



**WASHINGTON STATE
GAMBLING COMMISSION
MEETING**

**August 8, 2024
OLYMPIA, WASHINGTON**

Commissioners



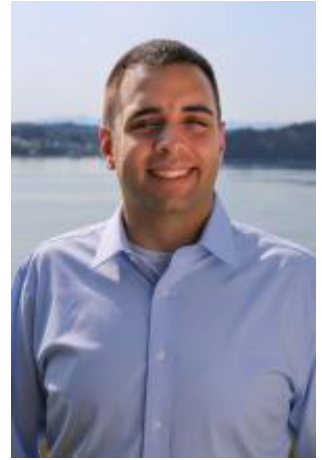
Alicia Levy
Chair



Bud Sizemore
Vice Chair

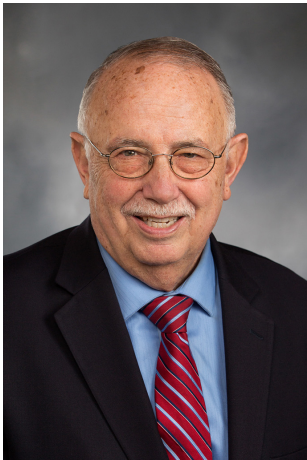


Sarah Lawson



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.

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Washington State Gambling Commission

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

Gambling Commission Meeting

Thursday, August 8th, 2024

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

By phone: 360-726-3322, ID: 663 890 290#

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 (Action)**
July 11, 2024, Commission Meeting Minutes Pg. 5
New Licenses & Class III Gaming Employees Pg. 10
HBCR List Pg. 25

Public Comment

Executive Director's Report

Tina Griffin, Executive Director

Tab 2 Presentation – Special Olympics of Washington Pg. 28
• 2024 Western Washington Enhanced Raffle Plan Request (Action)
Dan Frey, Special Agent Supervisor
Mary Do, Chief Operating Officer
Mark Sinay, VP of Finance

Public Comment

Tab 3 FY 2025 Revenue Update
Kriscinda Hansen, Chief Financial Officer

**RULE MAKING
ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS**

***Tab 4 Rule Up for Discussion and Possible Action (Possible Action)**
• Fee Increase Rules Pg. 44
Adam Amorine, Interim Legal Manager and Rules Coordinator

- *Tab 5 Rule Up for Final Action** **Pg. 53
(Action)**
- Minimum Cash on hand
Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

- *Tab 6 Default** **Pg. 57
(Action)**
- Hollywood Cardroom Casino

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

- Tab 7 Agency Request Legislation** **Pg. 67**

Tina Griffin, Executive Director

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 1 hour.

Public Comment

Adjourn

Updated: July 31, 2024

Next Meeting: September 12 & 13, 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.

July 11, 2024

Gambling Commission Meeting Minutes

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

Commissioners:

Chair Alicia Levy – In person
Vice Chair 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 – In person
Representative Eric Robertson – Excused

Staff Present:

Tina Griffin, Executive Director; Kriscinda Hensen, Chief Financial Officer; Julie Lies, Tribal Liaison; Adam Amorine, Interim Legal Manager and Rules Coordinator; Troy Kirby, PIO; Julie Anderson, Executive Assistant; Damon Mentzer, Administrative Assistant; Suzanne Becker, Assistant Attorney General (AAG); AAG Matt Kernutt; AAG Sharon James

Staff Present Virtually:

Gary Drumheller, Deputy Director; Jim Nicks, Assistant Director; Tony Hughes, Acting Agent in Charge; Bryce Mack, Special Agent Supervisor; Brennan Carrington, Special Agent; and Nicole Frazer, Administrative Assistant

There were 2 people in the audience and 27 people attended virtually.

Chair Levy welcomed everyone to the Liquor and Cannabis Board and called the July meeting to order at 9:41 AM. She announced that the meeting would be recorded and took the roll to ensure a quorum.

Tab 1 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 Sizemore moved to approve the consent agenda as presented by staff.

Commissioner Lawson seconded the motion.

The motion passed unanimously. 4:0

Executive Director's Report

Tina Griffin, Executive Director (ED) gave a brief update on agency staffing by congratulating Deputy Director Drumheller on his retirement. He announced that he will be retiring June 1, 2025. She also congratulated Jim Nicks for accepting the Assistant Director's position. One of the hiring priorities for the agency is to fill the Deputy Director's position so that we can capture the institutional knowledge that Deputy Director Drumheller has gathered over his career. Executive Director Griffin also highlighted a few conferences that staff have attended and encouraged Commissioners to

reach out to Agent in Charge LaMont if they had any questions.

Tab 2 - Budget Update and FY 25

Kriscinda Hansen, Chief Financial Officer (CFO), presented the materials for this tab. CFO Hansen gave a brief update on the agency's budget and the FY 25 supplemental budget request. She will provide another update at the August Commission meeting to align with the Fee Increase rules.

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

*Commissioner Sizemore moved to approve the FY25 supplemental budget request as presented by staff. Commissioner Lawson seconded the motion.
The motion passed unanimously. 4:0*

Tab 3 – 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.

Chair Levy asked Commissioners if they had any comments. Commissioner Sizemore agreed to bring this topic back to the August commission meeting for more discussion. She asked for public comment. There was none.

Tab 5 Rule up for Discussion and Possible Filing – Align License Expiration Dates

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

Chair Levy asked Commissioners if they had any questions. They did not. She asked for public comment.

Victor Mena, President of Last Frontier Gaming and CEO of Washington Gold, gave public comment.

*Commissioner Sizemore moved to approve draft language for Aligning License Expiration dates for further discussion as presented by staff.
Commissioner Ibsen seconded the motion.
The motion passed unanimously. 4:0*

At 10:17 AM Commissioners went into Executive Session to discuss current and potential agency litigation with legal counsel, including tribal negotiations. Representative Kloba arrived to attend the Executive Session in person. They adjourned Executive Session at 11:40 AM.

Chair Levy welcomed everyone back to the meeting after Executive Session at 11:40 AM and called the roll to ensure a quorum.

**RULE MAKING
ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS**

Tab 4 Rule up for Final Action – Firearms as a Prize

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

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

Commissioner Lawson moved to approve final action on language for Firearms as a Prize as presented by staff to be effective 31 days after filing with the code revisors office.

Commissioner Ibsen seconded the motion.

The motion passed unanimously. 4:0

Tab 6 Petition to Initiate Rule Making – No Limit Poker

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

Chair Levy asked Commissioners if they had any questions. They did not. She asked for public comment. Victor Mena, Last Frontier Poker Room gave public comment. Commissioner Sizemore then asked if the petitioner was provided information regarding the gambling act. ED Griffin stated that the petitioner was aware of the meeting time and location.

Commissioner Sizemore moved to deny the petition in writing stating the policy of the state of Washington on gambling is to keep the criminal element out of gambling and to promote the social welfare of the people by limiting the nature and scope of gambling activities and by strict regulation and control. Commissioner Lawson seconded the motion.

The motion passed unanimously. 4:0

Tab 7 Petition to Initiate Rule Making –Manufacturer and Distributer Fees

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

Chair Levy asked Commissioners if they had any questions. They did not. She asked for public comment.

Petitioner Dino DeGregorio, President of 56 Straight LLC and official distributor of Del Negro Playing Cards spoke to the Commissioners. After discussing the petition to initiate rule making, Chair Levy asked for public comments.

Victor Mena, President of Last Frontier Poker Room and CEO of Washington Gold, gave public comment. Petitioner DeGregorio replied to the public comment.

Commissioner Lawson addressed the petitioner with suggestions for a more detailed petition detailing the significant challenges and site the exact rule the petitioner would like changed. Therefore, Commissioner Lawson moved to deny the request because the petition was too vague and not sufficiently detailed, but she encouraged the petitioner to resubmit with more information. Commissioner Sizemore offered an amendment to the denial by asking the petitioner to consider withdrawing their petition and resubmit it later. Commissioner Lawson withdrew the motion to deny. The petitioner withdrew the petition stating they would resubmit it later with more information.

Tab 10 – Rule up for Discussion Only – Minimum Cash on Hand

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

Chair Levy asked Commissioners if they had any questions. They did not.

Tab 11 Default – Jeffrey T. Brown

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

Chair Levy asked if Jeffrey T. Brown was in attendance. He was not. She asked if Commissioners had any questions. They did not. She asked for public comment. There was none.

Commissioner Ibsen moved to revoke Jeffrey T. Brown’s Public Cardroom Employee License, number 68-31006 as presented by staff.

Commissioner Lawson seconded the motion.

The motion passed unanimously. 4:0

Tab 12 Agency Request Legislation

Tina Griffin, Executive Director (ED), presented the materials for this tab. Agency Request Legislation will be on the August agenda for more discussion. Agency Request Legislation will need to be finalized at the September 12 commission meeting so that we can meet the deadline of September 13.

Chair Levy asked Commissioners if they had any questions. Commissioner Sizemore agreed with ED Griffin to evaluate the lapses in payments before going to the legislature. He also asked for clarity regarding the Public Records Act Exemption. Commissioner Sizemore also asked if the Gambling Commission has changed their position on authorization of online raffles. Senator Conway replied that there is a clear ban against internet gaming in Washington.

Tab 8 Presentation – Self-Exclusion

Tony Hughes, Acting Agent in Charge (AAIC) presented the materials for this tab. AAIC Hughes gave a brief presentation on the Self-Exclusion program. This program will be reviewed annually.

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

Tab 9 Presentation – Strategic Intelligence Analysis

Bryce Mack, Special Agent Supervisor (SAS) and Brennan Carrington, Special Agent (SA) presented the materials for this tab. SAS Mack and SA Carrington gave an extensive presentation on criminal cases in Washington relating to gambling.

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

Chair Levy asked Commissioners if they had any questions. They did not.

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

At 1:11 pm Chair Levy adjourned the meeting and stated that the July agenda items were finished. If there are any public comments for anything from the July agenda, 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 August 8th, 2024.

Meeting adjourned at 1:11 PM



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

Index

	<u>PAGE</u>
NONPROFIT ORGANIZATIONS & COMMERCIAL BUSINESSES.....	1-2
MANUFACTURER REPRESENTATIVE	3-4
MAJOR SPORTS WAGERING REPRESENTATIVE.....	4-5
NON-PROFIT GAMBLING MANAGER	5
CARD ROOM EMPLOYEE	5-7
CLASS III GAMING EMPLOYEE	8-14

PAGES:14

Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 14.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

BINGO

GRANGE 00985/OROVILLE
00-25369 01-02846

622 FIR ST
OROVILLE WA 98844

RAFFLE

ASUNARO
00-25391 02-21424

11100 NE 6TH ST
BELLEVUE WA 98004

BRIGHTSPARK EARLY LEARNING SERVICES
00-25169 02-21354

233 BURNETT AVE S
RENTON WA 98057

BUILDING FUTURES FOUNDATION
00-19784 02-08469

103 E 29TH ST
VANCOUVER WA 98663

RAVE FOUNDATION
00-24001 02-20776

800 OCCIDENTAL AVE S
SEATTLE WA 98134

SAVE A FORGOTTEN EQUINE
00-24335 02-20974

10407 192ND AVE NE
REDMOND WA 98052

TILTH ALLIANCE
00-25364 02-21411

5513 S CLOVERDALE ST
SEATTLE WA 98118

YAKIMA VALLEY GRID KIDS ASSOCIATION
00-25362 02-21410

1412 WEIKEL RD
YAKIMA WA 98908

YAKIMA WARRIORS ASSOCIATION DBA YAKIMA JR CADETS
00-25313 02-21397

111 PALISADE STREET
MOXEE WA 98936

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

ACE OF CLUBS
00-25314 05-21879

2603 SIMPSON AVE
HOQUIAM WA 98550

APOGEE PUB & EATERY
00-25237 05-21858

14125 SE 171ST WAY
RENTON WA 98058

BUCKETZ BAR AND GRILL
00-25214 05-21850

206 N BENTON SUITE C
KENNEWICK WA 99336

FAMCLUB LLC
00-25310 05-21878

8315 83RD AVE SW
LAKEWOOD WA 98498

FRONTIER TAVERN
00-25352 05-21885

111 W 4TH AVE
ELLENSBURG WA 98926

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

SIRINYAS THAI RESTAURANT & LOUNGE
00-25271 05-21866

13614 W SUNSET HWY
AIRWAY HEIGHTS WA 99001

THAT ONE PLACE
00-25363 05-21888

1397 OLNEY AVE
PORT ORCHARD WA 98366

THE VIBE PUB & GRILL
00-25375 05-21894

10000 AURORA AVE N
SEATTLE WA 98113

TWIN PEAKS PUB
00-25366 05-21891

129 W NORTH BEND WAY
NORTH BEND WA 98045

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

BAKER, THOMAS M
23-00576

IGT
LAS VEGAS NV 89113

BERGGREN, PATRICIA M
23-03967

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

BUY, SOPHEAP
23-03955

AINSWORTH GAME TECHNOLOGY INC
LAS VEGAS NV 89118

CABALLERO, JOSE A
23-03377

PASSPORT TECHNOLOGY USA INC
GLENDALE CA 91203

CATANIA, JOSEPH D
23-03973

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

CHANDRA, RAHUL R
23-03966

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

DEANNE, BLAKE J
23-03965

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

DOEGE, KARL A
23-03974

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

ESPANA, JIMMY M
23-03971

AGS LLC
LAS VEGAS NV 89118

ESPIRITU, EDLYNNE M
23-03964

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

FAHER, JOSEPH R
23-02936

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

GANESAN, ARUN BROWN
23-03560

LIGHT & WONDER
LAS VEGAS NV 89119

GIOVO, RONALD J
23-03961

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

GRIGGS, TYLER L
23-03963

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

HANN, MELISSA J
23-03970

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

IRELAND, COREY O
23-03962

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

JIMENEZ DURAN, JESUS A 23-03954	PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203
LOPEZ, ADAN 23-03960	ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135
NGUYEN, DEANNA Y 23-03959	ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135
NOWLIN, ERIC N 23-03450	PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203
PRABHAKAR, GOUTHAM 23-03957	LIGHT & WONDER LAS VEGAS NV 89119
RAGURAM BABU, GAYATHRI 23-03956	LIGHT & WONDER LAS VEGAS NV 89119
RANDAL, CHRISTINA M 23-03420	EVERI PAYMENTS INC LAS VEGAS NV 89113-2175
RODRIGUEZ, FERNANDO A 23-03239	AINSWORTH GAME TECHNOLOGY INC LAS VEGAS NV 89118
SHERBON, JOSHUA J 23-03953	PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203
SHERRILL, CHRISTOPHER V 23-02109	ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135
SREENIVASAN, DEEPAK KOLLEGALA 23-03617	LIGHT & WONDER LAS VEGAS NV 89119
STEINER, MICHAEL M 23-03958	ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135
TOTANES, JARED M 23-03969	AINSWORTH GAME TECHNOLOGY INC LAS VEGAS NV 89118
VERONDA, JEFFERY J 23-03972	ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

MAJOR SPORTS WAGERING REPRESENTATIVE

CHIECHI, DEVON R
33-00630

IGT
LAS VEGAS NV 89113

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MAJOR SPORTS WAGERING REPRESENTATIVE

CZARNOMSKI, THOMAS J
33-00636

DRAFTKINGS
BOSTON MA 02116

NON-PROFIT GAMBLING MANAGER

EDWARDS, JANICE M
61-04292

BPOE 01937/LONG BEACH
LONG BEACH WA 98631-0370

RECKNAGEL, KRISSY A
61-04885

FOE 03338/EPHRATA
EPHRATA WA 98823

RIEDEL, CHAROL L
61-04886

FOE 02338/PORT ORCHARD
PORT ORCHARD WA 98366

RYAN, ANGEL L
61-04887

FOE 03862/SHELTON
SHELTON WA 98584

CARD ROOM EMPLOYEE

AKEY, TYLER M
68-34381

B

ALL STAR CASINO
SILVERDALE WA 98383

BLACKWELL, SUMMER N
68-37735

B

ALL STAR CASINO
SILVERDALE WA 98383

BOOZER, JOEL T
68-37711

B

BLACK PEARL RESTAURANT & CARD ROOM
SPOKANE VALLEY WA 99206-4719

BORT, BRENT M
68-37716

B

SILVER DOLLAR CASINO/RENTON
RENTON WA 98057

BURNS, ERIN A
68-37740

B

FORTUNE CASINO LA CENTER
LA CENTER WA 98629

BURTON, TERRANCE J
68-37728

B

CASINO CARIBBEAN
YAKIMA WA 98901

BUSSERT, REICHER A
68-37721

B

RC'S AT VALLEY LANES
SUNNYSIDE WA 98944

CAGAYAT, PHIAVANH
68-19284

B

IMPERIAL PALACE CASINO
TUKWILA WA 98188

CHAILANTE, JOSCIA R
68-37715

B

ALL STAR CASINO
SILVERDALE WA 98383

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

CODER, CASSANDRA L 68-26992	B	RC'S AT VALLEY LANES SUNNYSIDE WA 98944
CODER, GRAYCE L 68-37722	B	RC'S AT VALLEY LANES SUNNYSIDE WA 98944
DAE, KEAHI E 68-37717	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
DAVIS, KRISTY M 68-14010	B	JOKER'S CASINO SPORTS BAR & FIESTA CD RM RICHLAND WA 99352-4122
FESILI, LOA E 68-37718	B	IMPERIAL PALACE CASINO TUKWILA WA 98188
GARCIA, IZZABELLA E 68-37719	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
JONES, LEONARD C 68-10850	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
KARANJA, JENNIFER D 68-37727	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
KEILEY, THOMAS R 68-19298	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
KIM, PHALY 68-04306	B	ROXBURY LANES AND CASINO SEATTLE WA 98126
LIANG, ZHICHAO 68-37156	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
LOEWE, JENNIFER A 68-37731	B	ACE'S POKER MOUNTLAKE TERRACE WA 98043
LOPEZ, DANIEL JR 68-37710	B	ACE'S POKER MOUNTLAKE TERRACE WA 98043
LY, AMY 68-37732	B	GOLDIES SHORELINE CASINO SHORELINE WA 98133
MARTINEZ, CARLY L 68-33928	B	FORTUNE CASINO - RENTON RENTON WA 98055
MORAN-SILVA, SANTOS 68-37736	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

MYRSETH-BARREA, ILARAY L 68-33082	B	ACE'S POKER TUKWILA TUKWILA WA 98188
NGUYEN, NGOC K 68-37725	B	ACE'S POKER MOUNTLAKE TERRACE WA 98043
OBERTI, EDMUND A 68-37703	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
ODELL, IAN E 68-37734	B	ALL STAR CASINO SILVERDALE WA 98383
PIXLEY, GRETCHEN E 68-32595	B	ZEPPOZ PULLMAN WA 99163
SAMPHORS, SEREYOUT 68-34310	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
WESTBROOK, STEPHANIE L 68-36304	B	ALL STAR CASINO SILVERDALE WA 98383
WESTON, SHAWN A 68-37726	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
WHITE, FAWN M 68-37729	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
XIAO, JINGYUAN 68-37720	B	ACE'S POKER MOUNTLAKE TERRACE WA 98043

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

CARPENTER, RUSSELL J
69-57247

PURCELL, NICHOLAS C
69-57252

SCHNINDEHETTE, JON L
69-57250

WILDER, COLE A
69-45284

COLVILLE CONFEDERATED TRIBES

CHAVEZ, KATI
69-51879

DAVE, JOSIAH B
69-57294

GOGAL, LUKAS W
69-57316

GUILLEN CORNEJO, KEVI J
69-57291

HARRINGTON-LAMBERT, ROBERT M
69-57293

KING, SANDY M
69-57292

MANDA, MARISSA B
69-57290

MCDONALD, GERALDINE L
69-24050

ROSENDAHL, MICHAEL J
69-57303

SEMRAU, KARL J
69-57302

STANGER, BRIAN L
69-51534

VALLE, JULISSA I
69-53301

COWLITZ INDIAN TRIBE

CARLOW, DEBRA M
69-57327

CHIDESTER, HEATHER N
69-57236

CHILDS, BRADLEY A
69-57326

GARCIA, MICHAEL J
69-57216

HAYES, JENNIFER L
69-57273

KENNEDY, NOAH W
69-57270

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

KET, SELA
69-57268

LEBLANC, LONNIE R
69-57342

LI, LI-XIAO
69-57215

LOPEZ MORENO, MARIA G
69-57235

MANLEY, TAYLOR M
69-53052

MANNING, ILIA M
69-57288

MATTESON, SHARLENE R
69-57343

MEADORS, KYLE T
69-44748

MEDINA, DAVID M
69-57344

PATRICK, JAMIE M
69-57333

REMENAR, DANIEL R
69-57332

RENDON, JOSHUA M
69-57325

SHAW, JAXSON L
69-57324

SHUTKINA, TATYANA
69-57260

SOTO, CATHERINE L
69-57237

ST PIERRE, JENNIFER M
69-57219

SWINGRUBER, STUART A
69-57283

TEJADAL, APRIL ANN B
69-57218

WARNER, NATHAN H
69-57269

YODER, KEVIN J
69-57258

KALISPEL TRIBE

ARIAS, JOSE L
69-57335

AULD, SELICA R
69-57339

CHMIELEWSKI, LOGAN R
69-57245

COTTER, OWEN A
69-57244

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

DELEON GUERRERO, ALFONSO ELPEDIO J
69-57264

DIPASOUALE, ALESSANDRO R III
69-57225

DOZIER, ALYSSA L
69-57246

DYER, KATHERINE I
69-57261

JENSEN, ELENA S
69-57243

KENDZIORA, ASHLEY D
69-57352

KOTUR, PEGGY S
69-57262

NELSON, CHARLES R II
69-57275

PEGUERO, JOCELYN M
69-57336

RICHERSON, KAI G
69-57249

THOMPSON, DAVID E
69-57337

TOMELO, WILLOW R
69-50332

TORCHIO, PEYTON J
69-57263

VAN METER, RYAN H
69-57334

LUMMI NATION

CASTANEDA, ITALO A
69-57312

JOHN, DEBORAH M
69-06041

JOHNSON, SEAN D
69-56988

MEZA, JORDAN O
69-57309

SULKOSKY, ROBERT E
69-57313

TOMMY, VALERIE S
69-57314

VISHOUS, SHANE K
69-57310

WINTERS, SAMUEL J
69-57311

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

MUCKLESHOOT INDIAN TRIBE

ARIES, LOLA P
69-57305

JONES, LATECE M
69-21839

MOSES, HAROLD
69-27665

MUNSON, SAMANTHA A
69-46491

MYRON, KIMBERLEE L
69-36470

PATH, PISEY
69-57318

RAMIREZ NUNEZ, OMAR
69-57321

SAR, LEAP
69-57320

VO, THANG M
69-57319

WU, XIAOYUN
69-57304

NISQUALLY INDIAN TRIBE

COVIO, DERECK L
69-57272

MOORE, SUSAN M
69-57266

TATUALLA, MICHAEL A JR
69-57301

NOOKSACK INDIAN TRIBE

BAIN, JAMIE J
69-57347

GHIM, DOYOUNG D
69-57315

PORT GAMBLE S'KLALLAM TRIBE

BELL, ZOE N
69-57233

BOOTHE, AMY M
69-57285

BURCH, MATTHEW J
69-55373

BURGAMY, RIVER T
69-57240

DILLOW, JAMES E
69-57138

FRANZ, ROBERT B
69-57286

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PORT GAMBLE S'KLALLAM TRIBE

FULTON, ALICIA E
69-51995

LUND, MARLEE A
69-57279

MCCOSKERY, MICHAEL S
69-57287

MILLESON TUFT, JOHNATHAN J
69-57280

STEELE, MORGAN R
69-57231

SUN, JENNIFER C
69-28437

TRUEB, GREGORY R
69-57230

WELCH, ALEXANDRA N
69-46950

YOUNG, ALICIA M
69-57284

PUYALLUP TRIBE OF INDIANS

BRADFORD, SIM A II
69-55137

COLEMAN, LADARRYL R
69-48649

GENEEHA, GABRIEL E
69-52737

WERNER, JOCIE L
69-57229

QUINAULT NATION

NIPPER, LYDIA R
69-57277

SHOALWATER BAY TRIBE

PARKINS, ERIN C
69-57165

SNOQUALMIE TRIBE

KHUU, TAN T
69-57299

RODRIGUEZ, CARLOS D
69-57298

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SNOQUALMIE TRIBE

SWAN, HAYDEN W
69-57329

SPOKANE TRIBE

CHARRON, SYDNEY S
69-57328

LARKINS, DARRYL K
69-57256

PAYNE, OLIVIA R
69-52848

ROSE, ALLEN D
69-57289

SHORT, DEBORAH E
69-57300

WYNNE, AIDAN J
69-57257

SQUAXIN ISLAND TRIBE

ALEXANDER, LUCIA G
69-18319

BARLOW-MAULDIN, TRISTAN D
69-57330

BOWMAN, SETH L
69-50033

CANNON, JERRY C JR
69-57221

FARRELL, SHANIAH R
69-50115

NORDGREN, KENNETH J
69-55151

REICK, NATASHA J
69-57340

SANTOS, MARIA A
69-57222

TURNER, MARCENE D
69-57217

SWINOMISH INDIAN TRIBAL COMMUNITY

ALLEN, AMANDA R
69-57323

BAKER, ANNA C
69-34493

KESTERSON, ERIKA J
69-57371

LOBERIZA, NIMFA A
69-54619

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SWINOMISH INDIAN TRIBAL COMMUNITY

SCHMIDT, REBEKAH
69-57255

UDLOCK, OWEN E
69-57322

THE TULALIP TRIBES

ASTON, GENE J
69-57232

BILLY, ERIN M
69-57239

COOPERSMITH, ERIK S
69-10600

DONNELLY, MICHAEL G
69-57296

GREISING, ISAIAH J
69-57357

UPPER SKAGIT INDIAN TRIBE

ENGELAND, ALEXANDER A
69-57341

MENDOZA, KIMBERLEY
69-57276

SHARRATT, DAKOTA J
69-57271

YAKAMA NATION

BROWN, KYLE E
69-57356

DIAZ, BIANCA J
69-57308

FUNKHOUSER, JEFFREY S
69-21094

HERNANDEZ, JOANNA S
69-57307

HICKS, AARON L
69-45225

JOHN, ARMANDO R
69-57265

LOPEZ, RUBY
69-57370

MARAVILLA, MORELIA M
69-57306

MILLER, SONYIA
69-18366

YALLUP, SHELBY C
69-57355



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Licensed and Operating		37			
	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
FORTUNE CASINO LA CENTER	LA CENTER	Apr 9, 1998	Jun 30, 2025	00-16903	67-00010
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

Licensed and Operating			37		
	City	Commission Approval Date	License Expiration Date	Org #	License #
LANCER LANES AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2024	00-21681	67-00276
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
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2024	00-20009	67-00212

Licensed but Not Currently Operating			6		
	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
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2025	00-18777	67-00209

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.

AUGUST 8, 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: DAN FREY, SPECIAL AGENT SUPERVISOR, REGULATION & ENFORCEMENT UNIT

SUBJECT: SPECIAL OLYMPICS OF WASHINGTON – 2024 WESTERN WASHINGTON ENHANCED RAFFLE PLAN REQUEST

Special Olympics of Washington (SOWA) is requesting your approval to conduct a “Dream Adventure Raffle,” an enhanced raffle in Western Washington.

In the 2013 Legislative session, the Legislature passed Engrossed Substitute Senate Bill 5723 authorizing enhanced raffles. Washington Administrative Code (WAC) 230-03-152 states the commissioners may vote to approve a bona fide charitable or non-profit organization whose primary purpose is serving individuals with intellectual disabilities to conduct enhanced raffles when they meet the requirements of the law and submit a plan as set out in the rule.

Mission

SOWA’s mission is to provide year-around sports training and athletic competition in a variety of Olympic-type sports for children and adults with intellectual disabilities, giving them continuing opportunities to develop physical fitness, demonstrate courage, experience joy, and participate in the sharing of gifts, skills, and friendship with their families, other Special Olympics athletes, and the community.

Programs and Clients Served

SOWA currently serves more than 12,000 athletes and has a support system of more than 4,000 volunteers.

Purpose for Conducting the Enhanced Raffle

To provide the necessary resources for the organization to enhance its programming, and to grow its athlete base.

Enhanced Raffle Details

Ticket costs: \$50 each, 3-packs for \$125, or 6-packs for \$200.

Weekly Add-on tickets are one for \$20, 3-pack for \$50, or 6-pack for \$75.

\$25,000 Add-On Tickets are one for \$20, 3-pack for \$50, or 6-pack for \$75.

Value Pack, which includes an 8-pack of raffle tickets and a 12-pack of weekly Add-on tickets for \$350.

Super Value Pack, which includes an 8-pack of raffle tickets, a 12-pack of weekly Add-on tickets, and a 20-pack of the \$25,000 Add-on tickets for \$500.

Drawing	Date	Location	Prizes Available
Appreciation	September 18, 2024	2815 2 nd Ave, Suite 370, Seattle	\$1,000
Early Bird	October 16, 2024	2815 2 nd Ave, Suite 370, Seattle	Winner's choice between a 2024 Ford Bronco Sport or \$25,000
Weekly Add-on (8)	September 11, 2024 September 18, 2024 September 25, 2024 October 2, 2024 October 9, 2024 October 16, 2024 October 23, 2024 October 30, 2024	2815 2 nd Ave, Suite 370, Seattle	\$2,500 (each)
\$25,000 Add-on	November 8, 2024	2815 2 nd Ave, Suite 370, Seattle	\$25,000
Grand Prize	November 8, 2024	2815 2 nd Ave, Suite 370, Seattle	Winner's choice between a 2024 Tesla Model Y, 2024 Ford F-150 SuperCrew XLT 4x4 Truck, 2024 Mercedes Benz C-Class, or \$50,000

Security and Purchase of Prizes

All prizes will be purchased with the raffle revenue and awarded after each applicable drawing.

Protection of the integrity of the raffle

SOWA will conduct an audit of ticket stubs prior to each drawing. The audit will be performed by a member of the SOWA staff who will use an Excel-generated random list of tickets to audit.

The tickets will be made up of the entire population of tickets sold, both active and voided. The sample size will be no less than 90 tickets.

All ticket purchase proceeds of the raffle, whether the tickets are sold in the SOWA office by designated staff or through the call center, will be deposited into a SOWA raffle account which is separate from the organization's general operating funds.

An employee of SOWA will draw all winning raffle tickets.

Use of Proceeds

The proceeds will be used to further drive the vision of SOWA.

Protection in the Event of Low Ticket Sales

In the event the raffle ticket sales fall below the breakeven amount of 5,908 tickets sold, and net proceeds in excess of expenses produce a negative value, Special Olympics Washington will consider refunding all purchases and cancelling the raffle due to insufficient sales of tickets or issuing a flat \$5,000 to the Grand Prize winner.

Projected Budget

SOWA estimates the breakeven number of ticket sales to be 5,908 plus 7,276 weekly add on tickets, and 8,653 \$25,000 add-on tickets. SOWA estimates net proceeds to be between \$0 and \$251,811, provided 10,965 grand prize tickets, 13,505 weekly add-on tickets, and 16,050 \$25,000 add-on tickets are sold.

Dedicated Employee Responsible for Oversight of the Enhanced Raffle Operation:

Mary Do, Chief Operating Officer of SOWA, will be overseeing the enhanced raffle operation.

Licensed Service Supplier Managing the Enhanced Raffle

NZ Consulting, Inc., owned 100% by Neal Zeavy, is managing the enhanced raffle for SOWA.

Licensed Call Center Contracted to Receive Enhanced Raffle Ticket Sales

Incept Corporation, owned 100% by Salvatore Falletta, will be the call center contracted to receive enhanced raffle tickets sales for SOWA.

Attachments (1)

Special Olympics Washington



Special Olympics Washington Enhanced Raffle Plan 2024 “Special Olympics Washington Dream Adventure Raffle”

Purpose

Special Olympics Washington serves more than 12,000 participants across the state which is just a fraction of the nearly 170,000* individuals with intellectual disabilities (ID) in Washington who are eligible for its programs.

Through the challenges of the pandemic and as the organization continues to navigate through a post-pandemic world, one thing remains clear: Special Olympics Washington is a constant in the lives of its athletes. For individuals with intellectual disabilities in Washington, Special Olympics is often the only place where they can participate in physical activity, health education, and sports in their communities, as well as at a regional and state level.

Since the inception of the Special Olympics Washington Dream House Raffle in 2013 and the Dream Adventure Raffle in 2022, proceeds have enabled the organization to unlock old financial constraints and open the door to new programs, with the goal of serving more people with intellectual disabilities across the state. Both raffles allowed the organization to react and pivot quickly to provide athletes with critical resources and support during the unprecedented time of the pandemic, including critical sports, health and wellness programs, and leadership programming. The need to continue these programs and bring participants safely back onto the fields with their friends and reconnect with their communities is more vital than ever..

With the funds earned from the Dream Adventure Raffle, Special Olympics Washington can continue the journey of reaching into every corner of the state to make sure EVERYONE has the opportunity to be tested like champions!

About Special Olympics Washington

Special Olympics Washington was incorporated in 1975 and is a 501(c)(3) organization in Washington State. The mission of Special Olympics is to provide year-round sports training and athletic competition in a variety of Olympic-type sports for children and adults with intellectual disabilities, giving them continuing opportunities to develop physical fitness, demonstrate courage, experience joy and participate in the sharing of gifts, skills and friendship with their families, other Special Olympics athletes and the community. Special Olympics Washington currently serves more than 12,000 participants and has a support system of nearly 4,000 volunteers. The organization is part of Special Olympics International, which serves more than 3.9 million athletes and Unified Sports partners in nearly 200 countries and jurisdictions.

**Number of Individuals in Washington State with IDD: 170,000. Source: [Arc of Washington 2024 Advocates Notebook](#)*

About Our Athletes

Special Olympics serves individuals with intellectual disabilities. The term is used when a person has certain limitations in cognitive functioning and skills, including communication, social and self-care skills. The goal of Special Olympics Washington is to reach the approximately 170,000 people in Washington State with ID. Special Olympics Washington athletes range in age from 8 years old to the oldest of our athletes who compete into their 70's. We also have a Young Athletes program for children with and without ID ages 2 to 7.

Special Olympics Washington celebrates people's abilities rather than focus on their disabilities. No matter the person's age or skill level, Special Olympics Washington has something for anyone with intellectual disabilities. We deliver high-quality, year-round competition and training opportunities in an inclusive culture that stresses athletic excellence, rewards determination, emphasizes health, brings together communities and celebrates personal achievement.

Empowering Leaders On and Off the Playing Field

In addition to 23 Olympic-type sports offerings and 180+ local and state competitions, Special Olympics Washington also puts an emphasis on empowering our athletes off the playing field by providing opportunities through our Athlete Leadership Program, Unified Champions Schools®, and Inclusive Health initiatives.

Athlete Leadership: Athletes are empowered to use their voices to assume meaningful leadership roles, influence change in the Special Olympics movement, and help create more accepting and inclusive communities. In 2022, Special Olympics Washington inducted its first athlete as the chairperson of its board of directors.

Unified Champion Schools®: Special Olympics Unified Champion Schools® builds on Special Olympics' values, principles, practices, experiences, and impacts to shape a generation that welcomes everyone.

The Special Olympics Unified Champion Schools® program is aimed at promoting social inclusion through intentionally planned and implemented activities affecting systems-wide change. With sports as the foundation, the three-component model offers a unique combination of effective activities that equip young people with tools and training to create sports, classroom, and school climates of acceptance. These are school climates where students with disabilities feel welcome and are routinely included in, and feel a part of, all activities, opportunities, and functions.

Inclusive Health: Despite severe need and higher health risks, people with intellectual disabilities (ID) are often denied health services and die on average 16 years sooner than the general population. Special Olympics Health is creating a world where people with intellectual disabilities have every opportunity to be healthy.

Inclusive health means people with ID can take full advantage of the same health programs and services available to people who do not have ID. Currently, people with ID face significant challenges in accessing quality health care and obtaining opportunities that promote fitness and wellness, resulting in pronounced health disparities and reduced life expectancy. Special Olympics' health programming focuses on improving the physical and social-emotional well-being of people with ID by increasing inclusion in health care, wellness and health systems for Special Olympics athletes and others with ID.

All our programs and services are provided at no cost to our athletes, Unified partners and/or their families, and will continue to be made possible through the Dream House Raffle, Dream Adventure Raffle, individual giving, special events, grants, and corporate partnerships.

SPECIAL OLYMPICS WASHINGTON
Enhanced Raffle Rules
2024

Special Olympics Washington, a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code, is conducting this raffle pursuant to SB 5723, Washington Administrative Code 230-03-152, to raise funds for ongoing charitable purposes. The Rules and Regulations of the Special Olympics Washington raffle are set forth below. By purchasing a raffle ticket, the purchaser agrees to be bound by these rules and regulations. Special Olympics Washington's interpretation and application of the rules and regulations shall be final.

The 2024 Dream Adventure Raffle will start on August 19, 2024. The Grand Prize Drawing for Special Olympics Washington Dream Adventure Raffle will be held on Friday, November 8, 2024, at the Special Olympics Washington office at: 2815 2nd Ave, Suite 370, Seattle, WA, 98121. All drawings will be held at 2815 2nd Ave, Suite 370, Seattle, WA, 98121.

Tickets will not be sold after October 25, 2024. Tickets may sell out before that time. An independent raffle auditor will supervise the drawing. The drawing for prizes may be open to the public, but the winner does not need to be present to win.

Only 30,000 tickets will be sold. The chances of winning are based on that number. If fewer tickets are sold, the chances of winning the Grand Prize and other prizes improve. The IRS has taken the position that amounts paid for chances in raffles, lotteries or similar drawings for valuable prizes are not gifts, and consequently do not qualify as deductible charitable contributions.

Prize winners assume all fees, local, state, and federal taxes (including but not limited to income taxes based on the value of the prize). Likewise, there may be federal taxes and state and/or local tax consequences if winners select alternate cash prizes (See Prizes section below). Special Olympics Washington takes no responsibility for any tax liabilities. Consult your tax advisor. This offer is void where prohibited by law, and all federal, state and local laws and regulations apply.

By entering this raffle, entrants accept and agree (1) to be bound by all the rules, limitations and restrictions set forth here and (2) that their names and/or likenesses may be disclosed to and used by the news media and may otherwise be used by Special Olympics Washington for publicity purposes and in lists of prize winners to be published in area newspapers and announced on the Special Olympics Washington raffle website. Special Olympics Washington will provide purchasers with all raffle information as required by WAC 230-11-015. Other rules and regulations may apply. Please contact Special Olympics Washington if you have questions. Special Olympics Washington's interpretation and application of the rules and regulations shall be final.

By entering this raffle, each participant releases Special Olympics Washington, its directors, officers, employees and agents from any and all liability for injuries, losses or damages of any kind caused by participating in the raffle or winning any prize or resulting from acceptance, possession, use or misuse of any prize, and each winner agrees to indemnify and hold Special Olympics Washington harmless from any and all losses, damages, rights, claims and actions of any kind rising in connection with or as a result of participating in the raffle or the winner's acceptance or use of any prize.

Special Olympics Washington will provide a "Q&A" document that will be given to potential ticket purchasers and be prominently displayed on the Dream Adventure Raffle website:
www.PugetSoundRaffle.com.

Tickets:

- Raffle tickets cost \$50 each, 3-packs for \$125, or 6-packs for \$200.
- Weekly Add-On Tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75.
- \$25,000 Add-On Tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75.
- A Value Pack is available for purchase and includes an 8-pack of raffle tickets and a 12-pack of weekly add-on tickets for \$350.
- A Super Value Pack is available for purchase and includes an 8-pack of raffle tickets, a 12-pack of weekly add-on tickets, and a 20-pack of the \$25,000 add-on tickets for \$500.

Only one method of payment, one name, and one mailing address are permitted per ticket or ticket pack. Only one eligible person may be entered in the raffle per ticket sold. If the name of more than one person is submitted with a ticket purchase, and that ticket is selected as a winning ticket, then the person named first will be deemed the holder of record of that ticket and declared the winner regardless of who paid for the ticket. Division of prize by a group purchasing a ticket in common shall be the sole responsibility of the person named as the holder of record of that ticket, should that ticket be selected as a winner.

Tickets will be available for purchase starting August 19, 2024.

Early ticket purchases will be included in up to three drawings. Tickets purchased by September 6, 2024, will be eligible for the Appreciation Drawing - \$1,000 (drawing date: September 18, 2024) and the Early Bird Drawing - Ford Bronco Sport or \$25,000 cash (drawing date: October 16, 2024).

Tickets purchased by October 4, 2024, will be eligible for the Early Bird Drawing – Ford Bronco Sport or \$25,000 cash (drawing date: October 16, 2024).

All such tickets, including all winning tickets from the Appreciation Drawing and the Early Bird Drawing, will be included in applicable subsequent drawings as well as the Grand Prize drawing. Tickets purchased by October 25, 2024, will be eligible for the Grand Prize drawing (drawing date: November 8, 2024).

In addition, raffle participants who purchase at least one raffle ticket are eligible to purchase a Weekly Add-On ticket which provides entry into any remaining Weekly Add-On Drawings, and a \$25,000 Add-On ticket which provides entry into the \$25,000 Add-On drawing.

Weekly Add-On tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75. \$25,000 Add-On tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75. Rules for purchasing Add-On tickets are as follows:

Add-On tickets must be ordered in conjunction with a raffle ticket. Add-On ticket orders will not be accepted after the original raffle ticket order. Only one method of payment and only one mailing address are permitted. An individual can purchase as many Add-On tickets as they wish. There is no limit on the maximum number of Add-On tickets that may be sold.

Special Olympics Washington reserves the right to reject any entry form that is submitted with payment that does not constitute “good funds.” All defective or physically altered entry forms will be immediately disqualified by Special Olympics Washington. Prior to the Grand Prize drawing, Special Olympics Washington will make a reasonable effort to notify the individual and/or entity that submits such an entry form or one which has been rejected because the credit card or check did not clear that the entry has been rejected by attempting to make contact through the information provided at the time of submitting the purchase request. All orders for tickets for the

Weekly-Add On drawings, Appreciation drawings, and Early Bird drawings must be received and/or purchased by the indicated deadlines. Any orders received after these deadlines will be held for the subsequent drawings, if applicable and Grand Prize drawing. Special Olympics Washington assumes no responsibility for lost, late, misdirected, or non-delivered mail or fax messages, or any other failure to receive orders or deliver receipts prior to the drawing deadlines.

A raffle participant's sole and exclusive remedy for Special Olympics Washington's breach shall be limited to the return of the purchase price paid for his or her raffle ticket(s). In no event shall Special Olympics Washington, its directors, officers, employees, agents, or representatives be liable to any party for any loss or injuries to earnings, profits, or goodwill, or for any incidental, special, punitive or consequential damages of any person or entity whether arising in contract, tort or otherwise, even if advised of the possibility of such damages.

How to Purchase:

To purchase tickets: use the order form provided and fax the order form to (206) 361-8158, or you may mail it to Special Olympics Washington Dream Adventure Raffle, 2815 2nd Avenue, Suite 370 Seattle, WA, 98121, or call 877-740-9633, providing your name, address, phone number, email address for confirmation along with your credit card number, credit card security code and expiration date. Tickets cannot be purchased on the raffle website or by email. **Any entry form submitted by email will be rejected.** All entries must include payment by cash, check, money order or credit card in US dollars. Special Olympics Washington reserves the right to reject any entry form that is submitted with payment that does not constitute "good funds." No refunds will be made except under the following circumstances: any ticket order with payment received after 30,000 tickets have been sold or after October 25, 2024, will be returned. No other refunds are available except in the exclusive discretion of Special Olympics Washington. Special Olympics Washington assumes no responsibility for lost, late, misdirected, or non-delivered mail or fax messages, or any other failure to receive orders or deliver receipts prior to the drawing deadlines.

Selection of Winners:

The Special Olympics Washington Dream Adventure Raffle Grand Prize drawing will be held on November 8, 2024, from all eligible raffle tickets. Winners need not be present to win. In addition to the Grand Prize drawing, Special Olympics Washington will conduct the following additional drawings:

- Appreciation Drawing on September 18, 2024
- Early Bird Drawing on October 16, 2024
- Weekly Add-On drawing on September 11, 2024
- Weekly Add-On drawing on September 18, 2024
- Weekly Add-On drawing on September 25, 2024
- Weekly Add-On drawing on October 2, 2024
- Weekly Add-On drawing on October 9, 2024
- Weekly Add-On drawing on October 16, 2024
- Weekly Add-On drawing on October 23, 2024
- Weekly Add-On drawing on October 30, 2024
- \$25,000 Add-On drawing on November 8, 2024

All drawings will take place at the Special Olympics Washington office: 2815 2nd Avenue, Suite 370, Seattle, WA, 98121.

Winners will be notified according to the contact information provided to Special Olympics Washington at the time of ticket purchase. In addition to the list of winners posted on the Special

Olympics Washington raffle web site (PugetSoundRaffle.com), a list of winners may be obtained from Special Olympics Washington or by sending a self-addressed, stamped envelope to Special Olympics Washington Dream Adventure Raffle, 2815 2nd Avenue, Suite 370, Seattle, WA, 98121 within one week of the drawing.

In order to collect prizes valued \$5,000 or more, a ticket winner must sign and deliver to Special Olympics Washington: (a) a sworn affidavit of eligibility in accordance with these Rules and applicable law, including without limitation that he or she is at least 18 years old; (b) such written information as is required by any applicable tax and/or real estate laws, including without limitation his or her Social Security Number; (c) proof of identity in forms satisfactory to the Special Olympics Washington showing that the person claiming the prize is the same person who is named on the winning raffle ticket.; and (d) the winning ticket stub. Winners of prizes of \$5,000 or more may be required to submit a W-2G, Form 5754 or similar tax form (provided by Special Olympics Washington) for tax withholding purposes. There are a total of 83 prizes for the Grand Prize drawing.

Eligibility:

Anyone 18 years of age or older may enter. Special Olympics Washington employees, members of the Board of Directors, authorized agents and employees thereof, consultants, attorneys, independent accountant firm, and their spouses and children living in the same household are excluded from participating and are not eligible to win a prize. All federal, state, and local laws and regulations apply. The raffle is void where prohibited or restricted by law. An affidavit of eligibility may be required from prize winners.

Prizes:

The Grand Prize is the winner's choice between a 2024 Tesla Model Y, 2024 Ford F-150 SuperCrew XLT 4x4 Truck, or 2024 Mercedes Benz C-Class, or \$50,000 in cash (Value: \$50,000). A detailed description will be referred to in all raffle materials. Complete prize list below:

All vehicles come as base model factory equipped unless otherwise noted on the raffle website. Winner(s) are responsible for all state or local license, title, registration, taxes, or fees associated with the vehicle, as well as insurance (proof of which must be shown prior to delivery) and pickup or delivery costs at the dealership as well as any non-standard options chosen by the winner and negotiated with the dealership. All contracted vehicles are subject to availability at the automobile dealer and may be selected by Special Olympics Washington and may be substituted with a comparable vehicle by Special Olympics Washington or with the cash alternate prize.

Vacation travel is as noted on the raffle website. Please note that vacation travel is for land only and does not include airfare unless otherwise noted on the raffle website. All vacation and travel prizes are subject to space and availability. All gratuities, taxes and fees are the responsibility of the winner. Winners of travel related prizes must comply with all applicable requirements and restrictions related to said prizes including without limitation applicable travel dates, age restrictions, liability waivers, travel documentation and reservation and confirmation procedures. All vacations are subject to availability and may be substituted with a comparable vacation prize or with a cash alternate prize.

All unclaimed prizes will be returned to Special Olympics Washington 60 days after the Grand Prize drawing date.

Appreciation Drawing:

\$1,000 cash (Value: \$1,000)

Early Bird Drawing:

Winner’s choice between a 2024 Ford Bronco Sport or \$25,000 in cash (Value: \$25,000)

Weekly Add-On Drawing:

Prizes: 8 - \$2,500 cash prizes awarded over 8 weeks (Value: \$20,000)

\$25,000 Add-On Drawing:

Prize: Winner will be awarded \$25,000 in cash.

Grand Prize Drawing:

Grand Prize: The Grand Prize is the winner’s choice between a 2024 Tesla Model Y, 2024 Ford F-150 SuperCrew XLT 4x4 Truck, 2024 Mercedes Benz C-Class, or \$50,000 in cash (Value: \$50,000).

2nd Prize: Las Vegas Car Racing Experience or \$1,000 cash (Value: \$1,000)

3rd Prize: Vacation to Mexico or \$1,000 cash (Value: \$1,000)

4th Prize: Vacation to Italy or \$1,000 cash (Value: \$1,000)

5th Prize: Caribbean Cruise or \$1,000 cash (Value: \$1,000)

6th Prize: Seattle Mariners Tickets or \$1,000 cash (Value: \$1,000)

7th Prize: Seattle Kraken Tickets or \$1,000 cash (Value: \$1,000)

8th Prize: Seattle Seahawks Tickets \$1,000 cash (Value: \$1,000)

Prizes 9-13: 5 - \$500 gift cards (Value: \$2,500)

Prizes 14-83: 70 - \$100 gift cards (Value: \$7,000)

Gift card winners (9-83) will be notified via email and will have a choice between receiving a gift card from one of the following brands:

- AMC Theaters
- Amazon.com
- Best Buy
- Chipotle
- Darden Restaurants
- Grubhub
- Home Depot
- HomeGoods
- Hotels.com
- Landry’s Restaurants
- Panera Bread
- REI
- Target
- Visa Prepaid Card

General Terms and Conditions:

No express warranties are given and no affirmation of Special Olympics Washington by words and/or actions will constitute a warranty. The vehicles will be transferred to the prize winners “as is, where is, and with all faults.” Special Olympics Washington does not provide any guarantee or warranty, expressed or implied, in connection with the vehicles and accepts no liability or responsibility regarding the construction or condition of the vehicles. Special Olympics Washington does not warrant that the vehicles are of mercantile quality or that it can be used for any particular purpose.

All federal and state income taxes based on the value of the grand prize, if selected, will be due from the Grand Prize winner. If the Grand Prize winner selects the one-time cash payment, as well as winners of other prizes of \$5,000 or more, all appropriate and required federal and state taxes will be withheld by Special Olympics Washington in accordance with federal and state law and Special Olympics Washington will remit the balance of the cash prizes to the winners. Special Olympics Washington takes no responsibility for any tax liabilities. Consult your tax advisor.

Any controversy or claim arising out of or relating to the contract, or the breach thereof, shall be settled by binding arbitration administered by the American Arbitration Association (pursuant to its expedited procedures) under its Commercial Arbitration Rules, and judgment on the award rendered by the arbitrator may be entered in any court having jurisdiction thereof.

c(i) Dates of raffle and drawing:

- Start Date – August 19, 2024
- Appreciation Deadline – September 6, 2024
- Appreciation Drawing – September 18, 2024
- Weekly Add-On Drawings –
 - September 11, 2024 (deadline 9/6)
 - September 18, 2024 (deadline 9/13)
 - September 25, 2024 (deadline 9/20)
 - October 2, 2024 (deadline 9/27)
 - October 9, 2024 (deadline 10/4)
 - October 16, 2024 (deadline 10/11)
 - October 23, 2024 (deadline 10/18)
 - October 30, 2024 (deadline 10/25)
- Early Bird Deadline – October 4, 2024
- Early Bird Drawing – October 16, 2024
- Grand Prize and \$25,000 Add-On Deadline – October 25, 2024
- Grand Prize Drawing and \$25,000 Add-On Drawing – November 8, 2024

c(ii) Cost of raffle ticket:

- Raffle tickets cost \$50 each, 3-packs for \$125, or 6-packs for \$200.
- Weekly Add-On Tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75.
- \$25,000 Add-On Tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75.
- A Value Pack is available for purchase and includes an 8-pack of raffle tickets and a 12-pack of weekly add-on tickets for \$350.
- A Super Value Pack is available for purchase and includes an 8-pack of raffle tickets, a 12-pack of weekly add-on tickets, and a 20-pack of \$25,000 add-on tickets for \$500.

c(iii) Prizes available:

Appreciation Drawing:

\$1,000 cash (Value: \$1,000)

Early Bird Drawing:

Winner's choice between a 2024 Ford Bronco Sport or \$25,000 cash. (Value: \$25,000)

Weekly Add-On Drawing:

Prizes: 8 prizes of \$2,500 cash each. (Value: \$20,000)

\$25,000 Add-On Drawing:

Prize: Winner will be awarded \$25,000 in cash.

Grand Prize Drawing:

Grand Prize: The Grand Prize is the winner's choice between a 2024 Tesla Model Y, 2024 Ford F-150 SuperCrew XLT 4x4 Truck, or 2024 Mercedes Benz C-Class, or \$50,000 in cash (Value: \$50,000).

2nd Prize: Las Vegas Car Racing Experience or \$1,000 cash (Value: \$1,000)

3rd Prize: Vacation to Mexico or \$1,000 cash (Value: \$1,000)

4th Prize: Vacation to Italy or \$1,000 cash (Value: \$1,000)

5th Prize: Caribbean Cruise or \$1,000 cash (Value: \$1,000)

6th Prize: Seattle Mariner Tickets or \$1,000 cash (Value: \$1,000)

7th Prize: Seattle Kraken Tickets or \$1,000 cash (Value: \$1,000)

8th Prize: Seattle Seahawks Tickets \$1,000 cash (Value: \$1,000)

Prizes 9-13: 5 - \$500 gift cards (Value: \$2,500)

Prizes 14-83: 70 - \$100 gift cards (Value: \$7,000)

Gift card winners (9-83) will be notified via email and will have a choice between receiving a gift card from one of the following brands:

- AMC Theaters
- Amazon.com
- Best Buy
- Chipotle
- Darden Restaurants
- Grubhub
- Home Depot
- HomeGoods
- Hotels.com
- Landry's Restaurants
- Panera Bread
- REI
- Target
- Visa Prepaid Card

c(iv) Security of prizes:

Prizes including cash, vacations, and cars, which will be purchased and awarded after each applicable drawing with raffle revenue, thus prizes don't need to be protected since they are not being purchased prior to the raffle drawing.

c(v) Plans for selling raffle tickets:

Raffle tickets will be sold via phone, fax, mail, and in person.

Please refer to the Raffle Ticket Process document attachment (**Attachment A**)

c(vi) Description of how the integrity of the raffle will be protected:

Special Olympics Washington will conduct an audit of ticket stubs prior to each drawing. The audit will be performed by a member of the Special Olympics Washington staff who will use an Excel generated random list of tickets to audit. The tickets will be made up of the entire population of tickets sold, both active and voided. The sample size will be no less than 90 tickets.

All ticket purchase proceeds of the raffle, whether the tickets are sold in the Special Olympics Washington office by designated staff or through the call center, will be deposited into a Special Olympics Washington raffle account which is separate from the Organization's general operating funds.

An employee of Special Olympics Washington will draw all winning raffle tickets.

d) Explanation of how the proceeds from the raffle will be used:

Funds will be used to further drive the vision of Special Olympics Washington as described on page 1 of this document.

e) Plan to protect the licensee in the event of low-ticket sales and other risks:

In the event the raffle ticket sales fall below the breakeven amount of 5,908 tickets sold, net proceeds in excess of expenses produce a negative value, Special Olympics Washington will consider refunding all purchases and cancelling the raffle due to insufficient sales of tickets or issuing a flat \$5,000 to the Grand Prize winner.

f) Explanation of how the prize(s) will be purchased for the raffle:

Cash prizes are offered from the sale of raffle tickets. Non-cash prizes, such as vacations and cars will be purchased if the winner chooses such prize in lieu of cash.

g) Projected budget includes the following (Attachment B):

- i. Estimated gross gambling receipts, expenses, and net income for the raffle.
- ii. Corresponding sales and prize levels with projected revenues and expenses for each level.
- iii. Minimum and maximum prizes available.

h) Special Olympics Washington's dedicated employee is Mary Do.

i) NZ Consulting Inc. will be the licensed service supplier.

j) Incept will be our licensed call center.

k) Raffle Ticket Process Document (Attachment A)

l) Website Chat Feature:

Special Olympics Washington may communicate with the public via a chat feature on the raffle website to answer questions about the raffle including how to purchase raffle tickets although raffle tickets may not be purchased via the website chat feature directly. Special Olympics Washington will only use the chat feature to communicate information on how to order a ticket such as communicating the phone order number, fax number or mailing address for entry forms or to confirm whether an entry form has been received for processing. Ticket numbers will not be communicated via the chat feature.

SPECIAL OLYMPICS WA

WSGC Ticket Sales

2024 Fall Raffle

S:\Raffle\2024 Fall Raffle\Plan and Process\2024 SOWA Fall Raffle Budget v4.xlsx\WSGC Budget

	Breakeven	% of revenue	Budget	% of total revenue
Total # of Raffle Tickets	5,908		10,965	
Average Price/ticket	\$ 31.00		\$ 31.00	
GROSS RAFFLE TICKET SALES	\$ 183,148	51.5%	\$ 339,915	51.5%
Total # of Weekly Add On Tickets	7,276		13,505	
Average Price/ticket	\$ 13.00		\$ 13.00	
GROSS WEEKLY ADD ON TICKET SALES	\$ 94,588	26.6%	\$ 175,565	26.6%
Total # of \$25K Add On Tickets	8,653		16,050	
Average Price/ticket	\$ 9.00		\$ 9.00	
GROSS \$25K Add-On TICKET SALES	\$ 77,877	21.9%	\$ 144,450	21.9%
TOTAL SALES	\$ 355,613		\$ 659,930	

Expenses:

Advertising	54,000	15.2%	54,000	8.2%	Fixed
Professional Fees	61,343	17.3%	113,850	17.3%	Variable
Personnel	50,769	14.3%	50,769	7.7%	Fixed
Sales Expense	42,000	11.8%	42,000	6.4%	Fixed
Prize Expense	137,500	38.7%	137,500	20.8%	Fixed
Regulatory Expense	10,000	2.8%	10,000	1.5%	Fixed
TOTAL EXPENSE	355,612	100.0%	408,119	61.8%	
NET INCOME	1	0.0%	251,811	38.2%	

PRIZES

09/18/24 <i>Appreciation Drawing:</i> \$1,000 cash (Value: \$1,000)	\$ 1,000
10/16/24 <i>Early Bird Drawing:</i> Winner's choice between a 2024 Ford Bronco Sport or \$25,000 in cash	\$ 25,000
<i>Weekly Add-On Drawing:</i> Prizes: 8 - \$2,500 cash prizes awarded over 8 weeks (Value: \$20,000)	
09/11/24 #1	\$ 2,500
09/18/24 #2	\$ 2,500
09/25/24 #3	\$ 2,500
10/02/24 #4	\$ 2,500
10/09/24 #5	\$ 2,500
10/16/24 #6	\$ 2,500
10/23/24 #7	\$ 2,500
10/30/24 #8	\$ 2,500
11/08/24 <i>\$25K Add-On Drawing:</i>	\$ 25,000
11/08/24 <i>Grand Prize Drawing:</i> Prize: choice of 2024 Tesla Model Y, 2024 Ford F-150 SuperCrew XLT 4x4 Truck, or 2024 Mercedes Benz C-Class, or \$50,000 in cash (Value: \$50,000).	\$ 50,000
11/08/24 <i>2nd Prize:</i> Las Vegas Car Racing Experience or \$1,000 cash (Value: \$1,000)	\$ 1,000
11/08/24 <i>3rd Prize:</i> Vacation to Mexico or \$1,000 cash (Value: \$1,000)	\$ 1,000
11/08/24 <i>4th Prize:</i> Vacation to Italy or \$1,000 cash (Value: \$1,000)	\$ 1,000
11/08/24 <i>5th Prize:</i> Caribbean Cruise or \$1,000 cash (Value: \$1,000)	\$ 1,000
11/08/24 <i>6th Prize:</i> Seattle Mariner Tickets or \$1,000 cash (Value: \$1,000)	\$ 1,000
11/08/24 <i>7th Prize:</i> Seattle Kraken Tickets or \$1,000 cash (Value: \$1,000)	\$ 1,000
11/08/24 <i>8th Prize:</i> Seattle Seahawks Tickets \$1,000 cash (Value: \$1,000)	\$ 1,000
11/08/24 <i>Prizes 9-13:</i> 5 - \$500 gift cards (Value: \$2,500)	\$ 2,500
11/08/24 <i>Prizes 14-83:</i> 70 - \$100 gift cards (Value: \$7,000)	\$ 7,000

\$ 137,500

The materials for Tab 3
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.

August 2024 – Discussion and Possible Action

July 2024 – Discussion Only

May 2024 – Discussion Only

January 2024 – Initiate Rule Making

Tab 4 : August 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 July 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.

At the July 2024 commission meeting, staff presented updated budget projections, financial information, and shared a supplemental budget request. Commissioners approved the supplemental budget request. Commissioners discussed how to proceed with rulemaking to address license fee increases and elected to wait for more available data before taking further action.

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.

Attachments:

- Comment from Washington Professional Sports Teams
- Comment from Brandon Weedon
- Comment from Taek Kim
- Comment from Lisa Emery

Staff Recommendation

Staff recommends withdrawing our CR-101 to begin initial rulemaking regarding adjusting license fees OR continuing to discuss how to proceed with rulemaking while more data becomes available.

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.

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



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: [Washington State Gambling Commission](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Webform submission from: Request for public comment
Date: Monday, July 8, 2024 2:03:12 PM

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.



Staff Proposed Rulemaking

New Rules

WAC 230-15-190 Paying out odds-based and fixed based prizes

WAC 230-15-195 Keeping funds to pay fixed-based prizes

Amend

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

August 2024 – Final Action

July 2024 – Discussion Only

May 2024 – Discussion and Possible Filing

March 2024 – Initiate Rulemaking

Tab 5: August 2024 Commission Meeting Agenda.

Who Proposed the Rule Change?

Washington State Gambling Commission Staff

Background

BOLD = Changes made since July 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 (Revised) and 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

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.

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.

August 8, 2024

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

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

SUBJECT: **SK23 Investments LLC, doing business as Hollywood Cardroom**
CR 2023-01552
Final Order – August 8, 2024, Commission Meeting

The Washington State Gambling Commission (WSGC) issued licensee SK23 Investments, LLC d/b/a Hollywood Cardroom (hereinafter referred to as “Hollywood”), a permit, No. 25-00065, authorizing Manufacturer’s Special Sales Permit activity, and License No. 65-07522, authorizing Social and Public Card Room activity, in Shoreline, Washington. The permit expired on December 31, 2023, and the license expires on June 30, 2024.

On July 12, 2023, a WSGC agent met with majority owner Shawn Weintraub and the accounting manager to go over their records. The June 2023 player supported jackpot¹ bank statement indicated an overdraft fee of \$20, where a customer had cashed a check for a prize and the check was not honored by Hollywood’s bank due to insufficient funds to cover the check. The account balance remained negative for five days. Hollywood was informed that if it did not have the funds to operate a player supported jackpot it should not be operating that activity.

On October 5, 2023, a WSGC agent met with Hollywood’s accounting manager to receive corrected player supported jackpot documents for June through September 2023. The September 2023 prize fund accrual record showed prizes collected far exceeded the player supported jackpot revenue. The total amount collected was \$48,693.60, whereas the total amount of prizes paid out was \$121,962.00, a difference of \$73,268.40. Due to the accounting discrepancies Hollywood was unable to properly track and account for the player supported jackpot account for the months of June 2023 through October 2023.

¹ A player supported jackpot is a separate contest of chance directly related to the play or outcome of an authorized nonhouse-banked card game. In a player supported jackpot licensees collect funds from wagers for a separate prize, acting only as custodian for the funds with no legal rights except for administrative fees.

In addition, WSGC agents discovered a compliance issue in October 2023 during an inspection. It was discovered that the soft count² was not performed at the appropriate time per their approved internal control documents. Hollywood was required to perform the soft count at 10 A.M., however from August 30, 2023, to October 4, 2023, the soft count was performed late or early on 11 out of the previous 34 days.

On November 7, 2023, WSGC Special Agents conducted an on-site review of Hollywood's premises. During a review of Hollywood's financial documents Weintraub disclosed that he transferred \$40,000.00 of his retirement accounts into the operating account for Hollywood in May 2023. Further review indicated Hollywood received a loan of \$75,000.00 from a group Weintraub named "ROC Financial" but was in fact Everest Business Funding, an unregulated merchant business funding company, repayable on a daily basis through fifteen (15) percent of the daily gross receipts. This loan agreement also included a provision wherein Everest Business Funding monitors the business operating account to ensure compliance with the terms of the agreement. During that review it was revealed that George Sarhanis, an associate of Weintraub, attempted to recruit several potential investors, and was successful in obtaining the lending deal from Everest Business Funding and securing an accountant to work on Hollywood's financial records. Sarhanis did not appear on any employee payroll records, nor was he listed among any contractors or 1099 employees.

When reviewing the general ledger in both the physical and electronic forms, several inaccuracies were noted, including contributions not being entered into the general ledger, failure to keep an accounting system on a double-entry system in accordance with Generally Accepted Accounting Principles, inaccurate reporting of transactions, and failures to report cash infusions correctly. These inaccuracies made it impossible for agents to determine what funds were infused into the business or when those funds were infused. Furthermore, Weintraub repeatedly failed to disclose material facts and made several false or misleading statements during this investigation, including inaccurate or misleading statements as to the total debts Hollywood was incurring, agreements with third parties, and ability to repay these debts

Hollywood was required to submit quarterly license reports and pay quarterly license fees during the duration of their license. For the second quarter of 2023, Hollywood's license fees were rejected due to insufficient funds, and remains unpaid. Payment of \$7,433.00 for this replacement is due. For the fourth quarter of 2023, Hollywood failed to pay their quarterly license fee in the amount of \$2,512.00 and \$750.00 late fee.

Deputy Director Gary Drumheller (acting for Executive Director Tina Griffin) issued Administrative Charges on June 24, 2024, alleging that Hollywood Cardroom's above actions violated, WAC 230-03-085(1), (3), and (8), WAC 230-05-132, WAC 230-06-080, WAC 230-15-360(2)(d), WAC 230-15-400(6) & (7), WAC 230-15-730, RCW 9.46.170 and RCW 9.46.075(1), (7), & (8). The charges were mailed by regular mail on June 25, 2024, to Hollywood Cardroom's last known address on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by July 19, 2024. WSGC has not received a response as of July 23, 2024.

² A soft count is a process by which casinos count money in drop boxes for consistency in accounting.

Hollywood Default

August 8, 2024

Page 3

You may take final action against Hollywood Cardroom's gambling license. Combined, Hollywood Cardroom's failure to follow rules regarding accounting, financing, and maintaining player supported jackpots demonstrates the licensee poses a threat to the effective regulation of gambling as demonstrated through prior activities. The Commission can take final action against Hollywood Cardroom's gambling license under Case Number CR 2023-01552 pursuant to RCW 9.46.075, RCW 34.05.440, RCW 34.05.461, and WAC 230-03-085. Staff recommends that the Commission sign the proposed final order and revoke Hollywood Cardroom's gambling license, number 65-07522.

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wsgc.wa.gov

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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 2023-01552

SK23 INVESTMENTS, LLC d/b/a
HOLLYWOOD CARDROOM
Organization No. 00-24945,

FINAL ORDER OF THE
GAMBLING COMMISSION

Licensee.

This matter having come before the Washington State Gambling Commission (Commission) on August 8, 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 (WSGC) issued Licensee SK23 Investments, LLC d/b/a Hollywood Cardroom (hereinafter referred to as “Hollywood”), a permit, No. 25-00065, authorizing Manufacturer’s Special Sales Permit activity, and License No. 65-07522, authorizing Social and Public Card Room activity, in Shoreline, Washington.

2. The permit, 25-00065 which expired on December 31, 2023, and the license 65-07522, which expires on June 30, 2024, were issued subject to Hollywood’s compliance with state gambling laws and Commission rules.

3. On July 12, 2023, a WSGC agent met with majority owner Shawn Weintraub and the accounting manager to go over their records.

4. The June 2023 player supported jackpot¹ bank statement indicated an overdraft fee of \$20, where a customer had cashed a check for a prize and the check was not honored by Hollywood's bank due to insufficient funds to cover the check. The account balance remained negative for five days. Hollywood was informed that if it did not have the funds to operate a player supported jackpot it should not be operating that activity.

5. On October 5, 2023, a WSGC agent met with Hollywood's accounting manager to receive corrected player supported jackpot documents for June through September 2023. The September 2023 prize fund accrual record showed prizes collected far exceeded the player supported jackpot revenue. The total amount collected was \$48,693.60, whereas the total amount of prizes paid out was \$121,962.00, a difference of \$73,268.40.

6. Due to the accounting discrepancies Hollywood was unable to properly track and account for the player supported jackpot account for the months of June 2023 through October 2023. For example, Hollywood was unable to reconcile a difference in player funds for \$2,443.60 between the player supported jackpot prize balance and the bank statement in June 2023. In July 2023, Hollywood was unable to reconcile a difference in player funds for \$2,525.50 between the player supported jackpot prize balance and the bank statement. In August 2023, Hollywood was unable to reconcile a difference in player funds for \$39,118.90 between the player supported jackpot prize balance and the bank statement. In September 2023, Hollywood was unable to reconcile a difference in player funds for \$104,353.20 between the player supported jackpot prize balance and the bank statement. In October 2023, Hollywood was unable to reconcile a difference in player funds for \$92,062.60 between the player supported jackpot prize balance and the bank statement.

7. In addition, WSGC agents discovered a compliance issue in October 2023 during an inspection. It was discovered that the soft count² was not performed at the appropriate time per

¹ A player supported jackpot is a separate contest of chance directly related to the play or outcome of an authorized nonhouse-banked card game. In a player supported jackpot licensees collect funds from wagers for a separate prize, acting only as custodian for the funds with no legal rights except for administrative fees.

² A soft count is a process by which casinos count money in drop boxes for consistency in accounting.

their approved internal control documents. Hollywood was required to perform the soft count at 10 A.M., however from August 30, 2023, to October 4, 2023, the soft count was performed late or early on 11 out of the previous 34 days.

8. On November 7, 2023, WSGC Special Agents conducted an on-site review of Hollywood's premises. During a review of Hollywood's financial documents Weintraub disclosed that he transferred \$40,000.00 of his retirement accounts into the operating account for Hollywood in May 2023. Further review indicated Hollywood received a loan of \$75,000.00 from a group Weintraub named "ROC Financial" but was in fact Everest Business Funding, an unregulated merchant business funding company, repayable on a daily basis through fifteen (15) percent of the daily gross receipts. This loan agreement also included a provision wherein Everest Business Funding monitors the business operating account to ensure compliance with the terms of the agreement. During that review it was revealed that George Sarhanis, an associate of Weintraub, attempted to recruit several potential investors, and was successful in obtaining the lending deal from Everest Business Funding and securing an accountant to work on Hollywood's financial records. Sarhanis did not appear on any employee payroll records, nor was he listed among any contractors or 1099 employees.

9. When reviewing the general ledger in both the physical and electronic forms, several inaccuracies were noted, including contributions not being entered into the general ledger, failure to keep an accounting system on a double-entry system in accordance with Generally Accepted Accounting Principles, inaccurate reporting of transactions, and failures to report cash infusions correctly. These inaccuracies made it impossible for agents to determine what funds were infused into the business or when those funds were infused.

10. Hollywood was required to submit quarterly license reports and pay quarterly license fees during the duration of their license. For the second quarter of 2023, Hollywood's license fees were rejected due to insufficient funds, and remains unpaid. Payment of \$7,433.00 for this replacement is due. For the fourth quarter of 2023, Hollywood failed to pay their quarterly license fee in the amount of \$2,512.00 and \$750.00 late fee.

11. During the course of this investigation Weintraub repeatedly failed to disclose material facts, made several false or misleading statements as to the total debts Hollywood was incurring, agreements with third parties, and ability to repay these debts.

12. Deputy Director Gary Drumheller (acting for Executive Director Tina Griffin) issued Administrative Charges on June 24, 2024, alleging that Hollywood Cardroom's above actions violated, WAC 230-03-085(1), (3), and (8), WAC 230-05-132, WAC 230-06-080, WAC 230-15-360(2)(d), WAC 230-15-400(6) & (7), WAC 230-15-730, RCW 9.46.170 and RCW 9.46.075(1), (7), & (8). The charges allege Hollywood Cardroom's actions demonstrate a disregard for statutes and rules promulgated, and that they pose a clear threat to the effective regulation of gambling.

13. Hollywood Cardroom was sent the charges by regular mail on June 25, 2024, to the last address the Gambling Commission had on file. WSGC received a certified mail receipt from the United States Postal Service indicating the charges were delivered on June 26, 2024.

14. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by July 19, 2024. To date, the Commission has received no communication from Hollywood Cardroom.

II. CONCLUSIONS OF LAW

1. Hollywood Cardroom 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 Hollywood Cardroom's gambling license under Case Number CR 2023-01552 pursuant to RCW 9.46.075, RCW 34.05.440, RCW 34.05.461, and WAC 230-03-085.

3. Hollywood Cardroom's gambling license should be revoked under Case Number CR 2023-01552 pursuant to WAC 230-03-085(1), (3), (5), (8), and (9)(a), RCW 9.46.153(1), and RCW 9.46.075(1), (7), and (8).

III. ORDER

This matter having come before the Commission at its August 8, 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 Hollywood Cardroom's gambling license, Number 65-07522, is **REVOKED**.

DATED this __ day of August, 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:

HOLLYWOOD CARDROOM CASINO
1207 118TH PL SW
EVERETT WA 98204

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

Damon Mentzer
Administrative Assistant



Washington State Gambling Commission

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

AUGUST 8, 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: PROPOSED AGENCY REQUEST LEGISLATION FOR 2025

Staff is exploring agency request legislation to amend RCW 42.56.270 to exempt proprietary financial and security information submitted to or obtained by the Gambling Commission from public disclosure.

On July 25, 2024, staff sent the attached letter and draft language to tribal partners, our licensees, and stakeholders seeking comments by August 13, 2024. We also posted the letter and the draft language on our website.

As of July 30, 2024, we've received two responses.

We will continue to seek input from our tribal partners, licensees, stakeholders, and others as we prepare the packet for your approval at the September 2024 commission meeting.

Attachments:

- Letter of July 24, 2024
- Email responses

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Washington State Gambling Commission

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

July 24, 2024

Re: Agency Request Legislation

Dear Stakeholders and Tribal Partners:

The Gambling Commission is considering a proposal for agency request legislation, and we are contacting our tribal partners and stakeholders requesting their input and comments.

A draft of the possible legislation is enclosed; however, the exact wording may change before submittal to the Governor's Office. The proposal for consideration is:

- Amending RCW 42.56.270 to exempt proprietary financial and security information submitted to or obtained by the gambling commission.

As a licensing, regulatory, and enforcement agency, the Gambling Commission requires sensitive financial and security information to be submitted to determine qualification for licensure and compliance with laws, rules, and Tribal-State Compacts to fulfill our legislative mandate to keep the criminal element out of gambling.

We are seeking exemptions to include proprietary financial and security information, such as information on facility security, gambling equipment, financial statements, internal controls, and tribal memorandums of understanding and appendix revisions. Due to recent events, such as cyberattacks and violent robberies, we feel that it is important to update the exemptions outlined in RCW 42.56.270, to provide clarity through examples of records and information to be exempted from disclosure and ensure that the information the tribes and licensees are required to provide us is not contributing to these events.

The last update to the Public Records Act for records required to be submitted to the gambling commission for independent auditor's reports and financial statements of house-banked social card game licenses was in 2007. Given the vast changes in the types of gambling equipment and operating environment, an update to the Public Records Act is necessary to reflect the changes in the documents we receive to regulate the industry.

This proposed statutory change will allow the agency to protect sensitive proprietary financial and security information we receive to determine qualification for licensure and compliance with laws, rules, and Tribal-State Compacts without jeopardizing the assets and safety of the staff of our tribal partners and licensees. These changes would also reduce the risk of fraud in the operation of the gambling equipment.

July 24, 2024
Page 2

Due to the timeline associated with submitting agency request legislation, we would appreciate receiving your comments **no later than August 13, 2024**. Please send your comments and questions to me at Tina.Griffin@wsgc.wa.gov.

Sincerely,



Tina Griffin
Executive Director

Enclosure

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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

BILL REQUEST - CODE REVISER'S OFFICE

BILL REQ. #: P/CRO-27/25

ATTY/TYPIST: CRO:le1

BRIEF DESCRIPTION:

AN ACT Relating to

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF WASHINGTON:

Sec. 1. RCW 42.56.270 and 2023 c 340 s 11 are each amended to read as follows:

RCW Caption: Financial, commercial, and proprietary information.

The following financial, commercial, and proprietary information is exempt from disclosure under this chapter:

(1) Valuable formulae, designs, drawings, computer source code or object code, and research data obtained by any agency within five years of the request for disclosure when disclosure would produce private gain and public loss;

(2) Financial information supplied by or on behalf of a person, firm, or corporation for the purpose of qualifying to submit a bid or proposal for (a) a ferry system construction or repair contract as required by RCW 47.60.680 through 47.60.750; (b) highway construction or improvement as required by RCW 47.28.070; or (c) alternative public works contracting procedures as required by RCW 39.10.200 through 39.10.905;

(3) Financial and commercial information and records supplied by private persons pertaining to export services provided under chapters 43.163 and 53.31 RCW, and by persons pertaining to export projects under RCW 43.23.035;

(4) Financial and commercial information and records supplied by businesses or individuals during application for loans or program services provided by chapters 43.325, 43.163, 43.160, 43.330, 43.168, and 43.181 RCW and RCW 43.155.160, or during application for economic development loans or program services provided by any local agency;

(5) Financial information, business plans, examination reports, and any information produced or obtained in evaluating or examining a business and industrial development corporation organized or seeking certification under chapter 31.24 RCW;

(6) Financial and commercial information supplied to the state investment board by any person when the information relates to the investment of public trust or retirement funds and when disclosure would result in loss to such funds or in private loss to the providers of this information;

(7) Financial and valuable trade information under RCW 51.36.120;

(8) Financial, commercial, operations, and technical and research information and data submitted to or obtained by the clean Washington center in applications for, or delivery of, program services under *chapter 70.95H RCW;

(9) Financial and commercial information requested by the public stadium authority from any person or organization that leases or uses the stadium and exhibition center as defined in RCW 36.102.010;

(10)(a) Financial information, including but not limited to account numbers and values, and other identification numbers supplied by or on behalf of a person, firm, corporation, limited liability company, partnership, or other entity related to an application for a horse racing license submitted pursuant to RCW 67.16.260(1)(b), cannabis producer, processor, or retailer license, liquor license, gambling license, or lottery retail license;

~~(b) Internal control documents, independent auditors' reports and financial statements, and supporting documents: (i) Of house-banked social card game licensees required by the gambling commission pursuant to rules adopted under chapter 9.46 RCW; or (ii) submitted by tribes with an approved tribal/state compact for class III gaming;~~ Proprietary financial and security information submitted to or obtained by the gambling commission from and on behalf of license applicants, licensees, gaming facilities or a tribe pursuant to an approved tribal/state compact. Proprietary financial and security information includes, but is not limited to, the following:

(i) Financial statements and transactions including independent auditors' reports and financial statements with any supporting documents, bank account records, player tracking records, bond issuances, loan agreements, purchase agreements, and stock buyouts;

(ii) Gaming internal control documents. "Internal Controls" are defined as the documents that describe the internal operational system or internal procedures of the gaming facility designed to promote efficiency, safeguard assets,

and avoid fraud and error. Internal Control documents include but are not limited to records pertaining to security camera technical specifications, operation and placement; cash out procedures and locations; cage security information; building access controls; required forms; and personal identifiable information control procedures;

- (iii) Gaming facility security information, including descriptions of facility layout and schematics, firewall configurations, network topologies; source code, software files, digital signatures of software files, security assessment reports, and any sensitive information that could negatively impact the security of the facility;
- (iv) Gaming equipment, including related hardware, software, and security information, such as firewall configurations, network topologies or diagrams, source code, software files, digital signatures of software files, schematics, user credentials, system components, and any sensitive information about the equipment that could compromise the security and integrity of the equipment;
- (v) Tribal Memorandums of Understanding and Appendix Revisions, including attachments, that contain any of the information listed in (i) through (iv) of this subsection (10) (b); and
- (vi) The exemption for the information listed in (i) through (v) of this subsection (10) (b) continues to apply to the information regardless of the form of the information, including after the information has been incorporated into records created by the gambling commission;

(c) Valuable formulae or financial or proprietary commercial information records received during a consultative visit or while providing consultative services to a licensed cannabis business in accordance with RCW 69.50.561;

(11) Proprietary data, trade secrets, or other information that relates to: (a) A vendor's unique methods of conducting business; (b) data unique to the product or services of the vendor; or (c) determining prices or rates to be charged for services, submitted by any vendor to the department of social and health services or the health care authority for purposes of the development, acquisition, or implementation of state purchased health care as defined in RCW 41.05.011;

(12) (a) When supplied to and in the records of the department of commerce:

(i) Financial and proprietary information collected from any person and provided to the department of commerce pursuant to RCW 43.330.050(8);

(ii) Financial or proprietary information collected from any person and provided to the department of commerce or the office of the governor in connection with the siting, recruitment, expansion, retention, or relocation of that person's business and until a siting decision is made, identifying information of any person supplying information under this subsection and the locations being considered for siting, relocation, or expansion of a business; and

(iii) Financial or proprietary information collected from any person and provided to the department of commerce pursuant to RCW 43.31.625 (3) (b) and (4);

(b) When developed by the department of commerce based on information as described in (a) (i) of this subsection, any work product is not exempt from disclosure;

(c) For the purposes of this subsection, "siting decision" means the decision to acquire or not to acquire a site;

(d) If there is no written contact for a period of 60 days to the department of commerce from a person connected with siting, recruitment, expansion, retention, or relocation of that person's business, information described in (a) (ii) of this subsection will be available to the public under this chapter;

(13) Financial and proprietary information submitted to or obtained by the department of ecology or the authority created under chapter 70A.500 RCW to implement chapter 70A.500 RCW;

(14) Financial, commercial, operations, and technical and research information and data submitted to or obtained by the life sciences discovery fund authority in applications for, or delivery of, grants under RCW 43.330.502, to the extent that such information, if revealed, would reasonably be expected to result in private loss to the providers of this information;

(15) Financial and commercial information provided as evidence to the department of licensing as required by RCW 19.112.110 or

19.112.120, except information disclosed in aggregate form that does not permit the identification of information related to individual fuel licensees;

(16) Any production records, mineral assessments, and trade secrets submitted by a permit holder, mine operator, or landowner to the department of natural resources under RCW 78.44.085;

(17) (a) Farm plans developed by conservation districts, unless permission to release the farm plan is granted by the landowner or operator who requested the plan, or the farm plan is used for the application or issuance of a permit;

(b) Farm plans developed under chapter 90.48 RCW and not under the federal clean water act, 33 U.S.C. Sec. 1251 et seq., are subject to RCW 42.56.610 and 90.64.190;

(18) Financial, commercial, operations, and technical and research information and data submitted to or obtained by a health sciences and services authority in applications for, or delivery of, grants under RCW 35.104.010 through 35.104.060, to the extent that such information, if revealed, would reasonably be expected to result in private loss to providers of this information;

(19) Information gathered under chapter 19.85 RCW or RCW 34.05.328 that can be identified to a particular business;

(20) Financial and commercial information submitted to or obtained by the University of Washington, other than information the university is required to disclose under RCW 28B.20.150, when the information relates to investments in private funds, to the extent that such information, if revealed, would reasonably be expected to result in loss to the University of Washington consolidated endowment fund or to result in private loss to the providers of this information;

(21) Market share data submitted by a manufacturer under RCW 70A.500.190(4);

(22) Financial information supplied to the department of financial institutions, when filed by or on behalf of an issuer of securities for the purpose of obtaining the exemption from state

securities registration for small securities offerings provided under RCW 21.20.880 or when filed by or on behalf of an investor for the purpose of purchasing such securities;

(23) Unaggregated or individual notices of a transfer of crude oil that is financial, proprietary, or commercial information, submitted to the department of ecology pursuant to RCW 90.56.565(1)(a), and that is in the possession of the department of ecology or any entity with which the department of ecology has shared the notice pursuant to RCW 90.56.565;

(24) Financial institution and retirement account information, and building security plan information, supplied to the liquor and cannabis board pursuant to RCW 69.50.325, 69.50.331, 69.50.342, and 69.50.345, when filed by or on behalf of a licensee or prospective licensee for the purpose of obtaining, maintaining, or renewing a license to produce, process, transport, or sell cannabis as allowed under chapter 69.50 RCW;

(25) Cannabis transport information, vehicle and driver identification data, and account numbers or unique access identifiers issued to private entities for traceability system access, submitted by an individual or business to the liquor and cannabis board under the requirements of RCW 69.50.325, 69.50.331, 69.50.342, and 69.50.345 for the purpose of cannabis product traceability. Disclosure to local, state, and federal officials is not considered public disclosure for purposes of this section;

(26) Financial and commercial information submitted to or obtained by the retirement board of any city that is responsible for the management of an employees' retirement system pursuant to the authority of chapter 35.39 RCW, when the information relates to investments in private funds, to the extent that such information, if revealed, would reasonably be expected to result in loss to the retirement fund or to result in private loss to the providers of this information except that (a) the names and commitment amounts of the private funds in which retirement funds are invested and (b) the

aggregate quarterly performance results for a retirement fund's portfolio of investments in such funds are subject to disclosure;

(27) Proprietary financial, commercial, operations, and technical and research information and data submitted to or obtained by the liquor and cannabis board in applications for cannabis research licenses under RCW 69.50.372, or in reports submitted by cannabis research licensees in accordance with rules adopted by the liquor and cannabis board under RCW 69.50.372;

(28) Trade secrets, technology, proprietary information, and financial considerations contained in any agreements or contracts, entered into by a licensed cannabis business under RCW 69.50.395, which may be submitted to or obtained by the state liquor and cannabis board;

(29) Financial, commercial, operations, and technical and research information and data submitted to or obtained by the Andy Hill cancer research endowment program in applications for, or delivery of, grants under chapter 43.348 RCW, to the extent that such information, if revealed, would reasonably be expected to result in private loss to providers of this information;

(30) Proprietary information filed with the department of health under chapter 69.48 RCW;

(31) Records filed with the department of ecology under chapter 70A.515 RCW that a court has determined are confidential valuable commercial information under RCW 70A.515.130; and

(32) Unaggregated financial, proprietary, or commercial information submitted to or obtained by the liquor and cannabis board in applications for licenses under RCW 66.24.140 or 66.24.145, or in any reports or remittances submitted by a person licensed under RCW 66.24.140 or 66.24.145 under rules adopted by the liquor and cannabis board under chapter 66.08 RCW.

[2023 c 340 s 11. Prior: 2022 c 201 s 2; 2022 c 16 s 28; 2021 c 308 s 4; 2020 c 238 s 11; prior: 2019 c 394 s 10; 2019 c 344 s 14; 2019 c 212 s 12; prior: 2018 c 201 s 8008; 2018 c 196 s 21; 2018 c 4 s 9;

2017 c 317 s 17; prior: 2016 sp.s. c 9 s 3; 2016 sp.s. c 8 s 1; 2016 c 178 s 1; 2015 c 274 s 24; prior: 2014 c 192 s 6; 2014 c 174 s 5; 2014 c 144 s 6; 2013 c 305 s 14; 2011 1st sp.s. c 14 s 15; 2009 c 394 s 3; 2008 c 306 s 1; prior: 2007 c 470 s 2; (2007 c 470 s 1 expired June 30, 2008); 2007 c 251 s 13; (2007 c 251 s 12 expired June 30, 2008); 2007 c 197 s 4; (2007 c 197 s 3 expired June 30, 2008); prior: 2006 c 369 s 2; 2006 c 341 s 6; 2006 c 338 s 5; 2006 c 302 s 12; 2006 c 209 s 7; 2006 c 183 s 37; 2006 c 171 s 8; 2005 c 274 s 407.]

--- END ---

From: [Griffin, Tina \(GMB\)](#)
To: [Griffin, Tina \(GMB\)](#)
Subject: FW: Agency Request Legislation
Date: Friday, July 26, 2024 10:14:00 AM
Attachments: [image002.png](#)

From: Griffin, Tina (GMB)
Sent: Friday, July 26, 2024 10:14 AM
To: Janice Eaton <janice@tsihd.com>
Subject: RE: Agency Request Legislation

Janice,

Thank you for your email. Your comments are an important part of the process.

As you stated in your email, “everything in section iii and iv could actually compromise the integrity of the facility if this information is leaked or mishandled.” For this reason, we are seeking an exemption from disclosing the records listed in 10(b) to protect licensee’s assets and the safety of their staff. Currently, these records must be disclosed upon request.

RCW 42.56.270 outlines the financial, commercial, and proprietary information that is exempt from disclosure or release. Unless records are specifically identified as exempt in statute, then they must be released, which is why we have described the various records that we are seeking to have exempted from disclosure. While we’ve added quite a few examples of financial records to be exempted from disclosure in subsection (i), the examples of records in subsections (ii) through (v) are proprietary security information. Subsection (vi) is meant to further protect from disclosure information from the records listed above regardless of the format the information from those records is in.

Hopefully, this provides more context to our proposed changes to the statute. At our September 12 and 13, 2024, commission meeting our Commissioners will decide whether to submit this request to the Governor for approval to be addressed in the 2025 legislative session. You can provide further public comment on this proposed legislation at the August 8 and September 12 and 13, 2024 commission meetings. Information on our [upcoming commission meetings](#) can be found on our website. The agenda and links to participate are posted about 5 to 7 days in advance of the meeting.

Please let me know if you have additional questions.

Sincerely,

Tina Griffin, CPA, CFE (she/her)

Executive Director

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

Phone: [360-486-3546](tel:360-486-3546)
Mobile: [360-507-3456](tel:360-507-3456)

PO Box 42400
Olympia, WA 98504-2400



Email: tina.griffin@wsgc.wa.gov
Web: WSGC.wa.gov

From: Janice Eaton <janice@tsihd.com>
Sent: Thursday, July 25, 2024 4:43 PM
To: Griffin, Tina (GMB) <tina.griffin@wsgc.wa.gov>
Subject: Agency Request Legislation

External Email

The way the changes are written in 10 (b) are confusing at best. It lists in i-v all of the information requested as financial information but gaming facility security information and everything in section iii and iv for example have nothing to do with finances and could actually compromise the integrity of the facility if this information is leaked or mishandled. Then it goes on to state in section vi that the exemption for the information listed in I through v continues to apply . . . Are you requiring it or not? If it is exempt, then why even list it out to begin with? What is the actual change that you are looking to affect? This adds a bunch of verbiage that left as written doesn't have anything to do with financial information and then is exempt.

Janice Eaton | **Technical Security Integration, Inc.**
Phone: +1 805-278-2325 Ext 1007 | **Fax:** +1-805-201-0455
E-mail: janice@tsihd.com | **Site:** www.tsihd.com | **Address:** 716 N. Ventura Road, Suite 284, Oxnard, CA 93030



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From: [Selah Downtown Association](#)
To: [Griffin, Tina \(GMB\)](#)
Subject: Proposed Legislation for financial and proprietary information requests
Date: Friday, July 26, 2024 7:38:47 AM

External Email

Hi Tina,

I think this is very timely and a great idea. I get scams daily emailed and texted to me. I would love to have more security.

Thank you.

Pattie Graffe
Executive Director
509-490-1527
Selah Downtown Association
Cultivating Downtown
www.selahdowntown.org

Ask me how you can keep your B&O tax dollars local like these businesses did

