, TRACI R
69-56925

MEACH, ISAAC E
69-56904

MINARIK, THERESA G
69-57058

PINON, JUSTIN
69-52687

POTTER, SEQUOIA C
69-49881

ROACH, TYLER J
69-57195

STARR, STEPHANIE J
69-56855

SUQUAMISH TRIBE

ANDERSON, JONATHAN T
69-56941

MALONE, JACQUELYN T
69-56984

ROSAL, RACHELLE ROSSE L
69-57014

ROSAL, RONALD RYAN L
69-57015

STAYROOK, AUDREY M
69-56969

STOCKWELL, GRACIE L
69-56940

WILSON, JACOB D
69-56933

SWINOMISH INDIAN TRIBAL COMMUNITY

ADAMS, WARREN C
69-57104

BURBANK, STEVEN D
69-57171

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SWINOMISH INDIAN TRIBAL COMMUNITY

CLARK, JAMIL M
69-57105

HALSTAD, MICHAEL A
69-57193

HOSELTON, JASON
69-56965

KRAMER, EVAN L
69-57107

PEREA, FCHELLE ANN D
69-57150

PEREA, PERCIVAL S
69-47770

THE TULALIP TRIBES

DOUCETTE, DANIEL A
69-57055

FRYBERG, ALENA K
69-57154

FRYBERG, MATTHEW J JR
69-57160

HAWKINS, ZACHARY I
69-57056

HUE, DEVEN P JR
69-56935

JEWELL, JUSTIN L
69-54570

JONES-NGUYEN, TAELO N J
69-57089

JONES-SMITH, ALONZO A
69-57091

MOSHER, PAUL W III
69-57212

PABLO, RIELLY J
69-39062

PARKER, JESUS E JR
69-57128

SIGO, CASEY B
69-57106

SMITH, TYLER A
69-57090

SNYDER, RYAN L
69-57054

STONE, JASON P
69-27382

TSOODLE, GEORGE K II
69-56809

VARGAS, ERICA J
69-15504

WILLIAMS-IUKES, PAUL M
69-56936

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

ZABROSKY, GUNNER M
69-57167

UPPER SKAGIT INDIAN TRIBE

CALDER, JAMES T
69-57214

HAYES, TERRY W
69-57029

JEFFERSON, MERELE B JR
69-57142

KLANDER, ROBERT J
69-56981

STRODE, MARK E
69-36321

WHITTLE, KARLY M
69-57137

YAKAMA NATION

AGUADO, LILIANA
69-57083

BILL, RAEVIN L
69-57080

BILL, RANDOLPH P III
69-56958

ELI, LEROY I
69-46680

HAGGERTY, ALONZO G
69-56929

HANNIGAN, MYRON L
69-57228

HARTWELL, JONATHAN D
69-57116

HERRERA-BAUTISTA, YULIXA M
69-56930

JOHNSON, NINA M
69-13547

KETCHEN, PAUL A
69-47827

LITTLEBULL, LEROY G
69-57197

MOORE, CORISSA A
69-56959

PINKHAM, KAREN B
69-57082

SAMPSON, ARETHA M
69-26966

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

YAKAMA NATION

STRONG, SAMANTHA S
69-30613

VELEN REYES, BETTY J
69-57081

WALKER, BRIAN S
69-38150



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Licensed and Operating			38		
	City	Commission Approval Date	License Expiration Date	Org #	License #
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2025	00-18357	67-00058
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2024	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2024	00-11170	67-00183
CARIBBEAN CARDROOM	KIRKLAND	Nov 14, 2019	Sep 30, 2024	00-24515	67-00343
CASINO CARIBBEAN	KIRKLAND	Nov 14, 2019	Sep 30, 2024	00-24512	67-00341
CASINO CARIBBEAN	YAKIMA	Nov 14, 2019	Sep 30, 2024	00-24513	67-00342
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2024	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2024	00-24296	67-00339
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2025	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2025	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2025	00-21847	67-00281
DRAGON TIGER CASINO MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Dec 29, 2023	Jun 30, 2025	00-22459	67-00315
FORTUNE CASINO - LACEY	LACEY	Jul 14, 2022	Mar 31, 2025	00-24868	67-00347
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2024	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2025	00-23465	67-00329
GOLDIES SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2024	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2024	00-19513	67-00194
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2024	00-12554	67-00012
IMPERIAL PALACE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2024	00-19477	67-00192
IMPERIAL PALACE CASINO	TUKWILA	May 9, 2024	Mar 31, 2025	00-24893	67-00348
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2024	00-15224	67-00006
LANCER LANES AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2024	00-21681	67-00276

Licensed and Operating			38		
	City	Commission Approval Date	License Expiration Date	Org #	License #
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2025	00-21305	67-00267
MACAU CASINO	LAKEWOOD	Nov 14, 2019	Sep 30, 2024	00-24516	67-00345
NEW PHOENIX	LA CENTER	Oct 6, 2022	Jun 30, 2025	00-24981	67-00349
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2024	00-13069	67-00173
PALACE CASINO LAKEWOOD	LAKEWOOD	Dec 26, 2023	Dec 31, 2024	00-16542	67-00028
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2025	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2025	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2025	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2025	00-17613	67-00057
ROXBURY LANES AND CASINO	SEATTLE	Nov 18, 2004	Jun 30, 2025	00-20113	67-00231
SILVER DOLLAR CASINO/MILL CREEK	MILL CREEK	Sep 9, 2010	Jun 30, 2025	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2025	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2025	00-22128	67-00299
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2025	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2024	00-20009	67-00212
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2025	00-18777	67-00209

Licensed but Not Currently Operating			5		
	City	Commission Approval Date	License Expiration Date	Org #	License #
ACE'S POKER TUKWILA	TUKWILA	Nov 14, 2019	Sep 30, 2024	00-24514	67-00344
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2025	00-23814	67-00335
LUCKY DRAGONZ CASINO	SEATTLE	Mar 10, 2022	Jun 30, 2025	00-23001	67-00323
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2025	00-22130	67-00301
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2024	00-21998	67-00287

Applications Pending**1**

	City	Commission Approval Date	License Expiration Date	Org #	License #
GRAND CASINO	SHORELINE			00-25290	67-00350



Washington State Gambling Commission

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

JULY 11, 2024

TO: COMMISSIONERS

Alicia Levy, Chair
Bud Sizemore, Vice Chair
Sarah Lawson
Anders Ibsen

EX OFFICIO MEMBERS

Senator Steve Conway
Senator Jeff Holy
Representative Shelley Kloba
Representative Eric Robertson

FROM: TINA GRIFFIN, DIRECTOR

SUBJECT: DIRECTOR'S REPORT

Staffing Update – Assistant Director

On June 1, 2024, Jim Nicks was appointed Assistant Director of the Enforcement Operations Division. The Enforcement Operations Division is responsible for the core mission functions of the agency, which include the following Units: Regulation and Enforcement, Tribal Gaming, Licensing, Electronic Gaming Lab, Professional Training and Standards, and Intelligence.

Jim served as the interim Assistant Director for the last six months and has been the Agent in Charge of the Regulation Unit for the last six years. Prior to joining the commission, Jim worked for over 30 years for the Spokane Police Department. Jim rose through the ranks and served in various leadership roles and finished the last six years at the rank of Assistant Chief (second to the Chief).

Jim brings stability, strong leadership, and a desire to mentor and coach the agency's future leaders.

One of Jim's first tasks is to hire an Agent in Charge of the Regulatory and Enforcement Unit.

Staffing Update – Deputy Director

After 37 years in law enforcement, with just over 33 of those years working at the Gambling Commission in various roles, Deputy Director Gary Drumheller has decided to retire on June 1, 2025.

While we are very excited for Gary to enjoy more time with his family and grandchildren and embark on new adventures, this is going to leave a big gap in leadership and institutional knowledge.

Gary has graciously provided us with the gift of time to fill the deputy position.

Recruitment and onboarding are timely tasks. To ensure we have the best candidates to fill Gary's shoes, we expect to use an external recruitment agency, which means we will go through the procurement process to find the right recruitment agency.

We hope to have signed a contract for recruitment to begin in September, with onboarding by the first of the year or sooner.

Polaris – IT Modernization Project

In May 2024, we signed a contract with a Quality Assurance Reviewer (Reviewer) to assess the agency's readiness and determine project risks to be addressed prior to moving to the procurement phase of the project. The Reviewers anticipate their report will be published, along with the agency's responses, in early July 2024.

In May, we invited the state product and platform vendors to provide responses to some questions regarding their systems, potential estimated costs, and implementation timelines. We received 10 responses. All 10 respondents were invited to preview their systems with us at the end of May.

From the vendor demonstrations, we identified five vendors and systems we wanted to further consider. We provided our business requirements to those vendors to get a refined implementation timeline and costs, as well as a few user stories covering our primary system requirements. In mid-July, the vendors will demonstrate their system in response to the user stories.

We anticipate having a contract for procurement and implementation by September.

Lexipol Policy Update

Staff has begun the process of converting our policies to Lexipol, who provides state-specific policies and daily online policy training. With Lexipol, we will receive policy changes and notifications with changes in case law, legislation, industry best practices, and WASPC accreditation standards. Having timely, updated policies will mitigate agency risk.

While Lexipol provides state-specific policy language, we must review and modify each proposed policy to make sure it is applicable to our mission and the work we do under statute.

We currently have 143 policies. With Lexipol, we will have just a little over 200 policies.

In early June, we launched some of our Use of Force policies on the platform. We are currently working on releasing more in the next month and having all of them released by September.

Disordered Gambling Advisory Workgroup (DGAW)

The workgroup met on June 11, 2024, to discuss progress made on the Problem Gambling Task Force's recommendations. I'll give a more detailed update at the July commission meeting.

The materials for Tab 2
will be shared at the
commission meeting.



Staff Proposed Rule Making

WAC 230-05-160 - Charitable or nonprofit organization fees.

WAC 230-05-165 - Commercial stimulant organization fees.

WAC 230-05-170 - Fees for other businesses.

July 2024 – Discussion Only

May 2024 – Discussion Only

January 2024 – Initiate Rule Making

Tab 3: July 2024 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Washington State Gambling Commission Staff	
Background	
<p>BOLD = Changes made since May 2024 Commission Meeting</p> <p>RCW 9.46.070(5) requires the Commission to set fees to generate funds necessary to cover all costs of regulation, licensing, and enforcement.</p> <p>In 2023, the Commission adjusted license fees for charitable and nonprofit organizations, commercial stimulant organizations, and for other businesses. The changes were made to ensure the Commission was collecting revenue to support increasing expenditures with no staff increases, i.e., salaries and benefits, supplies and equipment, and government services from agencies such as the Attorney General’s Office and Department of Enterprise Services.</p> <p>In determining the proposed fee change for the 2023-2025 biennium, Commission staff presented an adjusted proposal based on revenue needs for the first year of the biennium (FY24) only in an effort to reduce the amount of the fee increase. This was done with the expectation that we may have to return in a year to revisit fees because it was estimated the revenue increase would not be enough to fully cover the increased costs and that we would be relying on our available fund balance to offset the difference.</p> <p>Five months of revenue and expenditure data with the fee changes show we are not collecting enough revenue to cover all costs of regulation, licensing, and enforcement. Reviewing current anticipated expenditures and the Governor's supplemental budget proposal indicates expenditures will continue to increase.</p> <p>Relying on our excess fund balance to cover increasing expenses is not sustainable. These increasing expenses include an indeterminate ongoing cost for software licensing that is the result of our project to replace our legacy IT systems, which we anticipate being completed in FY25. We have issued a Request for Information (RFI) to the vendor community; estimated ongoing costs are a part of that request. Responses to our RFI are due January 15, 2024.</p> <p>We will not be making any changes to the sports wagering vendor license fees.</p> <p>At the January 2024 commission meeting, Commissioners initiated rulemaking to explore adjusting license fees.</p> <p>Following a budget presentation at the February 2024 commission meeting, Commissioners expressed their concerns about reacting to quickly and wanted to see the first quarter 2024 quarterly license fees, which would be presented at the May 2024 commission meeting.</p>	

At the May 2024 commission meeting, staff presented the first quarter 2024 quarterly license fee revenue received and shared updated projections. Commissioners discussed how to proceed with rulemaking to address license fee increases to cover the costs of licensing, regulation, and enforcement based on the available data.

Policy Considerations

The current license fees may not be sufficient to cover the agency's costs of licensing, regulation, and enforcement beginning in fiscal year 2025.

Stakeholder and Tribal Partner Feedback

Prior to the January 2024 commission meeting, staff shared with tribal partners and stakeholders concerns of the decline in license fee revenue and sought their input and suggestions.

Prior to the May 2024 commission meeting, staff shared with tribal partners and stakeholders the first quarter 2024 quarterly license fee revenue received.

Prior to the July 2024 commission meeting, staff shared with tribal partners and stakeholders updated information and data regarding fee revenue received and budget projections.

Staff Recommendation

Staff recommends discussing how to proceed with rulemaking to address license fee increases to cover the costs of licensing, regulation, and enforcement based on the available data.

From: [Rules Coordinator \(GMB\)](#)
To: [Anderson, Julie \(GMB\)](#)
Subject: FW: Webform submission from: Request for public comment
Date: Monday, July 8, 2024 2:28:09 PM
Attachments: [image001.png](#)

Another comment regarding the fee increase.



Adam Amorine

Legal Manager and Rules Coordinator

Protect the public by ensuring that gambling is legal and honest.

Phone: [360-486-3473](tel:360-486-3473)
Email: adam.amorine@wsgc.wa.gov
Web: WSGC.wa.gov

PO Box 42400
Olympia, WA 98504-2400

From: Washington State Gambling Commission <no-reply@wsgc.wa.gov>
Sent: Monday, July 8, 2024 2:03 PM
To: Rules Coordinator (GMB) <rules.coordinator@wsgc.wa.gov>
Subject: Webform submission from: Request for public comment

External Email

Submitted on July 8, 2024 - 2:03pm

Submitted by: Anonymous

Submitted values are:

Select a Topic

Staff Initiated Rule Change: Fees Adjustment Fiscal Year 2025

Your Name

Lisa Emery

Organization

The Swinging Doors

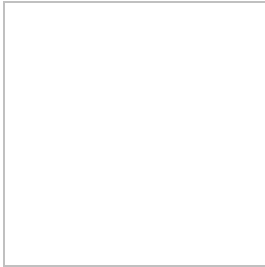
Comments

Increasing the license fees to pull-tab operators is to ensure regulation and enforcement

in the coming years? There will be NO pull-tab operators in the coming years if our fees keep increasing. The cost of games has gone up, the cost of labor has gone up, the cost of our dead game service has gone up, and our margins are shrinking to next to nothing! We just had an increase and now you are proposing another one?! Our license fees should be based on gross less payouts. (If a customer buys \$20 worth of pull-tabs and wins \$500, we are \$480 in the hole and have to pay fees on the \$20!) We are dealing with inflation like we have never experienced, and the highest labor costs, yet our state does not allow tip credit. Pull-tab operators will not survive if we don't get some sort of reprieve--sports gaming? slots? something! Some may argue that they don't want "expansion of gambling" but our sales have gone from over 3 million dollars per year in the mid-late 90's to now just over 1 million dollars per year. Take 2 million dollars per year out of any small business and increase every cost in their financial operation and see how many survive. Did those customers quit gambling? Absolutely not. They are just spending their money at tribal casinos. How about instating a Pull-tab Dealer License similar in nature to a Food Handler's Permit or Class 12/13 Liquor Service Permit? Individuals who deal pull-tabs at any licensed operator would be required to obtain a Pull-tab Dealer Permit. In order to obtain the permit, the individual would have to attend an in-person or online training class every 2 years for a fee. The class would convey important rules and regulations while touching on the impact of problem gambling. Another benefit to requiring pull-tab dealers to have a valid permit to deal tabs is that individuals who are caught stealing can have their permits revoked. The fees collected for the permit would help offset the rising costs for the WSGC without adding further fees to the licensees.

From: [Rules Coordinator \(GMB\)](#)
To: [Anderson, Julie \(GMB\)](#)
Cc: [Griffin, Tina \(GMB\)](#)
Subject: FW: Webform submission from: Request for public comment
Date: Monday, July 8, 2024 8:37:45 AM
Attachments: [image001.png](#)

Mr. Kim's comment is below.



Adam Amorine

Legal Manager and Rules Coordinator

Protect the public by ensuring that gambling is legal and honest.

Phone: [360-486-3473](tel:360-486-3473)

Email: adam.amorine@wsgc.wa.gov

Web: WSGC.wa.gov

PO Box 42400

Olympia, WA 98504-2400

From: Washington State Gambling Commission <no-reply@wsgc.wa.gov>

Sent: Friday, July 5, 2024 12:36 PM

To: Rules Coordinator (GMB) <rules.coordinator@wsgc.wa.gov>

Subject: Webform submission from: Request for public comment

External Email

Submitted on July 5, 2024 - 12:36pm

Submitted by: Anonymous

Submitted values are:

Select a Topic

Staff Initiated Rule Change: Fees Adjustment Fiscal Year 2025

Your Name

Taek Kim

Organization

MEEKER STREET BAR & GRILL

Comments

My name is Taek (Tac) Kim; I own a bar and grill in Kent, Washington.

I've been a Washington State pull tabs operator licensee since 1992, a privilege that has helped me provide a livelihood for my family and employees. Ensuring honest and legal gambling by the Washington State Gambling Commission is crucial to the integrity and success of our business.

I am commenting on the staff's recommendation to initiate rule-making to increase fees to cover the agency's licensing, regulation, and enforcement costs beginning in fiscal year 2025. I appreciate WSGC's vision of anticipating and responding to the evolving gambling industry by including the input of small business licensees like me in this conversation.

The disparity in gambling license fees is not just a number on a page. It's a significant burden on small business owners like me. This year, I'm faced with a staggering payment of \$20,800 for my gambling license. To put this into perspective, a Major sports wagers vendor license for corporations like MGM and Bally's, which do more than a thousand times the gambling volume, is a mere \$30,000 in Washington. Compared to other state agency licenses like Washington State Liquor and Cannabis Board, my liquor license fee is a mere \$2000, less than one-tenth of my current gambling license fee. Also, the liquor board doesn't have a variable license fee structure like WSGC; every business person pays the exact cost for services rendered by the agency.

Based on my WSGC license fees, my license rate is 1.516 percent of gross gambling, with a maximum license fee of \$20,800; for comparison, the Federal wagering tax rate (form 730) is 0.25 percent. Currently, I pay the WSGC license fees over six times what I spend the federal government on taxes.

The current license fees are a significant financial burden for my business. I'm paying ten times more for my gambling license than my liquor license, more than six times the Federal wagering tax, six times the Washington State gambling tax, twenty times the King County Health Department license fee, and equivalent to fifty percent of local gambling taxes I pay to the City of Kent. This imbalance is unfair and unsustainable for small businesses like mine. I urge the WSGC to consider these facts before considering another increase in license fees.

As stated in the 2023-28 Strategic Plan Goals & Objectives from the WSGC, the importance of fair and sustainable funding models cannot be overstated; analyzing similar-funded agencies' fees and responding to economic change is vital to solving the WSGC's budget problems. I agree with the WSGC's vision; by implementing these strategies, we can achieve a fair and sustainable system of gambling license fees, which is a crucial step towards ensuring the longevity and success of the gambling industry in

the State of Washington.

I propose two legislative recommendations to help ease this budget problem.

First, license fees for corporations like MGM and Bally, which are instrumental in most gambling revenue in the State of Washington, should be raised. It is beyond logic that small business owners pay the same license amount as these corporate entities, which do more than a thousandfold in business.

Second, a standard tax policy should be enacted to increase the number of applicants for pull tab licenses; amending a passage irrelevant in intent because of the passing of half a century will increase the number of licensees, helping with this budget problem.

RCW 9.46.110 states, “taxation of punchboards and pull-tabs for bona fide charitable or nonprofit organizations is based on gross receipts from the operation of the games less the amount awarded as cash or merchandise prizes and shall not exceed a rate of ten percent.

At the option of the county, city-county, city, or town, the taxation of punchboards and pull tabs for commercial stimulant operators may be based on gross receipts from the operation of the games. It may not exceed a rate of five percent or may be based on gross receipts from the operation of the games less the amount awarded as cash or merchandise prizes and may not exceed a rate of ten percent.”

I propose that the WSGC change RCW 9.46.110 to eliminate the second paragraph option of considering pull tabs for commercial stimulant operators and include them in the first paragraph.

New RCW 9.46.110 will include “taxation of punchboards and pull-tabs for bona fide charitable or nonprofit organizations and punchboards and pull tabs for commercial stimulant operators is based on gross receipts from the operation of the games less the amount awarded as cash or merchandise prizes and shall not exceed a rate of ten percent.

Again, I appreciate this opportunity to participate in this process and look forward to answering questions about this subject.

Sincerely,

Taek (Tac) Kim
Owner of Meeker Street Bar & Grill

taekkim7@gmail.com

From: [Brandon Weedon](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Fee increase
Date: Tuesday, June 25, 2024 1:50:49 PM

External Email

Continually increasing fees, licensing, taxes and the cost of games is forcing establishments to stop using pulltabs in the state of Washington as a source of revenue. The gambling commission continually chooses to support native gambling at the cost to the rest of the states non native establishments. If there is a revenue shortage it should come out of the profits from native gambling casinos and not pulltab, bingo and card room businesses. If that is not an option the gambling commission needs to consider lowering the payout percentages to offset the cost of any additional fees.

Brandon Weedon, Owner & General Manager



January 11, 2024

Tina Griffin
Director, Washington State Gambling Commission
P.O. Box 42400
Olympia, WA 98504
Delivered via email

Dear Director Griffin:

Please accept this letter as public comment regarding Tab 10 in the Commission Packet for the January 11, 2024 Commission Meeting. We were alarmed to only recently receive notice of another license fee increase and concerned about what that could mean for electronic raffles specifically and nonprofit operators and their beneficiaries in general.

Electronic raffles were disproportionately impacted in last year's fee increase and we are concerned that this next round will not account for that fact nor foreseeable downstream negative effects. In 2023, the gross gambling receipt fee rate for electronic raffles increased 733% and the maximum annual license fee increased 60% – far higher than other license types.

The immediate net effect of these increases is a reduction of charitable benefit in our local communities. Nonprofit organizations served through the funds raised by our Electronic Raffles include, but are not limited to: Refugee Women's Alliance, Duwamish River Community Coalition, YouthCare, Big Brothers Big Sisters of Puget Sound, Choose 180, FareStart, NAMI Seattle, Young Women Empowered, Youth Achievement Center, King County Play Equity Coalition, You Grow Girl!, Cultures United, Transfamilies, and EarthGen.

The longer net effect of these increases undercuts the sustainability and enthusiasm of current electronic raffle licensees and the ability to onboard new licensees. The Commission just recently expanded the definition of a qualifying sports team yet is on a course to make it overly infeasible for new entrants and the good work done in local communities. We, the current electronic raffle licensees, have been repeatedly transparent with WSGC and Commissioners about the significant burdens of the current system and fee structure that other jurisdictions with similar fee recovery mandates do not impose on their 50/50 raffles. This move – and anticipated future rate hikes – could shrink the electronic raffle contributions to WSGC rather than grow it.

We do recognize the conundrum the agency faces amid escalating costs. Yet turning up the fee dial repeatedly and significantly cannot be the only answer. More and earlier consultation is needed with licensees – especially on the nonprofit side – to increase transparency on the fiscal challenges and work collectively on solutions that work for all sides including charitable beneficiaries. We have invested substantial resources into starting up this activity at our home games and want to help the agency in finding long-term solutions.

Sincerely,

The Kraken, Mariners, Seahawks, and Sounders FC on behalf of their affiliated charitable organizations.

From: [Jacob Hall](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: WSGC - Fees Adjustment Fiscal Year 2025 - Public Comment
Date: Monday, May 6, 2024 10:23:28 AM
Attachments: [Outlook-qhqbqaws.png](#)
[WSGC May 7 Fee Rulemaking Comment Electronic Raffles.pdf](#)

External Email

To Whom It May Concern,

Please accept the attached letter as Public Comment in advance of tomorrow's Washington State Gambling Commission Public Feedback Session regarding the WSGC Budget update and potential rulemaking about fee structures, from the Kraken, Mariners, Seahawks, and Sounders FC on behalf of their affiliated charitable organizations.

If there are any questions, please do not hesitate to reach out.

Kind regards,

Jacob Hall (He/Him)

Manager, Social Impact & Development - Seattle Kraken

10601 5th Ave NE, Suite 100 | Seattle, WA 98125

Cell: (206) 579-2094



May 6, 2024

Tina Griffin
Director, Washington State Gambling Commission
P.O. Box 42400
Olympia, WA 98504
Delivered via email

Dear Director Griffin:

Please accept this letter as public comment regarding the WSGC Staff Initiated Rule Change: Fees Adjustment Fiscal Year 2025, for the May 7, 2024 Public Feedback Session. As mentioned in our previous letter, sent in January 2024, we were alarmed receive notice of another license fee increase and concerned about what that could mean for electronic raffles specifically and nonprofit operators and their beneficiaries in general.

Electronic raffles were disproportionately impacted in last year's fee increase and we are concerned that this next round will not account for that fact nor foreseeable downstream negative effects. In 2023, the gross gambling receipt fee rate for electronic raffles increased 733% and the maximum annual license fee increased 60% – far higher than other license types.

The immediate net effect of these increases is a reduction of charitable benefit in our local communities. Nonprofit organizations served through the funds raised by our Electronic Raffles include, but are not limited to: Refugee Women's Alliance, Duwamish River Community Coalition, YouthCare, Big Brothers Big Sisters of Puget Sound, Choose 180, FareStart, NAMI Seattle, Young Women Empowered, Youth Achievement Center, King County Play Equity Coalition, You Grow Girl!, Cultures United, Transfamilies, and EarthGen.

The longer net effect of these increases undercuts the sustainability and enthusiasm of current electronic raffle licensees and the ability to onboard new licensees. The Commission just recently expanded the definition of a qualifying sports team yet is on a course to make it overly infeasible for new entrants and the good work done in local communities. We, the current electronic raffle licensees, have been repeatedly transparent with WSGC and Commissioners about the significant burdens of the current system and fee structure that other jurisdictions with similar fee recovery mandates do not impose on their 50/50 raffles. This move – and anticipated future rate hikes – could shrink the electronic raffle contributions to WSGC rather than grow it.

We do recognize the conundrum the agency faces amid escalating costs. Yet turning up the fee dial repeatedly and significantly cannot be the only answer. More and earlier consultation is needed with licensees – especially on the nonprofit side – to increase transparency on the fiscal challenges and work collectively on solutions that work for all sides including charitable beneficiaries. We have invested substantial resources into starting up this activity at our home games and want to help the agency in finding long-term solutions.

Sincerely,

The Kraken, Mariners, Seahawks, and Sounders FC on behalf of their affiliated charitable organizations.



**Staff Proposed Rule Making
Rule Amendment
WAC 230-06-025 – Restrictions on firearms as prizes**

**July 2024 – Final Action
May 2024 – Discussion and possible filing
February 2024 – Initiate Rule Making**

Tab 4: July 2024 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Washington State Gambling Commissioners	
Background	
<p>BOLD = Changes made since the May 2024 Commission Meeting</p> <p>At the commission meeting on November 16, 2023, Commissioner Julia Patterson requested that the Gambling Commission evaluate WAC 230-06-025 (restrictions on firearms as prizes) to ensure the rule is in accordance with SHB 1240 (prohibiting manufacturing, importing, distributing, or selling assault weapons). Commissioners expressed concern that nonprofit and charitable organizations in Washington are able to award assault weapons as raffle prizes, which may conflict with SHB 1240 aiming to prevent the selling and manufacture of assault weapons in the State.</p> <p>Commissioners had further discussion on the topic at the January and February 2024 commission meetings.</p> <p>At the February 2024 meeting, Commissioners agreed to initiate rulemaking to change WAC 230-06-026 to ensure the law is in line with other state statutes and bring it more in line with how these raffles are actually being conducted in Washington State:</p> <ul style="list-style-type: none"> • Limit the certificate to be redeemable by a licensed firearm dealer to a Washington State dealer. • Limit the firearms that are available as prizes to only those firearms that are authorized for sale in Washington State. Amended language would clarify this point. • Prohibit persons who are not permitted to own firearms in Washington from winning a firearm in a raffle. Additional language to the rule is needed to ensure such prohibited individuals are not able to acquire a firearm as a raffle prize. <p>At the May 2024 meeting, Commissioners filed the proposed rule language for further discussion.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • WAC 230-06-025 (with proposed changes) 	
Staff Recommendation	
<p>Staff recommends that the Commission take final action on the amendments to WAC 230-06-025 after holding a public hearing with an effective date of 31 days after filing with the Office of the Code Reviser.</p>	

AMENDATORY SECTION (Amending WSR 06-17-132, filed 8/22/06, effective 1/1/08)

WAC 230-06-025 Restrictions on firearms as prizes. Only charitable or nonprofit organizations operating a raffle may award firearms, air guns, or other mechanical devices which are capable of discharging dangerous projectiles, including but not limited to, BB or CO₂ guns, rifles, shotguns, pistols or revolvers, or crossbows as a prize. The firearm must be authorized for sale in Washington state. If the prize awarded is restricted from transfer by state or federal law, the licensee must award the winner a certificate, redeemable by a licensed Washington state firearms dealer, for the prize offered. Alternatively, the winner shall be awarded a prize of equivalent value, such as a gift certificate, if the winner of the raffle is prohibited from owning or possessing firearms by other sections of the Revised Code of Washington (RCW).



Staff Proposed Rule Making

New, Amended, and/or Repealed Rules to Align Organizational License

Expiration Dates in:

WAC Chapter 230-03 Permitting and Licensing Rules and

WAC Chapter 230-05 Fees

WAC Chapter 230-06 Rule for all licensees

July 2024 – Discussion and possible filing

May 2024 – Initiate Rule Making

<p>Tab 5: July 2024 Commission Meeting Agenda.</p>	<p>Statutory Authority 9.46.070</p>
<p>Who Proposed the Rule Change?</p>	
<p>Washington State Gambling Commission Staff</p>	
<p>Background</p>	
<p>BOLD = Changes made since the May 2024 Commission Meeting</p> <p>RCW 9.46.070(1) – (4) authorizes the Commission to issue licenses for a period not to exceed one year to:</p> <ul style="list-style-type: none"> • a bona fide charitable or nonprofit organization, • an organization operating a business primarily engaged in the selling of food or drink for consumption on the premises, • an organization operating or conducting amusement games, and • organizations engaged in the manufacturing, selling, distributing, or supplying of devices, equipment, software, hardware, or any gambling related service set fees to generate funds necessary to cover all costs of regulation, licensing, and enforcement. <p>Currently, organizational licenses expire at the end of a quarter, depending on when their license was initially approved. In June 2023, the Commission adjusted annual license fees for charitable and nonprofit organizations, commercial stimulant organizations, and for other businesses. This was the first time the license fees had been adjusted since being implemented in 2018. Licensees began paying the adjusted license fees when they renewed their license.</p> <p>Because of the quarterly expiration of organizational licenses, it took nine months before all organizational licensees began paying the adjusted license fees. More importantly, it currently takes 13 months from the implementation of the rule change for all licensees to be subject to the adjusted Gross Gambling Receipts Rate and 22 months (April 30, 2025) to receive a full year of revenue from the adjusted rates. This makes it extremely challenging to forecast cash flow and collect adjusted license fees in a timely manner.</p> <p>Staff are proposing that we initiate rulemaking to align all organizational license expiration dates to June 30th. This will aid in revenue forecasting as well as simplify implementation and communication to licensees when adjusting license fees in the future.</p> <p>Rulemaking would take the form of amending existing rules and/or adding additional rules to WAC chapters 230-03, 230-05, and/or 230-06.</p> <p>At the May 2024 meeting, commissioners initiated rulemaking to explore aligning the expiration date for organizational licenses.</p>	

On June 24, 2024, staff held a meeting with Tribal Partners to hear feedback regarding including sports wagering vendor licenses in this rule change.

Attachments:

- **New Rule WAC 230-03-002**
- **WACs 230-05-128 and 230-05-136**
- **WACs 230-05-128 (revised) and 230-05-136 (revised)**

Staff Recommendation

Staff recommends filing the attached new and amended rules for further discussion.

NEW RULE

WAC 230-03-002 Expiration date for organizational

licenses. (1) As used in this section, "organization" means a charitable or nonprofit organization holding one or more licenses listed in WAC 230-05-160, a commercial stimulant organization holding one or more licenses listed in WAC 230-05-165, and other businesses holding one or more licenses listed in WAC 230-05-170.

(2) Regardless of date of approval, all organization licenses expire June 30 of each calendar year.

WAC 230-05-128 Renew your license in a timely manner. (1)

You must renew online, unless you have received a waiver as outlined in this chapter and allow enough time to:

(a) Print the license prior to midnight before the license expires; or

(b) Have us print the license and mail it to you so you receive it before your license expires.

(2) If you have a waiver and are not renewing your license online, you must ensure a properly completed renewal application and all applicable license fees are received at our administrative office in Lacey at least ~~fifteen~~thirty days before the expiration date on the license.

(3) If you do not submit a properly completed renewal application and all fees and your license expires, you must immediately stop the gambling activity covered by your license.

(4) If your license expires, you must submit an application and you must not operate any gambling activity until a new license is issued.

[Statutory Authority: RCW 9.46.070. WSR 18-05-026, § 230-05-128, filed 2/9/18, effective 5/1/18.]

WAC 230-05-136 Prorating or refunding fees. (1) ~~We may~~

~~prorate organization license fees when we adjust expiration dates to schedule our workload.~~

~~(2) We may adjust expiration dates to end on the same day for organizations licensed for more than one activity. Whenever we adjust license expiration dates under this provision, we may prorate the required fees.~~

(~~3~~1) We will not prorate or refund fees when:

- (a) You discontinue your gambling activities; or
- (b) You voluntarily surrender your license or permit; or
- (c) We suspend or revoke your license.

(~~2~~4) We keep a portion of your application or license fees for processing costs when:

- (a) We deny or administratively close your application; or
- (b) You withdraw your application; or
- (c) You overpaid us; or
- (d) We received duplicate license fees.

[Statutory Authority: RCW 9.46.070. WSR 18-05-026, § 230-05-136, filed 2/9/18, effective 5/1/18.]

New rule for sunset to address licensees who renewed in September 2024:

WAC 230-05-177 Temporary reduction of base license fees.

- (1) As used in this section, "organization" means a charitable or nonprofit organization holding one or more licenses listed in WAC 230-05-160, a commercial stimulant organization holding one or more licenses listed in WAC 230-05-165, and other businesses holding one or more licenses listed in WAC 230-05-170.
- (2) For organizations renewing their license with a license effective date between October 1, 2024, and April 1, 2025, the base license fee will be pro-rated as follows:

License effective date	Base license fee reduction
October 1, 2024	25%
January 1, 2025	50%
April 1, 2025	75%

- (3) Organizations that renewed before the effective date of this rule will receive a refund of 25% of the base fee paid. All other organizations renewing will pay a reduced base fee amount.
- (4) This rule is only effective through June 30, 2025.



Rule Petition to Amend WAC 230-15-135

Wagering limits for card games

July 2024 –Initiate Rule Making

<p>Tab 6: July 2024 Commission Meeting Agenda.</p>	<p>Statutory Authority 9.46.070</p>
<p align="center">Who Proposed the Rule Change?</p>	
<p align="center">Douglas Maestas</p>	
<p align="center">Background</p>	
<p>Petitioner Douglas Maestas is requesting to completely remove the cap on betting in poker and the number of bets per round in poker. Currently, the maximum amount of a single wager in the game of Texas Hold'em poker is \$40, although Class F and house-banked card game licensees may offer a single wager not to exceed three hundred dollars. WAC 230-15-135 also allows for no more than four wagers in any betting round and no more than five betting rounds in any one game. This proposal seeks to eliminate each of those limits.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Petition received May 10, 2024. • Email clarifying proposed changes and consent to be included in the July 11th, 2024 commission meeting. 	
<p align="center">Policy Considerations</p>	
<p>The proposed rule change is a policy decision.</p> <ul style="list-style-type: none"> • The Commission may wish to consider if the proposal is consistent with the legislative intent expressed in RCW 9.46.010. 	
<p align="center">Staff Recommendation</p>	
<p>Under the requirements of the Administrative Procedures Act, the Commission must act on a petition within 60 days of receiving it. Your options are:</p> <ul style="list-style-type: none"> • Initiate rule making proceedings by filing the rule as proposed for further discussion or • Deny the petition in writing, (a) stating the reasons for denial and specifically address the concerns stated in the petition, or (b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. 	

From: [Washington State Gambling Commission](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Webform submission from: Request a rule change
Date: Friday, May 10, 2024 3:24:19 AM

External Email

Submitted on May 10, 2024 - 3:24am

Submitted by: Anonymous

Submitted values are:

Petitioner's Name

Douglas Maestas

Email

maestasdoug@gmail.com

Rule Petition Type

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

Amend Rule Selection Function

List rule number (WAC) if known

WAC 230-15-135

I am requesting the following change

Remove the cap on number of bets per round in poker. Completely remove the cap on bet size.

This change is needed because

For true no limit Texas hold em you are able to raise as many times as you want and wager your entire stack. There is no cap on bet sizing in most games across the country or even internationally. Being able to actually wager "all in" would allow you to scare off opponents as intended. These games self regulate based on stake. The majority of people will buy in for 200 big blinds or less depending on the card room. Most people buy in for 100 big blinds. For a game such as 3/5 that would be \$500. The most popular games around the country are 1/3, 3/5, and 5/10. 3/5 and 5/10 don't make much sense in WA because of the betting cap limit.

The effect of this rule change will be

Better games with happier players. True no limit Texas hold em.

From: [Doug Maestas](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Re: Request a rule change
Date: Friday, May 10, 2024 2:42:32 PM
Attachments: [image001.png](#)

External Email

Yes I like the way you laid out the changes. And I approve the July 11th wait. Thank you for your time and consideration.

On Fri, May 10, 2024 at 2:32 PM Rules Coordinator (GMB) <rules.coordinator@wsgc.wa.gov> wrote:

Good afternoon Douglas Maestas,

Thank you for submitting a rule change request. My name is Adam Amorine and I am the legal manager and rules coordinator for the Gambling Commission, so I will be working on your request. I wanted to confirm a couple of points before we move too far forward.

First, I understand you're requesting a change to [WAC 230-15-135](#) (Wagering limits for nonhouse-banked card games) to remove the cap on the number of bets one can make in a round of poker as well as the maximum wager one can make. WAC 230-15-135(1)(a)-(c) currently states:

Card room licensees must not exceed these wagering limits:

(1) Poker –

(a) There must be no more than five betting rounds in any one game; and

(b) There must be no more than four wagers in any betting round, for example, the initial wager plus three raises; and

(c) The maximum amount of a single wager must not exceed forty dollars; however, Class F and house-banked card game licensees may offer a single wager not to exceed three hundred dollars;

My understanding is that you are proposing striking the language under parts A, B, and C, and replacing it with alternate language to clarify no betting limit shall exist. An example of such a change would be:

Card room licensees must not exceed these wagering limits:

(1) **Poker** –

(a) There shall be no limit on the number of betting rounds in any one game; and

(b) There shall be no limit on the number of wagers in any betting round; and

(c) There shall be no maximum amount of a single wager.

Please let me know if you would like to propose alternate language for the changes you are proposing, or if I am misunderstanding your request altogether.

Secondly, I'd like to discuss the timing of when the Commission can hear and act on your request. As rules coordinator, it will be my responsibility to present the rule change at a public commission meeting. Ideally, I would be able present this rule change at our next scheduled commission meeting on July 11. However, the timing of this meeting conflicts with the Administrative Procedure Act's requirement that the agency act on petitions within 60 days (July 11th is 62 days from today). With your consent, I would like waiver to extend the aforementioned 60-day period another 2 days so that we may add your proposed rule change to our agenda for the next regularly scheduled commission meeting on July 11.

Please let me know if you have any questions. I look forward to your reply.

Sincerely,

Adam Amorine

Legal Manager and Rules Coordinator



Rule Petition to Amend
Licensing Manufacturers and Distributors of Gambling Equipment

July 2024 – Initiate Rule Making

Tab 7: July 2024 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Dino DeGregorio, President of 56 Straight LLC	
Background	
<p>Dino DeGregorio, President of 56 Straight LLC, is an official distributor of Dal Negro Playing Cards. He submitted a rule petition requesting a change in the rules governing how playing card vendors are treated. The petitioner believes the current rules cause his organization to have significant challenges to be able offer their products to gaming establishments in the state. The petitioner described the process to become an approved vendor in Washington as both arduous and costly. The petitioner believes these requirements and associated costs discourage many businesses from attempting to operate within our state, thereby stifling competition and innovation. The petitioner did not specify a specific rule change but urged the Commission to consider the issue broadly. He believes that the current rules and cost of licensure prohibit new vendors for items like playing cards, chips, and dice from entering the state marketplace.</p> <p>Currently, rules define playing cards as “gambling equipment.” (WAC 230-03-200). Gambling equipment distributors and manufacturers must be licensed. (WAC 230-03-185 & 230-03-190). All licensed organizations pay annual license fees. (WAC 230-05-120). The current base license fee for distributors is \$770 with a maximum annual license fee of \$11,200. The current base fee for manufacturers is \$1,650 with a maximum annual license fee of \$4,000. The gross gambling receipts rate that determines annual fees is 1.516% for both license types.</p> <p>If adopted, this rule change could require several amendments throughout WAC Title 230 including but not limited to WAC 230-03-200 defining gambling equipment.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Petition received June 5, 2024. • Additional email clarifying the proposal. • WACs 230-03-200, 230-03-190, 230-03-185, and 230-05-120 	
Policy Considerations	
<p>The proposed rule change is a policy decision regarding the classification of playing cards and other similar items as gambling equipment and the process for licensing manufacturers and distributors of those items.</p>	
Staff Recommendation	
<p>Under the requirements of the Administrative Procedures Act, the Commission must act on a petition within 60 days of receiving it. Your options are:</p> <ul style="list-style-type: none"> • Initiate rule making proceedings by filing the rule as proposed for further discussion or • Deny the petition in writing, (a) stating the reasons for denial and specifically address the concerns stated in the petition, or (b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. 	

From: [Washington State Gambling Commission](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Webform submission from: Request a rule change
Date: Wednesday, June 5, 2024 12:06:15 PM

External Email

Submitted on June 5, 2024 - 12:06pm

Submitted by: Anonymous

Submitted values are:

Petitioner's Name

Dino DeGregorio

Address

8075 Poppy Leaf Ave
Las Vegas, NV. 89113

Phone

[4802995936](tel:4802995936)

Email

dino@56straight.com

Rule Petition Type

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

Amend Rule Selection Function

I am requesting the following change

Dear Members of the Washington State Gambling Commission,

I hope this letter finds you well. I am writing to formally request a change in the rules governing how playing card vendors are treated by the Commission.

As it currently stands, the process to become an approved vendor in the State of Washington is both arduous and costly. The extensive requirements and high associated costs create significant barriers for new companies looking to enter the market. This situation discourages many businesses from attempting to operate within the state, limiting the available options for gaming establishments.

One of the unintended consequences of the current system is that it effectively protects a monopoly. By making it difficult for new vendors to gain approval, the state inadvertently supports the dominance of existing players, stifling competition and innovation. This lack of

competition can lead to higher costs for gaming establishments and, ultimately, the potential creation of a grey market—something we are seeing in other jurisdictions.

I represent Dal Negro Playing Card Company, a renowned Italian manufacturer with over 100 years of experience in producing high-quality playing cards. Our long-standing tradition of excellence and innovation has made us a trusted name in the gaming industry worldwide. However, despite our extensive history and proven track record, the current regulatory environment in Washington State poses significant challenges for us to offer our products to gaming establishments in the state.

Over the last few years, there has been considerable consolidation of playing card manufacturers in the United States. Many of the vendors initially approved in Washington are no longer making playing cards, leaving only one company currently licensed to sell playing cards in the state. This consolidation further exacerbates the monopoly issue and underscores the need for regulatory reform to promote a more competitive market.

In light of these issues, I urge the Commission to consider revising the rules to streamline the approval process for new vendors. By reducing the complexity and cost of becoming an approved vendor, the state can encourage a more competitive market, fostering innovation and providing better options for gaming establishments and consumers alike.

Thank you for your attention to this matter. I look forward to your favorable consideration of this request. Should you require any further information or wish to discuss this matter in more detail, please do not hesitate to contact me.

Sincerely,

Dino DeGregorio
President

56 Straight LLC: Official distributor of Dal Negro Playing Card Company

This change is needed because

Dear Members of the Washington State Gambling Commission,

I hope this letter finds you well. I am writing to formally request a change in the rules governing how playing card vendors are treated by the Commission.

As it currently stands, the process to become an approved vendor in the State of Washington is both arduous and costly. The extensive requirements and high associated costs create significant barriers for new companies looking to enter the market. This situation discourages many businesses from attempting to operate within the state, limiting the available options for gaming establishments.

One of the unintended consequences of the current system is that it effectively protects a monopoly. By making it difficult for new vendors to gain approval, the state inadvertently supports the dominance of existing players, stifling competition and innovation. This lack of competition can lead to higher costs for gaming establishments and, ultimately, the potential creation of a grey market—something we are seeing in other jurisdictions.

I represent Dal Negro Playing Card Company, a renowned Italian manufacturer with over 100 years of experience in producing high-quality playing cards. Our long-standing tradition of excellence and innovation has made us a trusted name in the gaming industry worldwide. However, despite our extensive history and proven track record, the current regulatory environment in Washington State poses significant challenges for us to offer our products to gaming establishments in the state.

Over the last few years, there has been considerable consolidation of playing card manufacturers in the United States. Many of the vendors initially approved in Washington are no longer making playing cards, leaving only one company currently licensed to sell playing cards in the state. This consolidation further exacerbates the monopoly issue and underscores the need for regulatory reform to promote a more competitive market.

In light of these issues, I urge the Commission to consider revising the rules to streamline the approval process for new vendors. By reducing the complexity and cost of becoming an approved vendor, the state can encourage a more competitive market, fostering innovation and providing better options for gaming establishments and consumers alike.

Thank you for your attention to this matter. I look forward to your favorable consideration of this request. Should you require any further information or wish to discuss this matter in more detail, please do not hesitate to contact me.

Sincerely,

Dino DeGregorio

President

56 Straight LLC: Official distributor of Dal Negro Playing Card Company

The effect of this rule change will be

Dear Members of the Washington State Gambling Commission,

I hope this letter finds you well. I am writing to formally request a change in the rules governing how playing card vendors are treated by the Commission.

As it currently stands, the process to become an approved vendor in the State of Washington is both arduous and costly. The extensive requirements and high associated costs create significant barriers for new companies looking to enter the market. This situation discourages many businesses from attempting to operate within the state, limiting the available options for gaming establishments.

One of the unintended consequences of the current system is that it effectively protects a monopoly. By making it difficult for new vendors to gain approval, the state inadvertently supports the dominance of existing players, stifling competition and innovation. This lack of competition can lead to higher costs for gaming establishments and, ultimately, the potential creation of a grey market—something we are seeing in other jurisdictions.

I represent Dal Negro Playing Card Company, a renowned Italian manufacturer with over 100 years of experience in producing high-quality playing cards. Our long-standing tradition of excellence and innovation has made us a trusted name in the gaming industry worldwide.

However, despite our extensive history and proven track record, the current regulatory environment in Washington State poses significant challenges for us to offer our products to gaming establishments in the state.

Over the last few years, there has been considerable consolidation of playing card manufacturers in the United States. Many of the vendors initially approved in Washington are no longer making playing cards, leaving only one company currently licensed to sell playing cards in the state. This consolidation further exacerbates the monopoly issue and underscores the need for regulatory reform to promote a more competitive market.

In light of these issues, I urge the Commission to consider revising the rules to streamline the approval process for new vendors. By reducing the complexity and cost of becoming an approved vendor, the state can encourage a more competitive market, fostering innovation and providing better options for gaming establishments and consumers alike.

Thank you for your attention to this matter. I look forward to your favorable consideration of this request. Should you require any further information or wish to discuss this matter in more detail, please do not hesitate to contact me.

Sincerely,

Dino DeGregorio

President

56 Straight LLC: Official distributor of Dal Negro Playing Card Company

From: [Dino DeGregorio](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Re: Request a rule change
Date: Wednesday, June 12, 2024 3:23:52 PM
Attachments: [image001.png](#)

External Email

Adam,

Thank you for sending me this email. It's very nice to meet you virtually. Last week, I was in Washington and had the opportunity to speak with Donna and Nathalie. They were very helpful in explaining some of the rules and processes in your state, and specifically suggested applying for a rule change regarding this matter.

Regarding your question, I'm not sure if this constitutes an actual rule change per se, but I want to bring to the board's attention that the process for licensing manufacturers and distributors is cumbersome and costly. For ancillary items like playing cards, chips, and dice, the cost of licensure often outweighs the opportunity. By treating these vendors like slot machine vendors, a barrier to entry is inadvertently created, effectively solidifying monopolies in your state. I don't believe this is the intention of the gaming control board.

As one of the principals of Shark Trap Gaming, I recently went through the licensing process to sell our shufflers in Washington, so I fully understand the time and cost involved. That being said, shufflers and playing cards operate on very different economies of scale.

The "facts from the ground" may not be readily apparent, and this issue will likely worsen due to the major consolidation of companies manufacturing these ancillary products. Additionally, this isn't just a Washington problem; we are seeing similar issues in other jurisdictions, where a grey market is emerging. Unlicensed vendors are selling ancillary items without going through the proper channels. While I would never risk my license for my shuffler product in Washington by selling playing cards without the proper license, I cannot speak for other companies.

Our intent is not to ask for preferential treatment but to consider a different process for ancillary items and not to lump all vendors into the same category.

If, after reading this, you feel it is warranted, I would be happy to join the meeting via Teams on July 11th and bring this to the board's attention formally. I am also happy to answer any questions you may have in the meantime.

Thank you for your time.

Dino

On Tue, Jun 11, 2024 at 4:49 PM Rules Coordinator (GMB)
<rules.coordinator@wsgc.wa.gov> wrote:

Good afternoon Dino DeGregorio,

My name is Adam Amorine and I'm the legal manager and rules coordinator with the Washington State Gambling Commission. I will be handling your recent request for a rule change. I wanted to reach out to you today with a few clarifying questions and some additional information.

First, I want to ensure I understand your request. In your request you state you "urge the Commission to consider revising the rules to streamline the approval process for new vendors." Do have specific rule changes in mind that would accomplish this goal? Is there a specific WAC that you would like to see revised? If so, do you have any alternative language you would like to propose for a revised rule?

Alternatively, are you asking that playing card vendors receive a type of special sales permit that allows card vendors to bypass our rules? For example, are you proposing that playing cards should no longer be considered gambling equipment?

Secondly, I want to inform you that this rule change proposal has been added to the agenda for the July 11th Commission meeting. You may attend in person or via Teams online and provide comment in support of your proposal if you would like. Please let me know if you plan on attending and I will update the agenda accordingly.

Thank you for your consideration to the above questions. Any guidance you can provide would be appreciated.

Best,



Adam Amorine

Legal Manager and Rules Coordinator

Protect the public by ensuring that gambling is legal and honest.

Phone: [360-486-3473](tel:360-486-3473)
Email: adam.amorine@wsgc.wa.gov
Web: WSGC.wa.gov

PO Box 42400
Olympia, WA 98504-
2400

WAC 230-03-200 Defining "gambling equipment." "Gambling equipment" means any device, gambling-related software, expendable supply, or any other paraphernalia used as a part of gambling or to make gambling possible. "Gambling equipment" includes, but is not limited to:

- (1) Amusement games;
- (2) Punch boards and pull-tabs;
- (3) Devices for dispensing pull-tabs;
- (4) Electronic devices for conducting, facilitating, or accounting for the results of gambling activities including, but not limited to:

- (a) Components of a tribal lottery system;
- (b) Electronic devices for reading and displaying outcomes of gambling activities; and

- (c) Accounting systems that are a part of, or directly connected to, a gambling system including, but not limited to:

- (i) Bet totalizers; or
- (ii) Progressive jackpot meters; or
- (iii) Keno systems;

- (5) Bingo equipment;
- (6) Electronic raffle systems;

- (7) Devices and supplies used to conduct card games, fund-raising events, recreational gaming activities, or Class III gaming activities, as defined in the Indian Gaming Regulatory Act at U.S.C. 25 chapter 29 § 2703 and in tribal-state compacts including, but not limited to:

- (a) Gambling chips;
- (b) Cards;
- (c) Dice;
- (d) Card shuffling devices;
- (e) Graphical game layouts for table games;
- (f) Ace finders or no-peek devices;
- (g) Roulette wheels;
- (h) Keno equipment; and
- (i) Tables manufactured exclusively for gambling purposes;

- (8) Debit card reading devices used at gambling tables to sell chips to players;
- (9) Ticket in ticket out (TITO) systems to include, but are not limited to:
 - (a) TITO-enabled bill validators;
 - (b) Ticket redemption kiosks.

[Statutory Authority: RCW 9.46.070. WSR 23-20-017, § 230-03-200, filed 9/22/23, effective 10/23/23; WSR 23-11-108, § 230-03-200, filed 5/19/23, effective 6/19/23; WSR 21-21-079, § 230-03-200, filed 10/18/21, effective 11/18/21; WSR 06-07-157 (Order 457), § 230-03-200, filed 3/22/06, effective 1/1/08.]

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

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

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

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

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

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

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

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

[Statutory Authority: RCW 9.46.070. WSR 19-15-060, § 230-03-190, filed 7/15/19, effective 8/15/19; WSR 18-05-026, § 230-03-190, filed 2/9/18, effective 5/1/18. Statutory Authority: RCW 9.46.070, 9.46.0201. WSR 16-19-015, § 230-03-190, filed 9/8/16, effective 10/9/16; WSR 16-08-033 (Order 718), § 230-03-190, filed 3/30/16, effective 4/30/16. Statutory Authority: RCW 9.46.070. WSR 06-07-157 (Order 457), § 230-03-190, filed 3/22/06, effective 1/1/08.]

WAC 230-03-185 Applying for a manufacturer license. (1) You must apply for a manufacturer license if you:

(a) Make or assemble a completed piece or pieces of gambling equipment for use in authorized gambling activities; or

(b) Convert, modify, combine, add to, or remove parts or components of any gambling equipment for use in authorized gambling activities; or

(c) Manufacture group 12 amusement games approved or modified after May 1, 2016. Manufacturers of group 12 amusement games that were approved before the effective date of this rule must apply by May 1, 2016, and be licensed by December 31, 2016. Manufacturers of group 12 amusement games can sell or lease group 12 amusement games to a licensed distributor or an amusement game licensee.

(2) You must demonstrate your ability to comply with all manufacturing, quality control, and operations restrictions imposed on authorized gambling equipment that you want to manufacture or market for use in Washington state.

(3) The licensing process may include an on-site review of your manufacturing equipment and process for each separate type of authorized gambling equipment to ensure compliance capability.

[Statutory Authority: RCW 9.46.070. WSR 18-05-026, § 230-03-185, filed 2/9/18, effective 5/1/18. Statutory Authority: RCW 9.46.070, 9.46.0201. WSR 16-19-015, § 230-03-185, filed 9/8/16, effective 10/9/16; WSR 16-08-033 (Order 718), § 230-03-185, filed 3/30/16, effective 4/30/16. Statutory Authority: RCW 9.46.070. WSR 09-11-085 (Order 646), § 230-03-185, filed 5/18/09, effective 7/1/09; WSR 06-07-157 (Order 457), § 230-03-185, filed 3/22/06, effective 1/1/08.]

WAC 230-05-120 Paying annual license fee. (1) All licensed organizations will pay annual license fees. The annual license fee will be up to five payments and includes:

(a) A base license fee paid with your:

(i) Initial application for a new license or permit; or

(ii) License renewal or annual permit application; and

(b) Quarterly license fees, if applicable, based on the gross gambling receipts reported on your quarterly license report.

(2) Licensed organizations starting a new activity will begin paying quarterly license fees, if applicable, on that activity upon completion of the first quarter, whether a partial or full quarter, after your license or annual permit was issued.

(3) Individual licensees will pay an annual license fee with their initial application or license renewal application.

[Statutory Authority: RCW 9.46.070, 9.46.075, 9.46.140, 9.46.153, 9.46.210. WSR 21-16-072, § 230-05-120, filed 7/30/21, effective 8/30/21. Statutory Authority: RCW 9.46.070. WSR 18-05-026, § 230-05-120, filed 2/9/18, effective 5/1/18.]



WASHINGTON STATE
**GAMBLING
COMMISSION**

Self-Exclusion Program
Annual Commission Report

Agent In Charge (Interim) Tony Hughes
Regulation & Enforcement Unit

Protect the public by ensuring that gambling is legal and honest.

Self-exclusion summary

Gambling Commission Self-Exclusion Program:

- Program began on May 1, 2022
- Over 900 people have enrolled into the program
- Annual compliance inspections occurred at all HBCR's



Self-Exclusion Annual Measurables

How Many Participants? **926**

- 91% increase from 5/1/2023 (484)

Total # of Participants for Each Time Period:

- One Year **302**
- Three Years **145**
- Five Years **103**
- Ten Years **376**



Self-Exclusion Annual Measurables

As of May 1, 2024:

Number of participants eligible to come off the list: **157**

Number of participants that removed themselves from the list: **85**

Number of participants that remained on the list: **72**



Self-Exclusion Annual Measurables

May 1, 2023 through April 30, 2024:

How many participants attempted to enter HBCR's or were identified at HBCR's? **133 incidents**

- 35 more than last year
- Examples how excluded persons were identified:
 - At the door by security officers using scanners
 - At the bar or restaurant
 - Gambling at table games



Self-Exclusion Annual Measurables

May 1, 2023 through April 30, 2024:

How many times were funds confiscated? **56 incidents**

- 16 more incidents than last year.

Total funds sent to the HCA: **\$31,402.00**

- \$38,840.50 was confiscated last year (5/1/22 – 4/30/23)



Self-Exclusion Annual Measurables

Regulatory Compliance Inspections – 2024:

- Inspection verifies compliance with Training, Enrolling persons, Monitoring/Preventing participants, and Confidentiality
- Agents work with HBCR's to gain compliance
- Examples of items noted from compliance inspections:
 - Training:
 - Annual re-training did not occur as required
 - Initial training for new staff did not w/in 3 days
 - Provide updated SE List to staff w/in 48 hours



Self-Exclusion Annual Measurables

May 1, 2023 through April 30, 2024:

Number of Enrollment Forms denied or incomplete: **22**

Number outstanding incomplete forms (applicants non-responsive): **8**

- Examples of why a form has been denied or incomplete:
 - Form was not notarized
 - Participant failed to complete or sign the form
 - HBCR did not fully complete
- SE Administrator works with person/and or HBCR to complete the form



Self-Exclusion Annual Measurables

May 1, 2023 through April 30, 2024:

- How many participants have attempted to remove themselves from the program: **19**
- Reasons:
 - Didn't understand what they were signing up for:
 - Participant believed the exclusion only applied to the HBCR where they enrolled.
 - Intoxicated when I enrolled.
 - Language barrier
 - Don't want to be on the list anymore



Self-Exclusion Annual Measurables

How participants enrolled into the Program:

- Enrolled at HBCR's: 754 (81%)
- Mailed Enrollment Form w/notary: 108 (12%)
- Enrolled at WSGC Lacey Office: 57 (6%)
- Mailed Enrollment Form w/PG Counselor signature: 8 (1%)



THANK YOU. QUESTIONS?





WASHINGTON STATE
**GAMBLING
COMMISSION**

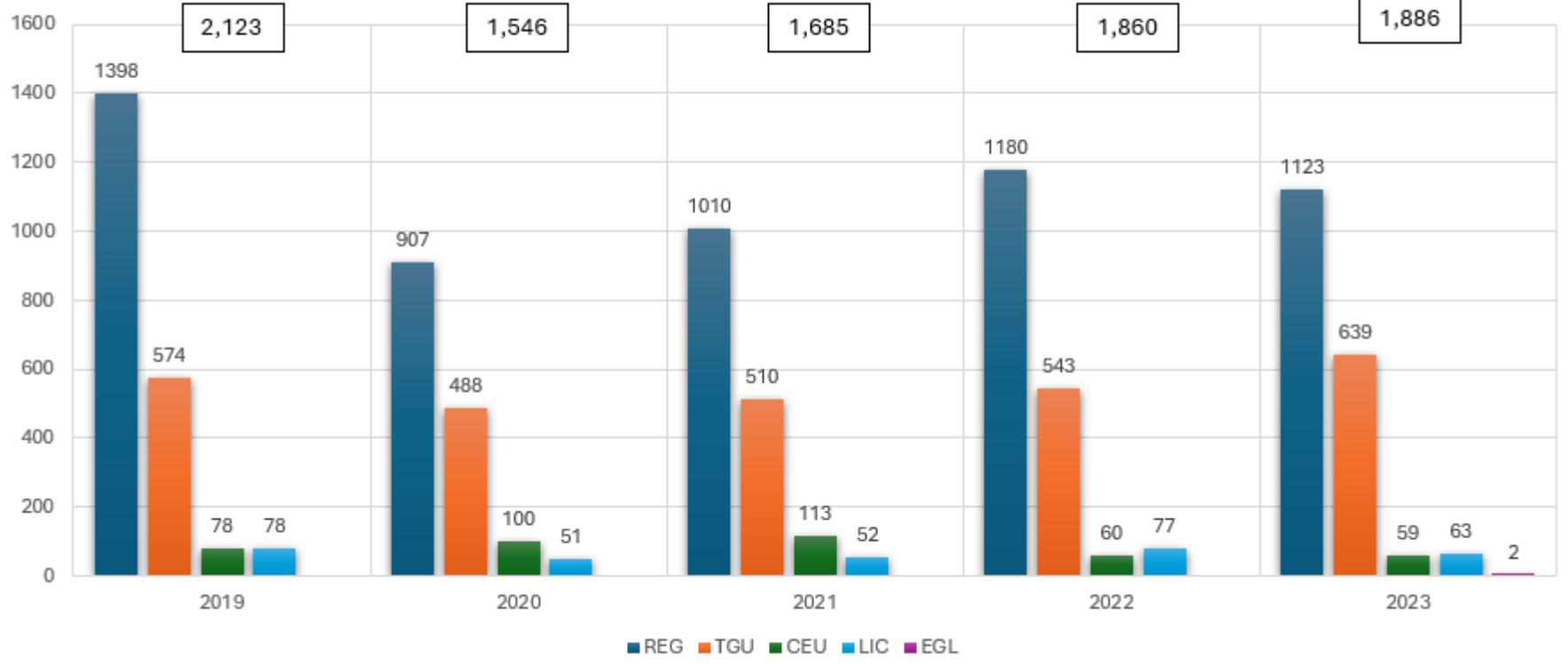
WSGC Strategic Intelligence Analysis

2023

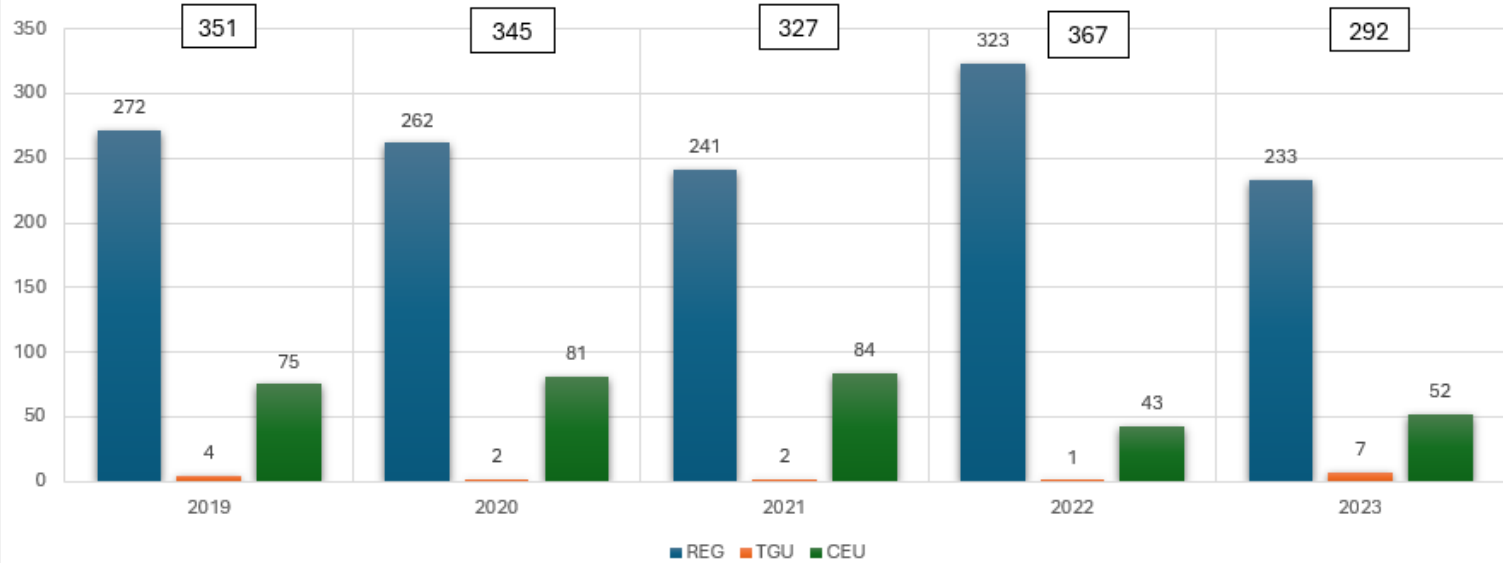
2023

Agency Wide Statistics

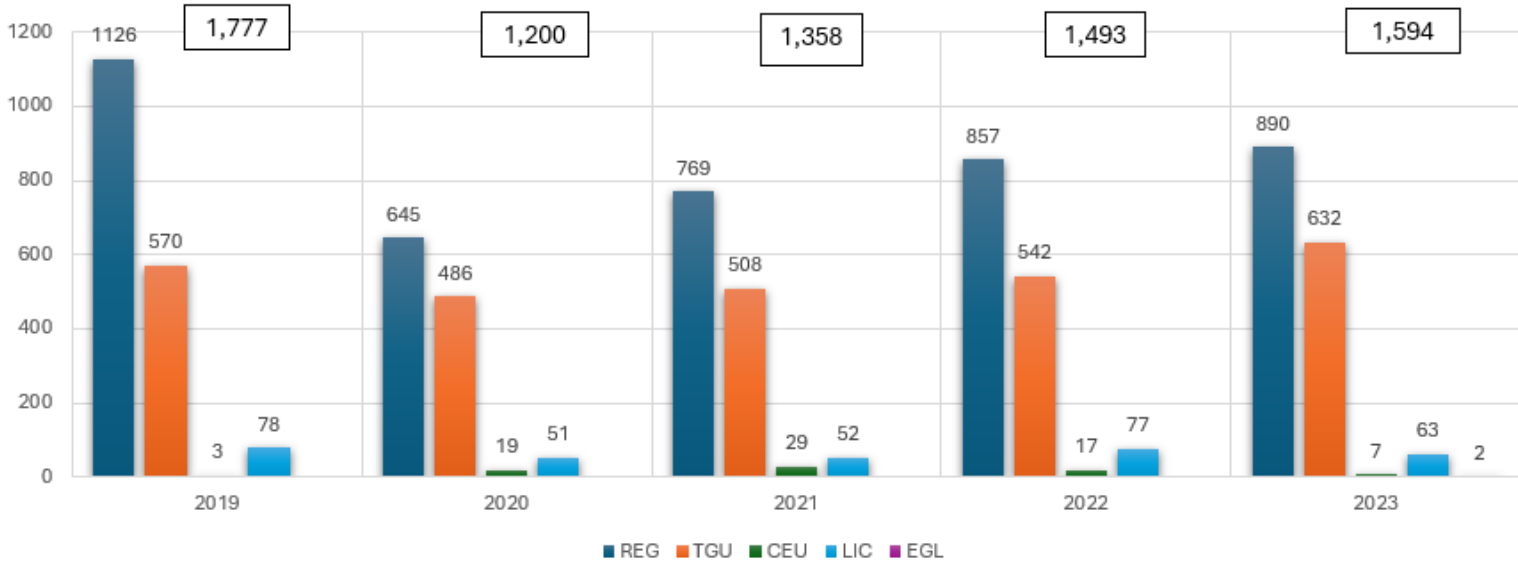
2019-2023 Total Cases Opened Per Year



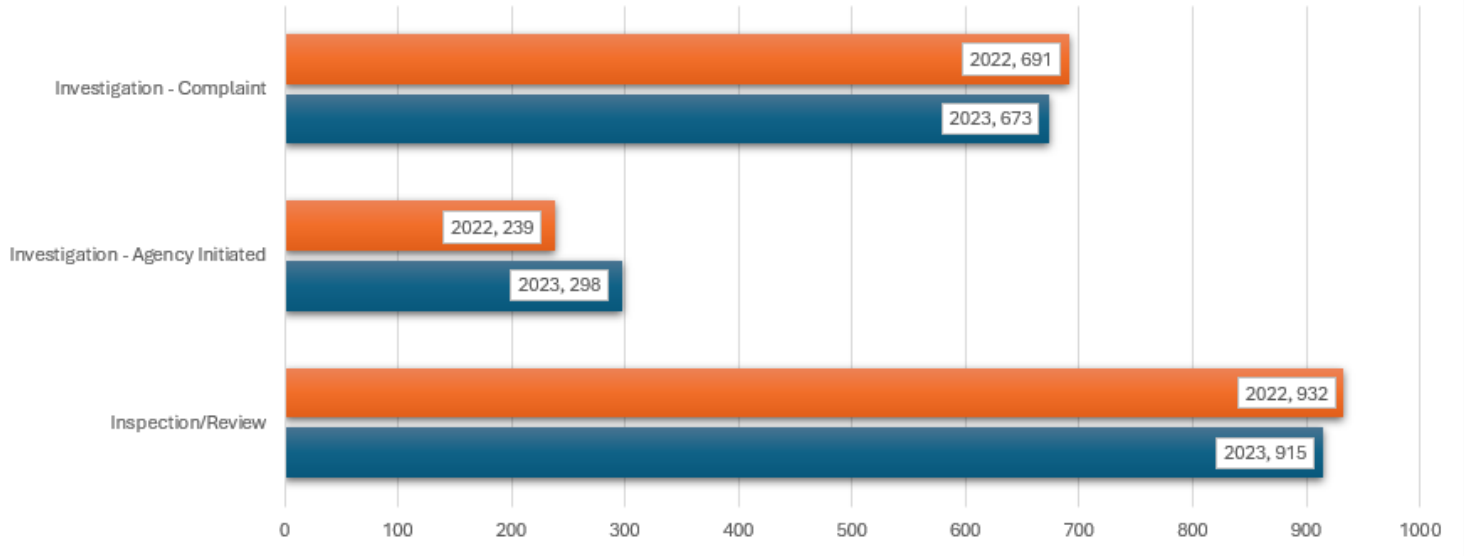
2019-2023 Criminal Cases Opened Per Year



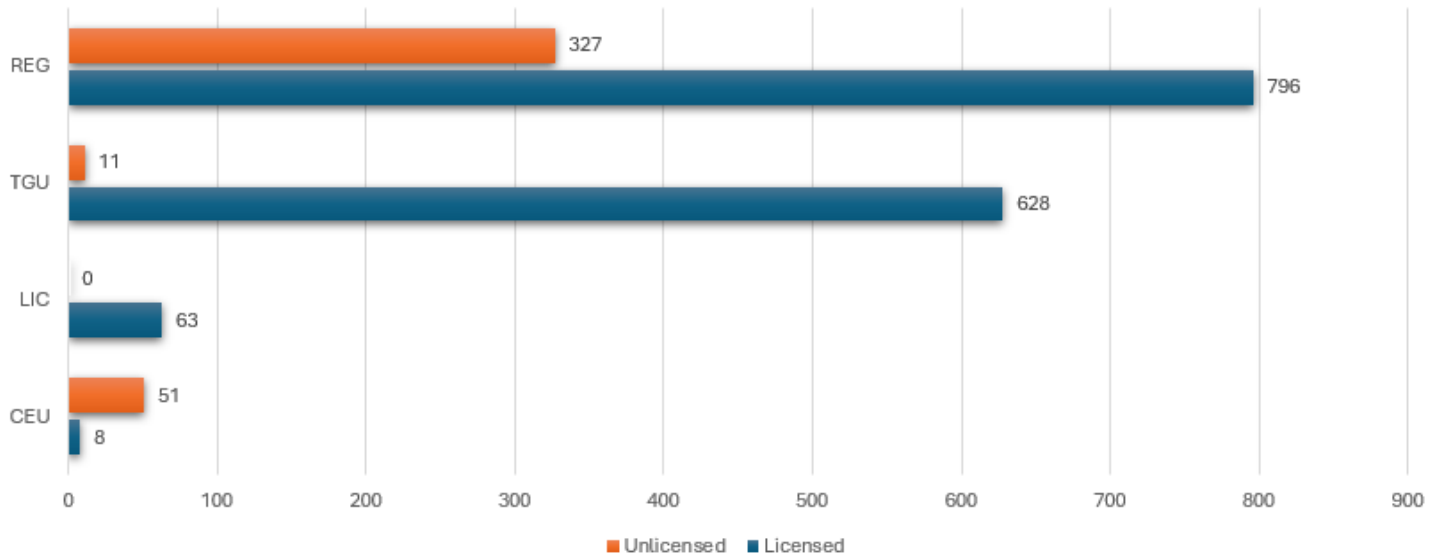
2019-2023 Administrative/Civil Cases Opened Per Year



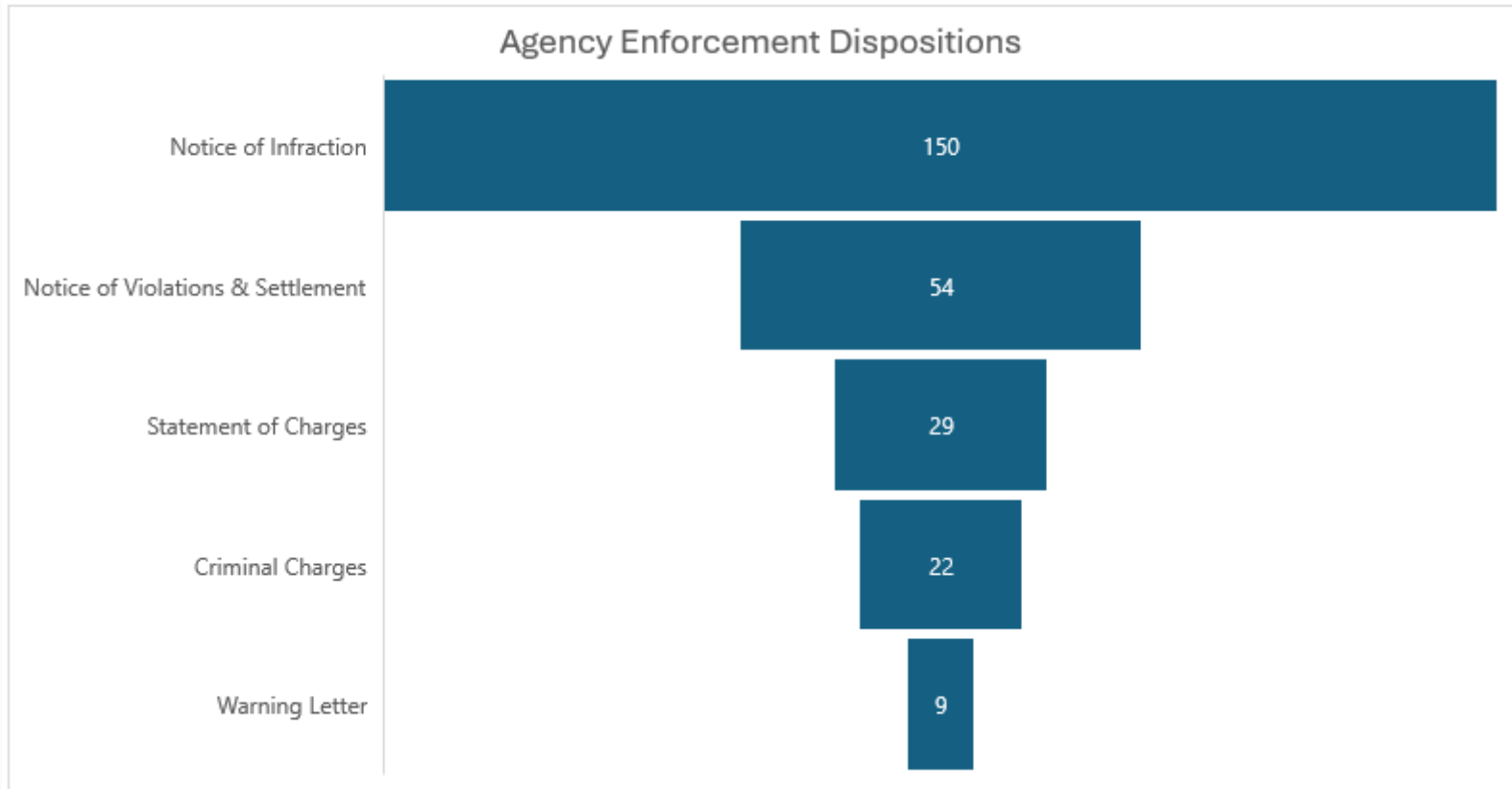
2022-2023 Incident Types



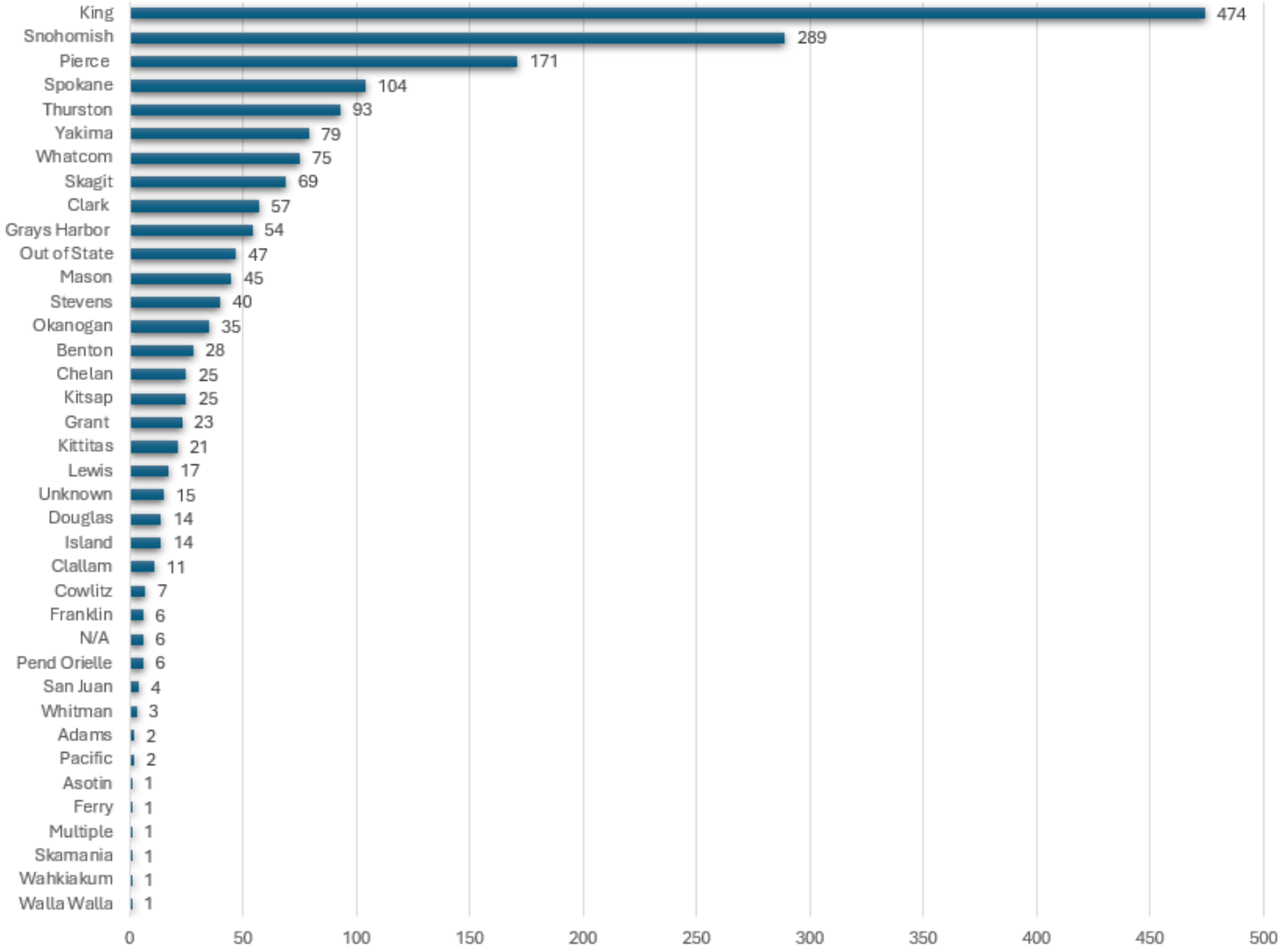
2023 Unit Licensed/Unlicensed Cases Count

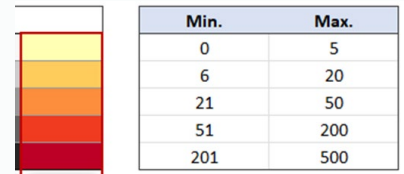
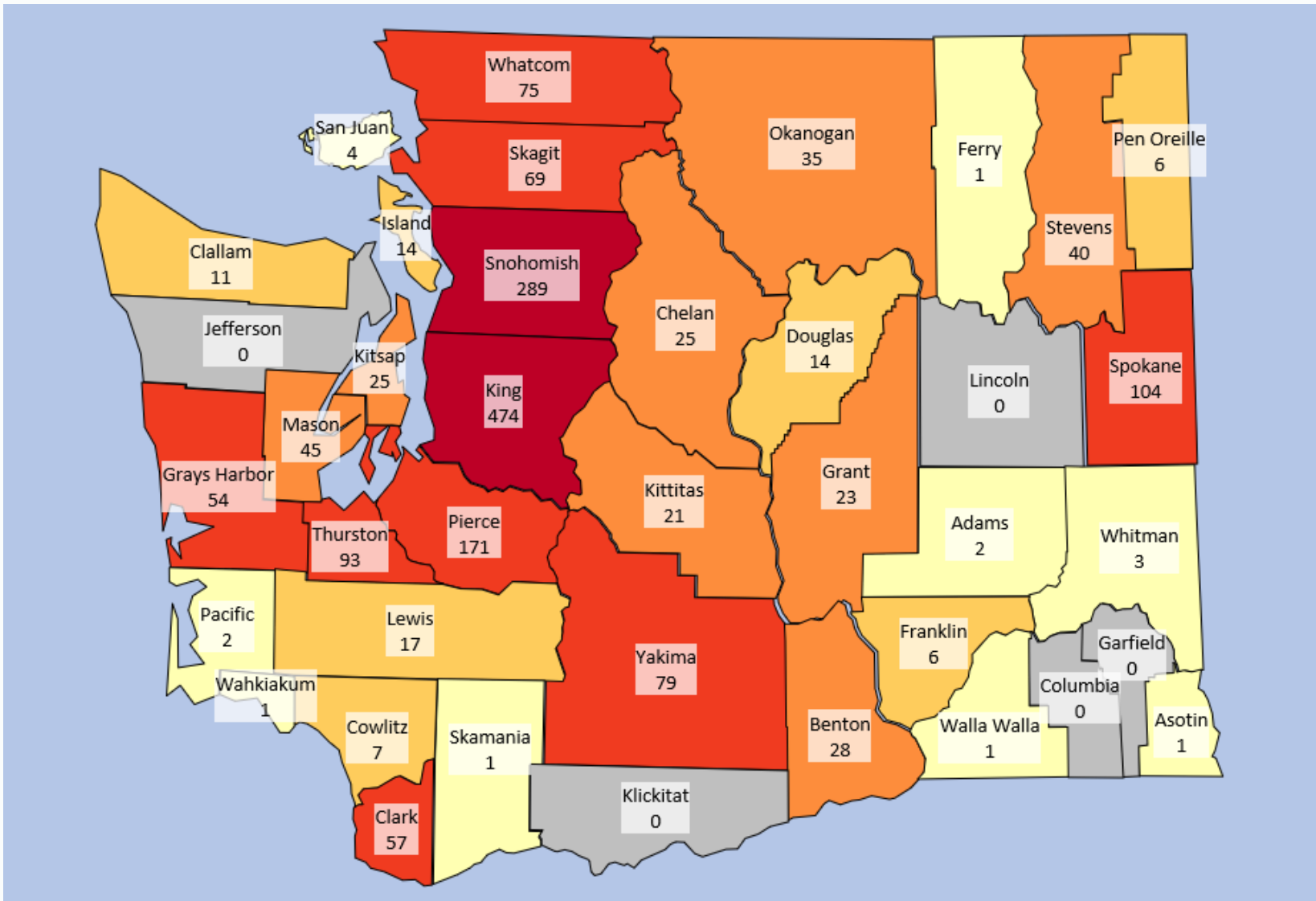


Agency Enforcement Dispositions



2023 Incident Locations by County





2023 Crime Specific Statistics

Theft Incidents & Example

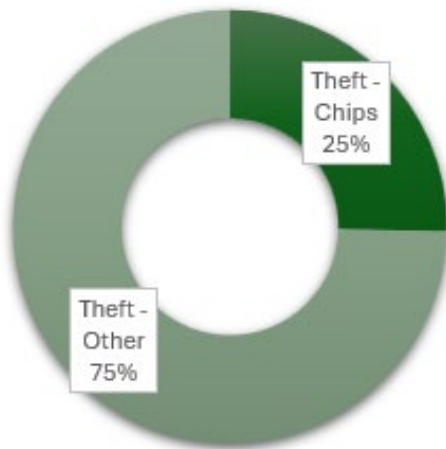
75 Cases Total

- 56 (Cash, Pull Tabs, Prizes, etc.)
- 19 (Chips)

Regulatory inspection of a non-profit licensee leads to arrest of theft suspect

- 4 counts of 1st degree theft
- On February 17, 2023, Special Agents arrested a gambling manager at the Prosser WA, Veterans of Foreign Wars Post, on theft charges.

2023 Theft Incidents



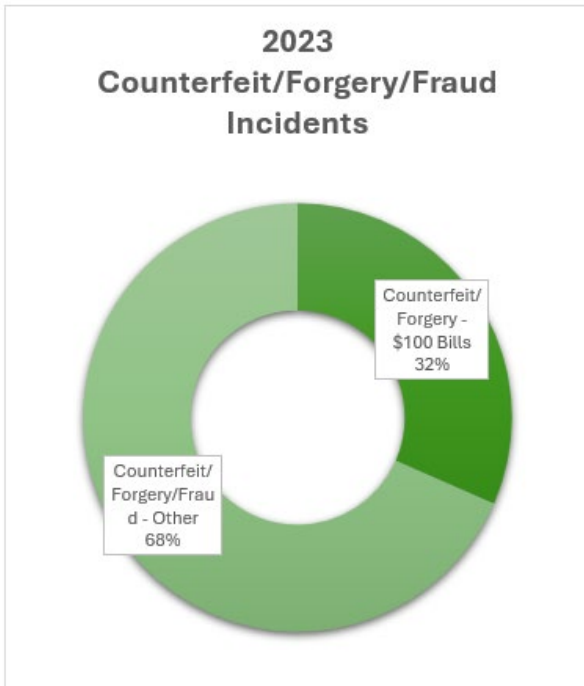
Counterfeit/Fraud/Forgery Incidents & Example

19 Cases Total

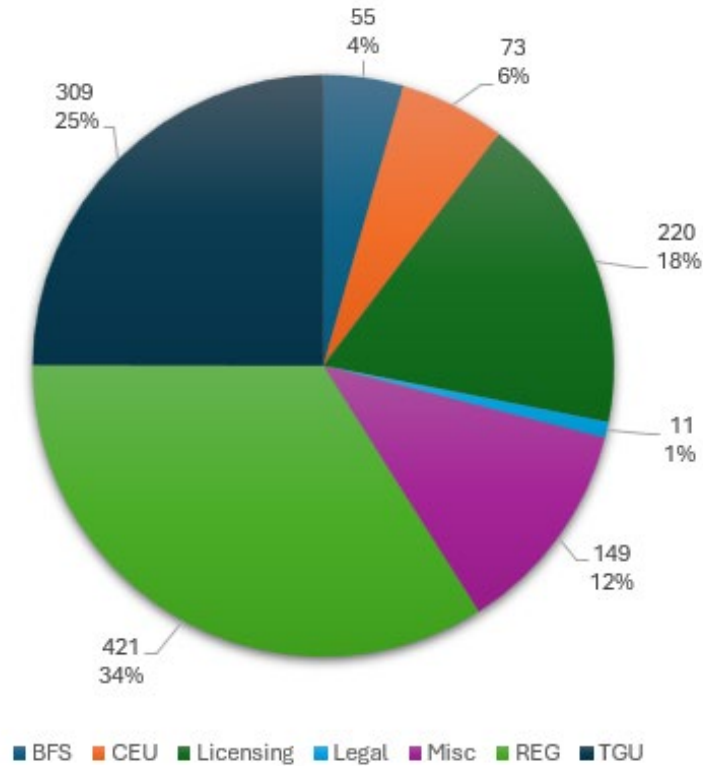
- 13 (Checks, \$5 Bills, embezzlement, etc.)
- 6 (\$100 Bills)

Gambling manager found guilty of stealing roughly \$24,000 from a weekly progressive raffle

- Raffle funds were stored in the manager's residence and were not present when the winner was drawn
- The suspect was found guilty by jury in Superior Court



2023 Agency Inquiries, Tips, & Complaints



Examples:

- Report of illegal raffle, bingo, card games or other activities
- Report of illegal online gambling platform
- Questions about if some type of activity is legal in WA state



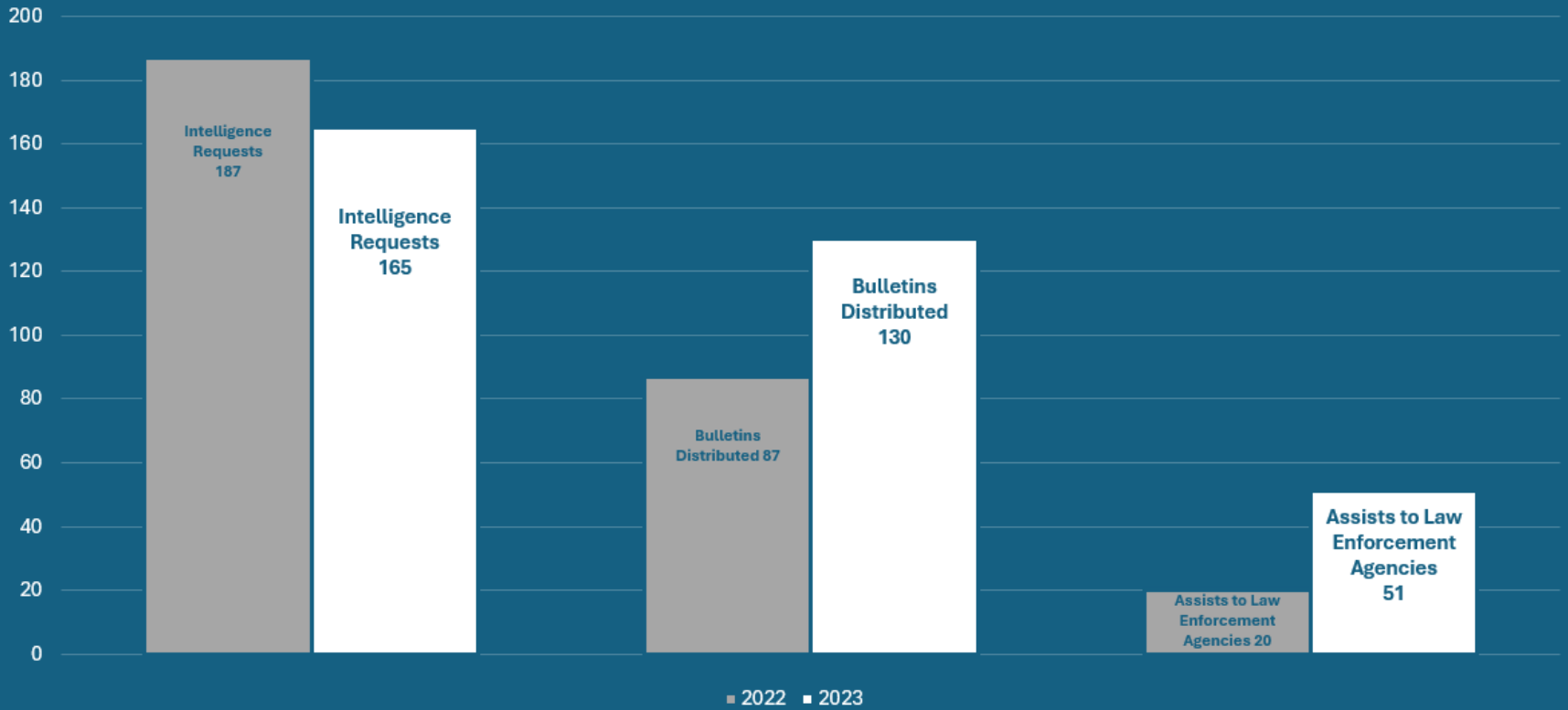
Special Agents Providing Over 300 Hours of Training to Licensees and the Public



2023

Intelligence Unit Statistics

2022-2023 INTELLIGENCE SUPPORT



Intelligence Unit Assisting Local Law Enforcement

In the second quarter of 2023, the WSGC Intelligence Unit published an Attempt to Identify bulletin on behalf of a local police department. In the fourth quarter of, 2023, a surveillance shift manager from a tribal casino partner was able to identify the individual and immediately notified the WSGC Intelligence Unit. On top of identifying the individual, the shift manger was able to provide a recent photo of the subject's vehicle. The information became crucial to the police department's ongoing investigation.

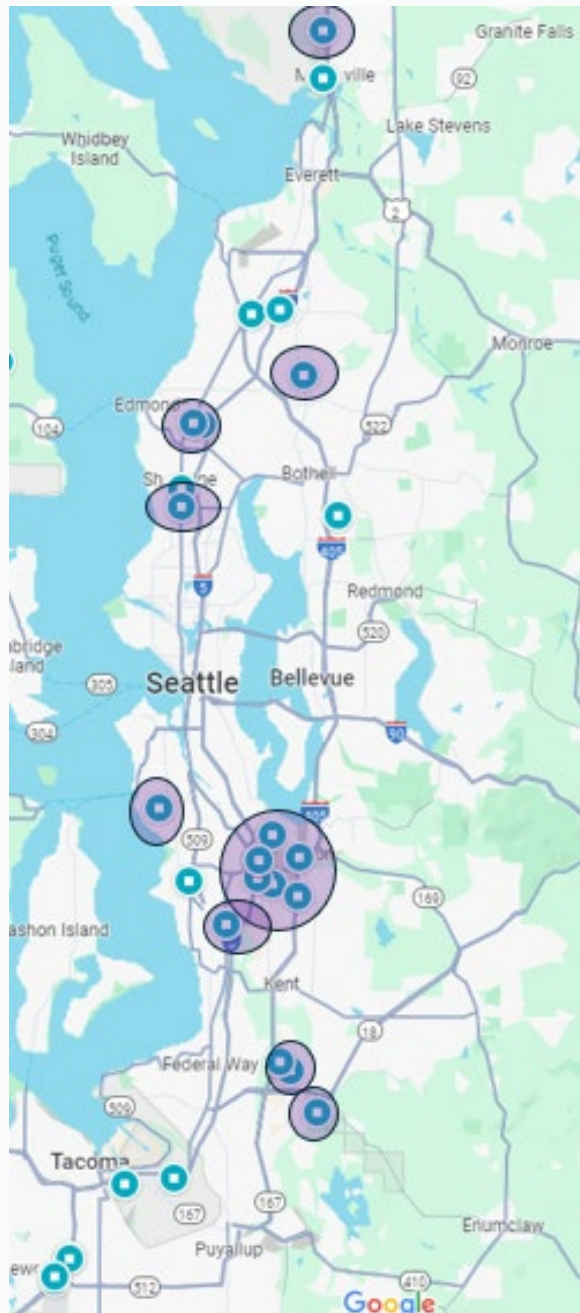




2023 had a lot of violent crime and specifically there were numerous casino follow home robberies



Map showing violent crimes related to gambling in 2023



Conclusions

- 2023 = Year of Robberies
- King County and I-5 corridor still the epicenter for violent crime and overall cases.
- More information sharing between partners & stakeholders





Staff Proposed Rulemaking

New Rules

WAC 230-15-186 Paying out odds-based and fixed based prizes

WAC 230-15-187 Keeping funds to pay fixed-based prizes

Amend

WAC 230-15-050 Minimum cash on hand requirements.

July 2024 – Discussion Only

May 2024 – Discussion and Possible Filing

March 2024 – Initiate Rulemaking

Tab 10: July 2024 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Washington State Gambling Commission Staff

Background

BOLD = Changes made since May 2024 Commission Meeting

At the November 2023 Commission meeting, Commissioners asked staff to work with stakeholders to determine if rulemaking could address recent stakeholder concerns regarding the minimum cash on hand requirements for house-banked card rooms.

Currently, our rules require house-banked card game licensees to have sufficient cash on hand to redeem all chips issued for play and pay out all prizes. Failure to keep funds to cash in chips, pay prizes, or redeem gambling related checks is prima facie evidence of fraud (WAC 230-15-050).

To ensure that house-banked card game licensees have sufficient cash on hand to redeem all chips for play and pay out all prizes, we require, by rule, house-banked card rooms to have a minimum amount of cash on hand based on a formula:

- At least \$1,000 for each house-banked table on the gambling floor, plus
- The amount of the largest single prize available, excluding progressive, player-supported, and house jackpot prizes.

Staff has found that the formula to calculate “*sufficient cash on hand to redeem all chips issued for play and pay out all prizes*” may not be adequate for all house-banked card game licensees. Rulemaking is needed to address staff’s concerns as follows:

- Some house-banked card rooms have had difficulty cashing out players’ chips at the cashier’s cage even though they met our minimum cash on hand requirements. These were cases where a player did not win a large prize, but were rather cashing out a large amount of chips from winning multiple smaller hands.
- It is rare for players to win large prizes in the tens of thousands of dollars at house-banked card rooms. Rather, general day to day operations in house-banked card rooms involves multiple players purchasing chips at tables and then redeeming chips at the cashier’s cage. Card rooms generally maintain cash in the cashier’s cage based on the volume of gambling in their facility, not based on the potential for someone to win a rare large prize.
- Consistency with other states. Other states minimum cash on hand requirements are based on volume of gambling, rather than a single large prize that may or may not be won. For example, the Nevada Gaming Control Board’s calculation for minimum cash on hand is a per table requirement plus 1% of gross gaming revenue (volume) from the last fiscal year. The National Indian Gaming Commission has the same calculation as Nevada for minimum cash on hand.
- In 2023, wager limits were increased from \$300 to \$400. Players are now able to buy more chips for play, and in turn, card rooms may have to redeem more chips at the cashier’s cage. The minimum cash on hand formula should address this potential greater influx of gaming.

- The “*largest single prize*” offered by almost every card room in the state is an odds-based prize that has an aggregate payout limit attached to it according to WAC 230-15-490. For example, a card room that offers a game that has 8000-1 odds and \$400 wagering limits can limit the prize to \$20,000 according to WAC 230-15-490. The \$20,000 aggregated prize becomes the “*largest single prize*” according to the formula in WAC 230-15-050. This was the same “*largest single prize*” amount in 2008 when the wagering limits were only \$200.

Staff has also found that rules only allow house-banked card game licensees to write checks for progressive jackpots, player supported jackpots, and house jackpots. Current rules do not specifically authorize checks to be written for large odds-based and fixed-based prizes (e.g. the prizes in Masque’s card game).

At the March 2024 commission meeting, Commissioners authorized initial rulemaking to amend WAC 230-15-050 and create new rules.

The proposed rules:

- Require card game licensees to exchange chips for cash unless the player requests payment by check;
- Changes the formula for determining the minimum amount of cash required to be in the cage, safe, and/or vault for house-banked card rooms;
- Allows for specific prizes to be paid by check; and
- Require house-banked card room licensees to have sufficient funds to pay fixed-based prizes offered.

At the May 2024 commission meeting, Commissioners discussed the proposed rules, altered the amended language for WAC 230-15-050(1), and authorized filing of the new and amended rules.

Following the May 2024 commission meeting, staff filed the CR 102 with the Office of the Code Reviser. Included in the CR 102 was a small business economic impact statement analysis, which concluded that the rule change does not impose more than minor costs. As discussed above, this rule changes the formula for determining how much cash a card room must have on hand and allows licensees to write checks to patrons instead of paying prizes in cash. Associated costs to small businesses would revolve around the issuance of a check to certain winning patrons. These costs are not expected to exceed three-tenths of one percent of the business’s annual revenue or income.

Attachments:

- WAC 230-15-050
- WAC 230-15-050 (Revised)
- Proposed rules WAC 230-15-186 and WAC 230-15-187

Stakeholder Feedback

Eric Persson, owner of Maverick Gaming, spoke at the March 14, 2024, commission meeting. Mr. Persson expressed his concern regarding potential safety risks associated with staff members and winning players handling a large amount of cash.

On April 15 and 16, 2024, staff hosted a feedback session with tribal partners and stakeholders where participants were invited to share their thoughts or concerns with the rule change. One participant shared information regarding Nevada’s approach to this topic. Another participant expressed support for the rule change due to the dangers of robbery and crime.

Staff Recommendation

This rule is up for discussion only.

WAC 230-15-050 Minimum cash on hand requirements. (1) Card game licensees must have sufficient cash on hand to redeem all chips issued for play ~~((and pay out all prizes))~~. Licensees must exchange chips brought to the cashier's cage by players for cash; however, the licensee must write a check for the balance of chips redeemed at the request of the player. Licensees must issue the check within 24 hours.

(2) Within three hours of opening for the business day, at a time included in the internal controls, house-banked card game licensees must have at least the following minimum amount of cash on premises in their cage, safe, and/or vault combined:

(a) ~~((One))~~ Two thousand dollars for each house-banked table on the gambling floor; plus

(b) ~~((The amount of the largest single prize available excluding progressive jackpot, player-supported jackpot, and house jackpot prizes.))~~ One percent times card room gross gambling receipts from the previous calendar year according to quarterly license reports submitted to the commission; however, a new house-banked card room who has not yet submitted a full calendar year of quarterly license reports must have at least \$30,000 for the purpose of this subsection.

For example: If a house-banked card room has 15 house-banked tables and ~~((a largest single prize of \$23,000, before opening, the cage))~~ their gross receipts were \$4,000,000 in their previous calendar year, they must have at least $((\$38,000))$ \$70,000 cash on hand: $15 \text{ tables} \times ((\$1,000))$ \$2,000 = $((\$15,000))$ \$30,000 + $((\text{largest single prize of } \$23,000 = \$38,000))$ $1\% \times \$4,000,000 = \$40,000$.

(3) ~~((Except for the restrictions on player-supported jackpot pay outs in WAC 230-15-405 and progressive jackpot pay outs in WAC 230-15-690,))~~ Licensees may pay specific prizes by check if sufficient funds are available on deposit and they meet the restrictions in the rules below:

(a) WAC 230-15-405 - Player-supported jackpot prizes.

(b) WAC 230-15-690 - Progressive jackpot prizes.

(c) WAC 230-15-673 - House jackpot prizes.

(d) WAC 230-15-190 - Odds-based and fixed-based prizes.

(4) Failure to keep funds to cash in chips, pay prizes, or redeem gambling related checks is prima facie evidence of fraud. Meeting the minimum cage cash amount does not relieve the licensee from the requirement to have sufficient funds available to redeem all chips and pay out all prizes.

NEW SECTION

WAC 230-15-186 Paying out odds-based and fixed-based prizes.

(1) House-banked card room licensees must immediately pay out all individual odds-based and fixed-based prizes of \$5,000 or less.

(2) For individual odds-based and fixed-based prizes over \$5,000, licensees must immediately pay out a minimum of \$5,000 and pay the remaining balance within 24 hours by check. The player may request that the licensee pay up to the entire prize balance by check. Licensees must then issue a check for the entire prize balance within 24 hours.

NEW SECTION

WAC 230-15-187 Keeping funds to pay fixed-based prizes. House-banked card room licensees must maintain at least the amount of the single largest fixed-based prize offered in a bank, mutual savings bank, or credit union location in Washington. Alternatively, licensees may maintain the amount of the single largest fixed-based prize in cash on the licensed premises.



Washington State Gambling Commission

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

July 11, 2024

TO: COMMISSIONERS:
Alicia Levy, Chair
Bud Sizemore, Vice Chair
Sarah Lawson
Anders Ibsen

FROM: Adam Amorine, Legal Manager, Legal and Records Division

SUBJECT: Jeffrey T. Brown, CR 2023-01495
Final Order – July 11, 2024, Commission Meeting

The Washington State Gambling Commission (WSGC) issued Licensee Jeffery T. Brown a Public Cardroom Employee License. Brown's license is currently linked to Great American Casino in Tukwila. His license expires July 11, 2024.

On September 1, 2023, a WSGC agent received notification from the Snoqualmie Gaming Commission ("STGA") that Brown's tribal gaming license had been revoked by STGA. STGA then provided WSGC pertinent information regarding their investigation, which started when STGA received a "Unemployment Insurance Tax Billing Statement" and an "Earnings Verification Form" from the Washington State Employment Security Department ("ESD"). Although Brown was employed by Snoqualmie Casino from October 2019 to January 2023, the investigation showed that Brown filed claims with ESD misreporting the hours he worked between September 24, 2022, through January 21, 2023. The investigation indicated Brown submitted unemployment claims to ESD stating that he had only worked for 58 hours whereas records kept by STGA found he had worked for 513.5 hours during the period in question.

On February 25, 2023, ESD sent a determination letter to Brown outlining their decision to reduce or deny Brown's unemployment benefits from September 25, 2022, to January 21, 2023, because Brown failed to report his gross earnings when he submitted his weekly claim. Brown owed \$398.00 as a result of this decision. On March 17, 2023, ESD sent a second determination letter to Brown outlining their decision to reduce or deny Brown's unemployment benefits from September 19, 2021, to April 16, 2022, because Brown failed to report his gross earnings when he submitted his weekly claim. The letter determined Brown "knowingly left out or lied about information" on his claim, which is fraud. As a result, ESD ordered Brown to pay a penalty of \$1,412.10 along with paying back \$10,826.10 in fraudulently obtained benefits.

4565 7th Avenue SE
Lacey, WA 98503
wsgc.wa.gov

PO Box 42400
Olympia, WA 98504
360-486-3440

901 N Monroe St Suite 240
Spokane, WA 99201
509-325-7900



Washington State Gambling Commission

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

ESD also provided a summary letter of finding to STGA, finding that Brown intentionally omitted and incorrectly reported the number of hours worked. Brown responded to the findings, indicating that he acknowledged the overpayment. STGA's investigation and Final Decision found Brown had acted with intent to commit fraud and ordered that his license be revoked. On July 21, 2023, STGA revoked Brown's tribal gaming license. On September 1, 2023, STGA notified WSGC of the Final Decision in the revocation of Brown's gaming license, upholding the July 21, 2023, decision to revoke.

Director Tina Griffin issued Brown Notice of Administrative Charges on May 14, 2024. They were mailed by regular mail on May 14, 2024, to Brown's last known address on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by June 6, 2024. On May 31, 2024, Brown called WSGC Legal Manager Adam Amorine to discuss the case. Brown indicated that he does not wish to contest the charges and understands that his license will be revoked. Brown wished to communicate his remorse for his actions and asked that the record reflect that he is paying back the ill-gotten funds. Brown confirmed that he did not wish to contest the charges by email following this phone call.

You may take final action against Brown's gambling license. Brown fraudulently obtained \$10,826.10 in unemployment benefits due to misreporting his working hours. Based on this incident, Brown poses a threat to the effective regulation of gambling as demonstrated through his prior activities. The Commission is authorized to revoke Jeffrey T. Brown's Public Cardroom Employee license pursuant to RCW 9.46.075(1), (8), and (9), RCW 9.46.153 (1), and WAC 230-03-085(1) and (9)(a). Staff recommends that the Commission sign the proposed final order and revoke Jeffrey T. Brown's Public Cardroom Employee License, number 68-31006.

4565 7th Avenue SE
Lacey, WA 98503
wsgc.wa.gov

PO Box 42400
Olympia, WA 98504
360-486-3440

901 N Monroe St Suite 240
Spokane, WA 99201
509-325-7900

**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2023-01495

JEFFREY T. BROWN
License No. 68-31006,

FINAL ORDER OF THE
GAMBLING COMMISSION

Licensee.

This matter having come before the Washington State Gambling Commission (Commission) on July 11, 2024, the Commission makes the following Findings of Fact, Conclusions of Law, and issues its Final Order:

I. FINDINGS OF FACT

1. The Washington State Gambling Commission issued Licensee Jeffery T. Brown a Public Cardroom Employee License, No. 68-31006. This license authorized Brown’s employment at Great American Casino in Tukwila, Washington.
2. This license, which expires on July 11, 2024, was issued subject to Brown’s compliance with state gambling laws and Commission rules.
3. WSGC has issued Mr. Brown a Class III Gaming Employee and Public Cardroom Employee License, Nos. 69-12964 and 68-31006, respectively. Mr. Brown has held one or both licenses, for the most part, since March 2001, until he completed an online Card Room Employee Transfer from Class III License application on January 30, 2023.
4. On September 1, 2023, a WSGC agent received notification from the Snoqualmie Tribal Gaming Agency (“STGA”) that Brown’s tribal gaming license had been revoked by STGA.

STGA provided WSGC documents from their investigation supporting the revocation shortly thereafter.

5. STGA's investigation indicated Mr. Brown had submitted claims to the Washington State Employment Security Department ("ESD") in which he misreported the hours he worked. Specifically, Mr. Brown submitted claims stating that he had only worked for 58 hours whereas records kept by STGA found he had worked for 513.5 hours between September 24, 2022, through January 21, 2023.

6. ESD concluded that Mr. Brown failed to report his gross earnings when he submitted his weekly claims between September 24, 2022, through January 21, 2023. ESD's determination letter stated Mr. Brown "knowingly left out or lied about information" on his claim, which is fraud. As a result, ESD ordered Mr. Brown to pay a penalty of \$1,412.10 along with paying back \$10,826.10 in fraudulently obtained benefits. Mr. Brown responded to the findings, indicating that he acknowledged the overpayment.

7. STGA's investigation and Final Decision found Mr. Brown had acted with intent to commit fraud and ordered that his license be revoked.

8. Director Tina Griffin issued Administrative Charges alleging that Mr. Brown's actions of fraudulently obtaining \$10,826.10 in unemployment benefits due to misreporting his working hours fell under the jurisdiction of WAC 230-03-085(1), (8), and 9(a). The charges allege Brown's actions demonstrate a disregard for statutes and rules promulgated, and that he poses a clear threat to the effective regulation of gambling.

9. Mr. Brown was sent the charges by regular mail on May 14, 2024, to the last address the Gambling Commission had on file.

10. On May 31, 2024, Mr. Brown placed a phone call to WSGC legal manager Adam Amorine indicating that he did not wish to contest the charges. Mr. Brown stated that he understood this action would result in the revocation of his gambling license. Mr. Brown confirmed his decision not to contest the charges in a follow-up email on May 31, 2024.

II. CONCLUSIONS OF LAW

1. Jeffery T. Brown received proper notice of the charges pursuant to RCW 34.05.413, RCW 34.05.434, WAC 230-17-005, WAC 230-17-010, and WAC 10-08-130.

2. The Commission can take final action against Jeffery T. Brown's gambling license under Case Number CR 2023-01495 pursuant to RCW 9.46.075, RCW 34.05.440, RCW 34.05.461, and WAC 230-03-085.

3. Jeffery T. Brown's gambling license should be revoked under Case Number CR 2023-01495 pursuant to RCW 9.46.075(1), (8), and (9), RCW 9.46.153 (1), and WAC 230-03-085(1) and (9)(a).

III. ORDER

This matter having come before the Commission at its July 11, 2024, Commission meeting, the Commissioners having heard arguments, been given the chance to review the administrative record, and being fully advised in this matter, now therefore:

It is hereby **ORDERED** that Jeffery T. Brown's gambling license, Number 68-31006, is **REVOKED**.

DATED this ___ day of July, 2024.

ALICIA LEVY, Chair

BUD SIZEMORE, Vice Chair

SARAH LAWSON

ANDERS IBSEN

NOTICE

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

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

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

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

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

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

Doug Van de Brake
Attorney General's Office
1135 Washington St. SE
P.O. Box 40100
Olympia, WA 98504-0100

CERTIFICATE OF SERVICE

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

JEFFERY T. BROWN
20225 BOTHELL EVERETT HWY
APT 414
BOTHELL WA 98012

EXECUTED this ___ day of July, 2024, at Lacey, Washington.

Damon Mentzer
Forms and Records Analyst



Washington State Gambling Commission

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

JULY 11, 2024

TO:

COMMISSIONERS

Alicia Levy, Chair
Bud Sizemore, Vice-Chair
Sarah Lawson
Anders Ibsen

EX OFFICIO MEMBERS

Senator Steve Conway
Senator Jeff Holy
Representative Shelley Kloba
Representative Eric Robertson

FROM: TINA GRIFFIN, EXECUTIVE DIRECTOR

SUBJECT: 2025 AGENCY REQUEST LEGISLATION

At the May 2024 commission meeting we discussed possible topics for agency request legislation for the 2025 legislative session.

On June 3, 2024, we met with tribal partners, licensees, and stakeholders to hear their thoughts and ideas. The following were shared as topics to pursue:

- Funding for WSGC to address illegal gambling activities
- Equalization of gambling tax rates
- Equity in license fees
- Authorization of online raffles

Taking all the information into consideration, we have the following topics for your consideration:

- Allow WSGC to collect unpaid license fees after the license expires.
- Allow WSGC to use credit or debit cards for collecting fees and have the payor pay the associated processing costs.
- Exempt technology, designs or drawings, building schematics, proprietary information, and financial information derived from or contained in agreements or contracts.

Today, we are looking for you to identify those topics you would like us to prepare for submitting to the Governor's Office for approval, which are due by September 13, 2024. (The September commission meeting is September 12 and 13, 2024.)

4565 7th Avenue SE
Lacey, WA 98503
wsgc.wa.gov

PO Box 42400
Olympia, WA 98504
360-486-3440

901 N Monroe St Suite 240
Spokane, WA 99201
509-325-7900