



**WASHINGTON STATE
GAMBLING COMMISSION
MEETING**

September 12, 2024

Lacey, WASHINGTON

Commissioners



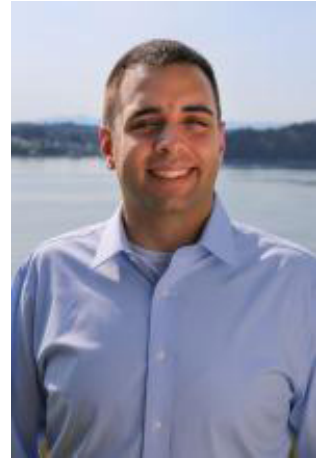
Alicia Levy
Chair



Bud Sizemore
Vice Chair

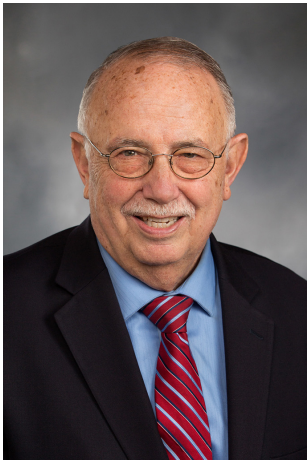


Sarah Lawson



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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**Special Gambling Commission Meeting
(Due to a change in meeting location)
Thursday, September 12, 2024**

You can attend the meeting virtually: [Click here to join the meeting](#) (TEAMS meeting link)

By phone: 360-726-3322, ID: 505 836 737#

In-Person: WSGC Lacey Office at 4565 7th Ave SE, Lacey, WA 98503

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 August 8, 2024, Commission Meeting Minutes New Licenses & Class III Gaming Employees HBCR List	(Action) Pg. 5 Pg.8 Pg. 28
<i>Public Comment</i>	Executive Director's Report	Tina Griffin, Executive Director Pg. 31
Tab 2	Agency Request Legislation	(Action) Pg. 34 Tina Griffin, Executive Director
<i>Public Comment</i>		

RULE MAKING ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS

*Tab 3	Rule Up for Final Action <ul style="list-style-type: none">• Aligning License Expiration Date	(Action) Pg. 67
<i>Public Comment</i>	Adam Amorine, Interim Legal Manager and Rules Coordinator	

-
- *Tab 4 Rule Up for Final Action**
• Minimum Cash on Hand

(Action)
Pg. 72

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

- *Tab 5 Default**
• Brian M. Goldberg

(Action)
Pg. 80

Adam Amorine, Interim Legal Manager and Rules Coordinator

Public Comment

Public Comment

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 1.5 hours.

Adjourn

Updated: September 6, 2024

Next Meeting: October 17 and 18, 2024, Washington Utilities and Transportation Commission, 621 Woodland Square Loop SE, Lacey WA 98503

Public Meeting Accommodations:

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

August 8, 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 – Virtual
Sarah Lawson – Virtual
Anders Ibsen – In person

Ex Officio Members Present:

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

Staff Present:

Tina Griffin, Executive Director; Kriscinda Hensen, Chief Financial Officer; Julie Anderson, Executive Assistant; Damon Mentzer, Administrative Assistant; Suzanne Becker, Assistant Attorney General (AAG)

Staff Present Virtually:

Gary Drumheller, Deputy Director; Jim Nicks, Assistant Director; Julie Lies, Tribal Liaison; Adam Amorine, Interim Legal Manager and Rules Coordinator; Troy Kirby, PIO; and Nicole Frazer, Administrative Assistant; Assistant Attorney General (AAG) Sharon James

There was 1 person in the audience and 32 people attended virtually.

Chair Levy welcomed everyone to the Liquor and Cannabis Board and called the August meeting to order at 9:31 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 Ibsen moved to approve the consent agenda as presented by staff.

Commissioner Sizemore seconded the motion.

The motion passed unanimously. 4:0

Executive Director's Report

Tina Griffin, Executive Director (ED) gave an update on agency staffing. She announced the agency is at 100 staff members and mentioned we are currently advertising for 14 positions. She briefed the Commissioners on the Polaris project and the contract review process for picking a vendor. ED Griffin announced that the agency had their quality review by the quality assurance board through OCIO. The link to the agency's review will be posted on our website.

ED reported that the agency is currently using Govdelivery service. She thanked Damon Mentzer and Troy Kirby for their work on this project.

Tab 2 – Presentation – Special Olympics of Washington

Dan Frey, Special Agent Supervisor (SAS) along with representatives from Special Olympics of Washington (SOWA) Mary Do, Chief Operating Officer (COO) and Mark Sinay, Vice President of Finance (VPF) presented the materials for this tab. SOWA requests approval of their second 2024 Western Washington Enhanced Raffle Plan. COO Do, thanked the commission for their continued support.

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

Commissioner Ibsen moved to approve the Special Olympics of Washington’s 2024 Western Washington Enhanced Raffle Plan as presented by staff. Commissioner Lawson seconded the motion.

The motion passed unanimously. 4:0

Tab 3 – FY 2025 Revenue Update

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

Chair Levy asked Commissioners if they had any comments. Commissioner Ibsen asked for further explanation to compare data recording in past years. ED Griffin explained the Fee Restructure happened in 2018. Senator Conway asked if the revenue breakdown by sector for reporting. CFO Hensen will get back to Senator Conway. Commissioner Sizemore also gave context to Commissioner Ibsen regarding the Fee Restructure and agrees with Senator Conway to look at the silos or sectors of fee payers to best evaluate or modify the rates for the various fees. He stated that the Revenue Update presentation tells us that there is not a need to modify the fee structure at this point.

Chair Levy asked for public comments. There was none.

RULE MAKING ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS

Tab 4 – Rule up for Final Action – 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. She asked for public comment. There was none.

Commissioner Sizemore moved to withdraw the 101 and proposed rules for Fee Increases as presented by staff. Commissioner Lawson seconded the motion.

The motion passed unanimously. 4:0

Tab 5 – Rule up for Final Action – Minimum Cash on Hand

Adam Amorine, Interim Legal Manager (ILM), and Rules Coordinator presented the materials for this tab. ILM reported that he received additional comments and alternate language for these rules and the comments are not included in the packet. The website will be updated with the additional materials presented at the meeting.

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

Commissioner Lawson moved to hold these rules over for further discussion.

Commissioner Sizemore seconded the motion.

The motion passed unanimously. 4:0

Tab 6 - Default – Hollywood Cardroom Casino

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

Chair Levy asked if anyone representing Hollywood Cardroom was in attendance. They were not. She asked if Commissioners had any questions. They did not. She asked for public comment. There was none.

Commissioner Ibsen moved to revoke Hollywood Cardroom’s gambling license; number 65-07522 as presented by staff.

Commissioner Lawson seconded the motion.

The motion passed unanimously. 4:0

Tab 7 Agency Request Legislation

Tina Griffin, Executive Director (ED), presented the materials for this tab. She reminded Commissioners that there will be an upcoming meeting for the public and tribal partners to share their comments and concerns.

Agency Request Legislation will be up for final action at the September 12 commission meeting.

Chair Levy asked Commissioners if they had any questions. They had none. She asked for public comment. There were none.

Chair Levy asked if there was any general public comment. There was none.

Commissioners took a 10-minute break.

At 10:30 AM Commissioners went into Executive Session to discuss current and potential agency litigation with legal counsel, including tribal negotiations.

Chair Levy welcomed everyone back to the meeting after Executive Session at 11:28 AM and called the roll to ensure a quorum.

Meeting adjourned at 11:28AM



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

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PAGES:19

Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 19.

JW

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

BINGO

TENINO COMMUNITY SERVICE CENTER
00-25376 01-02848

224 SUSSEX AVE E
TENINO WA 98589

RAFFLE

AKIN
00-25421 02-21433

1035 SW 124TH ST
SEATTLE WA 98146

BETHEL HIGH SCHOOL COMMUNITY BOOSTER CLUB
00-14732 02-21423

22215 38TH AVE E
SPANAWAY WA 98387

JANSEN ART CENTER
00-25367 02-21412

321 FRONT STREET
LYNDEN WA 98264

MARYHILL MUSEUM OF ART
00-21920 02-08959

35 MARYHILL MUSEUM DRIVE
GOLDENDALE WA 98620

MONTESSORI SOCIETY OF YAKIMA
00-24436 02-21040

511 N 44TH AVE.
YAKIMA WA 98908

PROVAIL
00-24418 02-21034

12550 AURORA AVE N
SEATTLE WA 98133

ROXY BREMERTON
00-25408 02-21429

270 4TH ST
BREMERTON WA 98337

SEATTLE PARKS FOUNDATION
00-25432 02-21438

1501 E MADISON ST SUITE 510
SEATTLE WA 98122

SEQUIM COMMUNITY BROADCASTING
00-25379 02-21419

609 W WASHINGTON ST
SEQUIM WA 98382

SPOKANE POLICE FOUNDATION
00-25427 02-21434

2302 N WATERWORKS
SPOKANE WA 99212

ST JOSEPH CHURCH
00-00569 02-00389

214 N 4TH ST
YAKIMA WA 98901

STANWOOD-CAMANO ARTS ADVOCACY COMMISSION
00-25407 02-21428

9910 270TH STREET NW
STANWOOD WA 98292

TENINO COMMUNITY SERVICE CENTER
00-25376 02-21417

224 SUSSEX AVE E
TENINO WA 98589

WA CHAPTER F.B.I. NATIONAL ACADEMY ASSO
00-18009 02-08117

2530 PARK ST
BELLINGHAM WA 98225

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**RAFFLE**

WA STATE NORTHERN IDAHO MOOSE ASSO
02-21391

7518 S DANA ST 00-25287
CHENEY WA 99004

WASHINGTON WOMEN IN NEED
00-25179 02-21358

3200 1ST AVENUE SOUTH
SEATTLE WA 98134

WHIDBEY ISLAND HOSPITAL FOUNDATION
00-25371 02-21415

5725 COUNTRY CLUB DR
LANGLEY WA 98260

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

COCO JOE'S
00-25398 05-21902

305 1ST AVE
ALGONA WA 98001

DEL-RED PUB
00-25405 05-21904

311 E MAIN ST
SOAP LAKE WA 98851

GAME ON BAR & GRILL
00-25395 05-21899

11114 EVERGREEN WAY STE E
EVERETT WA 98204

GENTLEMEN GENE'S PUB
00-25255 05-21863

1400 PARKER WAY
MOUNT VERNON WA 98273

LADY LUCK COWGIRL UP
00-25240 05-21859

14114 PACIFIC AVE S
TACOMA WA 98444

MCCRACKEN'S IRISH PUB
00-25357 05-21886

11723 E SPRAGUE AVE
SPOKANE VALLEY WA 99206

SIX POINT SALOON
00-25374 05-21893

3 TWISP AIRPORT RD
TWISP WA 98856

SPORTY'S BAR & GRILL
00-25433 05-21910

6503 EVERGREEN WAY
EVERETT WA 98203

SURE SHOT PUB
00-25155 05-21833

101 E NORTH BEND WAY
NORTH BEND WA 98045

THE ENGELS PUB
00-25399 05-21903

113 5TH AVE S
EDMONDS WA 98026

THE HIDEAWAY
00-25413 05-21906

22540 NE STATE ROUTE 3
BELFAIR WA 98528

THE PARLOUR
00-25336 05-21881

401 W RIVERSIDE
SPOKANE WA 99201

DATE: 08/23/2024

Page 3 of 19

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

MID-LEVEL SPORTS WAGERING VENDOR

RADAR LABS, INC.
10-00644 82-00034

841 BROADWAY 7TH FLOOR
NEW YORK NY 10003

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

ALVARADO, YARILIN
23-03985

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

DHARMADURAI, PRAVINKUMAR
23-03984

LIGHT & WONDER
LAS VEGAS NV 89119

GOGULA, HAMPI
23-03976

LIGHT & WONDER
LAS VEGAS NV 89119

HOMER, OAKLEE J
23-03979

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

HUTCHINS, PATRICK L
23-03977

BLUBERI GAMING USA INC
LAS VEGAS NV 89118

MANGANELLO, CHARMAINE M
23-03981

LIGHT & WONDER
LAS VEGAS NV 89119

NEAL, DENTON A
23-03980

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

OZGUNESLILER, REJOE S
23-03978

EVERI GAMES INC.
LAS VEGAS NV 89118

SANMUGAM, SHANKARESHWARAN
23-03982

LIGHT & WONDER
LAS VEGAS NV 89119

TRUONG, HELENA M
23-03975

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

WHITE, BRYAN J
23-03986

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

WOLFE, ETHAN C
23-03983

LIGHT & WONDER
LAS VEGAS NV 89119

MAJOR SPORTS WAGERING REPRESENTATIVE

GOODFRIEND, AVRAHAM F
33-00637

FANDUEL SPORTSBOOK
LOS ANGELES CA 90045

HALLAM, ROBERT J
33-00639

KAMBI
TA'XBIEX NA XBX1120

LEE, ARON K
33-00635

CAESARS SPORTSBOOK
LAS VEGAS NV 89118

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MAJOR SPORTS WAGERING REPRESENTATIVE

STEIN, PAUL F
33-00638

KAMBI
TA'XBIEX NA XBX1120

NON-PROFIT GAMBLING MANAGER

BARNETT, ERIN O
61-04888

AMERICAN LEGION 00129/OAK HARBOR
OAK HARBOR WA 98277

DINH, ROSEMARY N
61-04889

ONE ROOF FOUNDATION
SEATTLE WA 98119

LOZANO VAZQUEZ, ABIGAIL
61-04890

ONE ROOF FOUNDATION
SEATTLE WA 98119

SERVICE SUPPLIER REPRESENTATIVE

VISTEN, TYLER J
63-01172

RELIABLE SECURITY SOUND & DATA
EVERETT WA 98206-1295

CARD ROOM EMPLOYEE

AMMAR, BENJAMIN W
68-18570

B

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

ANDERSON, NICHOLAS M
68-37743

B

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

ANGEL, GARY L
68-37748

B

CLEARWATER SALOON & CASINO
EAST WENATCHEE WA 98802

BALAYANTS, MIKHAIL G
68-06055

B

FORTUNE CASINO - RENTON
RENTON WA 98055

BIRKLAND, CORY L
68-34304

B

IMPERIAL PALACE CASINO
TUKWILA WA 98188

CEJA, HIEDI
68-34650

B

NOB HILL CASINO
YAKIMA WA 98902

CILENTO, CHRISTIAN I
68-37763

B

IMPERIAL PALACE CASINO
AUBURN WA 98002

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

DELANEY, PAUL E 68-37756	B	ALL STAR CASINO SILVERDALE WA 98383
DEVOLL, SARAH A 68-37758	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
DUNN, SEAN C 68-09619	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
ERICKSON, DALIN H 68-37764	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
GIBSON, CODY J 68-37771	B	RIVERSIDE CASINO TUKWILA WA 98168
GONZALES, JASON P 68-21244	B	ACE'S POKER MOUNTLAKE TERRACE WA 98043
HATLEY, LESA L 68-17470	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
HOLLENBECK, AARON J 68-37742	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
HOLLINGER, HUNTER D 68-37761	B	WILD GOOSE CASINO ELLENSBURG WA 98926
HOLLIS, SHANTEL L 68-37755	B	LAST FRONTIER LA CENTER WA 98629-0000
HOWE, JENNIFER C 68-20451	B	WILD GOOSE CASINO ELLENSBURG WA 98926
JACOBSON, AUSTIN C 68-37754	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
JENKIN, JILL M 68-37752	B	JOKER'S CASINO SPORTS BAR & FIESTA CD RM RICHLAND WA 99352-4122
KALII, JOHN A III 68-23656	B	ACE'S POKER LAKEWOOD WA 98499
LAWSON, GARETT C 68-37768	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719
LI, HEWA 68-37757	B	FORTUNE CASINO LA CENTER LA CENTER WA 98629

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

LICEA, MARCO A 68-30814	B	CASINO CARIBBEAN YAKIMA WA 98901
MAI, LAN H 68-24873	B	FORTUNE CASINO - RENTON RENTON WA 98055
MONTES, LUCAS C 68-37767	B	CASINO CARIBBEAN YAKIMA WA 98901
MORA, LUSERO 68-37747	B	GOLDIES SHORELINE CASINO SHORELINE WA 98133
NGUYEN, LYNH U 68-37733	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
NGUYEN, THAC S 68-34620	B	FORTUNE CASINO - LACEY LACEY WA 98516
NUNEZ, GABRIEL 68-37751	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
PARSADANIAN, LISA A 68-37738	B	JOKER'S CASINO SPORTS BAR & FIESTA RICHLAND WA 99352-4122
PEACE, QUINCY L 68-37750	B	LANCER LANES AND CASINO CLARKSTON WA 99403-2219
PETH, MELONIE L 68-37753	B	ACE'S POKER LAKEWOOD WA 98499
PHAM, LONG T 68-16035	B	ROMAN CASINO SEATTLE WA 98178
PIERRE, MELANIE S 68-37765	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
RAMM, CORALEE E 68-20627	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
SEHMEL, BRADLEY J 68-28652	B	ALL STAR CASINO SILVERDALE WA 98383
STURM, BRANDON P 68-23285	B	ACE'S POKER MOUNTLAKE TERRACE WA 98043
TA, ALLAN I 68-29602	B	DESERT BLUFFS POKER ROOM KENNEWICK WA 99352

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

THOMPSON, DIANE M 68-37744	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719
THORNE, BAILEIGH A 68-37760	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719
TRUONG, NOUANSAVAN 68-25687	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
TUCKER, ALEXANDRA E 68-36420	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
VANDENELZEN, REBECCA D 68-37739	B	CASINO CARIBBEAN KIRKLAND WA 98034
WILLSE, TYLER S 68-28984	B	FORTUNE POKER RENTON WA 98057
WITCHER, MARLON L 68-37770	B	LILAC LANES & CASINO SPOKANE WA 99208-7393

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

EBNER, JOHN C
69-57363

GOERTZ, RACHAEL C
69-57346

MCALISTER, MELISSA R
69-45396

PATTERSON, MELINDA S
69-57345

COLVILLE CONFEDERATED TRIBES

BOYD, FEROL A
69-36663

BROOKS, JASMINE R
69-57560

COVINGTON, GREGORY A
69-57463

CUNNINGHAM, ALEXANDER L
69-57464

ELDREDGE, SCOTT J
69-57461

FLORES, HEIDI L
69-57403

GENDRON, RICHARD L
69-57465

LANDERS, DAMEON J
69-54317

MICHEL, GLORIA M
69-57474

RAMIREZ, JOHN A
69-57400

ROZALES, RIKKI A
69-57460

RUIZ, DESTINY L
69-53705

SCOTT, JESSICA L
69-57466

SENATOR, JAMIE K
69-57467

SEPULVEDA ANGULO, NICOLE
69-57468

STOBART, LUCINDA A
69-57402

VARGAS, SHERWIN C
69-51722

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

ALVAREZ, TAMMIE D
69-57423

ASHFORD, SPENCER M
69-57484

BOND, AMANDA A
69-41270

BRADLEY, STEVEN J
69-57552

BYRNE, WILLIAM A
69-57421

CAMACHO WOODCROFT, SOPHIA K
69-57395

CLEVELAND, JOSHUA M
69-57511

COOROUGH, KARLA M
69-57469

DAVALOS, MONIQUE S
69-57540

EARLS, CHRISTIAN S
69-57539

FAYARD, GABRIELLE D
69-57456

FELDMAN, AARON S
69-57551

FENSTERMACHER, ROBERT S
69-57391

FLANNERY, MILISSA L
69-57422

FOWLER, MATTHEW B
69-57547

GIDEONS, MAXWELL R
69-57485

HELM, TYLER W
69-57542

KELLEY, RYAN J
69-52279

KUCKELMANN, SEBASTIAN D
69-57483

MAIRS, JEREMY N
69-49333

OCHOA, JUAN M
69-57498

PELLETIER, JACOB A
69-57457

RE, KECIA L
69-41269

SAMPSON, BRENDA L
69-57425

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

SCOTT, MARK R
69-57545

SMITH, SHARON E
69-57455

SULLIVAN, MAXIMUS I
69-57424

WAGEMANN, JACKSON C
69-57392

WAGGONER, FEI
69-57512

WILLIAMS, ALEXIS J
69-57546

WOFFINDEN, MICHAEL A
69-57493

YATH, CHARLIE S
69-57486

ZANDER, COLE J
69-57362

KALISPEL TRIBE

BARGERSTOCK, TODD J
69-57522

BOWICK, NICHOLAS K
69-57382

BOWLIN, KAITLYN R
69-57380

BROKENROPE, LAKOTA R
69-57399

CROOKS, BRYCE J
69-34593

HARGRAVE, DENNY R
69-57521

JUNA, MELODY
69-57383

MCCORD, MARK H
69-57377

MILLER, MARY G
69-16001

MURANO, JEROMY T
69-57452

NICODEMUS, DANIEL J
69-57557

POLETTI, NICHOLAS B
69-57419

ROMO, KYLE A
69-57508

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

LUMMI NATION

AOUININGOC, KAILANI M
69-57379

BROWN, AARON L
69-57375

CURTIS, ROBERT A
69-57503

EATON, JACKSON T
69-57504

GROENEWEG, TRACY A
69-57378

JENNINGS, MARLON B
69-57481

ROSENSTEIN, REBECCA J
69-57376

SCHOLTEN, JEREMIAH D
69-57373

SIMMONS, JOSHUA A
69-57374

MUCKLESHOOT INDIAN TRIBE

ARELLANO, ROGER KYLE ANGEL S
69-57436

ASKEW, SAMUEL B
69-16706

BURCHFIELD, TAMSIN M
69-57368

CALUBANA, ONOFRE E
69-57435

CANTU, JOSHUA
69-57516

COMROE, ANGELA M
69-57480

DIAZ, DONNA PAULA C
69-57366

DWAH, TROCON K
69-53562

GREEN, AIREANNA E
69-57517

HOUSER, JAIDAN D
69-57479

JUNGWIRTH, TIMOTHY J
69-57437

KING, SHARLANE L
69-57438

LEAENO, MYA M
69-57478

LIGHTNER, SHARON L
69-57518

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

MUCKLESHOOT INDIAN TRIBE

MAH. CONOLAND K
69-53276

MALO. ELIZABETH I
69-57365

MANRY, JOSHUA T
69-57439

MATTSON, ERIC M
69-57477

MATTSON, SHELBY K
69-57364

MONOESSY, LARRY L JR
69-57432

MOSES, MELANIE R
69-22880

NOAESE, METITILANI E
69-57369

OLIVAR, LARISA D
69-57440

POTTS, THOMAS J
69-32264

STEVENS, MAYCALA A
69-57433

TEANGJIT, THAPAKORN
69-45126

THOMAS, MIKEIRA L
69-57515

UNTALAN, KENNETH Z
69-57568

VANBUSKIRK, SHANE M
69-57434

WARBUS, BRENDEN A
69-57430

WILLIAMS, ANDREW J II
69-57476

YOUNG, PRESTON A
69-57367

NISQUALLY INDIAN TRIBE

BAIRD, RYAN B
69-57353

BLACKETER, DANIEL K
69-36438

CHAPMAN, JACKI L
69-57428

GRAHAM, DEREK J
69-57381

HANCOCK, KENNETH J
69-18159

HERNANDEZ, LENA M
69-57414

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NISQUALLY INDIAN TRIBE

HOLSCLAW, JAMES P
69-57449

LEITKA, MARETTA L
69-45193

PADMOE CURTIS, ROSA M
69-57427

SHIPPEY, WILLETTE K
69-44162

VERNON, REBECCA A
69-57354

WELLS, NOELANI L
69-51584

YOUNG, JOSEPH L
69-57413

NOOKSACK INDIAN TRIBE

GUTHRIE, COLE A
69-57426

ST LOUIS, PALOMA A
69-57387

PORT GAMBLE S'KLALLAM TRIBE

ALMANZAN, FRANCESCA N
69-57418

ARNETTE, MICHAEL I
69-57451

BARBER-COOK, RACHEL A
69-57358

BOND, JOSH J
69-48446

BRINK, JESSICA L
69-57507

BUCK, JACOB L
69-57441

CASTILLO, DESIREE G
69-51819

GEORGE, CORNELIUS M
69-33459

GOODRICH, SHEA M
69-57450

ROSENBAUM, SUZANNE C
69-57444

SCHLECHT, RANDALL S
69-57360

SPEARS, NATHANIEL A
69-57509

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PORT GAMBLE S'KLALLAM TRIBE

WEISENBURGER, TRICIA M
69-57506

PUYALLUP TRIBE OF INDIANS

DEAN, CARY W
69-57475

HARRIS, QUINCY T
69-52740

MIKSCH-ALVARADO, ARTURO R
69-52781

SCHOLZ, JASON L
69-45643

STACKS, GAIGE L
69-57420

QUINAULT NATION

ALVAREZ DEMEZA, JUANA M
69-57389

APOLISTA, ARTHUR L
69-06871

BAILEY, BRYAN X
69-57417

GOLDMAN, JALEN A
69-57349

HOWELL, SHAWN D
69-57416

HUMPHRIES, ROBERT S
69-57351

POLK, GREGORY D II
69-57348

RICHARDSON, CHRISTOPHER D
69-57388

STROM, CATLIN H
69-57390

TYRRELL, DANIEL J
69-57350

SHOALWATER BAY TRIBE

MCCORMICK, KAREN J
69-57502

MOONEYHAM, PETER W
69-57409

NESS, NATAYLA S
69-57500

SCOTT, JANET L
69-57501

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SNOQUALMIE TRIBE

ANDREWS, RICHARD E
69-57576

AVILA-RAMIREZ, CASSANDRA M
69-57446

BRAZIL-THOMPSON, ASHLEY
69-57524

CHANG, GEORGE J
69-57526

COCHRAN, TYLER J
69-36104

CULP, MARIE N
69-57575

HANSON, DANIEL C
69-57572

INGEBO, ALEC M
69-57487

KIM, DONG KYUN
69-57525

KLATT, AARON A
69-40121

KOEUTH, SODARA
69-52483

LOVE, ANNIKA G
69-57488

MARTIN, TIMOTHY D
69-57530

MCDONALD, SAYA
69-57529

OCANA, ALAN
69-57408

ROY, DAISY M
69-57490

STOMPS, WEI
69-57492

TANNER, BELLA A
69-57445

TSHITEBUA, TRESOR HENOC M
69-57531

VO, LUC T
69-57491

WANNAPHRUEK, CHAKKAPHAT
69-57489

WEISE, PAUL M
69-57528

WINGERSON, JARED A
69-57527

XU, JIAYI
69-57574

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

ARIS, KARL R
69-57513

BAKER, KARMEN M
69-57361

BARKSDALE, AMANDA D
69-57398

BROWN, DONALD E
69-57549

DUVAL, KEVIN D
69-57482

EDWARDS, CHELSEA S
69-57397

FLANAGAN, ADILYNN R
69-57473

HUDSPETH, MILEA J
69-57458

NEAL, BREANNA N
69-50972

WELSH, MOIRA B
69-57448

WILSON, MICHELLE
69-57396

YOUNG, DAVINA D
69-57459

SQUAXIN ISLAND TRIBE

BALMER, ANGIE M
69-57505

EWERT, PETER J
69-57411

KOLE, KATHERINE L
69-57471

MCCAIN, DAWN M
69-57412

ORTIZ, GABRIELA R
69-57359

RAPPAZINI, SAMANTHA L
69-57472

ROWLAND, CASSANDRA Y
69-57499

UNDERWOOD, DEREK A
69-57510

WINKLE, AUSTIN J
69-57415

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SWINOMISH INDIAN TRIBAL COMMUNITY

BERRYMAN, JACK L
69-57442

MORENO, GUSTAVO G
69-57394

SCHOENSTEIN, LEXI T
69-57544

WASHINGTON, WALTER F
69-57519

WILLIAMS, JENNIFER L
69-57520

THE TULALIP TRIBES

CARBERRY, TANNER B
69-57407

CORNER, KALEB J
69-57410

COULTER, DYLAN T
69-37020

GUERRERO, CHRISTOPHER C
69-57555

HENRY, JESSIE P
69-33550

LE, HANH H
69-17010

SALUTIN, RICHARD T
69-57556

ZAHRADNIK, CAMERON T
69-11555

UPPER SKAGIT INDIAN TRIBE

KUNASCHK, OLIVIA F
69-57453

MATHIAS, TEVITA J
69-57405

MCPMAHON, AUGUST B
69-57406

YAKAMA NATION

CARDENAS, ROBERT JR
69-57562

DANIELS, ZOFIA A
69-57561

MCJOE, SILAS J
69-48176

SERNA YADAO, GENEVIEVE A
69-36073

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

YAKAMA NATION

WAHPAT, VALERIE L
69-25572



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, 2025	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, 2025	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**2**

	City	Commission Approval Date	License Expiration Date	Org #	License #
GRAND CASINO	SHORELINE			00-25290	67-00350
SLO PITCH PUB & EATERY	BELLINGHAM			00-16759	67-00038

SEPTEMBER 12, 2024

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

EX OFFICIO MEMBERS
Senator Steve Conway
Senator Jeff Holy
Representative Shelley Kloba
Representative Eric Robertson

FROM: TINA GRIFFIN, DIRECTOR

SUBJECT: DIRECTOR'S REPORT

Staffing Update – Agent in Charge, Regulatory and Enforcement Unit

On September 1, 2024, Tony Hughes was promoted to the Agent in Charge of the Regulation and Enforcement Unit.

Tony has over 25 years of experience with the agency. He graduated from the University of Puget Sound with a degree in Business & Public Administration. After college, Tony owned and operated the family business after his parents retired.

In 1999, Tony began his career with the Gambling Commission as a Special Agent in the Financial Investigations Unit in Lacey. He soon transferred to the Regulation Unit, during which he successfully completed the Basic Law Enforcement Academy.

In 2017, Tony was promoted to a Special Agent Supervisor position in the Regulation & Enforcement Unit (REU). At the beginning of 2024, he was appointed the Interim Agent in Charge of the REU.

Tony and his family live in Pierce County. He recently “retired” from coaching high school football for the last 22 years. He continues to play ice and roller hockey.

The Regulation & Enforcement Unit is responsible for the regulation of licensed gambling activities under WAC Chapter 230 and the criminal enforcement of RCW Chapter 9.46.

Staffing Update – Legislative and Rules Manager

On September 16, 2024, Tricia Gullion will begin as the agency's Legislative and Rules Manager.

Tricia has extensive experience with the Washington legislative process. She has worked as a Senior Legislative Manager for the Building Industry Association, a Public Information Office in the Washington State Senate, Legislative Coordinator for the Washington State School Directors Association, Public Affairs Coordinator for the Washington Realtors, and Legislative Assistant in the Washington State House of Representatives.

We are excited to have her join our team.

Staffing Update - Deputy Director

We are entering into a contract with a local recruiting firm and expect to begin meeting with them this month so recruitment can begin as soon as possible.

Law Enforcement Assists

Gambling Commission staff are frequently called upon as gambling subject matter experts to assist local and state agencies. Here are recent assists:

In late August 2024, a search warrant was served in Auburn by King County Animal Control, King County Sheriff's Office, Pierce County Animal Control, and Mason County Sheriff's Office. We assisted on-site with the identification of evidence of animal fighting. Approximately 80 roosters were found on site and six were seized. Evidence of cockfighting was also found, such as supplements, injectables, sparring muffs, and alteration tools.

We are assisting the State Auditor's Office and Morton Police Department with the city employee who misappropriated over \$900,000 from the City of Morton.

Disordered Gambling Advisory Workgroup (DGAW)

The workgroup met on September 10, 2024, to discuss progress made on the Problem Gambling Task Force's recommendations. I'll give a more detailed update at the September commission meeting.

One Washington

One Washington (One Wa) is a multi-phased approach to modernize the state administrative functions for finance, procurement, budget, human resources, and payroll.

Phase 1a, the first Phase in the replacement of the 1960's-era technology goes live July 1, 2025, and replaces statewide core financial systems. Staff have been working closely with

One Wa staff on the development of the system, user testing, training, and determining business process changes based on the future Workday system.

In October 2025, Phase 2, the phase to replace human resources and payroll systems, will begin. Phase 1b, expanded financials and procurement, will begin in January 2027.

Given the time and staffing needs required by each state agency in the development of these new systems, One Wa requested state agencies submit resource needs related to One WA agency readiness for the 25-27 biennium (FYs 26 and 27)– past requests have been limited to agency remediation efforts. These requests will be combined into a single project decision package. We submitted a request to fund 2 staff for Phase 2 – one for Human Resources and one for Business and Financial Services and half of an employee for Business and Financial Services for Phase 1B. We'll provide updates on this enterprise request during the 2025 legislative session.

SEPTEMBER 12, 2024

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

EX OFFICIO MEMBERS
Senator Steve Conway
Senator Jeff Holy
Representative Shelley Kloba
Representative Eric Robertson

FROM: TINA GRIFFIN, DIRECTOR

SUBJECT: AGENCY REQUEST LEGISLATION FOR 2025 LEGISLATIVE SESSION

Staff is proposing an amendment to the Public Records Act to exempt proprietary financial and security information collected and maintained by the Gambling Commission. The last update to the Public Records Act to exempt information collected by the Gambling Commission was in 2007.

Agency request legislation is to be submitted by close of business September 13, 2024, for the Governor's review and approval.

Statement of Need:

This request is tied to the Governor's priorities of having Healthy and Safe Communities and Efficient, Effective, and Accountable Government. The Gambling Commission is the only state agency devoted to gambling regulation, licensing, and enforcement. The legislative mandate of the Gambling Commission 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, RCW 9.46.010.

The Public Records Act (PRA) requires state agencies to make records available to the public unless the records are explicitly exempt from PRA disclosure. The provisions requiring public records disclosure must be interpreted liberally, while the exemptions are interpreted narrowly to effectuate the general policy favoring disclosure.

The PRA currently exempts the following records the Gambling Commission obtains:

- Financial account numbers, values, and other identification numbers and

- Internal control documents, independent auditor's reports and financial statements, and supporting documents of house-banked social card game licensees or submitted by the tribes with an approved tribal/state compact for class III gaming.

The Gambling Commission requires proprietary financial and security information to effectively license and regulate gambling in the state. We use this information to determine qualification for licensure and compliance with laws, rules, and Tribal-State Compacts to ensure gambling remains legal and honest and to adhere to our legislative mandate.

Enhancing the records exempted from disclosure:

- Prevents fraud and collusion by protecting the proprietary security information of gambling equipment suppliers;
- Limits the Tribes and licensees' exposure to cyber-attacks; and
- Protects the safety of the Tribe's and licensee's employees and patrons from violent robberies by limiting disclosure of proprietary facility security information.

In addition, the exemption would apply to the information regardless of the form of the information, i.e., whether it remains in the original format or in a format created by the commission.

Summary of Major Provisions:

We are seeking to amend RCW 42.56.270 to update the exempted records from disclosure to protect the:

- Assets of gambling applicants and gaming operators,
- Personal safety of gaming patrons and employees, and
- Integrity of gambling equipment used.

Proprietary financial and security information submitted or obtained by the gambling commission from license applicants, licensees, gaming facilities, or a tribe pursuant an approved Tribal-State Class III Compact would be exempted from disclosure. Examples of the types of records the proprietary financial and security information typically found are provided so the exemption can be interpreted narrowly to effectuate the general policy favoring disclosure.

Fiscal Note:

No fiscal impact; see attached.

Stakeholder Work:

On July 25, 2024, we sent the attached letter and initial Z-Draft to tribal leaders and their representatives, licensed house-banked card rooms, manufacturers, distributors, service suppliers, sports wagering vendors, and electronic raffle organizations, and stakeholders with whom have asked to receive WSGC communication. This notice was sent to over 700

recipients. The notice and draft language were also posted on our website with instructions on how to submit feedback to us.

Further outreach was made to:

- Rowland Thompson, Allied Daily Newspapers and Vice Chair of the Sunshine Committee,
- Kristi Weeks, Lottery Commission
- Suzanne Becker, Assistant Attorney General

On August 16, we held listening sessions with tribal partners and the public to get feedback on the proposed agency request legislation.

Overall feedback received is as follows:

Pattie Graffe, Executive Director, Selah Downtown Association – “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.”

Janice Eaton, Technical Security Integration, Inc. – “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 is 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.”

Rowland Thompson – Concerns that MOUs and Appendices with the Tribes and agency actions are available to the public.

Vicki Christopherson – Request for the Quarterly License Reports be specifically listed in the statute as not exempt from the Public Records Act.

Tribal partners – Consider exempting disaster recovery plans, incident response plans, risk assessment plans, and field-testing notes

All feedback was considered. Changes were made, in most instances, to address the feedback received.

Attachments:

Unformatted Draft Language

Fiscal Note

Notice and Original Z-Draft of Proposed Agency Request Legislation sent July 25, 2024

Email feedback received from Ms. Graffe, Ms. Eaton, and Ms. Christopherson

BRIEF DESCRIPTION: Concerning public inspection and copying of proprietary financial and security information submitted to or obtained by the gambling commission.

AN ACT Relating to public inspection and copying of proprietary financial and security information submitted to or obtained by the gambling commission; and amending RCW 42.56.270.

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:

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))~~ (i) 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:

(A) Financial statements and transactions including but not limited to 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. However, Quarterly License Reports are not exempt;

(B) Information that describes the internal operational system or internal procedures of the gaming facility designed to promote efficiency, safeguard assets, and avoid fraud and error, including but not limited to records pertaining to security camera technical specifications, operation, and placement; cash out procedures and locations; cage security information; building access controls; and personally identifiable information control procedures;

(C) Gaming facility security information, including but not limited to descriptions of facility layout and schematics, firewall configurations, network topologies, source code, software files, cryptographic hashes of software files, risk and security assessment reports, disaster recovery plans, incident response plans, and any other sensitive information that may negatively impact the security of the facility if released; and

(D) Gaming equipment information, including but not limited to related hardware, software, and security information, such as firewall configurations, field testing data and results from testing, network topologies or diagrams, source code, software files, cryptographic hashes of software files, schematics, user credentials, system components, and any other sensitive information about the equipment that may compromise the security and integrity of the equipment if released

(ii) The exemptions for the information listed in (b)(i) of this subsection (10) continue 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.

--- **END** ---

Individual State Agency Fiscal Note

Bill Number: Z-0024.2	Title: Exempting from public inspection and copying of proprietary financial and security information submitted to or obtained by the gambling commission.	Agency: 117-Washington State Gambling Commission
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Part I: Estimates

No Fiscal Impact

Estimated Cash Receipts to:

NONE

Estimated Operating Expenditures from:

NONE

Estimated Capital Budget Impact:

NONE

The cash receipts and expenditure estimates on this page represent the most likely fiscal impact. Factors impacting the precision of these estimates, and alternate ranges (if appropriate), are explained in Part II.

Check applicable boxes and follow corresponding instructions:

- If fiscal impact is greater than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete entire fiscal note form Parts I-V.
- If fiscal impact is less than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete this page only (Part I).
- Capital budget impact, complete Part IV.
- Requires new rule making, complete Part V.

Legislative Contact:	Phone:	Date: 09/06/2024
Agency Preparation: Kriscinda Hansen	Phone: 360-486-3489	Date: 09/06/2024
Agency Approval:	Phone:	Date:
OFM Review:	Phone:	Date:

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Significant provisions of the bill and any related workload or policy assumptions that have revenue or expenditure impact on the responding agency by section number.

This bill has no fiscal impact.

Section 1 adds the types of documents and information that are exempt from the Public Records Act.

II. B - Cash receipts Impact

Cash receipts impact of the legislation on the responding agency with the cash receipts provisions identified by section number and when appropriate, the detail of the revenue sources. Description of the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explanation of how workload assumptions translate into estimates. Distinguished between one time and ongoing functions.

II. C - Expenditures

Agency expenditures necessary to implement this legislation (or savings resulting from this legislation), with the provisions of the legislation that result in the expenditures (or savings) identified by section number. Description of the factual basis of the assumptions and the method by which the expenditure impact is derived. Explanation of how workload assumptions translate into cost estimates. Distinguished between one time and ongoing functions.

Part III: Expenditure Detail

III. A - Operating Budget Expenditures

NONE

III. B - Expenditures by Object Or Purpose

NONE

III. C - Operating FTE Detail: *FTEs listed by classification and corresponding annual compensation. Totals agree with total FTEs in Part I and Part IIIA.*

NONE

III. D - Expenditures By Program (optional)

NONE

Part IV: Capital Budget Impact

IV. A - Capital Budget Expenditures

NONE

IV. B - Expenditures by Object Or Purpose

NONE

IV. C - Capital Budget Breakout

Acquisition and construction costs not reflected elsewhere on the fiscal note and description of potential financing methods.

NONE

IV. D - Capital FTE Detail: *FTEs listed by classification and corresponding annual compensation. Totals agree with total FTEs in Part IVB.*

NONE

Part V: New Rule Making Required

Provisions of the bill that require the agency to adopt new administrative rules or repeal/revise existing rules.



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

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

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

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

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: [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



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: [Vicki Christophersen](#)
To: [Rules Coordinator \(GMB\)](#); [Griffin, Tina \(GMB\)](#); [Davies, Brooke](#); [Eric Persson](#); [Jason Bacigalupi](#); [Aaron Huang](#)
Subject: Maverick Gaming Comments on WSGC Agency Request Legislation
Date: Thursday, August 22, 2024 1:23:22 PM

External Email

Good afternoon,

Thank you for the opportunity to review the proposed agency request legislation concerning the confidentiality of personal and proprietary information submitted to the Washington State Gambling Commission (WSGC). We appreciate the intent behind this legislation to protect licensees and our staff from potential misuse of sensitive information.

However, it is essential to approach exemptions from the Public Records Act with utmost caution to avoid compromising the public's right to access critical information. The Act explicitly states:

"The people in delegating authority do not give their public servants the right to decide what is good for the people to know and what is not good for them to know. The people insist on remaining informed so that they may maintain control over the instruments that they have created. This chapter shall be liberally construed and its exemptions narrowly construed to promote this public policy and to assure that the public interest will be fully protected." (RCW 42.56.030)

Given this guiding principle, we strongly believe that data and information reported in the Quarterly Reports submitted by licensees to the agency should remain accessible to the public. Transparency regarding gambling activities, revenue, and local taxes is crucial and should not be obscured by the proposed confidentiality measures. To this end, we recommend adding language to the bill to explicitly clarify that the exemption does not extend to these Quarterly Reports.

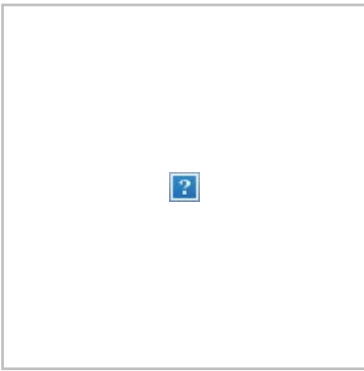
While we fully support the protection of proprietary and financial information that warrants confidentiality, it is vital that these protections do not inadvertently restrict public access to information that serves the broader public interest.

We appreciate your consideration of our concerns and look forward to collaborating with the commission to refine this important legislation.

Thank you again for the opportunity to provide comments.



Vicki Christophersen
Christophersen Inc.
www.christopherseninc.com
360.485.2026



On Tue, Aug 13, 2024 at 9:16 AM Washington State Gambling Commission
<WSGC@public.govdelivery.com> wrote:

[Share / View as a webpage](#)



AGENCY REQUEST LEGISLATION

August 16th, 11am

RCW 42.56.270

Exempting financial and proprietary
information from Public Records requests

**The Washington State Gambling Commission
invites you to a Public Comment Session**

Agency Request Legislation

Greetings,

On behalf of the Washington State Gambling Commission, we would like to invite you to review the language we propose to change RCW 42.56.270, regarding exempting financial and proprietary information from Public Records Act requests, and offer your feedback at a Public Comment Session.

The meeting will be held on Friday, August 16th at 11am. Instructions and link are

below.

The agency letter ([pdf](#)) explains why we are seeking the change, including draft bill language. All documents related to the rule change proposal (ARL Notice Letter) can be found on our website at [Request for public comment | Washington State Gambling Commission](#) under **Staff Initiated Rules Changes**. Written comment may be filed via the **Select a Topic** dropdown menu and selecting **Agency Request Legislation**.

Additionally, Public Comment may be offered via email at Rules.Coordinator@wsgc.wa.gov and also in-person or virtually at Commission Meetings.

Thank you for your time.

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This email was sent to vicki@christopherseninc.com using govDelivery Communications Cloud on behalf of: Washington State Gambling Commission · 4565 7th Avenue SE · Lacey, WA 98503





Staff Proposed Rule Making

New, Amended, and/or Repealed Rules to Align Organizational License Expiration Dates in:

- WAC Chapter 230-03 Permitting and Licensing Rules and
- WAC Chapter 230-05 Fees
- WAC Chapter 230-06 Rule for all licensees

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

<p>Tab 3: September 2024 Commission Meeting Agenda.</p>	<p>Statutory Authority 9.46.070</p>
<p align="center">Who Proposed the Rule Change?</p>	
<p align="center">Washington State Gambling Commission Staff</p>	
<p align="center">Background</p>	
<p>BOLD = Changes made since the July 2024 Commission Meeting</p> <p>RCW 9.46.070(1) – (4) authorizes the Commission to issue licenses for a period not to exceed one year to:</p> <ul style="list-style-type: none"> • a bona fide charitable or nonprofit organization, • an organization operating a business primarily engaged in the selling of food or drink for consumption on the premises, • an organization operating or conducting amusement games, and • organizations engaged in the manufacturing, selling, distributing, or supplying of devices, equipment, software, hardware, or any gambling related service set fees to generate funds necessary to cover all costs of regulation, licensing, and enforcement. <p>Currently, organizational licenses expire at the end of a quarter, depending on when their license was initially approved. In June 2023, the Commission adjusted annual license fees for charitable and nonprofit organizations, commercial stimulant organizations, and for other businesses. This was the first time the license fees had been adjusted since being implemented in 2018. Licensees began paying the adjusted license fees when they renewed their license.</p> <p>Because of the quarterly expiration of organizational licenses, it took nine months before all organizational licensees began paying the adjusted license fees. More importantly, it currently takes 13 months from the implementation of the rule change for all licensees to be subject to the adjusted Gross Gambling Receipts Rate and 22 months (April 30, 2025) to receive a full year of revenue from the adjusted rates. This makes it extremely challenging to forecast cash flow and collect adjusted license fees in a timely manner.</p> <p>Staff are proposing that we initiate rulemaking to align all organizational license expiration dates to June 30th. This will aid in revenue forecasting as well as simplify implementation and communication to licensees when adjusting license fees in the future.</p> <p>Rulemaking would take the form of amending existing rules and/or adding additional rules to WAC chapters 230-03, 230-05, and/or 230-06.</p> <p>At the May 2024 meeting, commissioners initiated rulemaking to explore aligning the expiration date for organizational licenses.</p>	

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

On August 12, 2024, staff held a public feedback session to hear general feedback from licensees, interested parties, and the public regarding this rule change.

On August 29, 2024, staff held meetings with Tribal Partners and the public to hear general feedback regarding this rule change.

Attachments:

- New Rule WAC 230-03-002
- New Rule WAC 230-05-177
- WACs 230-05-128 and 230-05-136 with revisions

Stakeholder Feedback

Victor Mena, President of Last Frontier Gaming and CEO of Washington Gold, provided public comment at the July commission meeting on July 11, 2024. Mr. Mena did not express support or opposition to this rule change. Instead, Mr. Mena wanted to ensure Commissioners and staff had considered potential unforeseen consequences regarding financial planning and cash flow issues that could arise after changing organizational expiration dates.

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.

NEW SECTION

WAC 230-03-002 Expiration date for organizational licenses. (1)

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

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

NEW SECTION

WAC 230-05-177 Temporary reduction of base license fees. (1) As used in this section, "organization" means a charitable or nonprofit organization holding one or more licenses listed in WAC 230-05-160, a commercial stimulant organization holding one or more licenses listed in WAC 230-05-165, and other businesses holding one or more licenses listed in WAC 230-05-170.

(2) For organizations renewing their license with a license effective date between October 1, 2024, and April 1, 2025, the base license fee will be prorated as follows:

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

(3) Organizations that renewed before the effective date of this rule will receive a refund of 25 percent of the base fee paid. All other organizations renewing will pay a reduced base fee amount.

(4) This rule is only effective through June 30, 2025.

AMENDATORY SECTION (Amending WSR 18-05-026, filed 2/9/18, effective 5/1/18)

WAC 230-05-128 Renew your license in a timely manner. (1) You must renew online, unless you have received a waiver as outlined in this chapter and allow enough time to:

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

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

(2) If you have a waiver and are not renewing your license online, you must ensure a properly completed renewal application and all applicable license fees are received at our administrative office in Lacey at least (~~fifteen~~) 30 days before the expiration date on the license.

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

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

AMENDATORY SECTION (Amending WSR 18-05-026, filed 2/9/18, effective 5/1/18)

WAC 230-05-136 Prorating or refunding fees. (1) (~~We may prorate organization license fees when we adjust expiration dates to schedule our workload.~~

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

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

(a) You discontinue your gambling activities; or

(b) You voluntarily surrender your license or permit; or

(c) We suspend or revoke your license.

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

(a) We deny or administratively close your application; or

(b) You withdraw your application; or

(c) You overpaid us; or

(d) We received duplicate license fees.



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.

September 2024 – Final Action

August 2024 – Discussion and Possible Final Action

July 2024 – Discussion Only

May 2024 – Discussion and Possible Filing

March 2024 – Initiate Rulemaking

Tab 4: September 2024 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Washington State Gambling Commission Staff

Background

BOLD = Changes made since August 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.

At the August 8, 2024 commission meeting, Commissioners discussed the proposed rules. Commissioners elected to wait to take final action on this rule to give more time for staff to review the feedback submitted by Kim McCabe on August 7, 2024.

After review and discussion, staff recommends changing the word "must" to "may" in WAC 230-15-050(1). This change allows licensees more flexibility in the way they are able to pay prizes.

Attachments:

- WAC 230-15-050 (Revised) and proposed rules WAC 230-15-186 and WAC 230-15-187
- Email and attachment from Kim McCabe

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.

On August 7, 2024, staff received an email from Kim McCabe (Maverick Gaming) with some suggested edits to the proposed language to WAC 230-15-050.

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 may write a check for the balance of chips redeemed, but only 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.

From: [Kim McCabe](#)
To: [Hughes, Tony \(GMB\)](#)
Subject: Draft Changes
Date: Wednesday, August 7, 2024 3:16:22 PM
Attachments: [Pages from August Commission Packet KM MK.docx](#)

External Email

This is my draft, waiting on Eric to comment. If he has any changes, I will let you know.



Kim McCabe- Ward, CPA
CAMS

SVP Compliance

M: 702-677-1270

E: Kim.McCabe@maverickgaming.com

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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 may write a check for player gaming winnings 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 fourth quarterly license report 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 tables × ~~(((\$1,000))~~ \$2,000 = ~~(((\$15,000))~~ \$30,000 + ~~((largest single prize of \$23,000 = \$38,000))~~ 1% × \$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.

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September 12, 2024

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

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

SUBJECT: BRIAN M. GOLDBERG
CR 2024-01120
Final Order – September 12, 2024, Commission Meeting

The Washington State Gambling Commission (WSGC) issued Licensee Brian M. Goldberg a manufacturer's representative license, No. 23-01694, authorizing him to work as a representative for Light & Wonder. This license, which expires on March 10, 2025, was issued subject to Goldberg's compliance with state gambling laws and Commission rules.

On June 25, 2024, WSGC received an email from a licensing agent with the Kalispel Tribal Gaming Agency (KTGA) notifying WSGC that one of their gaming vendors, Brian Goldberg, had recently been charged with six (6) felony counts of child molestation. At that time, Goldberg was employed as a manufacturer's representative for Light & Wonder, a gaming vendor for the KTGA. The KTGA also provided WSGC with Goldberg's criminal charging documents, which showed information was filed in Spokane County Court, case number 24-1-10340-32, on May 28, 2024. Goldberg was charged with two counts of Child Molestation in the First Degree, two counts of Child Molestation in the Second Degree, one count of Child Molestation in the Second Degree, and one count of Indecent Liberties. These offenses occurred at various times between December 1, 2020, and July 7, 2023, in which Goldberg would have been between the ages of 54 and 57.

On June 28, 2024, WSGC received email notification from Light & Wonder stating that the company would be terminating Goldberg's employment for failing to notify both Light & Wonder and the appropriate regulatory agencies of his criminal charges. A representative from Light & Wonder also submitted a Personnel Termination Notice through their Secure Access Washington account confirming Goldberg's termination.

Executive Director Tina Griffin issued Administrative Charges on August 6, 2024, alleging that Brian Goldberg's above actions violated, WAC 230-03-085(1), (8), & (9)(a), WAC 230-

06-085(1), RCW 9.46.153(1), and RCW 9.46.075(1), (7), (8), & (9). The charges allege Brian Goldberg's actions demonstrate a disregard for statutes and rules promulgated, and that he poses a clear threat to the effective regulation of gambling.

Brian Goldberg was sent the charges by regular mail on August 6, 2024, to the last address the Gambling Commission had on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by August 29, 2024. To date, the Commission has received no communication from Brian Goldberg.

You may take final action against Brian Goldberg's gambling license. Combined, Brian Goldberg's pending criminal charges and failure to notify WSGC of those charges demonstrates the licensee poses a threat to the effective regulation of gambling. The Commission can take final action against Brian Goldberg's gambling license under Case Number CR 2024-01120 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 Brian Goldberg's license, number 23-01694.

**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2024-01120

BRIAN M. GOLDBERG
License No. 23-01694,

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 Brian M. Goldberg a manufacturer's representative license, No. 23-01694, authorizing him to work as a representative for Light & Wonder. This license, which expires on March 10, 2025, was issued subject to Goldberg's compliance with state gambling laws and Commission rules.

2. On June 25, 2024, WSGC received an email from a licensing agent with the Kalispel Tribal Gaming Agency (KTGA) notifying WSGC that one of their gaming vendors, Brian Goldberg, had recently been charged with six (6) felony counts of child molestation. At that time, Goldberg was employed as a manufacturer's representative for Light & Wonder, a gaming vendor for the KTGA.

3. The KTGA also provided WSGC with Goldberg's criminal charging documents, which showed information was filed in Spokane County Court, case number 24-1-10340-32, on May 28, 2024. Goldberg was charged with two counts of Child Molestation in the First Degree,

two counts of Child Molestation in the Second Degree, one count of Child Molestation in the Second Degree, and one count of Indecent Liberties. These offenses occurred at various times between December 1, 2020, and July 7, 2023, in which Goldberg would have been between the ages of 54 and 57.

4. On June 28, 2024, WSGC received email notification from Light & Wonder stating that the company would be terminating Goldberg's employment for failing to notify both Light & Wonder and the appropriate regulatory agencies of his criminal charges. A representative from Light & Wonder also submitted a Personnel Termination Notice through their Secure Access Washington account confirming Goldberg's termination.

5. Executive Director Tina Griffin issued Administrative Charges on August 6, 2024, alleging that Brian Goldberg's above actions violated, WAC 230-03-085(1), (8), & (9)(a), WAC 230-06-085(1), RCW 9.46.153(1), and RCW 9.46.075(1), (7), (8), & (9). The charges allege Brian Goldberg's actions demonstrate a disregard for statutes and rules promulgated, and that he poses a clear threat to the effective regulation of gambling.

6. Brian Goldberg was sent the charges by regular mail on August 6, 2024, to the last address the Gambling Commission had on file.

7. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by August 29, 2024. To date, the Commission has received no communication from Brian Goldberg.

II. CONCLUSIONS OF LAW

1. Brian Goldberg 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 Brian Goldberg's gambling license under Case Number CR 2024-01120 pursuant to RCW 9.46.075, RCW 34.05.440, RCW 34.05.461, and WAC 230-03-085.

3. Brian Goldberg's gambling license should be revoked under Case Number CR 2024-01120 pursuant to WAC 230-03-085(1), (8), & (9)(a), WAC 230-06-085(1), RCW 9.46.153(1), and RCW 9.46.075(1), (7), (8), & (9).

III. ORDER

This matter having come before the Commission at its September 12, 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 Brian M. Goldberg's license, Number 23-01694, is **REVOKED**.

DATED this ___ day of September, 2024.

ALICIA LEVY, Chair

BUD SIZEMORE, Vice Chair

SARAH LAWSON

ANDERS IBSEN

TAB 6 - WRITTEN PUBLIC COMMENT

From: [AgencyWebsite \(GMB\)](#)
To: [Griffin, Tina \(GMB\)](#)
Subject: FW: Written Comment for 9/12/2024 WSGC
Date: Tuesday, September 10, 2024 12:35:20 PM
Attachments: [WSGC_PublicComment Sept 2024 - Google Docs.pdf](#)

From: Nanci Watson <nanci.watson@gmail.com>
Sent: Tuesday, September 10, 2024 12:27 PM
To: AgencyWebsite (GMB) <agency.website@wsgc.wa.gov>
Subject: Written Comment for 9/12/2024 WSGC

External Email

I have prepared written comments related to problem gambling. Let me know if you need anything else to submit this on my behalf.

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Gambling in the face of Suicide

Submitted as Public Comment to WSGC Sept, 2024, by Nanci Watson,
nanci.watson@gmail.com

In July, I was able to attend the National Conference on Gambling Addiction & Responsible Gambling, in San Diego.

There I attended a presentation from the Center for Gambling Studies, School for Social Work - Rutgers University, New Jersey.

It was called "Gambling as a Precipitating Factor in Deaths by Suicide in the National Violent Death Reporting System", M. van der Maas, R. DiMeglio, L. Nower.

Also attending and providing support were experts in Gambling Addiction from Maryland Center of Excellence on Problem Gambling, University of Maryland School of Medicine, in Baltimore.

For me this was, on the one hand a fantastic bit of culture shock, on the other, a sensation of having met someone who knew exactly what I was thinking.

I grew up on Fox Island, in the State of Washington, right down the beach from our one-time governor Dixie Lee Ray. When I attended an upper division zoology class from her at the UW, she was accompanied on the stage by her poodle and her wolfhound. She would have loved this presentation with its big ideas and bracing detail.

In my family, among the step kids, I have been impacted by suicide since my retirement. The first the death of young teenager, previously removed from the care of her mother, and observing that mother, then homeless, sleeping all day while spending most nights at the casino; This caused me to volunteer on the Problem Gambling Taskforce, as a member of the public impacted by problem gambling,

During my time on the taskforce, I was shocked by how sluggish our analysis of the problem appeared to be.

We were repeatedly reminded that "most people can gamble without any harm" and while wrapping up our recommendations, we were told that there "just wasn't time to look at the impact of specific types of gambling."

When recommendations were made to the State Legislature, to continue with the existing membership as an advisory council, the first step taken in the House, where Rep Chris Stearn (Vice Chair, State Government & Tribal Relations and Regulated Substances & Gaming) volunteered as the sponsor, for HB 1681, was to eliminate a member of the public altogether. Then after a first reading another change was made, that being to eliminate any member from

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the commercial card rooms, which compete with casinos, and creating a substitute version of the bill. During public comment, a representative from the State Gambling Commission made it known that the staff had not received a chance to review this last change before submitting and as a result the proposed wording was not consistent with the existing legislation. That problem was then ironed out as the bill proceeded and was passed as a second substitute. In the new year the Problem Gambling Advisory Council, as restructured, held its first meeting without utilizing open meeting guidelines, having been advised by legislative staff that no further Public Comment would be required.

Meanwhile the team from Rutgers University, two hours by car, north of Atlantic City, the "Fix Was In" with these findings were being validated and published not long after the presentation:

1. "In the State of Nevada suicide deaths associated with gambling are 9x higher than average." [Other noteworthy states were:] Delaware (1.10%), Washington (1.03%), and Oklahoma (1.00%).
2. "Financial harms seem to be most salient in the relationship between gambling and death by suicide. As a result we need to seriously consider that monitoring and addressing the impact of financial harms may be an effective strategy for reducing gambling-related suicide.
3. "Gambling on electronic gambling machines in gambling halls or bars was associated with increased odds of suicidal events. Other types of gambling ... were not associated independently with suicidal events. This result shows that the type of gambling needs to be considered as a relevant factor in gambling research."
4. "Evidence supports the fact that most harms from gambling are found among the proportion of the population that does not experience clinical levels of Gambling Disorder." [This is known as the Prevalence Paradox.]
5. "In 2003, an analysis of the major methodological issues facing researchers trying to measure the social costs of gambling noted that one of the greatest problems was a lack of systematically collected data. More than 20 years later, this problem persists in the US, resulting in a lack of available data that are useful in estimating the social costs of gambling. The results of [the] content analysis suggest that the NVDRS procedure could be improved with greater consideration of gambling as a contextual factor relevant to a death by suicide."

If anyone is interested to learn more, the lead author is shown below.

<https://www.sciencedirect.com/science/article/pii/S003335062400283X>

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