



**WASHINGTON STATE
GAMBLING COMMISSION
MEETING**

**January 9, 2025
OLYMPIA, WASHINGTON**

Commissioners



Alicia Levy
Chair



Bud Sizemore
Vice Chair



Sarah Lawson

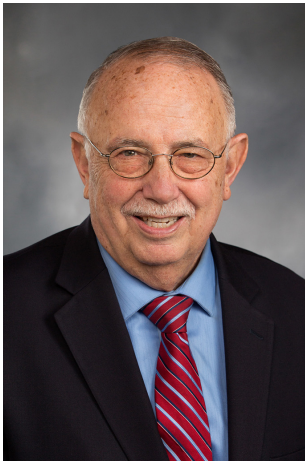


Anders Ibsen



Michael Charles

Ex Officios



Senator
Steve Conway



Senator
Jeff Holy



Representative
Shelley Kloba



Representative
Eric Robertson



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

Keeping gambling legal & honest.

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Washington State Gambling Commission

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

Gambling Commission Meeting

Thursday, January 9, 2025

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

(TEAMS meeting link)

By phone: 360-726-3322, ID: #965 496 363#

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

Public Comment can be provided by:

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

*The Chair may take items out of order and the Commissioners may take action on business items.
An asterisk identifies Administrative Procedures Act Proceedings (*)*

9:30 AM Call to Order *Alicia Levy, Chair*

***Tab 1** **Consent Agenda** **(Action)**
November 14, 2024, Commission Meeting Minutes
New Licenses & Class III Gaming Employees
HBCR List

Public Comment

Executive Director's Report

Tina Griffin, Executive Director

Staff Recognition

- *Mark Harris – 30 years*
- *Julie Lies – 35 years*

Strategic Plan Update

Tab 2 **Special Olympics of Washington** **(Action)**

- 2023 and 2024 Enhanced Raffle Results
- 2025 Enhanced Raffle Request

Roger Sauve, Special Agent
Mary Do, Chief Executive Officer
Mark Sinay, CFO/VP Accounting & Administration

Public Comment

**RULEMAKING
ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS**

***Tab 3 Rule Up for Final Action (Action)**

- Minimum Cash on Hand

Adam Amorine, Legal Manager

Public Comment

***Tab 4 Rule Up for Discussion and Possible Filing (Action)**

- Centralized Surveillance

Adam Amorine, Legal Manager

Public Comment

***Tab 5 Petition to Initiate Rulemaking (Action)**

- Advertisements for Sports Wagering

Tricia Gullion, Legislative and Rules Manager

Public Comment

***Tab 6 Petition to Initiate Rulemaking (Action)**

- Eligible Tables at a Poker Tournament

Tricia Gullion, Legislative and Rules Manager

Public Comment

***Tab 7 Petition to Initiate Rulemaking (Action)**

- Increasing the Betting Cap from \$300 to \$400 in Poker

Tricia Gullion, Legislative and Rules Manager

Public Comment

Tab 8 2025 Legislative Update (Possible Action)

Tricia Gullion, Legislative and Rules Manager

Public Comment

***Tab 9 Default (Action)**

- Defendant in Rem - CR 2024-01808

Adam Amorine, Legal Manager

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 1 hour.

Adjourn

Updated: January 2, 2025

Next Meeting: February 13th and 14th at LCB

Public Meeting Accommodations: Questions or comments about the agenda and requests for special accommodation should be directed to askus@wsgc.wa.gov



Washington State Gambling Commission

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

November 14, 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 – Virtual
Michael Charles – Virtual

Ex Officio Members Present:

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

Staff Present:

Tina Griffin, Executive Director; Kriscinda Hansen, Chief Financial Officer; Tricia Gullion, Legislative and Rules Manager; Adam Amorine, Interim Legal Manager; Damon Mentzer, Administrative Assistant; Michelle Rancour, Administrative Assistant; Julie Anderson, Executive Assistant and Suzanne Becker, Assistant Attorney General (AAG)

Staff Presents Virtually:

Gary Drumheller, Deputy Director; Jim Nicks, Assistant Director; Julie Lies, Tribal Liaison; Dan Wegenast, Agent in Charge; Bill McGregor, Special Agent Supervisor; Jess Loshe, Special Agent Supervisor; and Nicole Frazer, Administrative Assistant

There were nine people in the audience and 24 people attended virtually.

Chair Levy welcomed everyone to the Liquor and Cannabis Board and called the meeting to order at 9:30 AM. She welcomed our newest Commissioner Michael Charles to the Commission.

She announced that the meeting would be recorded and took the role to ensure a quorum.

Tab 1 - Proposed Compact Amendment Hearing – Stillaguamish Tribe of Indians

Tina Griffin, Executive Director, and Julie Lies, Tribal Liaison presented the materials for this tab. The Honorable Eric White, Chairman of the Stillaguamish Tribe was not available to present their materials, therefore Christopher Boser, Chairman of the Gaming Commission presented the materials for the Stillaguamish Tribe of Indians.

Chair Levy asked for public comment. There was none. Julie Lies, Tribal Liaison shared that there were no email comments.

Chair Levy asked the Commissioners if they had any comments. Senator Conway, Vice Chair Sizemore and Commissioner Lawson commented.

Vice Chair Sizemore moved to forward the proposed compact amendment for the Stillaguamish Tribe of Indians to the governor for review and final execution. Senator Conway seconded the motion.

***The motion passed. 8:0
Representative Roberts was excused from the meeting and did not vote.***

At 10:06 AM Commissioners and Ex Officios adjourned into Executive Session to discuss current and potential agency litigation with legal counsel, including tribal negotiations after a ten-minute break.

At 11:15 AM Chair Levy announced that Executive Session would continue for another 30 minutes.

The Commission reconvened the regular meeting at 11:45 AM. Chair Levy called the role to ensure a quorum. All Commissioners were present.

Tab 2 - Consent Agenda

Chair Levy asked the Commissioners if they had any changes to the consent agenda including the 2025 meeting schedule. They did not. She asked for public comment. There was none.

***Commissioner Ibsen moved to approve the consent agenda.
Commissioner Lawson seconded the motion.
The motion passed unanimously. 5:0***

Tab 6 - Rule up for Discussion and Possible Filing – Minimum Cash on Hand

Adam Amorine, Interim Legal Manager (ILM), presented the materials for this tab. **Chair Levy** asked if the Commissioners had any questions. **Commissioner Ibsen** asked about the frequency with which staff audits the licensees. ILM Amorine stated that staff conducts audits at least once a year at a minimum, possibly twice a year.

Chair Levy asked for public comment. There were none.

***Commissioner Ibsen moved to file the recommended language for Minimum Cash on Hand rules for further discussion and final action in January.
Commissioner Lawson seconded the motion.
The motion passed unanimously. 5:0***

Tab 7 - Petition to Initiate Rulemaking - Self-Exclusion

Tricia Gullion, Legislative and Rules Manager (LRM) presented the materials for this tab.

Chair Levy asked for public comment. Representative Kloba shared her opinion.

***Commissioner Lawson moved to deny the petition as presented by staff and stated that the current form is sufficient.
Commissioner Charles seconded the motion.
The motion was unanimously denied. 5:0***

Executive Director's Report

Tina Griffin, Executive Director (ED) gave an update on the Centennial Accord. ED Griffin updated the Commissioners on the IT Modernization project. She reminded Commissioners they could find the HBCR Financial Statement for 2023 in their packets.

Finally, she updated the Commissioners on the Deputy Director hiring.

Tab 3 – November 2024 Budget Update

Kriscinda Hansen, Chief Financial Officer, CFO presented the materials for this tab. Chair Levy asked the Commissioners if they had any further questions. They did not.

Tab 4 – Presentation – Seattle Junior Hockey Association

Angela Deckert, Special Agent presented the materials for this tab. Licensees Michael Murphy and Eric Heckenkemp were available for questions.

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

Tab 5- Presentation – Anti-Money Laundering

Jess Lohse, Special Agent Supervisor presented the materials for this tab.

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

Chair Levy announced that the January 2025 Commission Meeting will be held at the Liquor and Cannabis Board on January 9th and 10th, 2025.

At 12:25 PM Chair Levy adjourned the meeting.



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
January 2025

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Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 26.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

BINGO

FELIDA PTA VANCOUVER COUNCIL 3.7.13
00-20857 01-02854

7801 NE GREENWOOD DR
VANCOUVER WA 98682

FORDS PRAIRIE GRANGE NO 33
00-25461 01-02852

2640 W REYNOLDS AVE
CENTRALIA WA 98531

VFW 00992/WALLA WALLA
00-00300 01-01107

102 N COLVILLE ST
WALLA WALLA WA 99362

WASHOUGAL VOLUNTEER FIRE DEPT
00-23077 01-02855

1002 57TH ST
WASHOUGAL WA 98671

RAFFLE

FELIDA PTA VANCOUVER COUNCIL 3.7.13
00-20857 02-21460

7801 NE GREENWOOD DR
VANCOUVER WA 98682

HI-LINERS MUSICAL THEATRE
00-25494 02-21458

6000 16TH AVE SW
SEATTLE WA 98106

HUDSON'S BAY HIGH SCHOOL FOUNDATION
00-25293 02-21393

1601 E MCLOUGHLIN BLVD
VANCOUVER WA 98663

KIRKLAND ARTS CENTER
00-24921 02-21248

620 MARKET ST
KIRKLAND WA 98033

MUKILTEO ELEMENTARY PTSA 7.5.13
00-23630 02-09637

304 LINCOLN AVE
MUKILTEO WA 98275

NORTHWEST GIRLCHOIR
00-25479 02-21454

2150 N 122ND ST
SEATTLE WA 98133

SHARED SPACE FOR ALL
00-25522 02-21470

415 WESTLAKE AVE N
SEATTLE WA 98109

SOUND BEHAVIORAL HEALTH
00-25470 02-21451

860 TERRY AVE N
SEATTLE WA 98109

SOUTH SOUND CARE FOUNDATION
00-25477 02-21453

9007 S 19TH ST
TACOMA WA 98466

ST LOUISE CATHOLIC CHURCH
00-00416 02-09148

141 156TH AVE SE
BELLEVUE WA 98007

VFW 00992/WALLA WALLA
00-00300 02-00557

102 N COLVILLE ST
WALLA WALLA WA 99362

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**RAFFLE**VFW 02224/PUYALLUP
00-00295 02-00504120 2ND ST NE
PUYALLUP WA 98372-3026WENATCHEE AMATEUR HOCKEY ASSOCIATION
00-10255 02-090371300 WALLA WALLA AVE
WENATCHEE WA 98801WHATCOM COUNTY AMATEUR HOCKEY ASSOCIATION
00-22871 02-092511225 CIVIC FIELD WAY
BELLINGHAM WA 98229WHIDBEY ISLAND DANCE THEATRE
00-24849 02-21223714 CAMANO AVE
LANGLEY WA 98260**AMUSEMENT GAMES NONPROFIT**FOE 03358/GRANITE FALLS
00-04987 03-00894402 N GRANITE AVE
GRANITE FALLS WA 98252**PUNCHBOARD/PULL-TAB NONPROFIT**VFW 00992/WALLA WALLA
00-00300 05-01927102 N COLVILLE ST
WALLA WALLA WA 99362**PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT**BEEHIVE RESTAURANT
00-25481 05-21919300 E MAIN ST
MONTESANO WA 98563CORNER BAR & GRILL
00-25420 05-219087601 SR 20 STE B
ANACORTES WA 98221DRYDEN ROADHOUSE
00-25485 05-219218459 MAIN ST
DRYDEN WA 98821FALL CITY BAR & GRILL
00-25471 05-2191633723 SE REDMOND-FALL CITY RD
FALL CITY WA 98024GOLDEN STEER STEAK N' SEAFOOD
00-25344 05-2188323826 104TH AVE SE
KENT WA 98031JENO'S RESTAURANT
00-25487 05-21922123 E MAIN ST
MONROE WA 98272

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

PUGET SOUND PIZZA
00-25358 05-21887

12924 PACIFIC HWY SW
LAKEWOOD WA 98499

ROONEY'S FOOD & SPIRITS
00-25491 05-21924

17626 140TH AVE NE
WOODINVILLE WA 98072

RUBY SLIPPER BAR & GRILL
00-25492 05-21925

3995 BETHEL RD SE
PORT ORCHARD WA 98366

MANUFACTURER

ARROW/ BINGO KING/ CAPITAL/ CAPITOL/ E-MAX GAMING
20-00281 20-00281

9900 CLINTON RD
CLEVELAND OH 44144

DISTRIBUTOR

DYNAMIC GAMING SOLUTIONS
21-00321 21-00321

5300 S PORTLAND AVE
OKLAHOMA CITY OK 73119

COMMERCIAL AMUSEMENT GAMES OPERATOR

KOKORO TOYS LLC
00-25444 53-21582

14017 50TH PL W
EDGEWOOD WA 98026

KOKORO TOYS LLC
53-21582

KOKORO TOYS LLC
EDGEWOOD WA 98026

LUCKY CLAWW
00-25472 53-21583

14028 BEL-RED RD UNIT 207
BELLEVUE WA 98007

SUGARLOAF CREATIONS
00-25424 53-21581

246 S TAYLOR AVE
LOUISVILLE CO 80027

NON HOUSE-BANKED CARD GAME

DRYDEN ROADHOUSE
00-25485 65-07557

8459 MAIN ST
DRYDEN WA 98821

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

MAJOR SPORTS WAGERING VENDOR

BETRIVERS
10-00030 81-00020

900 N MICHIGAN AVE SUITE 950
CHICAGO IL 60611

MID-LEVEL SPORTS WAGERING VENDOR

SIMPLEBET LLC
10-00742 82-00037

222 BERKELEY STREET
BOSTON MA 02116

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

DISTRIBUTOR REPRESENTATIVE

BARRENO, XAVIER
22-01378

INTERBLOCK USA LLC
LAS VEGAS NV 89118

BEIMERT, MICHAEL A
22-01380

INTERBLOCK USA LLC
LAS VEGAS NV 89118

HACK, DUNCAN R
22-01379

TABS PLUS
AUBURN WA 98002

MANUFACTURER REPRESENTATIVE

ACAYAN, ANTHONY A
23-03172

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

ALLADA, VENKAT SAI
23-04014

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

BECK, BRANDON R
23-04027

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

BRISCOE, RYAN D
23-02966

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

BROWDER, DAVID F JR
23-01960

IGT
LAS VEGAS NV 89113

DEWALD, KELLY J
23-04036

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

FLOWERS, CASEY D
23-04021

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

GANGULY, SMITA
23-04024

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

GOUDA, SHAILESHKUMAR S
23-04025

LIGHT & WONDER
LAS VEGAS NV 89119

HEACOCK, DEREK M
23-02471

M3 TECHNOLOGY SOLUTIONS LLC
NORMAN OK 73069

HOLLIMAN, JEFFREY M
23-04030

EVERI GAMES INC.
LAS VEGAS NV 89118

KASZUPSKI, JOSEPH T
23-04019

BLUBERI GAMING USA INC
LAS VEGAS NV 89118

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

| | |
|--|---|
| KOZAKIEWICZ, AGATA M 23-04001 | AINSWORTH GAME TECHNOLOGY INC LAS VEGAS NV 89118 |
| LUTTRELL, GREGORY S 23-02294 | ECLIPSE GAMING SYSTEMS DULUTH GA 30096 |
| MCKILLIPS, DANIEL L 23-04031 | EVERI PAYMENTS INC LAS VEGAS NV 89113-2175 |
| MILLS, JEREMY K 23-04032 | EVERI PAYMENTS INC LAS VEGAS NV 89113-2175 |
| MOHIDEEN PITCHAI, MOHAMMED HASAN 23-04017 | LIGHT & WONDER LAS VEGAS NV 89119 |
| NANDHI MARLUSIDDAPPA, APOORVA 23-04028 | LIGHT & WONDER LAS VEGAS NV 89119 |
| PALANKI, KARUNAKARA R 23-04029 | LIGHT & WONDER LAS VEGAS NV 89119 |
| PORTER, VERNON R 23-04034 | ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135 |
| PRAKASH, MEGHANA 23-04018 | LIGHT & WONDER LAS VEGAS NV 89119 |
| RADHAKRISHNAN, JAYASRI 23-04016 | LIGHT & WONDER LAS VEGAS NV 89119 |
| RAJARAM, SHESHANTH 23-04026 | LIGHT & WONDER LAS VEGAS NV 89119 |
| ROBERTSON, SABRINA R 23-04013 | EVERI GAMES INC. LAS VEGAS NV 89118 |
| RYLAND, GEORGE A 23-04035 | EVERI GAMES INC. LAS VEGAS NV 89118 |
| SARKIS, VINCENT S 23-04020 | IGT LAS VEGAS NV 89113 |
| SORESMAN, DYLAN J 23-04022 | ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135 |
| STACHELRODT, MICHAEL H 23-04023 | ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135 |

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

VAN, KEVIN K
23-04015

EVERI GAMES INC.
LAS VEGAS NV 89118

MAJOR SPORTS WAGERING REPRESENTATIVE

ANGELOV, PAVEL P
33-00675

DRAFTKINGS
BOSTON MA 02116

CALVIN-CRANENBURGH, KANE B
33-00678

DRAFTKINGS
BOSTON MA 02116

CAMP, CHRISTOPHER B
33-00680

DRAFTKINGS
BOSTON MA 02116

GEORGIEV, PETAR M
33-00674

DRAFTKINGS
BOSTON MA 02116

LESCINSKIS, RIHARDS
33-00679

DRAFTKINGS
BOSTON MA 02116

O'BRIEN, MATTHEW T
33-00677

DRAFTKINGS
BOSTON MA 02116

SLEVIN, THOMAS J
33-00676

FANDUEL SPORTSBOOK
LOS ANGELES CA 90045

NON-PROFIT GAMBLING MANAGER

FOOTE, LISA J
61-04899

FOE 02218/CHELAN
CHELAN WA 98816

JOHNSON, GARY M
61-04900

FOE 00289/YAKIMA
YAKIMA WA 98902-3437

MOORE, WESLIE A
61-04746

FOE 00696/ROSLYN
ROSLYN WA 98941

RANDOLPH, MARK F
61-04901

FOE 04226/BELFAIR
BELFAIR WA 98528

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

SERVICE SUPPLIER REPRESENTATIVE

ELVROM, MITCHEL J
63-00642

NORTH AMERICAN VIDEO
POINT PLEASANT NJ 08742

LIPKOWITZ, JOHN M
63-00816

MARNELL COMPANIES, LLC
LAS VEGAS NV 89119

SALES, ANNA D
63-01183

MAVERICK WASHINGTON
KIRKLAND WA 98034

CARD ROOM EMPLOYEE

ABDULKADIR, ELIYAS M
68-37889

B

GREAT AMERICAN CASINO/EVERETT
EVERETT WA 98204

AGANA, DERRICK A
68-37877

B

GREAT AMERICAN CASINO/TUKWILA
TUKWILA WA 98168

ATKINSON, AUSTIN D
68-37847

B

ACE'S POKER
MOUNTLAKE TERRACE WA 98043

AUSTRIA, MARIA C
68-20195

B

LAST FRONTIER
LA CENTER WA 98629-0000

BEAMAN, ANDREW L
68-37857

B

GOLDIES SHORELINE CASINO
SHORELINE WA 98133

BROOKS, JAMISEN S
68-36870

B

CHIPS CASINO/LAKEWOOD
LAKEWOOD WA 98499

CHOI, IN SU
68-37872

B

ACE'S POKER
MOUNTLAKE TERRACE WA 98043

COOPER, DANIEL L
68-37882

B

LAST FRONTIER
LA CENTER WA 98629-0000

COTHREN, TUESDAY H
68-36221

B

JOKER'S CASINO AND SPORTS BAR
RICHLAND WA 99352-4122

DAVILA OSEGUEDA, MARIANO
68-37855

B

GOLDIES SHORELINE CASINO
SHORELINE WA 98133

DENSLOW, CYNTHIA A
68-37888

B

ALL STAR CASINO
SILVERDALE WA 98383

DOAN, LYNN M
68-36620

B

GREAT AMERICAN CASINO/TUKWILA
TUKWILA WA 98168

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

| | | |
|---|---|---|
| DOAN, TRUNG N 68-37890 | B | GOLDIES SHORELINE CASINO SHORELINE WA 98133 |
| DUONGCHANN, CHANSETHYRITH C 68-33941 | B | GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168 |
| ERMALOFF, NICOLETTE W 68-37860 | B | GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168 |
| EVERETT, CHARLES D 68-37871 | B | LAST FRONTIER LA CENTER WA 98629-0000 |
| FULSON-TRICHLER, JAVANNI K 68-37866 | B | GOLDIES SHORELINE CASINO SHORELINE WA 98133 |
| GEORGE, DESIREE C 68-37898 | B | PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837 |
| HAYNES, STEVEN L 68-37850 | B | DESERT BLUFFS POKER ROOM KENNEWICK WA 99352 |
| HILTON, JONI R 68-37849 | B | CRAZY MOOSE CASINO/PASCO PASCO WA 99301 |
| HOLBROOK, ELIZABETH C 68-37870 | B | NOB HILL CASINO YAKIMA WA 98902 |
| HOWARD OVERSTREET, LANCE A 68-37881 | B | PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837 |
| INSYXIENGMAY, AMMALA 68-06208 | B | CRAZY MOOSE CASINO/PASCO PASCO WA 99301 |
| KEENE, TOM S 68-37897 | B | LAST FRONTIER LA CENTER WA 98629-0000 |
| KIEFER, KERRY L 68-37843 | B | DESERT BLUFFS POKER ROOM KENNEWICK WA 99352 |
| KIN, SOTHEA K 68-37838 | B | GRAND CASINO SHORELINE WA 98133 |
| KNEFF-MCGUCKIN, DESTINEE J 68-37859 | B | PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837 |
| LAM, TAI 68-22424 | B | CARIBBEAN CARDROOM KIRKLAND WA 98034 |

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

| | | |
|--------------------------------------|---|--|
| LAMONT, ALEXANDER L 68-37848 | B | ALL STAR CASINO SILVERDALE WA 98383 |
| LE, JOHNNY 68-34369 | B | CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499 |
| LE, TIEN N 68-37880 | B | SILVER DOLLAR CASINO/RENTON RENTON WA 98057 |
| LE, TUNG P 68-05913 | B | SILVER DOLLAR CASINO/SEATAC SEATAC WA 98188 |
| LEFORCE, RONALD W JR 68-37883 | B | GRAND CASINO SHORELINE WA 98133 |
| LIN, XIAOLAN 68-31104 | B | CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499 |
| LOZANO, MICHAELA K 68-30507 | B | GRAND CASINO SHORELINE WA 98133 |
| LU, YONG-LIANG 68-20719 | B | SILVER DOLLAR CASINO/RENTON RENTON WA 98057 |
| LUJAN-ERMEL, CHRISTIAN N 68-37891 | B | CRAZY MOOSE CASINO II MOUNTLAKE TERRACE WA 98043-2463 |
| MARTINEZ-SUAREZ, JOANA 68-37842 | B | GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168 |
| MC DOWELL, FREDDIE L 68-37868 | B | COYOTE BOB'S CASINO KENNEWICK WA 99336 |
| MCCUIEN, JARROD M 68-35331 | B | COYOTE BOB'S CASINO KENNEWICK WA 99336 |
| MCLEOD, KRISTIAN M 68-36112 | B | ACE'S POKER MOUNTLAKE TERRACE WA 98043 |
| MEIER, ASHLYNN K 68-37884 | B | ALL STAR CASINO SILVERDALE WA 98383 |
| MONH, KAYLA K 68-37844 | B | ROXBURY LANES AND CASINO SEATTLE WA 98126 |
| MOOMAW, HUNTER J 68-37865 | B | BUZZ INN STEAKHOUSE EAST WENATCHEE WA 98802 |

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

| | | |
|-------------------------------|---|---|
| NGUYEN, DUNG T 68-37893 | B | GRAND CASINO SHORELINE WA 98133 |
| NGUYEN, HONG T 68-37854 | B | GOLDIES SHORELINE CASINO SHORELINE WA 98133 |
| NGUYEN, QUOC H 68-37876 | B | GRAND CASINO SHORELINE WA 98133 |
| NYAVOR, MACLE 68-37841 | B | GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168 |
| OSBORNE, JASON A 68-37896 | B | CRAZY MOOSE CASINO/PASCO PASCO WA 99301 |
| PENTA, ANASTASIIA 68-37845 | B | JOKER'S CASINO AND SPORTS BAR RICHLAND WA 99352-4122 |
| PRESLEY, CALEB D 68-37887 | B | IMPERIAL PALACE CASINO TUKWILA WA 98188 |
| RAMIREZ, RUBEN R 68-37886 | B | JOKER'S CASINO AND SPORTS BAR RICHLAND WA 99352-4122 |
| ROSS, ROSE 68-29398 | B | GRAND CASINO SHORELINE WA 98133 |
| RUGH, KIMBERLY J 68-35216 | B | NEW PHOENIX LA CENTER WA 98629 |
| SANCHEZ, CAMERON 68-37390 | B | SILVER DOLLAR CASINO/SEATAC SEATAC WA 98188 |
| SANTOS, KEVIN O 68-37851 | B | SILVER DOLLAR CASINO/RENTON RENTON WA 98057 |
| SARGENT, KASEY C 68-37879 | B | LILAC LANES & CASINO SPOKANE WA 99208-7393 |
| SINGH, MILLA 68-25997 | B | GOLDIES SHORELINE CASINO SHORELINE WA 98133 |
| SKARBO, KAI P 68-37878 | B | SILVER DOLLAR CASINO/RENTON RENTON WA 98057 |
| SMALL, DERREK R 68-37852 | B | IMPERIAL PALACE CASINO TUKWILA WA 98188 |

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

| | | |
|------------------------------------|---|--|
| SMITH, ROBERT E 68-24185 | B | CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499 |
| SPINDEN, WILLIAM J 68-12812 | B | FORTUNE CASINO LA CENTER LA CENTER WA 98629 |
| STEFFENSON, ELYZA N 68-37864 | B | JOKER'S CASINO AND SPORTS BAR RICHLAND WA 99352-4122 |
| STORY, TODD A 68-37892 | B | CRAZY MOOSE CASINO/PASCO PASCO WA 99301 |
| SYHARATH, BOUAVANH 68-08258 | B | JAMESTOWN SALOON ARLINGTON WA 98223 |
| TIMM, JOSHUA W 68-37197 | B | NEW PHOENIX LA CENTER WA 98629 |
| TORBENSON, BRIAN L 68-29104 | B | BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719 |
| TOWNSEND, BRITTAINY R 68-29451 | B | MACAU CASINO LAKEWOOD WA 98499-4457 |
| WHITE, JORDAN L 68-37863 | B | NEW PHOENIX LA CENTER WA 98629 |
| WISNIEWSKI, QUINN A 68-37249 | B | CRAZY MOOSE CASINO II MOUNTLAKE TERRACE WA 98043-2463 |
| WOODRUFF, PATRICK J JR 68-34545 | B | JOKER'S CASINO AND SPORTS BAR RICHLAND WA 99352-4122 |

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

ADAMS, BRIAN J
69-58002

CORDOVA, NICHOLAS D
69-54455

DEFRANCE, MELINDA E
69-58003

DORNING, KEISHA C
69-57905

GORDON, ERIK K
69-57904

HUSTON, JOSHUA A
69-58065

MATHUS, DOMINIK A
69-57906

POTENZONE, MICHAEL J
69-58077

SEM, CHRISNA B
69-38490

SNIPES, JARROD C
69-26114

COLVILLE CONFEDERATED TRIBES

BURNS, KRISTIN G
69-58101

CHEER-BOYCE, TIFFANY A
69-34376

CLARK, VERONICA L
69-57924

COPPOCK, GAGE H
69-57893

EDWARDS, SHALESA J
69-28598

ENSMINGER, BRIAN C
69-58100

ESPERSE, ISAIAH A
69-58099

HELGESON, NICOLE K
69-58098

HURTADO-HERMOSILLO, LUIS A
69-58011

JASSO, ALEJANDRO
69-57975

JUAREZ-LOPEZ, BRYAN
69-57971

LAWRENCE, JUNIOR
69-50648

LOBATO-CASTRO, BRIAN
69-58097

MARCHAND, DAKOTA K
69-57925

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COLVILLE CONFEDERATED TRIBES

SUAREZ CRUZ, ROBERTO C
69-42378

VANCE, TRACY L
69-58038

COWLITZ INDIAN TRIBE

BARNWELL, LEXIE L
69-57942

BAZURTO, STREELAN C
69-58013

BLAKE, MICHELLE L
69-57949

BROVCHENKO, ANASTASIIA
69-58030

CARPENTER, JD M
69-57946

CASTLE, REILEY W
69-57895

CHAN, WAI YU
69-49078

DANG, JUSTIN P
69-57962

DO, TUYEN M
69-41467

ESSEL, KAITLYN M
69-58040

FARRAR, CALEB N
69-58054

GARDNER, TROY A
69-57838

GARRETSON, ANTHONY R
69-58033

GRAMMER, NOEL P
69-57921

HAGEN, KERRY K
69-57869

HARGRAVE, MADISON B
69-57950

HERBERT, GAVIN A
69-58086

HERNANDEZ, THOMAS J
69-57861

HERRMANN, ASHER J
69-57947

HOOPER, RENA M
69-57961

JENSEN, DANIELLA D
69-58055

JIAN, ZHANGRONG
69-47920

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

KNEELAND, MAKAYLA R
69-57900

LANE, ELISHA M
69-57943

LASSILA, JUSTIN T
69-43170

LIU, MEILAN
69-55459

LOCKE, SAVANNAH M
69-58006

LUAFALEMANA KALAULI, JEREMIAH-RANDY
69-57881

MEDLIN, PAUL B
69-43069

MILLER, ERIK E
69-57849

MORRISON, MARIA C
69-58085

MUSSER, ALEXIS G
69-58045

NAIR, AARYA PRAKASH
69-58026

NAJARRO, STANLEY
69-57843

PADRON, DUSTIN M
69-57968

PANINA, DARIIA
69-58060

PENLAND, ETHAN O
69-57909

PERKINS, JOHN A
69-57945

PIPER, SCOTT E
69-57892

PRATT, ISAAC N
69-58012

RASH, JACK T
69-57957

SCHMITZ, MICHAEL E
69-57834

SIDES, CAROL M
69-57926

SIMPSON, AMANDA R
69-57914

SMITH, KAREN D
69-57972

SMITH, MATTHEW C
69-58075

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

SNOW, KEITH C
69-57907

SVIECHINA, YULIA
69-57933

TRAVIS, RACHAEL L
69-42604

UZCATEGUI MARTINEZ, LUIS E
69-58035

VILDOSOLA, GILBERT A
69-46992

WESCOM, BRANDON K
69-57999

WHITE, ERIC J
69-57953

KALISPEL TRIBE

ABBOTT, RAYMOND D JR
69-57883

ABREGANA, JAIME III
69-57908

ALLEN, KELLY M
69-58001

BARNES, KAIN D
69-57988

BERRY, RYAN P
69-54555

BURT, ALEXANDER S
69-58048

CLARK, TRAEY A
69-57932

CRANFORD, MEKAI L
69-57989

DEAN, LISA M
69-58066

DENNY, KYLE J
69-51298

DICK, NICHOLAS A
69-58093

DOMPIER, CHRISTOPHER B
69-58049

GEORGE, ANDRE M
69-57963

GOOD, MELANIE L
69-58005

HELMICK, CHERIE E
69-58022

HOWATT, CALEB J
69-58092

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

HYAMS, LIAM B
69-57931

KIRBY, TONYA M
69-57964

LINDBLADE, TIMOTHY
69-58004

LOCK, DEREK D
69-58041

NIEZWAAG, KEANU L
69-58000

RUSSELL, ALIA A
69-16083

SAXON, DREW T
69-57854

SEGANOS, GREGORY W
69-57983

SMITH, CHRISTOPHER J
69-57882

SOLTERO, SERGIO M
69-58089

VANG, LO
69-58047

WARDEN, RYAN T
69-57930

WIEDMAN, SARAH N
69-57910

WRUBLIK, CAYDEN M
69-57982

LUMMI NATION

AFRAID OF BEAR, FONTANELLE M
69-57868

ALECK-SOLOMON, JUSTICE A
69-57923

BALLEW, PATRICIA A
69-57922

FIGUEROA, LUCAS A
69-57867

HILLAIRE-LUMBERT, BRADEN C
69-34080

JONES, DOMINICK J
69-54950

LUC, TAI B
69-32024

PLASTER, HAROLD J JR
69-31755

RODRIGUEZ, DAVID M
69-57612

TYRONE, STACY L
69-57865

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

MUCKLESHOOT INDIAN TRIBE

AMADOR, ERNEST R
69-57955

ANDY, KRISTINA M
69-29188

CAMARILLO ROJAS, WILLIAM A
69-57970

CHETH, CHAKRYA
69-57878

CRUZ-GUAJARDO, FLORENTINO JR
69-58016

DEMARIS, KIEL A
69-57917

FOX, LISA D
69-57956

IOANE, PATRICK E
69-57954

JIAO, YINAN
69-57969

KHA, LEON S
69-58083

LE, SKIP M
69-57876

MALO, NEVAEH N
69-57918

MAULOLO, JEANNIELEE F
69-57877

MILNE-RUSSELL, MATTHEW C
69-43281

MOSES, MARVIN N
69-35788

OUM, CHANNDARA
69-56336

POLO, VICTORIA R
69-58018

RAMUNO, STEVEN J
69-57919

UCH, KUN MONIKA
69-31827

VEIKOSO, PAEA
69-58017

WELLINGTON, NATHANIEL L
69-57920

NISQUALLY INDIAN TRIBE

ATA, TAUULO M
69-57901

CHARGUALAF, ROBERT L
69-58029

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NISQUALLY INDIAN TRIBE

EARL, CODY J
69-57987

GRIGSBY, JOHN P
69-58050

HAWKINS-HULL, PAMELA M
69-57860

JOHNSON-FRANKLIN, ASHLEY L
69-57863

JUAREZ, ANDREW S
69-57864

MALDONADO, M D
69-58076

MCCLOUD, JASON S
69-58071

MERIDA DE BORJAS, GREGORIO A
69-58008

METSCHER, BENJAMIN L
69-58070

MILLER, CURTIS A JR
69-57995

MULKINS, KATHERYN M
69-57871

NEAGLE, TIMOTHY S
69-57958

ROTZ, JENNIFER L
69-58087

ROWLAND, JOHN R
69-58080

SALWAY, JUSTION
69-42327

TRUAX, TERYN L
69-57974

WHITTINGTON, KANDRA L
69-57875

NOOKSACK INDIAN TRIBE

KENTNER, TYLER J
69-57994

OSBORN, ALEXANDRA L
69-57992

PORT GAMBLE S'KLALLAM TRIBE

BRUMPTON, CAIDENCE N
69-58088

HOANG, VIET H
69-37319

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PORT GAMBLE S'KLALLAM TRIBE

SMITH, CLETE B
69-58046

PUYALLUP TRIBE OF INDIANS

ATOFU, ELIZABETH L
69-10722

BABAUTA, LYDIA A
69-58019

BLANKENSHIP, JON A
69-08412

BRANIGAN, DUSTIN Q
69-49546

BYRD, RICHARD J
69-58067

CARDWELL, REGINA F
69-57998

CHUOP, SRAS
69-58063

COOK, TAYVON J
69-43444

DALIMOCON, TEOFILO C III
69-58061

DRUMMOND, LATRIKA L
69-58062

DUMLAO, JEFFREY T
69-30433

DUNCOMBE, JEREMIAH E
69-53791

HAMMOCK, JOANN M
69-58007

HERRERA AMERICANO, ROGELIO
69-58039

JAMIAS, JEREMIAH D
69-58064

KHIEV, CHANTAL
69-49125

LAVALLIE, RANDILYNN M
69-44654

MAIDEN, MALIK I
69-58081

MC GRATH, DOREEN M
69-45718

MOUNG, SOKHEAN
69-38312

OSTER, ISZAIH S
69-58025

QUINTERO GARCIA, LOURDES J
69-57852

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

RODRIGUEZ, NICOLE
69-57913

ROWE, YALE F
69-58082

SERRANO, JOHANN S
69-58020

SIAKI, FOFOA T
69-58068

SIEGLE, JASMINE P
69-58010

SITH, NARAT
69-57996

SMITHERS, THERESE J
69-58102

ST JOHN, NOAH C
69-51248

TANDUYAN, JAEVAN-CLARCK Y
69-57997

TAYLOR, CRYSTAL J
69-58072

TODD, SHELLI L
69-58073

WOEHL, THERESA M
69-58105

QUINAULT NATION

MALONE, KAREN A
69-58053

MARTIN, DAVID E
69-57912

MOYLES, SUSAN E
69-57839

SHOALWATER BAY TRIBE

MC DONALD, MICHAEL J
69-57960

MCHONE, AMBER M
69-15307

SKOKOMISH TRIBE

BROWN, DEBORAH E
69-57858

ELLWANGER, CHRISTINE M
69-58024

HANLEY, DONOVAN D
69-57880

LINTON, JAROM C
69-57941

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SKOKOMISH TRIBE

RANDAZZO, BLAKE M
69-57973

SNOQUALMIE TRIBE

BACKMAN, JUSTIN J
69-58091

BALDWIN, MELISSA A
69-57856

FACKRELL, ISAAC J
69-57847

KHAMPHASOUK, ANNALY
69-57934

LEE, REVIN V
69-58037

PIRAK, NATHAN T
69-57936

PRATHER, JOSHUA A
69-57952

SAELEE, SAMLEE
69-58032

SINER, RYAN P
69-57855

SMAIL, MARIE D
69-58031

SWANSON, JOSEPH M
69-58090

VINCENT, SHAKWEL K
69-57884

WOLDESEMAYAT, BEZAWIT G
69-57951

SPOKANE TRIBE

BATES, JANIEVA R
69-57965

BECK, BRANDA R
69-58056

BECK, JOSEPH V
69-43595

DE VINCENTIS, BRIGITTE R
69-12360

GARCIA, YVONNE M
69-58059

GREESON, AUBREY T
69-57891

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

HANSON, MARCUS B
69-57850

KING, JEANINE C
69-57966

LEBRET, TRACY G
69-58069

LEYVA, ANNETT M
69-57967

MILLER, MYA C
69-58058

MONTI, THOMAS E
69-57890

SALINAS, KENNEDY N
69-57851

SHERWOOD, KAINAN C JR
69-57844

STEVENS, KEYONNA L
69-58079

SQUAXIN ISLAND TRIBE

ABRAMS, KATHLEEN L
69-57990

BEAGLEY, CURTIS E
69-58028

CAREAGA, JEREMY D
69-58036

CHESTER, MICHAEL A
69-57916

DAVIS, HOLLY C
69-57862

EVERTSZ, KEVIN A
69-57938

GARRETT, GABRIEL A
69-57959

HAHN, WALTER I
69-57887

HUSTER, NICOLE E
69-57870

JOHNSON, MICHAEL E
69-57886

KENYON, STEFANIE D
69-25901

LOPEZ, CHARLES W
69-57874

PARNHAM, CINDY M
69-57896

SWEENEY, RICHARD C III
69-58094

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SWINOMISH INDIAN TRIBAL COMMUNITY

ANDERSON, MATTHEW P
69-58042

BAKER, ACE C JR
69-57790

DODGE, MARISSA D
69-57927

PAIGE, KAYLA G
69-58044

WALDEN, TREVOR D
69-57948

THE TULALIP TRIBES

BRINSON, SYLVANNA G
69-06044

BROWDER, CHRISTOPHER J
69-58023

COOPER, BRANDON M
69-57981

ELDRIDGE, DAMIEN A
69-57985

FOLLESTAD, JESSICA F
69-28943

FREEMAN, PHILIP A
69-57940

GAUBE, CLARENCE E JR
69-38820

GERLACH, RYAN T
69-57978

GUERRERO, MICHAEL I
69-57980

IUKES, JOSHUA M
69-50443

JAMES-TEEIAS, CHRISTEENA L
69-57976

JOHNSON, MARK A
69-16652

KWEK, MARC M
69-57897

LEUTAKOUN, ADAM D
69-57986

LONGHAIR, PRENTISS K
69-57898

LOSIK, AUSTIN J
69-42586

MAURICIO, JOSE J
69-57984

OLSON, JASON L
69-57977

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

PATTON, NICHOLAS G
69-57979

PERRY, JESSICA A
69-57866

SMITH, RODGER
69-58021

STRUVE, SHELLY L
69-11014

ZACKUSE, RYELON D
69-57833

UPPER SKAGIT INDIAN TRIBE

ADICH, COLE S
69-58051

ALVAREZ, ALICIA R
69-57889

BELL, SHILOH K
69-58128

BROTHERTON, KYLE A
69-57888

CALLAHAN, KEVIN R JR
69-57939

DIAW, ALIEU M
69-58078

HARTNESS HOLLIS, JENEVIEVE M
69-57993

HILYER, NATALIE T
69-57929

RIDDLE, MICHAEL R
69-58095

YAKAMA NATION

BALDERAS, MANUEL N
69-58117

FILIPPE, JOHN C
69-43775

HENGEVELD, CODY M
69-52299

IRVING, MICHAEL T JR
69-16493

JOHNSON, JADYN B
69-58009

MORALES, LUIS JR
69-55945

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

YAKAMA NATION

TAKESGUN, ANNIE M
69-42352

WHEELER, CAROLINA B
69-58084



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 | Jun 30, 2025 | 00-22440 | 67-00321 |
| BUZZ INN STEAKHOUSE/EAST WENATCHEE | EAST WENATCHEE | Oct 10, 2002 | Jun 30, 2025 | 00-11170 | 67-00183 |
| CARIBBEAN CARDROOM | KIRKLAND | Nov 14, 2019 | Jun 30, 2025 | 00-24515 | 67-00343 |
| CASINO CARIBBEAN | KIRKLAND | Nov 14, 2019 | Jun 30, 2025 | 00-24512 | 67-00341 |
| CASINO CARIBBEAN | YAKIMA | Nov 14, 2019 | Jun 30, 2025 | 00-24513 | 67-00342 |
| CHIPS CASINO/LAKEWOOD | LAKEWOOD | Apr 8, 1999 | Jun 30, 2025 | 00-17414 | 67-00020 |
| CLEARWATER SALOON & CASINO | EAST WENATCHEE | Feb 14, 2019 | Jun 30, 2025 | 00-24296 | 67-00339 |
| COYOTE BOB'S CASINO | KENNEWICK | Jul 10, 2009 | Mar 31, 2025 | 00-21848 | 67-00282 |
| CRAZY MOOSE CASINO II | 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 |
| FORTUNE CASINO - LACEY | LACEY | Jul 14, 2022 | Mar 31, 2025 | 00-24868 | 67-00347 |
| FORTUNE CASINO - RENTON | RENTON | Jan 8, 2015 | Jun 30, 2025 | 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 | Jun 30, 2025 | 00-17610 | 67-00016 |
| GRAND CASINO | SHORELINE | Nov 14, 2024 | Jun 30, 2025 | 00-25290 | 67-00350 |
| GREAT AMERICAN CASINO/EVERETT | EVERETT | Nov 12, 1998 | Jun 30, 2025 | 00-19513 | 67-00194 |
| GREAT AMERICAN CASINO/TUKWILA | TUKWILA | Jan 15, 1998 | Jun 30, 2025 | 00-12554 | 67-00012 |
| IMPERIAL PALACE CASINO | AUBURN | Jan 9, 2003 | Jun 30, 2025 | 00-19477 | 67-00192 |
| IMPERIAL PALACE CASINO | TUKWILA | May 9, 2024 | Mar 31, 2025 | 00-24893 | 67-00348 |
| JOKER'S CASINO AND SPORTS BAR | RICHLAND | Nov 12, 1998 | Jun 30, 2025 | 00-15224 | 67-00006 |

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Licensed and Operating**37**

| | City | Commission Approval Date | License Expiration Date | Org # | License # |
|----------------------------------|-------------|---------------------------------|--------------------------------|--------------|------------------|
| LANCER LANES AND CASINO | CLARKSTON | Nov 13, 2008 | Jun 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 | Jun 30, 2025 | 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 | Jun 30, 2025 | 00-13069 | 67-00173 |
| 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 |
| SLO PITCH PUB & EATERY | BELLINGHAM | Nov 14, 2024 | Jun 30, 2025 | 00-16759 | 67-00038 |
| WILD GOOSE CASINO | ELLENSBURG | Apr 8, 2004 | Jun 30, 2025 | 00-20009 | 67-00212 |

| Licensed but Not Currently Operating | | | | | 8 |
|---|-------------------|---------------------------------|--------------------------------|--------------|------------------|
| | City | Commission Approval Date | License Expiration Date | Org # | License # |
| ACE'S POKER TUKWILA | TUKWILA | Nov 14, 2019 | Jun 30, 2025 | 00-24514 | 67-00344 |
| DRAGON TIGER CASINO MOUNTLAKE TERRACE | MOUNTLAKE TERRACE | Dec 29, 2023 | Jun 30, 2025 | 00-22459 | 67-00315 |
| 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 |
| MAVERICK CASINO | LAKEWOOD | Dec 26, 2023 | Jun 30, 2025 | 00-16542 | 67-00028 |
| ROYAL CASINO | EVERETT | Sep 9, 2010 | Jun 30, 2025 | 00-22130 | 67-00301 |
| WIZARDS CASINO | BURIEN | Feb 11, 2010 | Jun 30, 2025 | 00-21998 | 67-00287 |
| ZEPPOZ | PULLMAN | Nov 13, 2008 | Mar 31, 2025 | 00-18777 | 67-00209 |

| Applications Pending | | | | | 1 |
|---------------------------------|-------------|---------------------------------|--------------------------------|--------------|------------------|
| | City | Commission Approval Date | License Expiration Date | Org # | License # |
| SUAVE RICO'S CANTINA AND CASINO | SEATAC | | | 00-25527 | 67-00351 |

- To address identified Certified Gambling Counselors (CGC) clinician gaps in Washington the following steps have been taken:
 - Scholarships offered by the Evergreen Council on Problem Gambling to those seeking to be CGC;
 - Lower barriers to recruit and train CGC;
 - Expanded training courses offered; and
 - Training scholarships offered by HCA to lower barriers and increase participation
- The statewide budgetary freeze may impact the state Problem Gambling Program's ability to contract with new treatment providers.
- Set the 2025 quarterly meeting dates

Problem Gambling Signage Update

In November 2024, we contracted with the Evergreen Council on Problem Gambling to develop updated problem gambling and gambling disorder informational signs as outlined in RCW 9.46.071. The statute requires the Commission to provide problem gambling and gambling disorder informational signs with the toll-free helpline number to be posted in gambling establishments. The signs the Commission currently provides to licensed gambling establishments to post are about 30 years old when the legislation originated.

The four different informational signs contain the toll-free helpline number and a QR code that takes the user to the Evergreen Council on Problem Gambling's website page which offers a chat feature and other resources. The new signs are much more engaging than the current text-heavy signs we currently provide.

We plan to order 8,000 signs (2,000 of each sign) to distribute to our over 2,100 commercial and nonprofit licensees. With our rule change in June 2024, licensees must post these signs in multiple areas of their facility, specifically at all public entrances and exits to the business, in or near gambling area(s), and in the area where cash or electronic transfers of funds are available to patrons.

All versions of the signs are available on our website for licensees to print on their own should they need a quick replacement, including black and white versions if they don't have a colored printer. The QR code is our website to make it easier for users to link to problem gambling resources.

Freeze response to OFM

In response to a projected budget deficit of \$10 to \$12 billion, Governor Inslee issued a Directive to state agencies under his authority to implement a freeze

on hiring, service contracts, goods and equipment purchases, and travel effective December 2, 2024.

The Office of Financial Management (OFM) issued specific instructions on the implementation of the Directive. Expenses related to public safety and the health of Washingtonians were exempted from the freeze.

The attached letter dated December 10, 2024, was sent to OFM outlining how the Gambling Commission intends to comply with the Directive. The letter also outlined the effects of a potential sweep of funds from the gambling revolving account.

2025 Agency Priorities

Outside of the normal business requirements of the agency, for 2025, the staff will focus on the following priorities:

- Fulfill the agency mission by responding to calls for service and public safety that ensures gambling is legal and honest;
- Replace our legacy IT systems, which includes steps to ensure timely implementation, system development, data migration, rules development, internal and external communication, change management, user testing, training, etc.;
- Participate in the development, testing, training, and launch of One WA, a statewide enterprise project to replace the state accounting and human resource programs;
- Hiring, recruitment, and onboarding new staff;
- Records management to migrate data and agency records to new systems - data migration for the new IT system and move agency official records, personal records, and shared documents to cloud-based servers.
- Preparation for WASPC reaccreditation in 2026, with a mock audit in late-2025 and on-site evaluation by March 2026; and
- Implement the Strategic Plan.

Staffing Changes

Adam Amorine accepted the position of Legal Manager. Adam is a Northwest native and Seattle University School of Law graduate. After graduating from law school, he began his law career as an attorney with the Social Security Administration in Baltimore, Maryland. After three years on the East Coast, he returned home to Washington and started working with the Gambling Commission. Since beginning with us Adam has served as a staff attorney, rules coordinator, and interim legal manager. While in those roles he's completed a myriad of training including the FBI Leeda Supervisory training course. Adam recently married his wife, Mariana, and the two

live in West Seattle with their dog, Henry.

Attachments

- Memorandum dated December 10, 2024, to Pat Sullivan, Director of OFM
- Four new problem gambling posters



Washington State Gambling Commission

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

December 10, 2024.

To: Pat Sullivan, Director of Office of Financial Management

From: Tina Griffin, Executive Director

Subject: BUDGET REDUCTIONS FOR FISCAL YEAR 2025 and 2025-2027 BIENNIUM

In response to your letter of November 8, 2024, the Gambling Commission's planned response is outlined in this memorandum.

The Gambling Commission operates from the gambling revolving account, RCW 9.46.100. Receipts into the gambling revolving account are from license fees and reimbursement of actual costs to regulate gambling under the Tribal-State Compacts. Disbursements from the gambling revolving fund are based on the authorization of the commission. The Gambling Commission does not generate revenue for or receive appropriations from the General Fund. Any reductions in the Gambling Commission's expenditures will not impact the General Fund.

As the sole state agency responsible for licensing, regulating, and enforcing the Gambling Act, our programs all relate to public safety. We will explore the following areas for potential savings:

- Reduce in-person training attendance and associated travel that is not necessary to carry out the core functions of the agency or a position, and
- Assess contracts for goods and services to ensure they are necessary to carry out the core functions of the agency.

In the past during dire financial times, the Legislature has sometimes swept funds from the gambling revolving account. While the effects of a sweep of our funds is always concerning, the impact of a sweep of the gambling revolving fund this year would be far-reaching, and would likely result in the following:

- Failure to replace our legacy IT systems, which could result in a shutdown of the agency's operations.

This project is under the oversight of WaTech. We have recently signed a contract with an implementor and identified the product licenses to purchase. Additionally, we have a contract with a Quality Assurance provider for the

duration of the project and will be engaging an Organizational Change Management Consultant and a tester for the project. We are obligated to these costs, but they will not be fully realized until the end of the project. These costs, plus the ongoing costs of licensing and maintenance agreements for the system, will not be fully realized until the end of the project. The project is on track to go-live by January 2026.

Our licensing, case reporting, external secure site for our Tribal partners and licensees, time keeping, and billing systems are well-beyond end of life. IT staff who maintain these systems are due to retire within the next year, leaving no one with the expertise to maintain these legacy systems. Failure to complete our project to replace these systems would be catastrophic for the ongoing operations of the agency.

It has taken us several years to save enough money to replace these systems. A sweep of funds would prevent us from replacing these systems for many years. Our current systems will not be able to sustain our operations into the future.

- Failure to meet current obligations and carry out our legislative mandate.

License fees are based on gross gambling receipts, and gambling activity is unpredictable. License fees are collected the month following the end of a quarter. We rely on our fund balance to carry us through the months in which we don't receive revenue and during those times that gambling activity is down. Sweeping funds from the gambling operating fund could leave the agency with a shortfall because gambling activity fluctuates with external factors such as the weather and the economy.

- Increased license fees to recoup the funds necessary to operate.

The Gambling Commission is required to set annual license fees (RCW 9.46.070(5)). Because of rule-making timelines and because fees can only be adjusted on an annual basis, it takes at least 18 months to increase and collect one year of increased license fees. Reductions of our fund balance may not provide us with the funds necessary to operate while we seek to increase license fees.

The gambling revolving fund includes cost reimbursements for the actual and reasonable costs of regulating the Class III Tribal-State Compacts. A sweep of funds from the gambling revolving account would include taking these tribal cost reimbursements.

- Inability to pay increases to mandated central service costs and legislative increases in salaries and benefits.

As a self-funded agency, we must ensure that we have the necessary funds to pay for the unexpected increases in mandated central service costs, increased salaries and benefits, and other mandatory costs for our agency.

If you have any questions, please contact me at Tina.Griffin@wsgc.wa.gov or our Chief Financial Officer Kriscinda Hansen at Krisinda.Hansen@wsgc.wa.gov.

KEEP GAMBLING FUN

**DON'T
BORROW
TO
GAMBLE**



Is gambling causing concerns
for you or your family? There is help and hope.
Get the help you need to live the life you want.

Contact the confidential 24/7 Problem Gambling Helpline:



CALL. TEXT. CHAT.

1-800-547-6133

CHAT ONLINE AT [EVERGREENCPG.ORG](https://www.evergreencpg.org)

KEEP GAMBLING FUN

**KNOW
THE
RISKS**



Is gambling causing concerns
for you or your family? There is help and hope.
Get the help you need to live the life you want.

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KEEP GAMBLING FUN

**STICK
TO
YOUR
LIMITS
(ON TIME AND MONEY)**



Is gambling causing concerns
for you or your family? There is help and hope.
Get the help you need to live the life you want.

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KEEP GAMBLING FUN

**TAKE A
BREAK
FROM
THE GAME**



Is gambling causing concerns
for you or your family? There is help and hope.
Get the help you need to live the life you want.

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Washington State Gambling Commission

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

JANUARY 9, 2025

TO: COMMISSIONERS

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

EX OFFICIO MEMBERS

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

FROM: ROGER SAUVE, SPECIAL AGENT, REGULATION UNIT

SUBJECT: SPECIAL OLYMPICS OF WASHINGTON – 2023 WESTERN WASHINGTON ENHANCED RAFFLE RESULTS

At the August 2023 commission meeting, the Commissioners approved a plan submitted by the Special Olympics of Washington (SOWA) to conduct an enhanced raffle in Western Washington. SOWA held the grand prize drawing on December 1, 2023.

The purpose of this memo is to report the results of the enhanced raffle and the agents' review.

The grand prize offered was the winner's choice between a 2024 Tesla Model Y, 2024 Ford F-150 SuperCrew XLT 4X4 Truck, or 2024 Mercedes Benz C-Class, or \$50,000 in cash based on 30,000 tickets being sold.

The results of the December 1, 2023, enhanced raffle are as follows:

| Tickets Sold | Sales of Raffle Tickets | Prizes Awarded | Other Expenses | Net Proceeds from Enhanced Raffle |
|--------------|-------------------------|----------------|----------------|-----------------------------------|
| 9501 | \$564,515 | \$186,843 | \$229,031 | \$148,641 |

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360-486-3440

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



Washington State Gambling Commission

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Drawing details and prizes:

| Drawing | Date | Location | Prizes Awarded |
|--------------------|---------------------------|-------------|----------------|
| Appreciation | September 8, 2023 | SOWA Office | \$1,000 |
| Weekly Add-ons (9) | September – November 2023 | SOWA Office | \$22,500 |
| Early Bird | November 3, 2023 | SOWA Office | \$25,000 |
| 50/50 Add-on | December 1, 2023 | SOWA Office | \$61,743 |
| Grand Prize | December 1, 2023 | SOWA Office | \$50,000 |

*In addition to prizes noted above, there were an additional \$26,600 in prizes awarded.

Regulatory Review

An agent from the Regulatory Unit compiled the results of the enhanced raffle. Prior to the compilation of results, they reviewed the approved enhanced raffle plan and reviewed the case reporting system for compliance history. No material findings were noted.

The agent reviewed the licensee's gambling records to verify accuracy and compliance with the WAC's. No material discrepancies were noted.

The agent confirmed SOWA operated the enhanced raffle within the plan approved by the Commissioners.

Regulatory Actions:

No known regulatory actions by other state or federal agencies were noted in relation to the enhanced raffle.

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JANUARY 9, 2025

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EX OFFICIO MEMBERS

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

FROM: ROGER SAUVE, SPECIAL AGENT, REGULATION UNIT

SUBJECT: SPECIAL OLYMPICS OF WASHINGTON – SPRING 2024 WESTERN WASHINGTON ENHANCED RAFFLE RESULTS

At the January 2024 commission meeting, the Commissioners approved a plan submitted by the Special Olympics of Washington (SOWA) to conduct an enhanced raffle in Western Washington. SOWA held the grand prize drawing on May 10, 2024.

The purpose of this memo is to report the results of the enhanced raffle and the agents' review.

The grand prize offered was a dream home or an annuity of \$4,000,000 paid over 20 years or a one time cash payment of \$2,800,000 based on 84,000 tickets being sold. If fewer than 84,000 tickets were sold, the grand prize winner would receive a choice between a sum equal to 50% of the net raffle proceeds paid as an annuity over 20 years, or a one time cash payment of 70% of the annuity value.

The results of the May 10, 2024, enhanced raffle are as follows:

| Tickets Sold | Sales of Raffle Tickets | Prizes Awarded | Other Expenses | Net Proceeds from Enhanced Raffle |
|--------------|-------------------------|----------------|----------------|-----------------------------------|
| 22,202 | \$3,671,490 | \$970,148 | \$2,038,995 | \$662,347 |

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Washington State Gambling Commission

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Drawing details and prizes:

| Drawing | Date | Location | Prizes Awarded |
|------------------------|------------------------|-------------|----------------|
| Appreciation | February 16, 2024 | SOWA Office | \$1,000 |
| Weekly Add-ons (12) | February – May 2024 | SOWA Office | \$120,000 |
| Early Bird 1 | March 8, 2024 | SOWA Office | \$100,000 |
| Early Bird 2 | April 5, 2024 | SOWA Office | \$50,000 |
| \$100K Add-on | May 10, 2024 | SOWA Office | \$100,000 |
| Grand Prize | May 10, 2024 | SOWA Office | \$355,601 |

*In addition to prizes noted above, there were an additional 4,249 prizes awarded valued between \$25-\$10,000.

Regulatory Review

An agent from the Regulatory Unit compiled the results of the enhanced raffle. Prior to the compilation of results, they reviewed the approved enhanced raffle plan and reviewed the case reporting system for compliance history. No material findings were noted.

The agent reviewed the licensee's gambling records to verify accuracy and compliance with the WAC's. No material discrepancies were noted.

The agent confirmed SOWA operated the enhanced raffle within the plan approved by the Commissioners.

Regulatory Actions:

No known regulatory actions by other state or federal agencies were noted in relation to the enhanced raffle.

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Washington State Gambling Commission

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

JANUARY 9, 2025

TO:

COMMISSIONERS

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Bud Sizemore, Vice Chair
Michael Charles
Sarah Lawson
Anders Ibsen

EX OFFICIO MEMBERS

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

FROM: ROGER SAUVE, SPECIAL AGENT, REGULATION UNIT

SUBJECT: SPECIAL OLYMPICS OF WASHINGTON – 2025 WESTERN WASHINGTON ENHANCED RAFFLE PLAN REQUEST

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

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

Mission

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

Programs and Clients Served

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

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Purpose for Conducting the Enhanced Raffle

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

Enhanced Raffle Details

Ticket costs: \$150 each, 3-pack for \$400, or 6-pack for \$550.

Weekly Add-on tickets are \$25 each, 3-pack for \$60 or 6-pack for \$100.

\$100,000 Add-on tickets are \$25 each, 3-pack for \$60, or 6-pack for \$100.

Value Pack, which includes a 8-pack of raffle tickets and a 12-pack of weekly add-on tickets for \$700.

Super Value Pack, which includes a 8-pack of raffle tickets, a 12-pack of weekly add-on tickets, and a 20-pack of \$100,000 add-on tickets for \$950.

| Drawing | Date | Location | Prizes Available |
|--------------------|--|---|---|
| Appreciation | February 14, 2025 | 2815 2 nd Ave, Suite 370, Seattle | \$1,000 |
| Early Bird 1 | March 5, 2025 | 2815 2 nd Ave, Suite 370, Seattle | Winner's Choice: Mercedes Sprinter Van Custom Conversion, a Rivian R1S, or \$100,000 cash |
| Early Bird 2 | April 2, 2025 | 2815 2 nd Ave, Suite 370, Seattle | Winner's Choice: Genesis GV70, a Ford F-150, or \$50,000 cash |
| Weekly Add-on (12) | February 12, 2025 February 19, 2025 February 26, 2025 March 5, 2025 March 12, 2025 March 19, 2025 March 26, 2025 April 2, 2025 April 9, 2025 April 16, 2025 April 23, 2025 April 30, 2025 | 2815 2 nd Ave, Suite 370, Seattle | \$10,000 (each) |

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Washington State Gambling Commission

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

| | | | |
|------------------|-------------|---|---|
| \$100,000 Add-on | May 9, 2025 | 2815 2 nd Ave, Suite 370, Seattle | \$100,000 |
| Grand Prize | May 9, 2025 | 2815 2 nd Ave, Suite 370, Seattle | \$9 million Dream House or \$4,000,000 annuity or \$2,800,000 cash option |

Projected Budget

SOWA estimates the breakeven number of ticket sales to be \$2,055,585. The net proceeds will depend upon the grand prize awarded. SOWA estimates net proceeds to be between \$0 and \$10,877,632 provided the \$9,000,000 house is the grand prize.

Dedicated Employee Responsible for Oversight of the Enhanced Raffle Operation

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

Licensed Service Supplier Managing the Enhanced Raffle

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

Licensed Call Center Contracted to Receive Enhanced Raffle Ticket Sales

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

Attachments (2)

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**Special Olympics Washington
Enhanced Raffle Plan 2025
“Special Olympics Washington Dream House Raffle”**

Purpose

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

Through the challenges of the pandemic, one thing remained clear: Special Olympics Washington is a constant in the lives of its athletes. For individuals with intellectual disabilities in Washington, Special Olympics is often the only place where they can participate in physical activity, health education, and sports in their communities, as well as at a regional and state level. The need to continue these programs is more vital than ever.

Since the inception of the Special Olympics Washington Dream House Raffle in 2013 and the Dream Adventure Raffle in 2022, proceeds have enabled the organization to unlock old financial constraints and open the door to new programs, with the goal of serving more people with intellectual disabilities across the state. Both raffles allowed the organization to react and pivot quickly to provide athletes with critical resources and support during the unprecedented time of the pandemic, including critical sports, health and wellness programs, and leadership programming. Now, as the organization navigates through a post-pandemic world, proceeds from the raffles are enabling the organization to bring participants safely back onto the fields with their friends and reconnect with their communities.

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

About Special Olympics Washington

Special Olympics Washington was incorporated in 1975 and is a 501(c)(3) organization in Washington State. The mission of Special Olympics is to provide year-round sports training and athletic competition in a variety of Olympic-type sports for children and adults with intellectual disabilities, giving them continuing opportunities to develop physical fitness, demonstrate courage, experience joy and participate in the sharing of gifts, skills and friendship with their families, other Special Olympics athletes and the community. Special Olympics Washington currently serves approximately 12,000 participants and has a support system of nearly 4,000 volunteers. The organization is part of Special Olympics International, which serves more than 6.7 million athletes and Unified Sports partners in more than 200 countries and jurisdictions.

**Number of Individuals in Washington State with IDD: 170,000. Source: [Arc of Washington 2023 Advocates Notebook](#)*

About Our Athletes

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

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

Empowering Leaders On and Off the Playing Field

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

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

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

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

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

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

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

SPECIAL OLYMPICS WASHINGTON
Enhanced Raffle Rules
2025

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

The 2025 Dream House Raffle will start on January 20, 2025.

The Grand Prize Drawing for Special Olympics Washington Dream House Raffle will be held on Friday, May 9, 2025, at the Special Olympics Washington office at: 2815 2nd Ave, Suite 370, Seattle, WA, 98121. All drawings will be held at 2815 2nd Ave, Suite 370, Seattle, WA, 98121. Tickets will not be sold after April 25, 2025. Tickets may sell out before that time. An independent raffle auditor will supervise the drawing. The drawing for prizes may be open to the public, but the winner does not need to be present to win.

Only 85,000 tickets will be sold. The chances of winning are based on that number. If fewer tickets are sold, the chances of winning the Grand Prize and other prizes improve. The IRS has taken the position that amounts paid for chances in raffles, lotteries or similar drawings for valuable prizes are not gifts, and consequently do not qualify as deductible charitable contributions.

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

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

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

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

Tickets:

- Raffle tickets cost \$150 each, 3-packs for \$400, or 6-packs for \$550.
- Weekly Add-On Tickets are one for \$25, 3-pack for \$60 or 6-pack for \$100.
- \$100,000 Add-On Tickets are one for \$25, 3-pack for \$60 or 6-pack for \$100.
- A Value Pack is available for purchase and includes a 8-pack of raffle tickets and a 12-pack of weekly add-on tickets for \$700.
- A Super Value Pack is available for purchase and includes a 8-pack of raffle tickets, a 12-pack of weekly add-on tickets, and a 20-pack of \$100,000 add-on tickets for \$950.

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

Tickets will be available for purchase starting January 20, 2025.

Tickets purchased by January 31, 2025, will be eligible for the Appreciation Drawing - \$1,000 cash (drawing date: February 14, 2025), the Early Bird 1 Drawing - Mercedes Sprinter Van Custom Conversion, a Rivian R1S, or \$100,000 cash (drawing date: March 5, 2025), the Early Bird 2 Drawing – a Genesis GV70, a Ford F-150, or \$50,000 cash (drawing date: April 2, 2025), and the Grand Prize Drawing (drawing date: May 9, 2025).

Tickets purchased by February 21, 2025 will be eligible for the Early Bird 1 Drawing - Mercedes Sprinter Van Custom Conversion, a Rivian R1S, or \$100,000 cash (drawing date: March 5, 2025), the Early Bird 2 Drawing – a Genesis GV70, a Ford F-150, or \$50,000 cash (drawing date: April 2, 2025), and the Grand Prize Drawing (drawing date: May 9, 2025).

Tickets Purchased by March 21, 2025 will be eligible for the Early Bird 2 Drawing – a Genesis GV70, a Ford F-150, or \$50,000 cash (drawing date: April 2, 2025), and the Grand Prize Drawing (drawing date: May 9, 2025).

All such tickets, including all winning tickets from the Appreciation Drawing and the Early Bird Drawings, will be included in applicable subsequent drawings as well as the Grand Prize drawing. Tickets purchased by April 25, 2025, will be eligible for the Grand Prize drawing (drawing date: May 9, 2025).

In addition, raffle participants who purchase at least one raffle ticket are eligible to purchase a Weekly Add-On ticket which provides entry into any remaining Weekly Add-On Drawings and a \$100,000 Add-On ticket which provides entry into the \$100,000 Add-On drawing. Weekly Add-On tickets are one for \$25, 3-pack for \$60 or 6-pack for \$100. \$100,000 Add-On tickets are one for \$25, 3-pack for \$60 or 6-pack for \$100. Rules for purchasing Add-On tickets are as follows:

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

Special Olympics Washington reserves the right to reject any entry form that is submitted with payment that does not constitute "good funds." All defective or physically altered entry forms will be immediately disqualified by Special Olympics Washington. Prior to the Grand Prize drawing, Special Olympics Washington will make a reasonable effort to notify the individual and/or entity that submits such an entry form or one which has been rejected because the credit card or check did not clear that the entry has been rejected by attempting to make contact through the information provided at the time of submitting the purchase request. All orders for tickets for the Weekly-Add On drawings, Appreciation drawings, and Early Bird drawings must be received and/or purchased by the indicated deadlines. Any orders received after these deadlines will be held for the subsequent drawings, if applicable and Grand Prize drawing. Special Olympics Washington assumes no responsibility for lost, late, misdirected, or non-delivered mail or fax messages, or any other failure to receive orders or deliver receipts prior to the drawing deadlines.

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

How to Purchase:

To purchase tickets: use the order form provided and fax the order form to (206) 361-8158, or you may mail it to Special Olympics Washington Dream House Raffle: 2815 2nd Avenue, Suite 370 Seattle, WA, 98121 or call 877-740-9633, providing your name, address, phone number, email address for confirmation along with your credit card number, credit card security code and expiration date. Tickets cannot be purchased on the raffle website or by email. **Any entry form submitted by email will be rejected.** You may also purchase tickets in person at Special Olympics Washington: 2815 2nd Avenue, Suite 370, Seattle, WA 98121. All entries must include payment by cash, check, money order or credit card in US dollars. Special Olympics Washington reserves the right to reject any entry form that is submitted with payment that does not constitute "good funds." No refunds will be made except under the following circumstances: any ticket order with payment received after 85,000 tickets have been sold or after April 25, 2025, will be returned. No other refunds are available except at the exclusive discretion of Special Olympics Washington. Special Olympics Washington assumes no responsibility for lost, late, misdirected, or non-delivered mail or fax messages, or any other failure to receive orders or deliver receipts prior to the drawing deadlines.

Selection of Winners:

The Special Olympics Washington Dream House Raffle Grand Prize drawing will be held on May 9, 2025, from all eligible raffle tickets. Winners need not be present to win. In addition to the Grand Prize drawing, Special Olympics Washington will conduct the following additional drawings:

- Appreciation Drawing on February 14, 2025
- Early Bird 1 Drawing on March 5, 2025
- Early Bird 2 Drawing on April 2, 2025
- Weekly Add-On drawing on February 12, 2025
- Weekly Add-On drawing on February 19, 2025
- Weekly Add-On drawing on February 26, 2025
- Weekly Add-On drawing on March 5, 2025
- Weekly Add-On drawing on March 12, 2025
- Weekly Add-On drawing on March 19, 2025

- Weekly Add-On drawing on March 26, 2025
- Weekly Add-On drawing on April 2, 2025
- Weekly Add-On drawing on April 9, 2025
- Weekly Add-On drawing on April 16, 2025
- Weekly Add-On drawing on April 23, 2025
- Weekly Add-On drawing on April 30, 2025
- \$100,000 Cash Add-On drawing on May 9, 2025
- Grand Prize Drawing on May 9, 2025

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

Winners will be notified according to the contact information provided to Special Olympics Washington at the time of ticket purchase. In addition to the list of winners posted on the Special Olympics Washington raffle web site (PugetSoundRaffle.com), a list of winners may be obtained from Special Olympics Washington or by sending a self-addressed, stamped envelope to Special Olympics Washington Dream House Raffle, 2815 2nd Avenue, Suite 370, Seattle, WA, 98121 within one week of the drawing.

In order to collect prizes valued \$5,000 or more, a ticket winner must sign and deliver to Special Olympics Washington: (a) a sworn affidavit of eligibility in accordance with these Rules and applicable law, including without limitation that he or she is at least 18 years old; (b) such written information as is required by any applicable tax and/or real estate laws, including without limitation his or her Social Security Number; (c) proof of identity in forms satisfactory to the Special Olympics Washington showing that the person claiming the prize is the same person who is named on the winning raffle ticket.; and (d) the winning ticket stub. Winners of prizes of \$5,000 or more may be required to submit a W-2G, Form 5754 or similar tax form (provided by Special Olympics Washington) for tax withholding purposes. There are a total of 1,350 prizes for the Grand Prize drawing.

Winning Odds:

The odds of winning a prize will depend on the number of tickets sold. If all 85,000 tickets are sold the odds of winning the Grand Prize is 1 in 85,000. If fewer tickets are sold, the chance of winning the Grand Prize, Early Bird Prizes and all secondary prizes improves. There is no limit to ticket sales for the Add-on tickets. Odds depend upon the total number of add-on tickets sold.

Eligibility:

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

Prizes:

The Grand Prize is the home located within the Puget Sound area of Washington, and a detailed description will be referred to in all raffle materials. Alternatively, the Grand Prize winner may elect to receive an annuity of \$4,000,000 paid over 20 years or a one-time \$2,800,000 cash payment (except as stated below) based on 84,000 tickets sold. The Grand Prize winner must make an election in writing between the house (value \$9 million), the annuity, or the one-time cash payment no later than 5:00 p.m. May 23, 2025. If the Grand Prize winner cannot be located by 5:00 PM (14

days after the drawing date), after attempting to make contact through the information provided at the time of purchasing the ticket, such winner will be deemed to have elected the onetime cash alternative prize and another winner will not be selected for such prize.

In the event of circumstances outside of the control of Special Olympics Washington such as but not limited to: fire, earthquake, foreclosure and as determined by Special Olympics Washington, the Grand Prize winner will instead have no election as stated above and will instead have an election between an annuity of \$4,000,000 paid over 20 years or a onetime \$2,800,000 cash payment (except as stated below). A minimum of 84,000 tickets must be sold by April 25, 2025, for the Grand Prize Winner to have a choice of the House, the annuity of \$4,000,000 paid over 20 years, or a onetime \$2,800,000 cash payment alternate prize. If fewer than 84,000 tickets are sold by April 25, 2025, the raffle will be held as scheduled, and prizes will be awarded as advertised with the exception that the Grand Prize Winner will receive a choice between sum equal to 50% of the Net Raffle Proceeds paid as an annuity over 20 years, not to exceed \$4,000,000 or a onetime cash payment of 70% of the annuity value, not to exceed \$2,800,000. Net Raffle Proceeds will be calculated based on Special Olympics Washington accounting, which shall be final and conclusive with respect to the Grand Prize Winner. For these purposes, "Net Raffle Proceeds" are defined as the balance of funds left after paying all other prizes, all raffle expenses and all expenses for the House. Special Olympics Washington will estimate the final prize ("Estimate Prize") just prior to the Grand Prize drawing so as to award 90% of the estimated prize payment. No later than 120 days from the drawing date, Special Olympics Washington will verify that all expenses have been accounted for and a final Net amount will be calculated ("Actual Prize"). Special Olympics Washington will issue a final check to the Grand Prize Winner based on the difference between the Actual Prize and the Estimated Prize payment along with an updated W-2G.

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

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

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

Appreciation Drawing:

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

Early Bird 1 Drawing:

Winner's choice between a Mercedes Sprinter Van Custom Conversion, a Rivian R1S, or \$100,000 cash* (Value: \$100,000)

Early Bird 2 Drawing:

Winner's choice between a Genesis GV70, a Ford F-150, or \$50,000 cash* (Value: \$50,000)

Weekly Add-On Drawing:

Prizes: 12 - \$10,000 cash* prizes awarded over 12 weeks (Value: \$120,000)

\$100,000 Add-On Drawing:

Prize: \$100,000 cash

Grand Prize Drawing:

Grand Prize: The \$9 million Dream House or \$4,000,000 annuity or \$2,800,000 cash option*

2nd Prize: Vacation in Kenya (8 day/7 night) or \$10,000 cash*

3rd Prize: Vacation in Greece (5 day/4 night) or \$5,000 cash*

4th Prize: Vacation in Bali, Indonesia (8 day/7 night) or \$5,000 cash*

5th Prize: Vacation in Florence & Cortona, Italy (7 day/6 night) or \$5,000 cash*

6th Prize: Vacation in Costa Rica (9 day/8 night) or \$5,000 cash*

7th Prize: Vacation in Singapore (6 day/5 night) or \$5,000 cash*

8th Prize: Vacation in the Virgin Islands (7 day/6 night) or \$5,000 cash*

9th Prize: Vacation in Barcelona (6 day/5 night) or \$5,000 cash*

10th Prize: Vacation in Azores Islands, Portugal (6 day/5 night) or \$5,000*

*Except as stated above

11th Prize: Seattle Mariner Tickets or \$1,000 cash (Value: \$1,000)

12th Prize: Seattle Kraken Tickets or \$1,000 cash (Value: \$1,000)

13th Prize: Seattle Seahawks Tickets or \$1,000 cash (Value: \$1,000)

Prizes 14-20: \$1,000 gift cards

Prizes 21-40: \$500 gift cards

Prizes 41-70: \$250 gift cards

Prizes 71-1,350: \$100 gift cards

Gift card winners (14-1,350) will be notified via email and will have a choice between receiving a gift card from one of the following brands:

- AMC Theaters
- Amazon.com
- Best Buy
- Chipotle
- Darden Restaurants
- Grubhub
- Home Depot
- HomeGoods
- Hotels.com
- Landry's Restaurants

- Panera Bread
- REI
- Target
- Visa Prepaid Card

General Terms and Conditions:

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

At the time of closing, all federal and state income taxes based on the value of the House will be due from the Grand Prize winner. If the Grand Prize winner selects the annuity or the one-time cash payment as well as winners of Early Bird prizes, Add-On prizes, and secondary prizes of \$5,000 or more, all appropriate and required federal and state taxes will be withheld by Special Olympics Washington in accordance with federal and state law and Special Olympics Washington will remit the balance of the cash prizes to the winners. Special Olympics Washington makes no guarantee that the Grand Prize Winner will be able to sell the House for the value of \$9 million dollars nor is there any guarantee that the Internal Revenue Service (IRS) will accept that value of the house for the purpose of determining any income tax that may be due from the winner. Special Olympics Washington takes no responsibility for any tax liabilities. Consult your tax advisor.

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

c(i) Dates of raffle and drawing:

- Start Date – January 20, 2025
- Appreciation Deadline – January 31, 2025
- Appreciation Drawing – February 14, 2025
- Weekly Add-On Drawings –
- Weekly 1 – February 7 deadline. Drawing February 12
- Weekly 2 – February 14 deadline. Drawing February 19
- Weekly 3 – February 21 deadline. Drawing February 26
- Weekly 4 – February 28 deadline. Drawing March 5
- Weekly 5 – March 7 deadline. Drawing March 12
- Weekly 6 - March 14 deadline. Drawing March 19
- Weekly 7 – March 21 deadline. Drawing March 26
- Weekly 8 – March 28 deadline. Drawing April 2
- Weekly 9 – April 4 deadline. Drawing April 9
- Weekly 10 – April 11 deadline. Drawing April 16
- Weekly 11 – April 18 deadline. Drawing April 23
- Weekly 12 – April 25 deadline. Drawing April 30
- Early Bird 1 Deadline – February 21, 2025
- Early Bird 1 Drawing – March 5, 2025
- Early Bird 2 Deadline – March 21, 2025
- Early Bird 2 Drawing – April 2, 2025

- Grand Prize and \$100,000 Cash Add-On Deadline – April 25, 2025
- Grand Prize Drawing and \$100,000 Add-On Drawing – May 9, 2025

c(ii) Cost of raffle ticket:

- Raffle tickets cost \$150 each, 3-packs for \$400, or 6-packs for \$550.
- Weekly Add-On Tickets are 1 for \$25, 3-pack for \$60 or 6-pack for \$100.
- \$100,000 cash Add-On Tickets are one for \$25, 3-pack for \$60 or 6-pack for \$100.
- A Value Pack is available for purchase and includes a 8-pack of raffle tickets and a 12-pack of weekly add-on tickets for \$700.
- A Super Value Pack is available for purchase and includes a 8-pack of raffle tickets, a 12-pack of weekly add-on tickets, and a 20-pack of \$100,000 add-on tickets for \$950.

c(iii) Prizes available:

- **Appreciation Drawing:**
\$1,000 cash (Value: \$1,000)
- **Early Bird 1 Drawing:**
Winner's choice between a Mercedes Sprinter Van Custom Conversion, a Rivian R1S, or \$100,000 cash* (Value: \$100,000)
- **Early Bird 2 Drawing:**
Winner's choice between a Genesis GV70, a Ford F-150, or \$50,000 cash* (Value: \$50,000)
- **Weekly Add-On Drawing:**
Prizes: 12 - \$10,000 cash* prizes awarded over 12 weeks (Value: \$120,000)
- **\$100,000 Add-On Drawing:**
Prize: \$100,000 cash
- **Grand Prize Drawing:**
Grand Prize: The \$9 million Dream House or \$4,000,000 annuity or \$2,800,000 cash option*
2nd Prize: Vacation in Kenya (8 day/7 night) or \$10,000*
3rd Prize: Vacation in Greece (5 day/4 night) or \$5,000*
4th Prize: Vacation in Bali, Indonesia (8 day/7 night) or \$5,000*
5th Prize: Vacation in Florence & Cortona, Italy (7 day/6 night) or \$5,000*
6th Prize: Vacation in Costa Rica (9 day/8 night) or \$5,000*
7th Prize: Vacation in Singapore (6 day/5 night) or \$5,000*
8th Prize: Vacation in the Virgin Islands (7 day/6 night) or \$5,000*
9th Prize: Vacation in Barcelona (6 day/5 night) or \$5,000*
10th Prize: Vacation in Azores Islands, Portugal (6 day/5 night) or \$5,000*
*Except as stated above

11th Prize: Seattle Mariner Tickets or \$1,000 cash (Value: \$1,000)
12th Prize: Seattle Kraken Tickets or \$1,000 cash (Value: \$1,000)
13th Prize: Seattle Seahawks Tickets or \$1,000 cash (Value: \$1,000)
Prizes 14-20: \$1,000 gift cards
Prizes 21-40: \$500 gift cards
Prizes 41-70: \$250 gift cards
Prizes 71-1,350: \$100 gift cards

Gift card winners (14-1,350) will be notified via email and will have a choice between receiving a gift card from one of the following brands:

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

c(iv) Security of prizes:

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

c(v) Plans for selling raffle tickets:

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

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

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

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

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

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

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

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

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

If Special Olympics Washington determines ticket sales are insufficient to qualify for a complete enhanced raffle to move forward, the enhanced raffle winner must receive fifty percent of the net proceeds in excess of expenses as the Grand Prize. The enhanced raffle winner will receive a choice between an annuity value equal to 50% of the net proceeds in

excess of expense paid by annuity over 20 years, or a one-time cash payment of 70% of the annuity value. In no case will the Grand Prize be less than \$50,000. Unless the raffle ticket sales fall at or below the breakeven amount and net proceeds in excess of expenses produce a negative value, Special Olympics Washington will consider refunding all purchases and cancelling the raffle due to insufficient sales of tickets or issuing a flat \$5,000 to the Grand Prize winner.

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

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

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

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

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

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

j) Incept will be our licensed call center.

k) Raffle Ticket Process Document (Attachment A)

l) Website Chat Feature:

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

SPECIAL OLYMPICS WA

WSGC Ticket Sales

2025

S:\Raffle\2024 House Raffle\Raffle Plan

| HOUSE RAFFLE P&L | Breakeven | % of revenue | \$300k Annuity or \$210k Lump Sum GP | % of revenue | \$4M Annuity or \$2.8M Lump sum GP | % of revenue | House GP |
|-------------------------------------|------------------------|--------------|--------------------------------------|--------------|------------------------------------|--------------|-------------------------|
| Revenue: | | | | | | | |
| Total # of Raffle Tickets | 16,897 | | 21,124 | | 83,125 | | 84,000 Threshold |
| Average Price/ticket | \$110.46 | | \$ 110.46 | | \$ 110.46 | | \$ 110.46 |
| GROSS RAFFLE TICKET SALES | \$ 1,866,425.28 | | \$ 2,333,335.36 | | \$ 9,181,902.18 | | \$ 9,278,553.78 |
| Total # of Weekly Add-On Tickets | 13,627 | | 21,149 | | 83,021 | | 90,451 |
| Average Price/ticket | \$16.99 | | \$ 16.99 | | \$ 16.99 | | \$ 16.99 |
| WEEKLY ADD-ON TICKET SALES | \$ 231,486.46 | | \$ 359,271.75 | | \$ 1,410,292.86 | | \$ 1,536,512.61 |
| Total # of \$100,000 Add-On Tickets | 14,548 | | 22,578 | | 88,630 | | 96,562 |
| Average Price/ticket | \$17.16 | | \$17.16 | | \$17.16 | | \$17.16 |
| \$100K ADD-ON TICKET SALES | \$ 249,597.41 | | \$ 387,380.32 | | \$ 1,520,630.80 | | \$ 1,656,725.68 |
| Total all ticket types | 45,072 | | 64,852 | | 254,775 | | 271,013 |
| Average ticket price | \$ 48.20 | | \$ 48.20 | | \$ 48.20 | | \$ 48.20 |
| Total Revenue | \$ 2,347,509.15 | | \$ 3,079,987.43 | | \$ 12,112,825.84 | | \$ 12,471,792.07 |

Expenses:

| | | | | | | | | |
|----------------------|------------------------|---------------|------------------------|--------------|------------------------|--------------|------------------------|----------------------------------|
| Advertising | \$ 350,000.00 | 14.9% | \$ 350,000.00 | 11.4% | \$ 350,000.00 | 2.9% | \$ 350,000.00 | 2.8% Fixed \$ |
| Professional Fees | \$ 381,610.48 | 16.3% | \$ 500,713.61 | 16.3% | \$ 1,969,133.80 | 16.3% | \$ 1,277,489.51 | 16.3% Variable \$ |
| Postage & Printing | \$ 880,000.00 | 24.0% | \$ 880,000.00 | 24.0% | \$ 880,000.00 | 24.0% | \$ 880,000.00 | 24.0% Fixed \$ |
| Personnel | \$ 30,000.00 | 1.5% | \$ 30,000.00 | 1.3% | \$ 30,000.00 | 1.3% | \$ 30,000.00 | 1.3% Fixed \$ |
| Sales Expense | \$ 92,724.67 | 3.9% | \$ 106,099.82 | 3.4% | \$ 270,478.62 | 2.2% | \$ 276,986.62 | 2.2% Variable \$ |
| Prize Expense | \$ 579,174.00 | 24.7% | \$ 579,174.00 | 18.8% | \$ 579,174.00 | 4.8% | \$ 579,174.00 | 4.6% Fixed \$ (excl Grand Prize) |
| Regulatory Expense | \$ 34,000.00 | 1.4% | \$ 34,000.00 | 1.1% | \$ 34,000.00 | 0.3% | \$ 34,000.00 | 0.3% Fixed \$ |
| Total Expense | \$ 2,347,509.15 | 100.0% | \$ 2,479,987.43 | 80.5% | \$ 4,112,786.42 | 34.0% | \$ 3,427,650.12 | 27.5% |

| | | | | | | | |
|-------------------|----------------|-------------|----------------------|--------------|------------------------|--------------|------------------------|
| Net Income | \$ 0.00 | 0.0% | \$ 600,000.00 | 19.5% | \$ 8,000,000.00 | 66.0% | \$ 9,044,141.95 |
|-------------------|----------------|-------------|----------------------|--------------|------------------------|--------------|------------------------|

GRAND PRIZE COMPUTATION

Annuity Computation

| | | | | |
|---------------------------------|-----|---------------|-----------------|-----|
| Grand Prize - 50% of Net Income | N/A | \$ 300,000.00 | \$ 4,000,000.00 | N/A |
| Net to SOWA | N/A | \$ 300,000.00 | \$ 4,000,000.00 | N/A |

Lump Sum Computation

| | | | | |
|-----------------------------------|----------------|----------------------|------------------------|------------|
| Grand Prize - 70% of Annuity | \$ 0.00 | \$ 210,000.00 | \$ 2,800,000.00 | N/A |
| Net to SOWA - Lump Sum Pmt | \$ 0.00 | \$ 390,000.00 | \$ 5,200,000.00 | N/A |

| | | | | |
|-----------------------------------|------------|------------|------------|---------------------|
| Grand Prize - House | N/A | N/A | N/A | \$ 9,000,000.00 |
| Net to SOWA - House Option | N/A | N/A | N/A | \$ 44,141.95 |

Prize Schedule

| | | | |
|--------------------------|--------------------|------------|---|
| Weekly Add-On 1 | 02/12/25 | \$ 10,000 | |
| Appreciation | 02/14/25 | \$ 1,000 | |
| Weekly Add-On 2 | 02/19/25 | \$ 10,000 | |
| Weekly Add-On 3 | 02/26/25 | \$ 10,000 | |
| Weekly Add-On 4 | 03/05/25 | \$ 10,000 | |
| Early Bird 1 | 03/05/25 | \$100,000 | Winner's choice between a Mercedes Sprinter Van Custom Conversion, a Rivian R1S, or \$100,000 cash* |
| Weekly Add-On 5 | 03/12/25 | \$ 10,000 | |
| Weekly Add-On 6 | 03/19/25 | \$ 10,000 | |
| Weekly Add-On 7 | 03/26/25 | \$ 10,000 | |
| Weekly Add-On 8 | 04/02/25 | \$ 10,000 | |
| Early Bird 2 | 04/02/25 | \$ 50,000 | Winner's choice between a Tesla Model Y, a Toyota Tacoma, or \$50,000 cash |
| Weekly Add-On 9 | 04/09/25 | \$ 10,000 | |
| Weekly Add-On 10 | 04/16/25 | \$ 10,000 | |
| Weekly Add-On 11 | 04/23/25 | \$ 10,000 | |
| Weekly Add-On 12 | 04/30/25 | \$ 10,000 | |
| \$100,000 Add-On | 05/09/25 | \$100,000 | |
| Grand Prize | 05/09/25 | TBD | The \$9 million Dream House or \$4,000,000 annuity or \$2,800,000 cash option* |
| 2nd Prize | 05/09/25 | \$ 10,000 | Vacation in Kenya (8 day/7 night) or \$10,000 cash* |
| 3rd Prize | 05/09/25 | \$ 5,000 | Vacation in Greece (5 day/4 night) or \$5,000 cash* |
| 4th Prize | 05/09/25 | \$ 5,000 | Vacation in Bali, Indonesia (8 day/7 night) or \$5,000 cash* |
| 5th Prize | 05/09/25 | \$ 5,000 | Vacation in Florence & Cortona, Italy (7 day/6 night) or \$5,000 cash* |
| 6th Prize | 05/09/25 | \$ 5,000 | Vacation in Costa Rica (9 day/8 night) or \$5,000 cash* |
| 7th Prize | 05/09/25 | \$ 5,000 | Vacation in Singapore (6 day/5 night) or \$5,000 cash* |
| 8th Prize | 05/09/25 | \$ 5,000 | Vacation in the Virgin Islands (7 day/6 night) or \$5,000 cash* |
| 9th Prize | 05/09/25 | \$ 5,000 | Vacation in Barcelona (6 day/5 night) or \$5,000 cash* |
| 10th Prize | 05/09/25 | \$ 5,000 | Vacation in Azores Islands, Portugal (6 day/5 night) or \$5,000* |
| 11th Prize | 05/09/25 | \$ 1,000 | Seattle Mariner Tickets or \$1,000 cash (Value: \$1,000) |
| 12th Prize | 05/09/25 | \$ 1,000 | Seattle Kraken Tickets or \$1,000 cash (Value: \$1,000) |
| 13th Prize | 05/09/25 | \$ 1,000 | Seattle Seahawks Tickets or \$1,000 cash (Value: \$1,000) |
| 7 Prizes 14-20 | 05/09/25 | \$ 7,000 | \$1,000 gift cards |
| 20 Prizes 21-40 | 05/09/25 | \$ 10,000 | \$500 gift cards |
| 30 Prizes 41-70 | 05/09/25 | \$ 7,500 | \$250 gift cards |
| 1280 Prizes 71-1,350 | 05/09/25 | \$128,000 | \$100 gift cards |
| 1337 Gift Cards | | | Total number of prizes: 1,366 |
| 1366 Total Prizes | Fixed Prize Cost | \$ 576,500 | |
| Eliminated \$25, \$50 GC | Cost of gift cards | \$ 2,674 | (Service Fee \$2 per card) |
| | | \$ 579,174 | |

Note:

2024-4,266 prizes

4236 Gift Cards

Cost: \$613,500

Var \$37,000



Staff Proposed Rulemaking

New Rules

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

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

Amend

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

January 2025 – Final Action

November 2024 – Discussion and Possible Action

September 2024 – Discussion and Possible Final Action

August 2024 – Discussion and Possible Final Action

July 2024 – Discussion Only

May 2024 – Discussion and Possible Filing

March 2024 – Initiate Rulemaking

Tab 3: January 2025 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Washington State Gambling Commission Staff

Background

BOLD = Changes made since November 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 recommended 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.

At the September 12, 2024, commission meeting, Commissioners discussed the proposed rules and elected to explore additional revisions to the rule language. Specifically, Commissioners sought changes that would require cardrooms to pay larger prizes by check at the request of the player.

At the November 14, 2024, commission meeting, Commissioners approved the attached rule language. Staff filed the corresponding CR 102 with the Office of the Code Revisor on November 15, 2024.

Attachments:

- Amended WAC 230-15-050
- Proposed rules WAC 230-15-186 and WAC 230-15-187
- Email and attachment from Kim McCabe
- Email from anonymous user

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.

On September 11 & 19, 2024, staff received an email from an individual who wished to stay anonymous. This individual expressed several concerns regarding the proposed rule allowing a 24-hour delay for issuing checks to players. Among their concerns were possible erosion of trust and player confidence, an unfair financial burden on players, and possible financial manipulation.

Staff Recommendation

Staff recommends that the Commission take final action on the attached rules after holding a public hearing with an effective date of 31 days after filing with the Office of the Code Reviser

AMENDATORY SECTION (Amending WSR 22-01-182, filed 12/20/21, effective 1/20/22)

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, in the event a player requests a check instead of cash for player gambling winnings over \$5000, licensees must issue the player a 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 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 230-15-186 - 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.

[Statutory Authority: RCW 9.46.070. WSR 22-01-182, § 230-15-050, filed 12/20/21, effective 1/20/22; WSR 09-03-024 (Order 640), § 230-15-050, filed 1/9/09, effective 2/9/09; WSR 07-23-081 (Order 620), § 230-15-050, filed 11/20/07, effective 1/1/08; WSR 07-09-033 (Order 608), § 230-15-050, filed 4/10/07, effective 1/1/08.]

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

"This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited."

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~~must write a check for ~~the player gaming winnings balance of chips redeemed~~ at the request of the player. Licensees must issue the check within 24 hours.

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

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

(b) ~~((The amount of the largest single prize available excluding progressive jackpot, player-supported jackpot, and house jackpot prizes.))~~ One percent times card room gross gambling receipts from the previous calendar year, according to fourth 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.

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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: [Lohse, Jess \(GMB\)](#)
To: [Amorine, Adam \(GMB\)](#)
Cc: [Hughes, Tony \(GMB\)](#); [Frazer, Nicole \(GMB\)](#)
Subject: FW: 24 hour check
Date: Monday, September 23, 2024 10:59:00 AM
Attachments: [image001.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)

FYI- As requested by Tina, I responded to the individual noted below.

Adam, I let the individual know that we would include their comments in the commission meeting packet when the minimum cash on hand rule comes up again for discussion.

From: Lohse, Jess (GMB)
Sent: Monday, September 23, 2024 10:57 AM
To: concerned2700@outlook.com
Subject: RE: 24 hour check

Thanks for your feedback. We will make sure your feedback is included in the commission meeting packet when the rule is discussed again.

With regards to your question below, the amended rule and two new rules would **not** allow stakeholders with multiple properties to share bankrolls nor maintain a single static account for the largest single prize across all their locations. Each individual card room licensee would need to meet the rule requirements independently. Thanks.



Jess Lohse

Special Agent Supervisor

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

Phone: [206-786-3530](tel:206-786-3530)
Email: jess.lohse@wsgc.wa.gov
Web: WSGC.wa.gov

501 S. 336th St., Suite
210
Federal Way, WA 98003



From: Anonymous Smith <concerned2700@outlook.com>
Sent: Thursday, September 19, 2024 2:28 PM
To: AgencyWebsite (GMB) <agency.website@wsgc.wa.gov>
Subject: Re: 24 hour check

External Email

Dear Members of the Washington State Gambling Commission,

I am writing to kindly request confirmation of receipt of my previous letter concerning the proposed rule change allowing a 24-hour delay for issuing checks of fixed-odds winnings on payouts exceeding \$5,000 in house-banked card rooms.

I would also like to seek clarification on whether this rule might allow stakeholders with multiple properties to share bankrolls and maintain a single static account for the largest single prize across all their locations. This could potentially put operators with single or fewer properties at a disadvantage compared to those with multiple establishments.

Thank you for your attention to this matter.

Sincerely,

[Anonymous Concerned Party]

From: Anonymous Smith
Sent: Wednesday, September 11, 2024 1:54 PM
To: askus@wsgc.wa.gov <askus@wsgc.wa.gov>
Subject: 24 hour check

Dear Members of the Washington State Gambling Commission,

This letter outlines concerns about the proposed rule allowing a 24-hour delay for issuing checks on payouts exceeding \$5,000 in house-banked card rooms. While the intention may be to enhance safety, this proposal risks undermining player trust, financial transparency, and operational efficiency within Washington's gaming industry.

Key points include:

1. Erosion of player trust and confidence
2. Unfair financial burden on players
3. Negative impact on visitors and local gaming
4. Potential for fraud and financial manipulation
5. Redundancy with existing verification processes
6. Operational and practical concerns
7. Inconsistency with current payment options
8. Alternative solutions for liquidity management

Erosion of Trust and Player Confidence

Trust between players and operators is fundamental to a healthy gaming industry. Players reasonably expect to receive their winnings promptly after a successful wager. A 24-hour delay, especially without a clear and compelling reason, could create the perception that the house is unprepared to meet its obligations, potentially undermining player confidence in Washington's card rooms.

Unfair Financial Burden on Players

The proposed 24-hour delay effectively requires players to extend credit to the operator, unfairly shifting financial risk onto the players. Gamblers should not bear the responsibility of financing the house's operations, especially after risking their own money.

There is little justification for delaying payouts when the house should always have sufficient funds to meet its obligations promptly.

Impact on Visitors and Local Gaming

Washington's card rooms serve both residents and visitors, many of whom have limited time for recreational activities. Players winning large sums reasonably expect prompt access to their winnings. A 24-hour delay could negatively impact the player experience, discourage participation in local gaming activities, and potentially affect revenue for these businesses and the state.

Fraud Prevention and Financial Manipulation

A 24-hour delay opens the door for potential financial manipulation, where operators might rely on new player buy-ins to pay out previous winners. This could create financial instability and undermine the integrity of the gaming system. Immediate electronic transfers or check issuance would eliminate this risk and ensure payouts are based on actual liquidity.

Existing Verification Processes

Operators already have mechanisms in place to work with the Washington State Gambling Commission (WSGC) in cases of uncertainty about a win. In disputes, operators can retain video recordings, request reviews, and involve the WSGC as needed. These safeguards are more than sufficient to verify the legitimacy of large wins, rendering the 24-hour delay unnecessary.

Operational Clarity and Practical Concerns

The proposed rule raises several practical concerns:

- How will regulators verify that sufficient funds were available when the wager was accepted?
- How and when will the decision to pay by check be made?
- How will this affect table accounting for fixed-odds games?
- Will the floor supervisor issue an IOU to the player if the house opts to pay by check?

These operational uncertainties could lead to confusion and inefficiencies, ultimately affecting both the operators and players.

Consistency with Current Debit/Credit Options

Under current regulations, players can withdraw funds using debit and credit cards,

providing immediate access to their money for gambling. To maintain consistency, this approach should also apply to cashouts and payouts exceeding \$5,000, allowing players to receive immediate payments through electronic funds transfers or checks.

Emergency Drop and Count Process

One potential solution to avoid liquidity issues would be to implement an "Emergency drop and count" procedure. This would allow card rooms to access additional funds when needed without disrupting normal operations or delaying payouts to players.

Recommendation

I strongly recommend that the Washington State Gambling Commission allow house-banked card rooms to issue checks immediately upon a player's request, regardless of the payout amount. If there are concerns about the validity of a win, the payout can be reviewed by the WSGC. This approach would balance fairness, safety, and operational efficiency while protecting player interests and ensuring card rooms meet their financial obligations.

Conclusion

The proposed 24-hour window for issuing checks is unnecessary and could negatively impact player experience and the perception of fairness in Washington's card rooms. It introduces operational inefficiencies, erodes trust, and conflicts with principles of fraud prevention that require the immediate availability of funds.

Immediate payouts are essential for maintaining trust, ensuring fair play, and supporting the financial stability of the gaming industry in Washington. Modern banking solutions can address safety concerns without compromising the integrity of immediate payouts.

Thank you for your time and consideration.

From: Anonymous Smith <concerned2700@outlook.com>
Sent: Wednesday, November 13, 2024 2:12 PM
To: Lohse, Jess (GMB) <jess.lohse@wsgc.wa.gov>; AgencyWebsite (GMB) <agency.website@wsgc.wa.gov>
Subject: Re: 24 hour check

External Email

Dear Members of the Washington State Gambling Commission,

I am writing as a follow-up to my previous letter concerning the proposed rule allowing a 24-hour delay for issuing checks on fixed odds payouts exceeding \$5,000 in house-banked card rooms. In addition to my previously stated concerns about trust erosion, financial burden on players, and operational inefficiencies, I would like to highlight several additional critical issues that have come to light upon further analysis.

Key Additional Concerns:

Frequency of Affected Payouts

With the recent increase in maximum bets to \$400 and common 15:1 payout ratios, wins of \$6,000 occur at approximately 1 in 18 probability

This is not a rare occurrence but rather a regular part of normal gameplay

What appears designed for exceptional circumstances would actually impact routine gaming operations and regular players

Lack of Consumer Notification Requirements

The proposed rules contain no provisions for notifying players about potential delayed payouts

Players deserve clear advance notice of payout policies before placing wagers

Absence of signage requirements demonstrates a concerning lack of transparency

Impact on Regular Gaming Operations

A typical table could see multiple delayed payout situations per day

This frequency would create unnecessary administrative burden

Could significantly impact game flow and player experience

What was perhaps intended for extraordinary situations would affect routine gameplay

Public Stakeholder Consideration

The gambling public, as the primary financial stakeholder in these operations, appears to have had minimal input in these proposals

The proposed rules seem to prioritize operator convenience over player interests

There has been insufficient consideration of the practical impact on regular players

Recommendation:

I strongly urge the Commission to:

Not pass these rules as currently written

Return the proposal to staff for comprehensive reevaluation

Require inclusion of all stakeholder perspectives, especially the gambling public

Consider raising the threshold for delayed payouts to a more appropriate level

Include mandatory signage and notification requirements

Analyze the real-world frequency and impact of these delays on regular gameplay

The Commission's primary duty is to protect the public interest while ensuring fair and efficient gaming operations. These proposed rules, as written, fail to achieve this balance and require substantial revision with greater emphasis on

player protection and practical gaming operations.

Thank you for considering these additional concerns.

Sincerely,

[Anonymous Concerned Party]

P.S. I would specifically request that staff conduct a probability analysis of common pay ratios at the new \$400 limit to better understand how frequently these delayed payouts would actually occur in practice. This data seems crucial for making an informed decision about appropriate thresholds and policies.

From: Lohse, Jess (GMB) <jess.lohse@wsgc.wa.gov>

Sent: Monday, September 23, 2024 10:56 AM

To: concerned2700@outlook.com <concerned2700@outlook.com>

Subject: RE: 24 hour check

Thanks for your feedback. We will make sure your feedback is included in the commission meeting packet when the rule is discussed again.

With regards to your question below, the amended rule and two new rules would **not** allow stakeholders with multiple properties to share bankrolls nor maintain a single static account for the largest single prize across all their locations. Each individual card room licensee would need to meet the rule requirements independently. Thanks.



Jess Lohse

Special Agent Supervisor

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

Phone: [206-786-3530](tel:206-786-3530)
Email: jess.lohse@wsgc.wa.gov
Web: WSGC.wa.gov

501 S. 336th St.,
Suite 210
Federal Way,
WA 98003



From: Anonymous Smith <concerned2700@outlook.com>

Sent: Thursday, September 19, 2024 2:28 PM

To: AgencyWebsite (GMB) <agency.website@wsgc.wa.gov>

Subject: Re: 24 hour check

External Email

Dear Members of the Washington State Gambling Commission,

I am writing to kindly request confirmation of receipt of my previous letter concerning the proposed rule change allowing a 24-hour delay for issuing checks of fixed-odds winnings on payouts exceeding \$5,000 in house-banked card rooms.

I would also like to seek clarification on whether this rule might allow stakeholders with multiple properties to share bankrolls and maintain a single static account for the largest single prize across all their locations. This could potentially put operators with single or fewer properties at a disadvantage compared to those with multiple establishments.

Thank you for your attention to this matter.

Sincerely,

[Anonymous Concerned Party]

From: Anonymous Smith

Sent: Wednesday, September 11, 2024 1:54 PM

To: askus@wsgc.wa.gov <askus@wsgc.wa.gov>

Subject: 24 hour check

Dear Members of the Washington State Gambling Commission,

This letter outlines concerns about the proposed rule allowing a 24-hour delay for issuing checks on payouts exceeding \$5,000 in house-banked card rooms. While the intention may be to enhance safety, this proposal risks undermining player trust, financial transparency, and operational efficiency within Washington's gaming industry.

Key points include:

1. Erosion of player trust and confidence
2. Unfair financial burden on players
3. Negative impact on visitors and local gaming
4. Potential for fraud and financial manipulation
5. Redundancy with existing verification processes
6. Operational and practical concerns
7. Inconsistency with current payment options
8. Alternative solutions for liquidity management

Erosion of Trust and Player Confidence

Trust between players and operators is fundamental to a healthy gaming industry. Players reasonably expect to receive their winnings promptly after a successful wager. A 24-hour delay, especially without a clear and compelling reason, could create the perception that the house is unprepared to meet its obligations, potentially undermining player confidence in Washington's card rooms.

Unfair Financial Burden on Players

The proposed 24-hour delay effectively requires players to extend credit to the operator, unfairly shifting financial risk onto the players. Gamblers should not bear the responsibility of financing the house's operations, especially after risking their own money.

There is little justification for delaying payouts when the house should always have sufficient funds to meet its obligations promptly.

Impact on Visitors and Local Gaming

Washington's card rooms serve both residents and visitors, many of whom have limited time for recreational activities. Players winning large sums reasonably expect prompt access to their winnings. A 24-hour delay could negatively impact the player experience, discourage participation in local gaming activities, and potentially affect revenue for these businesses and the state.

Fraud Prevention and Financial Manipulation

A 24-hour delay opens the door for potential financial manipulation, where operators might rely on new player buy-ins to pay out previous winners. This could create financial instability and undermine the integrity of the gaming system. Immediate electronic transfers or check issuance would eliminate this risk and ensure payouts are based on actual liquidity.

Existing Verification Processes

Operators already have mechanisms in place to work with the Washington State Gambling Commission (WSGC) in cases of uncertainty about a win. In disputes, operators can retain video recordings, request reviews, and involve the WSGC as needed. These safeguards are more than sufficient to verify the legitimacy of large wins, rendering the 24-hour delay unnecessary.

Operational Clarity and Practical Concerns

The proposed rule raises several practical concerns:

- How will regulators verify that sufficient funds were available when the wager was accepted?
- How and when will the decision to pay by check be made?
- How will this affect table accounting for fixed-odds games?
- Will the floor supervisor issue an IOU to the player if the house opts to pay by check?

These operational uncertainties could lead to confusion and inefficiencies, ultimately affecting both the operators and players.

Consistency with Current Debit/Credit Options

Under current regulations, players can withdraw funds using debit and credit cards, providing immediate access to their money for gambling. To maintain consistency, this approach should also apply to cashouts and payouts exceeding \$5,000, allowing players to receive immediate payments through electronic funds transfers or checks.

Emergency Drop and Count Process

One potential solution to avoid liquidity issues would be to implement an "Emergency drop and count" procedure. This would allow card rooms to access additional funds when needed without disrupting normal operations or delaying payouts to players.

Recommendation

I strongly recommend that the Washington State Gambling Commission allow house-banked card rooms to issue checks immediately upon a player's request, regardless of the payout amount. If there are concerns about the validity of a win, the payout can be reviewed by the WSGC. This approach would balance fairness, safety, and operational efficiency while protecting player interests and ensuring card rooms meet their financial obligations.

Conclusion

The proposed 24-hour window for issuing checks is unnecessary and could negatively impact player experience and the perception of fairness in Washington's card rooms. It introduces operational inefficiencies, erodes trust, and conflicts with principles of fraud prevention that require the immediate availability of funds.

Immediate payouts are essential for maintaining trust, ensuring fair play, and supporting the financial stability of the gaming industry in Washington. Modern banking solutions can address safety concerns without compromising the integrity of immediate payouts.

Thank you for your time and consideration.



Rule Petition to Amend and Adopt New Rules
 Authorizing Centralized Surveillance
 New and amended rules to WAC Chapter 230-03, 230-05, and 230-15

January 2025 – Discussion & Possible Filing
February 2024 – Initiate Rule Making

| | |
|--|-------------------------------------|
| Tab 4: January 2025 Commission Meeting Agenda. | Statutory Authority 9.46.070 |
| Who Proposed the Rule Change? | |
| Vicki Christopherson on behalf of Maverick Gaming | |
| Background | |
| <p>BOLD = Changes made since February 2024 Commission Meeting</p> <p>Vicki Christopherson on behalf of Maverick Gaming is requesting to create a regulatory structure to allow centralized surveillance of house-banked card rooms under common ownership.</p> <p>The petitioner stated this change can help house-banked card rooms with common ownership:</p> <ul style="list-style-type: none"> • Ensure compliance with regulations • Maintain a safe and secure environment for guests and staff • Protect gaming operations and the public. <p>The petitioner seeks to update the WAC to reflect the advancements in technology and opportunity for house-banked card rooms under common ownership to implement centralized surveillance monitoring systems designed to ensure that gaming is conducted in an honest, competitive, and safe environment.</p> <p>In November 2021, a petition was received from Tim Merrill of Maverick Gaming to authorize centralized surveillance. In January 2022, the Commission chose to initiate rule-making that would address policy considerations outlined by staff. In February 2023, staff recommended withdrawing rulemaking due to the policy concerns outlined by staff. At the February 2023 commission meeting, the petitioner withdrew their petition with the understanding that staff would work with them on this topic over the next 18 months.</p> <p>At the January 2024 commission meeting, staff provided an update on the discussions with Maverick Gaming and research done to date on the topic. Maverick Gaming also provided an update on their research done to date.</p> <p>The purpose of surveillance systems is to, in a way that is not publicly accessible, document events that:</p> <ul style="list-style-type: none"> • Ensure the licensed gambling activities are conducted honestly and free of criminal elements and activities, • Protect the public and employees, and • Safeguard the licensee’s assets. <p>Currently, rules require Class F and house-banked card room licensees to maintain analog or digital closed-circuit television (CCTV) systems within their licensed premises that are monitored by the licensee’s card room employees.</p> | |

Attachments:

- **Proposed new and amended rule language.**
- Petition.
- January 2024 Commission staff PowerPoint Presentation.
- January 2024 Maverick Gaming PowerPoint Presentation.

At the February 2024 commission meeting, Commissioners initiated rulemaking to explore authorizing centralized surveillance systems.

Since the February 2024 commission meeting, staff has worked to develop or amend the attached rules related to the authorization of centralized surveillance systems. These rules create a regulatory framework for centralized surveillance systems and include licensing standards, technical specifications, staffing obligations, testing requirements, and disruption procedures.

Staff created these rules by starting with the language of the petition, which asks the Gambling Commission to “develop a regulatory framework to allow for centralized surveillance for cardrooms under common ownership.” Staff then used existing surveillance rules as a basis for the new rules related to centralized surveillance. These existing rules have been tried and tested in Washington State, have proven effective, and are generally well understood by licensees. The existing rules require licensees to maintain their own surveillance departments and do not allow those obligations to be passed on to third parties. New rules regarding centralized surveillance would not change these requirements, but would allow licensees with multiple cardrooms under common ownership to house surveillance departments in a centralized off-site location rather than on-site locations.

Policy Considerations

Staff did not find any jurisdiction in the U.S. currently allowing for centralized surveillance rooms for card room activities by rule or regulation. The petitioner has received special permission in Colorado and Nevada to operate a centralized surveillance room.

Staff confirmed that Maverick Gaming operates centralized surveillance in Nevada through a variance granted by Nevada Gaming Control Board (NGCB) Chair. The variance was granted to the NGCB casino surveillance standard requirements under Regulation 5.160. The circumstances for which variances are authorized are not outlined in statute or regulation.

Staff confirmed that Maverick Gaming operates centralized surveillance in Colorado as authorized under Division of Gaming’s Internal Control Minimum Procedures, Section 13, Surveillance system standards, which requires each casino to have an “in-house” surveillance room, except for commonly owned casinos within the same county. They also authorize licensees to seek variances related to surveillance.

Staff have the following policy concerns:

- Location of centralized surveillance room, i.e., in-state, out-of-state, within the same county of card rooms being monitored, etc.
- The number of card rooms the centralized surveillance room can monitor and staffing requirements.
- Licensure of the centralized surveillance room and its employees.
- Network and operating requirements of the centralized surveillance rooms.
- Access to surveillance video by our staff and law enforcement.

- Ability to keep the surveillance system as a CCTV with the ability to view surveillance showing fluid motion and detail, without interruption.
- Type of security encryption used to transmit surveillance video.
- Communication between the card room and the centralized surveillance room.
- Responsibility for violations in the centralized surveillance room when they are tied to multiple licensed card rooms.
- **Rules in Colorado and Nevada allow centralized surveillance systems by exception or variance, but centralized surveillance systems are not specifically authorized by rule in any jurisdiction.**

Attachments:

- Letters requesting approval for centralized surveillance in Nevada.
- Colorado Division of Gaming Internal Control Minimum Procedures Variance Request Forms.

Public and Tribal Partner Feedback

On February 5, 2024, the petitioner provided an email (attached) sharing their thoughts on possible components of a regulatory structure for centralized surveillance rules.

On September 5, 2024, staff met with licensees, interested parties, and other members of the public to discuss feedback and general concerns with the proposed rules. Eric Persson, CEO of Maverick Gaming, asked if the rule changes apply to both house banked and non-house banked cardrooms. Staff responded that they do. Mr. Persson also commented that implementing a centralized surveillance system would require significant investment; therefore, he would not be in favor of a sunset clause in these rules. Finally, Mr. Persson asked if a type of dual license would be available allowing, in the event that there is a disruption in the centralized surveillance video feed, an individual who is licensed in a non-surveillance role to perform surveillance duties in the on-site room until a certified person is available. Staff responded that required internal controls and license types will remain the same and rules will continue to require independent departments. Staff held an additional feedback session on December 19, 2024 where no additional comments were made.

Staff held consultation sessions with tribal partners on September 3, September 24, and December 19, 2024. Staff agreed to share the following concerns communicated by Tribal partner representatives during those meetings:

- **Rules are progressing for cardroom licensees when a tribe had been denied similar abilities in the past. Staff shared the history of this rule and how it fits in the rule making process.**
- **If or when an onsite room would require staffing, ensuring the staff assigned did not have incompatible functions that could compromise the operation. Staff responded that the individuals staffing the surveillance rooms must be licensed and the surveillance department must be independent from other departments.**
- **A surveillance employee monitoring too many tables at once may not be able to monitor all areas, including key functions and locations such as the cage, effectively.**

- The risk of compromising the operation by transmitting live video of a gaming area offsite, the specific technical standards to be used for security testing and risk assessments, and the licensing process for security testing companies of the centralized surveillance systems was unclear.

Staff Recommendation

The actions available to Commissioners include:

- File the attached language for further discussion, or
- Seek alternative language and/or continue discussion in future meetings, or
- Deny the petition in writing a) stating the reasons for denial and specifically address the concerns stated in the petition, or (b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition.

WAC 230-15-261 Defining "Surveillance system." For the purposes of this chapter, a "surveillance system" means a system containing video cameras, monitors, digital recording equipment, servers, switches, and/or ancillary equipment.

WAC 230-15-262 Defining "closed circuit television" (CCTV). For the purposes of this chapter, "closed circuit television" (CCTV) means a surveillance system that uses wired surveillance cameras connected to equipment secured in a surveillance room for monitoring and recording purposes and which video signals are not publicly distributed or accessible.

WAC 230-15-263 Defining "surveillance room." For the purposes of this chapter, a "surveillance room" means a secure location(s) on the premises of a licensed card room that houses a portion of the surveillance system including monitors, digital recording equipment, servers, switches, and/or ancillary equipment.

CENTRALIZED SURVEILLANCE REQUIREMENTS

WAC 230-15-800 Defining "centralized surveillance monitoring location." For the purposes of this chapter, a "centralized surveillance monitoring location" means a secure room at a licensed house-banked card room with remote access to surveillance systems of

multiple licensed card rooms owned and controlled by the same parent company. Access to surveillance systems includes, but is not limited to, the viewing of video data signals from cameras.

WAC 230-15-805 Approving centralized surveillance monitoring

locations House-banked card game licensees must receive written approval from us before utilizing or operating a centralized surveillance monitoring location. The following conditions must be met:

(1) Before a house-banked or Class F card room is allowed to be monitored by a centralized surveillance monitoring location, they must submit internal controls to us in the format we require; and

(2) The house-banked card room that houses the centralized surveillance monitoring location must submit internal controls to us in the format we require; and

(3) The centralized surveillance monitoring location must pass a preoperational inspection.

WAC 230-15-810 Closed circuit television surveillance systems

required Any house-banked or Class F card room being monitored by a centralized surveillance monitoring location must have a closed circuit television (CCTV) system on their premises and adhere to all applicable rules.

WAC 230-15-815 Centralized surveillance monitoring location

requirements Centralized surveillance monitoring locations must:

(1) Be located on the licensed premises of a house-banked card room; and

(2) Have at least one "monitoring station" for each surveillance department employee working in the room. A "monitoring station" is a designated area for one surveillance department employee to work at which includes at least:

(a) A computer connected to one or more monitored card rooms that is capable of pulling up all cameras of a monitored card room and reviewing playback of recorded video to include forward, reverse, slow motion, and frame-by frame; and

(b) A controller to utilize pan tilt zoom (i.e. PTZ) cameras. The centralized surveillance monitoring location may have PTZ override capabilities over the monitored card room's surveillance room; and

(c) Video monitors to view surveillance cameras and ability to listen to required audio; and

(d) Dedicated method of communication (e.g. phone) to communicate between monitored card rooms and centralized surveillance monitoring location; and

(3) Have a sufficient number of video monitors at each monitoring station to simultaneously view multiple gambling tables, the cashier's cage, and count room activities; and

(4) Have an alarm device that signals centralized surveillance monitoring location employees when any count room door of a monitored card room is opened; and

(5) Have an alarm device that signals centralized surveillance monitoring location employees when the cage cashier manually triggers a silent alarm in the cage of a monitored card room; and

(6) Have an alarm device that signals centralized surveillance monitoring location employees when any surveillance room door of a monitored card room is opened; and

(7) Have a failure notification system for each monitored card room that provides immediate notification for any digital recording equipment system failure.

WAC 230-15-820 Staffing requirements for centralized surveillance monitoring locations. The licensee who houses the centralized surveillance monitoring location must ensure that at least two surveillance department employees are present in the room and monitoring activities whenever one or more monitored card rooms are

conducting gambling and during the count process. In addition, the licensee must:

(1) Control access to the room so that only licensed surveillance department employees use the room. Approved supervisory or management personnel may also enter the room to review activities, but only if they are licensed at each house-banked card room the centralized surveillance monitoring location monitors; and

(2) Have at least one surveillance department employee for every 15 house-banked gambling tables open for play with at least one dedicated surveillance department employee to observe the transporting of drop boxes of a house-banked card room or when the count takes place. For example, if there are seven house-banked card rooms being monitored with 45 house-banked gambling tables open for play then three surveillance department employees would be required. However, if there were also four soft counts taking place at the same time, at least four surveillance department employees would be required in the room.

WAC 230-15-825 Additional requirements of licensees that house a centralized surveillance monitoring location. Licensed locations that house a centralized surveillance monitoring location must ensure that:

(1) Surveillance department employees are licensed at each card room monitored by the centralized surveillance monitoring location; and

(2) A sign-in log, in the format we require, is maintained to document anyone entering or leaving the room; and

(3) Surveillance department employees keep a log of all surveillance activities, in the format we require, for each card room monitored by the centralized surveillance monitoring location; and

(4) Breaks for surveillance department employees are limited to thirty minutes or less per shift; and

(5) Any time a winning wager, a jackpot, or bonus pay out greater than three thousand dollars is won, surveillance department employees use pan-tilt-zoom (PTZ) cameras to verify:

- (a) Winning hands; and
- (b) Amounts of the wager; and
- (c) Amounts of the pay out; and
- (d) Players who won the prize.

WAC 230-15-830 Centralized surveillance monitoring location

disruptions. In the event that the centralized surveillance monitoring location is unable to view any camera that covers required gambling areas at a monitored card room, the following conditions must be met:

(1) Immediately notify supervisory personnel at the monitored card room; and

(2) The monitored house banked card room must shut down gambling operations in specific areas of the card room not covered by a required camera until the camera feed is restored. Alternatively, if the onsite surveillance room is capable of viewing the required camera, they may operate in the specific area once a licensed employee, as approved in the internal controls, staffs the surveillance room. For example, if a gambling table is not covered by a surveillance camera, the monitored card room must shut down the gambling table but may continue to operate other gambling tables at the card room where the surveillance system is operational; and

(3) The centralized surveillance monitoring location must document the disruptions in a malfunction log in the format we require; and

(4) Report the issue to us within twenty-four hours.

WAC 230-15-835 Surveillance room requirements for monitored card rooms. House-banked and Class F card room licensees that utilize a centralized surveillance monitoring location must:

(1) Have a surveillance camera installed in the surveillance room(s) that views the surveillance equipment to include the digital

recording equipment, computers, and monitors. The centralized surveillance monitoring location must have remote access to the camera viewing the onsite surveillance room(s) ; and

(2) Grant us access to the surveillance room within thirty minutes. A licensed authorized card room employee, as approved in the internal controls, who is knowledgeable in the operation of the surveillance system must be available to assist us.

WAC 230-15-840 Security for centralized surveillance monitoring locations access of closed circuit television surveillance systems.

Centralized surveillance monitoring locations may remotely access live or recorded surveillance footage from licensed card rooms under the following conditions:

(1) Remote viewing requires a dedicated and secure communication protocol or application utilizing encryption. Any communication must be secured from intrusion, interference, and eavesdropping; and

(2) Ensure security for all communications and data to prevent unauthorized access. These security measures should include, but are not limited to, current encryption standards for critical information, isolation from public networks, and use of firewalls; and

(3) Laptops or computers used for remote viewing must meet the following requirements:

(a) Be dedicated to the closed circuit television surveillance systems being monitored; and

(b) Have a mechanism to detect and prevent installation of spyware, key loggers, hacking tools, or other malicious software; and

(c) Have regularly updated antivirus software protection; and

(d) Employ active firewall software; and

(e) Have hardened operating system; and

(f) Have security vulnerability patching; and

(4) Ensure that access protocols are embedded in the system software that prohibit users from rewriting over storage discs, changing system configurations, or otherwise making changes such as to cause the integrity of the system or the historical data to be called into question; and

(5) Prior to offering centralized surveillance and every license year thereafter, the licensee must have an independent technical expert, who is a licensed service supplier, perform a system integrity and security assessment of the surveillance system. The scope of the security assessment must include vulnerability and penetration testing. The independent technical expert's report will be submitted to us within 30 days of the report's completion and must include (a)

the scope of the review, (b) name and company affiliation of the individuals who conducted the assessment, (c) date of assessment, (d) findings, (e) recommended corrective action, if applicable, and (f) the licensee's response to the findings and recommended corrective action if applicable; and

(6) Report any system security breach to us within twenty-four hours.

WAC 230-15-845 Remote viewing of monitored card rooms

surveillance video. Centralized surveillance monitoring locations must be able to remotely access all surveillance camera views and required saved video files from licensed card rooms they monitor. The following video monitoring conditions must be met:

(1) There must be adequate bandwidth capacity and transmission speed to ensure all monitored cameras have minimal live view latency (less than a one second delay); and

(2) Each camera view or saved video file called up for remote viewing at a centralized monitoring location must have:

(a) Sufficient bandwidth speeds to show fluid motion equivalent to 25 FPS or better.

(b) Sufficient clarity to clearly distinguish the value of currency, coins, gaming chips, playing cards, and outcome of the game; and

(3) Each camera view and required saved video files at a monitored card room must be capable of having its video picture displayed on all video monitors at a centralized surveillance monitoring location.

AMENDED RULES

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

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

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

(b) Gambling management services; or

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

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

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

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

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

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

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

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

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

(j) Performing the testing and certification of gambling equipment as required by Title 230 WAC; or

(k) Performing the system integrity and security assessment of a surveillance system used by a centralized surveillance monitoring location; or

(1) Providing nonmanagement-related recordkeeping or storage services for punch board and pull-tab operators, when the combined total gross billings from such services exceed \$30,000 during any permit period or license year.

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

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

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

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

(d) A person who only provides nonmanagement-related recordkeeping or storage services for punch board and pull-tab operators, when the combined total gross billings from such services do not exceed \$30,000 during any permit period; or

(e) A person who provides names, images, artwork or associated copyrights, or trademarks, or patent use, or other features that do not affect the results or outcome of the game, for use in gambling equipment; or

(f) Regulated lending institutions; or

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

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

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

WAC 230-15-320 Surveillance room requirements for house-banked card

game licensees. House-banked card game licensees must maintain one or more surveillance rooms. They must:

(1) Control access to the surveillance room so that only surveillance department employees use the room. Owners or their approved supervisory or management personnel may also enter the surveillance room to monitor activities. Licensees may allow authorized personnel to escort any other person into the surveillance room for educational, investigative, or maintenance purposes; and

(2) Ensure that surveillance room entrances are not easily observed from the gambling floor; and

(3) Ensure that a surveillance department employee is present in the room and monitoring activities using the equipment any time the card room is conducting gambling and during the count process.

However, subject to subsection (4) of this section, licensees may operate the surveillance room without staff only in the following limited circumstances:

(a) For routine breaks that are less than thirty minutes per shift; or

(b) When only nonhouse-banked card games are operated with wager limits of forty dollars or less and such limits are documented in their internal controls.; or

(c) When the house-banked card room is being monitored by an approved centralized surveillance monitoring location.

(4) Ensure that any time a winning wager, a jackpot, or bonus pay out greater than three thousand dollars is won, they use pan-tilt-zoom (PTZ) cameras to verify:

- (a) Winning hands; and
- (b) Amounts of the wager; and
- (c) Amounts of the pay out; and
- (d) Players who won the prize.

WAC 230-15-267 Remote access of closed circuit television surveillance systems. House-banked and Class F card game licensees must strictly control digital closed circuit television (CCTV) systems. Licensees may allow remote access to the CCTV system under the following conditions:

(1) Licensed gambling service suppliers that install and maintain closed circuit television (CCTV) surveillance systems may remotely

access digital CCTV systems for maintenance or repair under the following provisions:

(1a) The card room licensee must notify us before the remote access occurs; and

(2b) The card room licensee must document any remote access in their surveillance log; and

(3c) Remote access will only be enabled for the duration of the maintenance or repair and the connection terminated immediately after.; and

(2) Centralized surveillance monitoring locations approved in the internal controls may access the digital CCTV system.

WAC 230-05-112 Defining "gross gambling receipts."

(1) "Gross gambling receipts" means the amount due to any operator of an authorized activity as described in subsection (5) of this section.

(2) The amounts must be stated in U.S. currency.

(3) The value must be before any deductions for prizes or other expenses, such as over/short.

(4) "Gross gambling receipts" does not include fees from players to enter player-supported jackpots. However, any portion of wagers

deducted for any purpose other than increasing current prizes or repayment of amounts used to seed prizes are "gross gambling receipts."

(5) Gross gambling receipts for authorized activities:

| | |
|------------------------------------|--|
| Activity: | Gross gambling receipts include amounts due to any operator for: |
| (a) Punch board and pull-tab | Purchasing chances to play. |
| (b) Raffles and enhanced raffles | Purchasing chances to enter. |
| (c) Electronic raffles | Purchasing chances to enter. |
| (d) Bingo | Fees or purchase of cards to participate. |
| (e) Amusement games | Amounts paid to play amusement games. |
| (f) Card games | <ul style="list-style-type: none"> • "Net win" from house-banked card games; • Tournament entry fees; • Administrative fees from player-supported jackpots; • Fees to participate in nonhouse-banked card games. |
| (g) Manufacturers and distributors | (i) Fees from sales, rentals, leases, royalties, and service fees collected for the following gambling |

| | |
|--|---|
| | <p>equipment in Washington to include, but not limited to:</p> <ul style="list-style-type: none"> • Bingo paper or bingo cards; • Punch boards and pull-tabs; • Devices for dispensing pull-tabs; • Electronic raffle systems; • Electronic devices for conducting, facilitating or accounting for the results of gambling activities; • Cards; • Dice; • Gambling chips; • Cash exchange terminals; • Progressive meters; • Gambling software; • License agreements; • Card shuffling devices; • Graphical game layouts for table games; • Ace finders or no-peek devices; • Roulette wheels; • Keno equipment; • Tables manufactured exclusively for gambling purposes; • Bet totalizers; • Electronic devices for reading or displaying outcomes of gambling activities; • Tribal lottery systems and components thereof. <p>(ii) Fees from the service, repair, and modification of gambling equipment in Washington to include, but not limited to:</p> |
|--|---|

| | |
|--------------------------------|--|
| | <ul style="list-style-type: none"> • Charges for labor and parts for repairing gambling equipment; • Service fees related to gambling operations; • Training or set-up fees; • Maintenance contract fees related to gambling equipment and operations. |
| (h) Gambling service suppliers | <p>Fees from gambling-related services provided in or to be used in Washington to include, but not limited to:</p> <ul style="list-style-type: none"> • Consulting, advisory or management services related to gambling; • Interest from financing the purchase or lease of gambling equipment, infrastructure or facilities or equipment that supports gambling operations; • Acting as a lending agent, loan services or placement agent; • Assembly of components for gambling equipment to be used under a contract with a licensed manufacturer; • Ongoing financial arrangements for gambling related software with a licensed manufacturer; • Installing, integrating, maintaining, or servicing digital surveillance systems that allow direct access to the operating system; |

| | |
|--|--|
| | <ul style="list-style-type: none"> • Training individuals to conduct authorized gambling activities; • Performing testing and certification of tribal lottery systems in meeting requirements specified in the tribal-state compacts; • <u>Performing system integrity and security assessments of a surveillance system used by a centralized surveillance monitoring location;</u> • Providing nonmanagement related recordkeeping or storage services for punch board and pull-tab operators; • Ownership of proprietary games or equipment. |
| (i) Punch board/pull-tab service businesses | Providing nonmanagement related recordkeeping or storage services for punch board and pull-tab operators. |
| (j) Fund-raising event distributors | Fees from contracts to organize and conduct recreational gaming activities. |
| (k) Fund-raising events and agricultural fairs | Fees received from the operation of bingo, amusement games, raffles, lotteries, contests of chance, and/or net win from table games operated at a fund-raising event. |
| (l) Major sports wagering vendor | Fees or revenues received from providing sports wagering goods and services, including management, consulting, sales, rentals, leases, and royalties, for any sports wagering activities in Washington. |

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| (m) Mid-level sports wagering vendor | Fees or revenues received from providing sports wagering goods and services, including sales, rentals, leases, and royalties, for any sports wagering activities in Washington. |
| (n) Ancillary sports wagering vendor | Fees or revenues from providing sports wagering goods and services, including sales, rentals, leases, and royalties, for any sports wagering activities in Washington. |

Mentzer, Damon (GMB)

From: Washington State Gambling Commission <no-reply@wsgc.wa.gov>
Sent: Wednesday, January 17, 2024 3:33 PM
To: Rules Coordinator (GMB)
Subject: Webform submission from: Request a rule change

External Email

Submitted on January 17, 2024 - 3:32pm

Submitted by: Anonymous

Submitted values are:

Petitioner's Name

Vicki Christophersen

Address

721 4th Ave #3329
Kirkland, Washington. 98033

Phone

[3604852026](tel:3604852026)

Email

vicki@christopherseninc.com

Rule Petition Type

New Rule - I am requesting WSGC to adopt a new rule.

New Rule Selection Function

Subject or purpose of the rule

To create regulatory structure to allow centralized surveillance of house banked card rooms under common ownership.

The rule is needed because

The Washington State Gambling Commission should initiate rulemaking to develop a regulatory framework to allow for centralized surveillance for cardrooms under common ownership. Centralized surveillance can help house bank card rooms with common ownership ensure compliance with regulations and maintain a safe and secure environment for guests and staff. A centralized surveillance operation better protects gaming operations and the public.

Centralized surveillance is an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for patrons – efficient and consistent operations across properties. Well-crafted centralized surveillance is designed to ensure that gaming is conducted in an honest, competitive, and safe environment – public safety is increased by providing a surveillance operator and supervision over the process within a

centralized room which would have a larger footprint than the current surveillance room model. Additionally, a centralized system will allow external regulatory access to enable gambling agents to review live footage, obtain necessary evidence in a timely manner without having to drive to individual properties to obtain footage, increasing efficiency and creating cost savings.

In the past, the need for separate surveillance systems was apparent. Separate systems provided additional functionality and security when systems were not capable of management from a central location. With today's digital IP systems, functionality has improved significantly. A single, networked system reduces cabling needs without restricting cabling distances.

The effect of this rule change will be

Updated Washington Administrative Code that better reflects the advancements in technology and opportunity for house banked card rooms under common ownership to implement centralized surveillance monitoring systems designed to ensure that gaming is conducted in an honest, competitive, and safe environment. This will provide an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for guests and staff.



WASHINGTON STATE
**GAMBLING
COMMISSION**

Update on Centralized Surveillance

January 11, 2024

Presented By:

Tina Griffin, Executive Director

Bill McGregor, Special Agent Supervisor

Follow-Up from Rulemaking

January 2022 - Maverick Gaming petitioned for rulemaking

February 2023 – Staff recommended denial of petition

- Maverick Gaming withdrew the petition with the understanding that staff would work with them on this topic over the next 18 months



Objective of Today's Presentation

To provide an update on research done to date and the ongoing conversations regarding possible approaches to Maverick's request to authorize centralized surveillance monitoring in Washington.



What other states have authorized centralized surveillance?

- Colorado – Through Internal Control Procedures¹
 - “Each casino must have a surveillance room in-house. Exceptions would only be for commonly owned casinos, which are within the same County. The surveillance room must be within one of the commonly owned casinos.”¹
 - Each combined surveillance room must be staffed for each individual license in accordance with the minimum staffing requirements.¹
 - For combined surveillance rooms with a second and third casino, manned surveillance is required if the total number of gaming devices (slots and table games) between all casinos is 500 or more.¹
 - There are no other specific requirements for combined surveillance rooms.

Note: Per Colorado Revised Statute 44-30-105 and Code of Colorado Regulations 207-1, Rule 19, Limited gaming is only authorized in the following Colorado cities: Central, county of Gilpin; Black Hawk, county of Gilpin; and Cripple Creek, county of Teller.

¹ Colorado Limited Gaming Control Commission’s Internal Control Minimum Procedures, Section 13.G.



What other states have authorized centralized surveillance?

- Nevada - Only through a Variance
 - The Board Chair may exempt a licensee from complying with any casino surveillance standard¹.
 - Variance criteria and requirements are determined by the Board Chair.
 - Location of surveillance rooms are dependent on the licensee's annual gross gambling revenue²:
 - More than \$15 million must maintain and operate surveillance from a surveillance room in a licensed gambling establishment
 - Less than \$15 million must be maintained and operated from a secure location.

¹ NV Regulation 5.160(8).

² NV Surveillance Standards for Nonrestricted Licensees 1.01(5), 1.020, and 2.010.



Approaches States Have Used to Authorize Centralized Surveillance

- Move surveillance requirements from rule to Internal Control Minimum Procedures (Colorado)
- Allow Director or Commissioners to authorize a rule variances on a case-by-case basis (Nevada)



Topics for Future Discussions

- Location of monitoring room
- Ratio of centralized surveillance rooms to house-banked card rooms
- Staffing requirements
- Who would be the monitoring entity
- Equity
- Network requirements



Questions

Tina Griffin, Executive Director

Bill McGregor, Special Agent Supervisor





MAVERICK
G A M I N G

Washington Centralized Surveillance

Jan 7, 2022

Overview





OVERVIEW

Maverick Gaming proposes to centralize surveillance monitoring for our Washington properties. The centralized surveillance monitoring would provide the ability to observe card room gambling activity from individual card rooms to a secure centralized surveillance room. All existing surveillance equipment (cameras, DVRs, monitors, surveillance software and other related equipment) will remain at each property, in the existing surveillance rooms, secured.

THE OBJECTIVE

- Improve public safety and the safety of our patrons and team members.
- Centralize reporting, training, supervision, and communication to provide consistency throughout our property's surveillance monitoring.
- Provide gaming agents with real time access to surveillance to enable better response time to criminal activities, timely investigations and video evidence collection.

Proposal

2



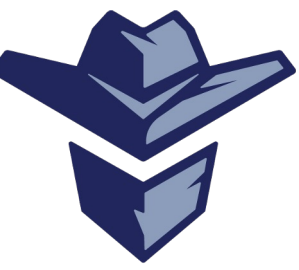
To better protect our gaming operations and the public, Maverick proposes a centralized surveillance operations.

A centralized surveillance operation provides:

- An efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for patrons – efficient and consistent operations across properties;
- Is designed to ensure that gaming is conducted in an honest, competitive, and safe environment – public safety is increased by providing a surveillance operator and supervision over the process within a centralized room which would have a larger footprint than the current surveillance room model; and
- External regulatory access to enable WSGC agents to review live footage, obtain necessary evidence in a timely manner without having to drive to individual properties to obtain footage - saves the WSGC time and money.



- Drawing from our successful experience in other jurisdictions employing centralized surveillance, we propose the establishment of a streamlined and efficient surveillance system for cardrooms. By centralizing surveillance operations, we can share expertise seamlessly across all cardrooms. This approach facilitates the swift exchange of information, ensuring uniformity in reviews and reports. This, in turn, increases public safety and the safety of our guests and employees.
- Build a centralized Surveillance Room operated on a 24-hour/7-days per week basis with multiple observers and supervisory personnel.
- Our proposed centralized team would be comprised of our existing surveillance team with addition of new team members with specialized skills.
- Property management is trained on the system if immediate access is required at a remote location for local viewing in the event of connection issue.
- All properties have and will continue to have their own totally functioning and operational surveillance systems and rooms.
- Our centralized surveillance room will act as the main viewing area and will have remote viewing for all properties.



Advantages to having Centralized Surveillance

Centralized surveillance can help the casino ensure compliance with these regulations and maintain a safe and secure environment for guests and staff. A manager in the room with all the observers ensuring procedures are followed every time for consistency in gathering everything that is needed.



Sample of a centralized surveillance room

Advantages of Centralized Surveillance:



Standardized Processes:

Incident Response Time Improvement: Implementing standardized processes across cardrooms has shown to decrease incident response times by an average of 15%, enhancing the overall security posture.

Supervision and Training:

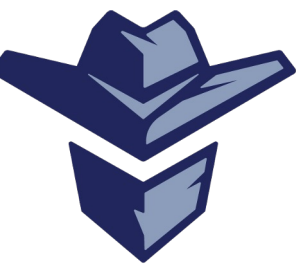
Training Cost Efficiency: Centralized supervision and training result in cost savings of approximately 10%, with a 20% improvement in staff proficiency, contributing to more effective surveillance practices.

Centralized Viewing and Reporting:

Enhanced Incident Documentation: Centralized report writing improves the accuracy and completeness of incident reports, leading to a 25% reduction in investigations time and a more thorough analysis of gambling activities.

External Surveillance Access:

Improved Oversight and Collaboration: Allowing external surveillance observers, as well as WSGC agents, to review footage live and remotely as needed enhances collaboration and oversight. This feature has shown to decrease response times to potential threats by 18%, providing an additional layer of security and responsiveness to cardroom operations.



Advantages of Centralized Surveillance:

Enhanced Security: Centralized surveillance allows for comprehensive monitoring of the entire casino premises, including gaming floor, entrances, exits, and other sensitive areas. This helps in preventing theft, cheating, and other criminal activities.

Quick Response to Incidents: Having all surveillance monitors and operators in one location enables a swift response to any incidents or suspicious activities. This helps security personnel intervene promptly and prevent potential problems from escalating. With multiple personnel in the room, each can focus on specific tasks to enable a timely response.

Efficient Monitoring: Centralized surveillance facilitates efficient monitoring of multiple areas simultaneously, ensuring that no part of the casino is left unobserved. Observers can quickly switch between different cameras and areas as needed. The ability to work as a team to monitor and track individuals, groups or activities to eliminate risk to staff and patrons.

Coordination with Security Personnel: Centralized surveillance rooms can easily communicate with on-the-ground security personnel, allowing for real-time coordination during security incidents or emergencies. One observer watching the incident and getting video evidence. One observer calling law enforcement or management. One observer on the radio communicating with the security personnel.

Evidence Collection: In the event of disputes, theft, or other incidents, a centralized surveillance room can provide high-quality video evidence to assist in investigations and legal proceedings. The ability to have state-of-the-art equipment with centralized conveniences that would allow WSGC to see video evidence at anytime by logging into a secure point to point connection.



Disadvantages of **NOT** having Centralized Surveillance



Sample of Current room set up

Limited coverage: With only one observer, it's practically impossible to monitor the entire casino, gaming tables, cashiers, conduct reviews, write incident reports, observe fills/credits, and any other items that happen and need video captured. This limited coverage increases the chances of missing important incidents or suspicious activities.

Inadequate response time: In the event of an incident a single operator may struggle to respond quickly and effectively due to the inability to multitask or handle that type situation alone (they freeze). This could result in delayed or inadequate responses to security threats.

Monitoring fatigue: Continuous monitoring of multiple screens and areas can lead to operator fatigue and decreased vigilance. This fatigue can impair the operator's ability to remain attentive and focused, potentially leading to missed security breaches. Per WAC 230-15-320, an observer is only allowed to be out of the room for a total of 30 minutes per shift. By having more observers monitoring this will allow for increased break times.

Lack of backup and support: In the absence of additional operators, there is no one to provide backup or support in case of emergencies, technical issues, or the need for immediate assistance. This lack of redundancy can compromise the overall security of the casino.

Risk of collusion: In a single-operator scenario, there is an increased risk of collusion or compromise, as the operator may not have the necessary checks and balances to ensure their integrity and prevent unethical behavior.

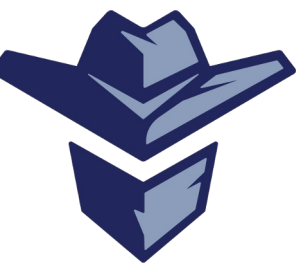


Our Experience:

We operate centralized surveillance in Nevada and Colorado. In both states, the regulator's established robust requirements for centralized surveillance and we were granted the approvals based on the regulator's review of our proposed operations and technology employed.

The benefits we have highlighted for you are based on our experience with converting from the standalone surveillance rooms to a centralized surveillance model in our Nevada and Colorado operations.

Each jurisdiction had their own set of standards and requirements to authorize approvals for centralized surveillance, as provided in the next slides.



Colorado Requirements – Centralized Surveillance Approval Process

“Each casino must have a surveillance room in-house. Exceptions would only be for commonly owned casinos, which are within the same County. The surveillance room must be within one of the commonly owned casinos.”¹

- Each combined surveillance room must be staffed for each individual license in accordance with the minimum staffing requirements.¹
- For combined surveillance rooms with a second and third casino, manned surveillance is required if the total number of gaming devices (slots and table games) between all casinos is 500 or more.¹
- The approval process for Colorado requires firewall testing and review of centralized surveillance room and compliance with Internal Control Minimum Procedures.

¹ Colorado Limited Gaming Control Commission’s Internal Control Minimum Procedures, Section 13.G. ²

²Revised Statutes (C.R.S.) 44-30-105.



Nevada - Centralized Surveillance Approval Process

The Nevada Gaming Control Board Chairman may exempt a licensee from complying with any casino surveillance standard. All requests for exemption must be in writing and state the reasons for the request and the alternative measures, if any, the licensee will undertake to accomplish the objectives of the casino surveillance standard.¹

- Variance criteria and requirements are determined by the Board Chairman.

¹ NV Regulation 5.160(8).

² NV Surveillance Standards for Nonrestricted Licensees 1.01(5), 1.020, and 2.010.



Nevada - Surveillance Staffing Requirements:

Surveillance room and staffing requirements are dependent on annual gross gambling revenue²:

- More than \$15 million must maintain and operate surveillance from a surveillance room in a licensed gambling establishment. The surveillance room must be attended at all times by personnel trained in the use of the equipment, knowledge of the games and house rules. When necessary, surveillance rooms may be unattended for periods of time not to exceed one (1) hour in any eight (8)-hour period to allow appropriate meal and rest breaks.
- Less than \$15 million must be maintained and operated from a secure location. There is no requirement for a manned surveillance room, there must be at least one person on the property at all times with a working knowledge and the ability to operate the surveillance equipment, and who can provide immediate access to the secured location to Board agents.
- **This is similar to California requirements for card rooms with less than 31 table games, they do not require manned surveillance rooms.** ³

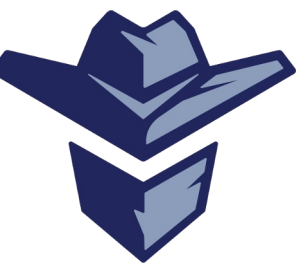
¹ NV Regulation 5.160(8).

²NV Surveillance Standards for Nonrestricted Licensees 1.01(5), 1.020, and 2.010.

³Cal. Code Regs. tit. 4§ 12396. Surveillance. (B)(3)(d)

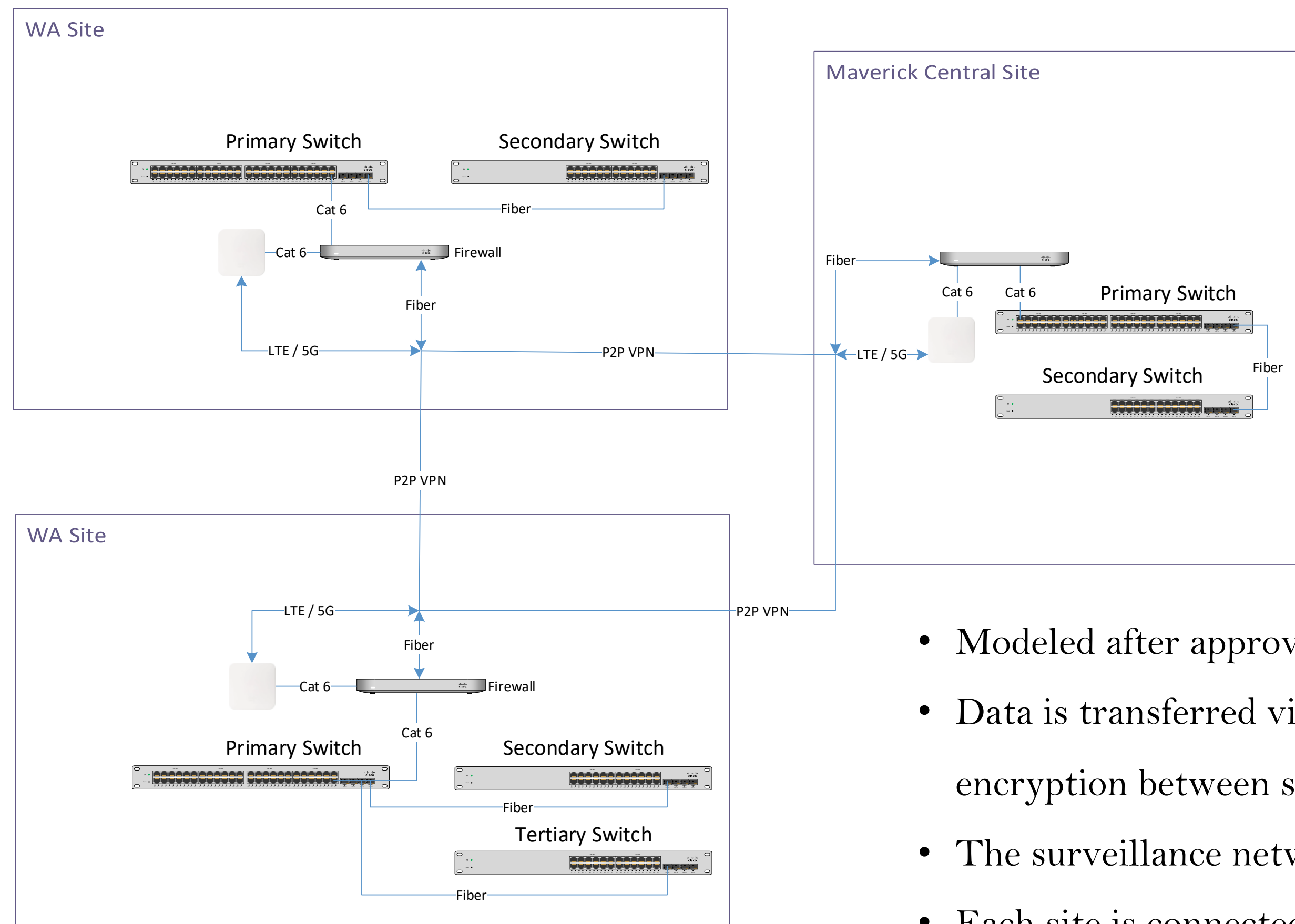
Network Topology

3



Centralized Networking Topology

The interconnected system will utilize a secure transmission line, firewalled and password-protected on both ends, ensuring encrypted video transmission that can only be terminated by the host location.



- Modeled after approved implementations in NV and CO
- Data is transferred via secure point to point tunnels utilizing 128bit encryption between site firewalls
- The surveillance network is restricted and isolated from other networks
- Each site is connected with fiber provided by local Telcos with cellular (LTE / 5G) redundancy

Conclusion

4



- A centralized surveillance room provides an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for guests and staff.
- A centralized surveillance monitoring system is designed to ensure that gaming is conducted in an honest, competitive, and safe environment.
- In the past, the need for separate surveillance systems was apparent. Separate systems provided additional functionality and security when systems were not capable of management from a central location. With today's digital IP systems, functionality has improved significantly. A single, networked system reduces cabling needs without restricting cabling distances.
- Video Management System (VMS) solutions can designate accesses and denials of feeds to users individually, at a central location or throughout a facility, from cameras all networked to the same system. Additionally, digital networks can provide added functionality.



- Integrated analytics create a searchable database of stored video and provide data on customer movement and behavior.
- Integrated IP surveillance systems provide more data, more capability, and more accuracy for casino surveillance and security operations than ever before.
- Surveillance systems and capabilities have drastically changed since the Washington Administrative Code was written. The WACs could not have addressed the capabilities as they are today.
- We propose to update the WACs to accommodate changes in technology and move Washington forward with centralized surveillance rooms.
- We look forward to continued conversations with WSGC and team. When those conversations reach the appropriate time, we will reach out to initiate rule making changes.



MAVERICK
SPORTS

THANK YOU



June 2, 2020

Chairwoman Sandra Douglass Morgan
Nevada Gaming Control Board
555 E. Washington Suite 2600
Las Vegas, Nevada 89101

Re: Maverick Gaming, LLC Request for Centralized Surveillance Room
– Amended from our May 29, 2020 submission to include Exhibit A

Dear Chairwoman Morgan,

We respectfully request approval to centralize our surveillance functions in our Red Lion Hotel and Casino (“Red Lion”) for all of our Northern Nevada properties, to include Wendover Nugget Hotel and Casino (“Nugget”), Red Garter Hotel and Casino (“Red Garter”), and Gold Country Inn Hotel and Casino (“Gold Country”).

The Nugget is the only property that falls within the requirements of Regulation 5 Surveillance Standard 2.010(8) of having a surveillance room being attended at all times. The Red Garter and Red Lion are a category “C” licensee and the Gold Country is a

category "D" therefore the surveillance rooms are not manned at all times, however we do have personnel that have a working knowledge and ability to operate the surveillance equipment and can provide immediate access to the secured surveillance rooms. Please see Exhibit A for property location specifics.

Our Nugget property had five (5) surveillance staff and a Director prior to the closure due to COVID-19. The Red Lion had a Surveillance Supervisor. The Red Garter and Gold Country, based on their close proximity to Nugget, and Red Lion, respectively, leveraged the staff at the Nugget and Red Lion.

With our proposed centralized surveillance team, we would have five (5) to six (6) surveillance staff and a Manager at the Red Lion that would be manned at all times. With Elko having a higher population than Wendover, we feel that we will be able to attract and retain more qualified surveillance staff at the Red Lion. Our Surveillance Director at the Nugget would be retained to handle the Nugget and Red Garter surveillance equipment and provide immediate access to Board agents when required. We also intend to train other members of the management team that will have working knowledge of the surveillance equipment. This will enable our teams at each property to facilitate investigations and NV GCB agent requests and provide immediate access to the surveillance room/area. Please see Exhibit A for employee specifics.

We submitted revised detailed Surveillance Plans for the Nugget, Red Lion, and Gold Country on May 28, 2020 to the Enforcement Division Operations Unit to address all Regulation 5 Surveillance Standard requirements.

We will submit a revised detailed Red Garter Surveillance Plan prior to reopening that property. We are using the closure period to improve the surveillance capabilities and coverage.

All of our properties have and will continue to have their own

totally functioning and operational surveillance systems and rooms/area. Our centralized surveillance room at the Red Lion will act as the main viewing area and have remote viewing for all properties.

Pursuant to Regulation 5 Surveillance Standard 12, this is accomplished through a secured transmission line that is firewalled and password protected on both ends. The video transmission is encrypted and can be terminated by the host location.

We understand that the following conditions for approval will be imposed and we are committed to complying with said conditions:

1. Our surveillance room, system and camera coverage is to be inspected and approved by the Enforcement Division prior to the centralization.
2. Our staffing levels within the centralized room will be maintained at the levels outlined in this request for approval.
3. Each property will maintain a fully functional surveillance system with the ability to monitor and record gaming activity as required by Regulation 5 Surveillance Standards.
4. Each property will have complete override capability to interrupt or shut down the remote surveillance to the Red Lion centralized room.
5. Board agents will be granted immediate access to the centralized room and to the other property surveillance rooms/area.

Please let us know if you have any questions or would like further clarification. We appreciate your consideration of this request.

Best regards,



Kim McCabe

SVP Compliance
702-677-1270

Cc: Enforcement Division Operations Unit
Michelle Campbell, Agent Enforcement Division
Brian McIntosh, Supervisor Enforcement Division
Ryan Sullivan, Special Agent Enforcement Division

Exhibit A

Property Location and Surveillance Employee Specifics:

The Wendover Nugget is located at 1225 Wendover Blvd. Wendover, NV. This property had four (4) surveillance staff, one(1) Supervisor and a Director prior to the closure due to COVID-19. With the centralization, the Nugget will consist of the Director and trained management staff to fill in when access is needed to the surveillance room. The training of the management team will begin the week of June 1, 2020.

The Red Garter is located at 1225 Wendover Blvd. Wendover, NV and relied on the staff at the Wendover Nugget. The Red Garter is 1.6 miles from the Nugget.

The Red Lion is located at 2065 Idaho Street, Elko, NV and had a Surveillance Supervisor. The centralized department will consist of five(5) to six (6) staff and a Manager. The existing Supervisor will be promoted to Manager and we will hire surveillance operators and technicians. We are in the process of recruiting for these positions. We will offer a transfer to some of the Nugget Surveillance staff that are willing to travel or move to Elko.

Gold Country is located at 2050 Idaho Street, Elko, NV and relied on the staff at Red Lion. Gold Country is 350 feet from the Red Lion.

The furthest property from the Red Lion is the Wendover Nugget, which is 107 miles.



STEVE SISOLAK
Governor

NEVADA GAMING CONTROL BOARD

1919 College Parkway, P.O. Box 8003, Carson City, Nevada 89702
555 E. Washington Avenue, Suite 2600, Las Vegas, Nevada 89101
3650 S. Pointe Circle, Suite 203, P.O. Box 31109, Laughlin, Nevada 89028
557 W. Silver Street, Suite 207, Elko, Nevada 89801
9790 Gateway Drive, Suite 100, Reno, Nevada 89521
750 Pilot Road, Suite I, Las Vegas, Nevada 89119

SANDRA D. MORGAN, *Chairwoman*
TERRY JOHNSON, *Member*
PHIL KATSAROS, *Member*

June 5, 2020

Las Vegas
(702) 486-2000
Fax: (702) 486-2045

Ms. Kim McCabe
Senior Vice President of Compliance
Red Lion Inn and Casino
2065 Idaho Street
Elko, Nevada 89801

Re: Correspondence #2020-C407
Surveillance Room Consolidation

Dear Ms. McCabe:

The Nevada Gaming Control Board has reviewed your correspondence received on June 2, 2020, requesting approval for a consolidated surveillance room.

According to your correspondence, the consolidated surveillance room will be located at Red Lion Inn and Casino to incorporate ongoing surveillance operations with Wendover Nugget Hotel and Casino, Red Garter Hotel and Casino, and Gold Country Inn and Casino.

Your consolidation request is approved, provided the following conditions are adhered to:

1. The surveillance room, system and camera coverage must be inspected and approved by the Enforcement Division after consolidation.
2. The consolidated room must maintain or exceed your current staffing levels.
3. All casino surveillance rooms must remain fully functional with the capability to monitor and record all gaming activity within the casinos. Additionally, all surveillance locations must have override capability to interrupt the remote surveillance location if needed.
4. Board agents must be granted immediate access 24 hours a day to the consolidated surveillance room and/or original surveillance rooms upon request.

Ms. Kim McCabe
Page 2

Further questions should be directed to the Enforcement Division's Operations Unit at 555 East Washington Avenue, Suite 2600, Las Vegas, Nevada 89101.

Sincerely,

A handwritten signature in cursive script that reads "Terry Johnson".

Terry Johnson, Esq.
Board Member

TJ/MC

cc: Sandra D. Morgan, Chairwoman
Phil Katsaros, Board Member
Enforcement (Las Vegas/Elko)
Audit Division
Tax and License Division
Records and Research Services



June 2, 2020

Chairwoman Sandra Douglass Morgan
Nevada Gaming Control Board
555 E. Washington Suite 2600
Las Vegas, Nevada 89101

Re: Maverick Gaming, LLC Request for Centralized
Surveillance Room – Amended from our May 29, 2020
submission to include Exhibit A

Dear Chairwoman Morgan,

We respectfully request approval to centralize our surveillance functions in our Red Lion Hotel and Casino (“Red Lion”) for all of our Northern Nevada properties, to include Wendover Nugget Hotel and Casino (“Nugget”), Red Garter Hotel and Casino (“Red Garter”), and Gold Country Inn Hotel and Casino (“Gold Country”).

The Nugget is the only property that falls within the requirements of Regulation 5 Surveillance Standard 2.010(8) of having a surveillance room

being attended at all times. The Red Garter and Red Lion are a category “C” licensee and the Gold Country is a category “D” therefore the surveillance rooms are not manned at all times, however we do have personnel that have a working knowledge and ability to operate the surveillance equipment and can provide immediate access to the secured surveillance rooms. Please see Exhibit A for property location specifics.

Our Nugget property had five (5) surveillance staff and a Director prior to the closure due to COVID-19. The Red Lion had a Surveillance Supervisor. The Red Garter and Gold Country, based on their close proximity to Nugget, and Red Lion, respectively, leveraged the staff at the Nugget and Red Lion.

With our proposed centralized surveillance team, we would have five (5) to six (6) surveillance staff and a Manager at the Red Lion that would be manned at all times. With Elko having a higher population than Wendover, we feel that we will be able to attract and retain more qualified surveillance staff at the Red Lion. Our Surveillance Director at the Nugget would be retained to handle the Nugget and Red Garter surveillance equipment and provide immediate access to Board agents when required. We also intend to train other members of the management team that will have working knowledge of the surveillance equipment. This will enable our teams at each property to facilitate investigations and NV GCB agent requests and provide immediate access to the surveillance room/area. Please see Exhibit A for employee specifics.

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We will submit a revised detailed Red Garter Surveillance Plan prior to reopening that property. We are using the closure period to improve the surveillance capabilities and coverage.

All of our properties have and will continue to have their own totally functioning and operational surveillance systems and rooms/area. Our centralized surveillance room at the Red Lion will act as the main viewing area and have remote viewing for all properties.

Pursuant to Regulation 5 Surveillance Standard 12, this is accomplished through a secured transmission line that is firewalled and password protected on both ends. The video transmission is encrypted and can be terminated by the host location.

We understand that the following conditions for approval will be imposed and we are committed to complying with said conditions:

1. Our surveillance room, system and camera coverage is to be inspected and approved by the Enforcement Division prior to the centralization.
2. Our staffing levels within the centralized room will be maintained at the levels outlined in this request for approval.
3. Each property will maintain a fully functional surveillance system with the ability to monitor and record gaming activity as required by Regulation 5 Surveillance Standards.
4. Each property will have complete override capability to interrupt or shut down the remote surveillance to the Red Lion centralized room.
5. Board agents will be granted immediate access to the centralized room and to the other property surveillance rooms/area.

Please let us know if you have any questions or would like further clarification. We appreciate your consideration of this request.

Best regards,



Kim McCabe
SVP Compliance
702-677-1270

Cc: Enforcement Division Operations Unit
Michelle Campbell, Agent Enforcement Division
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The furthest property from the Red Lion is the Wendover Nugget, which is 107 miles.

Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



This form must be completed in its entirety as a MS WORD document prior to submission for consideration. Submission must be made VIA EMAIL as an ATTACHMENT.

Date: 12/3/19
Casino: Z Casino
Prepared By: Tahsha Braning
Job Title: Internal Compliance Officer
Phone Number: 303-271-2526
Email: tbraning@jzscasino.com

| DIVISION USE ONLY | |
|--------------------|---------------------------|
| Reviewed by: | <u>Variance Committee</u> |
| Approved / Denied: | <u>APPROVED</u> |
| Variance Number: | <u>512</u> |
| Approved by: | <u>Variance Committee</u> |
| Date: | <u>12/3/2019</u> |
| Variance Expires: | <u>12/3/2022</u> |
| File Updated By: | <u>LP</u> |

Variance Request from ICMP...

ICMP Section Title: Surveillance
ICMP Section Number: 13
ICMP Sub-Section Title: C

Colorado Division of Gaming
Reserves the right to revoke or
amend this variance at any time

ICMP Wording:

{In this area, please copy/paste or type the ICMP wording affected by the variance request. If the variance affects an entire ICMP Section summarize the section addressed by the variance}

Regarding ICMP Section 13, Surveillance subsection C “The licensee must have a failure notification system that provides notification of any recording failure within 15 minutes. All recording failures must be addressed within one hour of system notification”, please consider the following as our plan for complying:

Colorado Division of Gaming

Internal Control Minimum Procedures (ICMP)

Variance Request Form



Variance Requested and Justification:

{Please draft the proposed internal control procedures by explaining the compensating control(s) and/or procedure(s) that will be implemented to replace the required outlined ICMP procedure(s) noted above. Also include a valid justification as to why the variance from the ICMP is necessary.}

- Z Casino will have the Security Team conduct surveillance equipment checks every half hour when the surveillance room is unmanned, and if the connection to Surveillance at Grand Z (Variance #7) fails. All recording failures must be addressed within one hour of system notification and all video losses, that are not a result of routine maintenance, that exceed 15 minutes for critical cameras or an hour on other required gaming cameras will be immediately reported to the Division.
- In addition, we would like to use a Tablet during slot drop in order to complete the half hour checks more efficiently.
 1. Tablet will be stored in the surveillance room when not in use
 2. Tablet will not have public access or access by anyone outside Z Casino
 3. Tablet will be password protected
 4. No other apps will be installed on the tablet other than the native OS system, apps that cannot be removed and the browser to check the IP address
 5. If for any reason equipment checks cannot be completed via the tablet the drop team will stop, lock up the carts and keys every thirty minutes and Security will physically complete the equipment checks
-

Z Casino does have a failure notification system in place that provides notification of any recording failure within 15 minutes but the room is unmanned at times. The system does not notify outside of the room.

Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



This form must be completed in its entirety as a MS WORD document prior to submission for consideration. Submission must be made VIA EMAIL as an ATTACHMENT.

Date: 12/3/19
Casino: Z Casino
Prepared By: Tahsha Braning
Job Title: Internal Compliance Officer
Phone Number: 303-271-2526
Email: tbraning@jzscasino.com

| DIVISION USE ONLY | |
|--------------------------|-------------------|
| Reviewed by: | <u>Neely</u> |
| Approved / Denied: | <u>Approved</u> |
| Variance Number: | <u>517</u> |
| Approved by: | <u>Neely</u> |
| Date: | <u>11/15/2019</u> |
| Variance Expires: | <u>11/15/2020</u> |
| File Updated By: | <u>LP</u> |

| Variance Request from ICMP... | |
|--------------------------------------|---------------------|
| ICMP Section Title: | <u>Surveillance</u> |
| ICMP Section Number: | <u>13</u> |
| ICMP Sub-Section Title: | <u>C</u> |

Colorado Division of Gaming
Reserves the right to revoke or
amend this variance at any time

| ICMP Wording: |
|---|
| <p><i>{In this area, please copy/paste or type the ICMP wording affected by the variance request. If the variance affects an entire ICMP Section summarize the section addressed by the variance}</i></p> <p>Regarding ICMP Section, Surveillance subsection C "The licensee must have a failure notification system that provides notification of any recording failure within 15 minutes. All recording failures must be addressed within one hour of system notification."</p> |

Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



Variance Requested and Justification:

{Please draft the proposed internal control procedures by explaining the compensating control(s) and/or procedure(s) that will be implemented to replace the required outlined ICMP procedure(s) noted above. Also include a valid justification as to why the variance from the ICMP is necessary.}

Requested Variance:

Z Casino will have the Grand Z Surveillance operator conduct Surveillance equipment checks every half hour when the surveillance room at Z Casino is unmanned. All recording failures must be addressed within one hour of system notification and all video losses, that are not a result of a routine maintenance, that exceed 15 minutes for critical cameras or an hour on other required gaming cameras will be immediately reported to the Division.

Justification:

Z Casino does have a failure notification system in place that provides notification of any recording failure within 15 minutes but currently the Security Team conducts the equipment checks every half hour. Allowing the Operator at the Grand Z to monitor the failure notification system for Z Casino would allow failures to be addressed sooner rather than later.

If the connection between Grand Z Casino and Z Casino fails, and the Grand Z surveillance operator is unable to monitor the failure notification system, Z Casino staff will follow procedures outlined in Variance # 8.

Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



This form must be completed in its entirety as a MS WORD document prior to submission for consideration. Submission must be made VIA EMAIL as an ATTACHMENT.

Date: 12/3/19
Casino: Grand Z Casino
Prepared By: Tahsha Braning
Job Title: Internal Compliance Officer
Phone Number: 303-271-2526
Email: tbraning@jzscasino.com

| DIVISION USE ONLY | |
|---------------------------|-------------------|
| Reviewed by: | <u>Neely</u> |
| Approved / Denied: | <u>Approved</u> |
| Variance Number: | <u>713</u> |
| Approved by: | <u>Neely</u> |
| Date: | <u>11/15/2019</u> |
| Variance Expires: | <u>11/15/2020</u> |
| File Updated By: | <u>LP</u> |

| Variance Request from ICMP... | |
|--------------------------------------|---------------------|
| ICMP Section Title: | <u>Surveillance</u> |
| ICMP Section Number: | <u>13</u> |
| ICMP Sub-Section Title: | <u>C</u> |

**Colorado Division of Gaming
Reserves the right to revoke or
amend this variance at any time**

| ICMP Wording: |
|---|
| <p><i>{In this area, please copy/paste or type the ICMP wording affected by the variance request. If the variance affects an entire ICMP Section summarize the section addressed by the variance}</i></p> <p>Regarding ICMP Section, Surveillance subsection C "The licensee must have a failure notification system that provides notification of any recording failure within 15 minutes. All recording failures must be addressed within one hour of system notification."</p> |

Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



Variance Requested and Justification:

{Please draft the proposed internal control procedures by explaining the compensating control(s) and/or procedure(s) that will be implemented to replace the required outlined ICMP procedure(s) noted above. Also include a valid justification as to why the variance from the ICMP is necessary.}

Requested Variance:

Z Casino will have the Grand Z Surveillance operator conduct Surveillance equipment checks every half hour when the surveillance room at Z Casino is unmanned. All recording failures must be addressed within one hour of system notification and all video losses, that are not a result of a routine maintenance, that exceed 15 minutes for critical cameras or an hour on other required gaming cameras will be immediately reported to the Division.

Justification:

Z Casino does have a failure notification system in place that provides notification of any recording failure within 15 minutes but currently the Security Team conducts the equipment checks every half hour. Allowing the Operator at the Grand Z to monitor the failure notification system for Z Casino would allow failures to be addressed sooner rather than later.

If the connection between Grand Z Casino and Z Casino fails, and the Grand Z surveillance operator is unable to monitor the failure notification system, Z Casino staff will follow procedures outlined in Variance # 8.

From: [Vicki Christophersen](#)
To: [McGregor, Bill \(GMB\)](#); [Griffin, Tina \(GMB\)](#); [Mentzer, Damon \(GMB\)](#); [Eric Persson](#); [Kim McCabe](#); [Phyllis Erney](#); [Davies, Brooke](#)
Subject: Centralized surveillance follow up
Date: Monday, February 5, 2024 7:08:24 AM
Attachments: [Proposed components of rule set authorizing centralized surveillance.pdf](#)

External Email

Good morning,

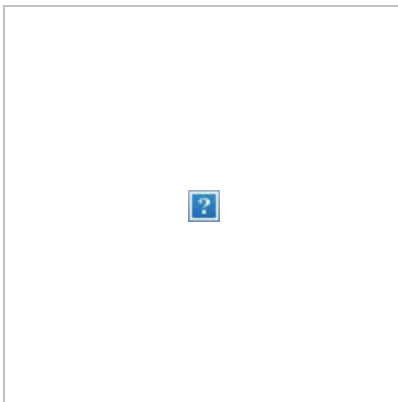
Consistent with recent discussions and per your request we are sending here an outline of the components of a rule set for centralized surveillance.

The attached outline represents the components that we believe need to be part of an effective regulatory structure for centralized surveillance. Should the commission authorize our petition and open rule making we look forward to working collaboratively with you to draft proposed rule language.

Thanks!



Vicki Christophersen
Christophersen Inc.
www.christopherseninc.com
360.485.2026



Proposed components of rule set authorizing centralized surveillance

1. Qualifications
 - a. Operator with more than one licensed cardroom
 - b. Define coverage requirement criteria
2. Location of the Centralized Surveillance Operations
 - a. Potential establishment of requirements regarding proximity WSGC office
 - b. Security requirements
3. Network Security and Requirements
 - a. Symmetrical Internet Service with a fiber connection
 - b. An SD WAN capable firewall and managed switches capable of network segregation and fiber connectivity.
4. Connectivity
 - a. Requirement for 24/7 WSGC Connection for live viewing capabilities, at operator's expense
5. Licensing construction
 - a. Part of the current cardroom license vs. separate entity license
6. Staffing issues
 - a. Minimum Staffing Requirements
 - b. Licensing of Surveillance Operators and Management;
7. Access to onsite surveillance rooms at the card rooms
8. Reporting requirements
 - a. lines of Centralized Operations to an independent Executive of the cardroom owner;
9. Enforcement
 - a. Each individual cardroom responsible party – citations apply to each individual cardroom.



Rule Petition to Amend

December 9, 2024 – Initiate Rule Making

| | |
|---|-------------------------------------|
| Tab 5: January 2025 Commission Meeting Agenda | Statutory Authority 9.46.070 |
| Who Proposed the Rule Change? | |
| Maximian Ust | |
| Background | |
| <p>Petitioner Maximian Ust is requesting to restrict or amend rules aimed at advertisements for sports wagering to the public. The petitioner states that gambling advertisements can advertise however they want wherever they want in Washington. The petitioner also states that these relentless advertisements (who focus on getting younger males to gamble) is enticing former gambling addicts and creating a new generation of gamblers.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Petition received December 5, 2024. | |
| Policy Considerations | |
| <p>Currently, only our tribal partners are authorized to offer sports betting by entering into a compact with the state– see RCW 9.46.360: Indian tribes—Compact negotiation process. and RCW 9.46.0364: Sports wagering authorized. The Washington State Gambling Commissioners are limited to act within current law and compact.</p> | |
| Staff Recommendation | |
| <p>Under the requirements of the Administrative Procedures Act, the Commission must act on a petition within 60 days of receiving it. Your options are:</p> <ul style="list-style-type: none"> • Initiate rule making proceedings by filing the rule as proposed for further discussion or Deny the petition in writing, (a) stating the reasons for denial and specifically address the concerns stated in the petition, or (b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. | |

Gullion, Tricia (GMB)

From: Washington State Gambling Commission <no-reply@wsgc.wa.gov>
Sent: Monday, December 2, 2024 1:58 PM
To: Rules Coordinator (GMB)
Subject: Webform submission from: Request a rule change

External Email

Submitted on December 2, 2024 - 1:57pm

Submitted by: Anonymous

Submitted values are:

Petitioner's Name

Maximian Ust

Address

15025 SE Fairwood BLVD
Renton, WA. 98059

Phone

[2065734808](tel:2065734808)

Email

ustm@cwu.edu

Rule Petition Type

New Rule - I am requesting WSGC to adopt a new rule.

New Rule Selection Function

Subject or purpose of the rule

Is to limit the way that Sports gambling companies can advertise to the public.

The rule is needed because

Gambling advertisements are able to advertise however they want wherever they want in Washington. These relentless advertisements (who focus on getting younger males to gamble) is enticing former gambling addicts and creating a new generation of gamblers.

The effect of this rule change will be

Prevent gambling website's ads be shown during live sporting events, Disallow celebrity endorsements, Prevent slogans such as "Risk free bet".



Rule Petition to Amend

December 9, 2024 – Initiate Rule Making

| | |
|--|-------------------------------------|
| Tab 6: January 2025 Commission Meeting Agenda | Statutory Authority 9.46.070 |
| | |
| Who Proposed the Rule Change? | |
| Stephen McNulty | |
| Background | |
| <p>Petitioner Stephen McNulty is requesting to increase the number of eligible tables in a poker tournament from 15 to 50. The petitioner states that this would accommodate larger tournament fields so that players in Washington State do not need to drive numerous hours in order to play in larger tournaments with better structures than are currently available in the state of Washington. Petitioner also adds that reduction in costs for citizens, increase in total prize pool giving them a better return on their investment, happier patrons of our local Washington card rooms, increased tax revenue for the state of Washington, better safety for the citizens that play poker in Washington.</p> <p>Attachments:</p> <ul style="list-style-type: none"> • Petition received December 5, 2024. • Email correspondence addressing RCW 9.46.0285 limits on poker tables per establishment | |
| Policy Considerations | |
| <p>Currently, RCW 9.46.0285 addresses the number of tables authorized shall not exceed fifteen separate tables per establishment.</p> | |
| Staff Recommendation | |
| <p>Under the requirements of the Administrative Procedures Act, the Commission must act on a petition within 60 days of receiving it. Your options are:</p> <ul style="list-style-type: none"> • Initiate rule making proceedings by filing the rule as proposed for further discussion or Deny the petition in writing, (a) stating the reasons for denial and specifically address the concerns stated in the petition, or (b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. | |

Gullion, Tricia (GMB)

From: WSPT Shark Cage <wspt.sharkcage@gmail.com>
Sent: Monday, December 9, 2024 1:43 PM
To: Gullion, Tricia (GMB)
Subject: Re: Webform submission from: Request a rule change

External Email

Thank you Tricia. I have submitted an email to my state legislatures as well. I would still like to keep this on the agenda for January 9th to keep it visible for the commission.

If there is any other way I can be involved in the process I would relish the opportunity.

Thank you,

Steve

On Mon, Dec 9, 2024 at 10:39 AM Gullion, Tricia (GMB) <tricia.gullion@wsgc.wa.gov> wrote:

Dear Stephen,

My name is Tricia Gullion and I'm the Legislative and Rules Manager. Thank you for your email regarding a rule change to poker tables.

Currently, the number of eligible tables in poker tournaments is set by [RCW 9.46.0282: "Social card game."](#) The Washington State Gambling Commissioners do not have the authority to change the law and increase the number of poker tables.

If you would like to explore changing the law, I would suggest contacting your state legislators with your concerns. You can look up your legislators here: <https://leg.wa.gov/legislators/>

With that context, your rule petition will be heard at the regular commission meeting on January 9 if you wish to proceed. However, given the information above, it is unlikely that the commissioners will be able to take the action you proposed. Therefore, if you would like to withdraw your petition, please reply to this email indicating that you wish to withdraw.

Alternatively, if you have any proposed rule language that you would like to bring forward, please submit that to us for further consideration.

Thank you for reaching out and please let me know if you have any questions.

Best,



Tricia Gullion

Legislative and Rules Manager

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

Mobile: [\(360\) 800-7285](tel:3608007285)
Email: Tricia.Gullion@wsgc.wa.gov
Web: WSGC.wa.gov

PO Box 42400
Olympia, WA 98504-2400

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

Sent: Friday, December 6, 2024 3:47 PM

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

Subject: Webform submission from: Request a rule change

External Email

Submitted on December 6, 2024 - 3:46pm

Submitted by: Anonymous

Submitted values are:

Petitioner's Name

Stephen McNulty

Address

20814 23rd Ave SE
Bothell, WA. 98021

Phone

[4257701155](tel:4257701155)

Email

WSPT.SharkCage@gmail.com

Rule Petition Type

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

Amend Rule Selection Function

I am requesting the following change

To increase the number of eligible tables in a poker tournament from 15 to 50.

This change is needed because

To accommodate larger tournament fields so that players in Washington State do not need to drive numerous hours in order to play in larger tournaments with better structures than are currently available in the state of Washington.

The effect of this rule change will be

Reduction in costs for citizens, increase in total prize pool giving them a better return on their investment, happier patrons of our local Washington card rooms, increased tax revenue for the state of Washington, better safety for the citizens that play poker in Washington.

--

WSPT Board of Directors

[WSPT Facebook Page](#)

[WSPT Webpage](#)



Rule Petition to Amend WAC 230-15-135
Wagering limits for card games

January 2025 –Initiate Rule Making

| | |
|---|-------------------------------------|
| Tab 7: January 2025 Commission Meeting Agenda. | Statutory Authority 9.46.070 |
| Who Proposed the Rule Change? | |
| Stephen Jackson | |
| Background | |
| <p>The petitioner would like to increase the poker single wager limits in Class F and House Banked Cardrooms from 300 to 400 dollars. The petitioner stated that the Commission is unwilling to remove the betting caps altogether, as noted in the July 2024 meeting. This petitioner asks the Commission to raise the betting caps to \$400 to be in line with the betting limits of house-banked card games. See WAC 230-15-140(1). Additionally, the petitioner added that this change gives poker parity with other games.</p> <p>WAC 230-15-135 currently states: Wagering limits for nonhouse-banked card games. Card room licensees must not exceed these wagering limits:</p> <p>(1) Poker -</p> <p>(a) There must be no more than five betting rounds in any one game; and</p> <p>(b) There must be no more than four wagers in any betting round, for example, the initial wager plus three raises; and</p> <p>(c) The maximum amount of a single wager must not exceed forty dollars; however, Class F and house-banked card game licensees may offer a single wager not to exceed three hundred dollars;</p> | |
| <p>Attachments:</p> <ul style="list-style-type: none"> Petition received December 9, 2024. | |
| Policy Considerations | |
| <p>The proposed rule change is a policy decision. The Commission may wish to consider if the proposal is consistent with the legislative intent expressed in RCW 9.46.010.</p> | |
| Staff Recommendation | |
| <p>Under the requirements of the Administrative Procedures Act, the Commission must act on a petition within 60 days of receiving it. Your options are:</p> <ul style="list-style-type: none"> Initiate rule-making proceedings by filing the rule as proposed for further discussion or Deny the petition in writing, (a) stating the reasons for the denial and specifically addressing the concerns stated in the petition, or (b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. | |

Gullion, Tricia (GMB)

Subject: FW: Webform submission from: Request a rule change

-----Original Message-----

From: Stephen Jackson <swjaxon@gmail.com>
Sent: Tuesday, December 10, 2024 10:05 AM
To: Gullion, Tricia (GMB) <tricia.gullion@wsgc.wa.gov>
Subject: Re: Webform submission from: Request a rule change

External Email

Ms. Gullion,

Thank you for the response. The requested change is correct. I was curious if it is possible to join the January meeting virtually.

Thank you again,
Stephen

On Mon, 9 Dec 2024 at 16:13, Gullion, Tricia (GMB) <tricia.gullion@wsgc.wa.gov> wrote:

>

> Dear Stephen,

Thank you for submitting a rule change request. My name is Tricia Gullion and I am the Legislative and Rules Manager for the Gambling Commission and I will be working on your request.

I wanted to confirm your request in the WAC language below. I understand you're requesting a change to WAC 230-15-135 (Wagering limits for nonhouse-banked card games) to increase the wager one can make from \$300 to \$400.

WAC 230-15-135(1)(a)-(c)

currently states:

Card room licensees must not exceed these wagering limits:

(1) Poker –

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

(b) There must be no more than four wagers in any

betting round, for example, the initial wager plus three raises; and

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

This request will be heard at the next Commission meeting on January 9, 2025. Please let me know if you have any questions or concerns.

Thanks and have a good day,

Tricia Gullion

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

Sent: Monday, December 9, 2024 2:20 PM

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

Subject: Webform submission from: Request a rule change

> External Email

> Submitted on December 9, 2024 - 2:19pm

> Submitted by: Anonymous

> Submitted values are:

> Petitioner's Name

> Stephen Jackson

> Address

> 1211 Falls Drive

> Bellingham, WA. 98229

Phone

> 7024032243

> Email

> swjaxon@gmail.com

> Rule Petition Type

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

Amend Rule Selection Function

List rule number (WAC) if known

WAC 230-15-135

I am requesting the following change

Amending WAC 230-15-135(1)(c) to read as follows: "The maximum amount of a single wager must not exceed forty dollars; however, Class F and house-banked card game licensees may offer a single wager not to exceed four hundred dollars[.]"

This change is needed because The Commission is unwilling to remove the betting caps altogether, as noted in the July 2024 meeting. This petition asks the Commission to raise the betting caps to \$400 to be in line with the betting limits of house-banked card games. See WAC 230-15-140(1). This change gives poker parity with other games.

The effect of this rule change will be Increasing the betting cap from \$300 to \$400 in poker games.



Washington State Gambling Commission

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

January 9, 2025

TO: COMMISSIONERS

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

EX OFFICIO MEMBERS

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

FROM: Tricia Gullion, Legislative & Rules Manager

SUBJECT: January 2025 LEGISLATIVE UPDATE

The Legislature's long, 105-day session begins on Monday, January 13. The Commission has one agency-request bill for this session requesting a public records exemption. This legislation would exempt the proprietary financial and security information of our Tribal partners and licensees to keep financial documents, independent auditor reports and supporting documents of house-banked licensees and Tribal partner gaming facilities secure.

Based on the adopted cutoff calendar, the expected deadlines for this year's legislative process are as follows:

| CUTOFF DATES | |
|---------------------------|--|
| Monday, January 13, 2025 | Session Begins |
| Tuesday, February 4, 2025 | Law & Justice Day |
| Friday, February 21, 2025 | Policy Committee Cutoff |
| Friday, February 28, 2025 | Fiscal Policy Cutoff |
| Wednesday, March 12, 2025 | House of Origin Cutoff |
| Wednesday, April 2, 2025 | Opposite Chamber Policy Committee Cutoff |
| Tuesday, April 8, 2025 | Opposite Chamber Fiscal Policy Cutoff |
| Wednesday, April 16, 2025 | Opposite Chamber Cutoff |
| Sunday, April 27, 2025 | SINE DIE |

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

P.O. Box 42400
Olympia, WA 98504
360-486-3440

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



Washington State Gambling Commission

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

The Senate committee handling gambling issues will continue to be the Senate Committee on Business, Financial Services, Gaming, and Trade this coming session. For 2025 in the House of Representatives, it will now be the Committee on State Government and Tribal Relations. Members of the respective committees are as follows:

| Business, Financial Services, & Trade | State Government and Tribal Relations |
|---|---|
| Claudia Kauffman (D) 47th LD, Chair | Sharlett Mena (D) – 29th LD, Chair |
| Adrian Cortes (D) – 18th LD, Vice-Chair | Chris Stearns (D) – 47th LD, Vice Chair |
| Perry Dozier (R) – 16th LD, Ranking | Kevin Waters (R) – 17th LD, Ranking |
| Phil Fortunato (R) – 31st LD | Jim Walsh (R) – 19th LD, Asst. Ranking |
| Jim McCune (R) – 2nd LD | Rob Chase (R) – 4th LD |
| Bob Hasegawa (D) – 11th LD | TBD |
| John Lovick (D) – 44th LD | TBD |
| Derek Stanford (D) – 1st LD | TBD |
| Jeff Wilson (R) – 19th LD | |

Finally, the legislature is facing a significant budget deficit over the next two biennia. In previous situations, the legislature has swept the gambling revolving account. If this were to occur during this legislative session, the result could prevent the implementation of our much-needed IT system upgrade. We have started reaching out to lawmakers to make them aware of this project and to ask them to safeguard this fund when addressing budget needs during the legislative session.

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

P.O. Box 42400
Olympia, WA 98504
360-486-3440

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



Washington State Gambling Commission

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

January 9, 2025

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

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

FROM: **Adam Amorine, Legal Manager**

SUBJECT: **Defendant in rem, CR 2024-01808**
Final Order – January 9, 2025, Commission Meeting

On October 24, 2024, Snohomish County Superior Court Judge Marybeth Dingley authorized issuance of a search warrant (No. 2024-0831-31) requested by a Special Agent of the Washington State Gambling Commission (WSGC) following an investigation into an illegal gambling machine (coin pusher) located at Lucky's Market in Vancouver, Washington.

WSGC Special Agents began their investigation after receiving an anonymous tip regarding the existence of a Silver Fall coin pusher located inside of Lucky's Market located at 3200 E. Fourth Plain Blvd, Vancouver, Washington, 98661. WSGC Special Agents confirmed the existence of the machine during ensuing visits to Lucky's Market. Additionally, a WSGC Special Agent confirmed the game was illegal by risking \$2.00 in US currency by placing the money in the coin-pusher and received \$.50 in US Currency in return. The Special Agent used the quarters to play a game of chance that was beyond their control and with the understanding that they would receive something of value in the event of a certain outcome. Based on this investigation, WSGC Special Agents established probable cause existed for violations of RCW 9.46.221, professional gambling in the second degree, and RCW 9.46.215, ownership or interest in a gambling device.

On October 29, 2024, WSGC Special Agents executed the search warrant at Lucky's Market. Upon arrival, WSGC Special Agents contacted the cashier/employee and informed them that they were there to seize an illegal gambling machine/coin pusher located inside of the business. A copy of the search warrant was provided to store owners Aaryan Tran and Anna Ngo. Both Tran and Ngo stated that they did not know the machine was illegal. WSGC Special Agents seized the machine and the currency within, which amounted to \$3,273.64.

WSGC Special Agents provided both Tran and NGO Notices of Seizure and Intended Forfeiture ("Notice"). These Notices stated that the Silver Fall Coin Pusher and currency within (\$3,273.64) were seized pursuant to RCW 9.46.231. The Notice informed them that

they have a right to a hearing regarding the forfeiture. It informed them that to initiate the hearing procedure he must notify the agency of his claim of ownership or right of possession of the seized property within 45 days of the date of the seizure. The Notice also informed them that failure to notify the Washington State Gambling Commission of a claim of ownership or right to possession within 45 days of the date of the seizure will result in forfeiture of the seized property. The Notice identified the 45-day due date as December 13, 2024.

As of December 13, 2024, no response regarding the seized property was timely made. Therefore, the purpose of this Final Order of Forfeiture before the Commissioners is to complete the process with final agency action and find that the coin pushing machine and \$3,273.64 in funds are forfeited to the Washington State Gambling Commission.

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BEFORE THE WASHINGTON STATE GAMBLING COMMISSION

| | |
|---|---|
| In re the forfeiture of: \$3,273.64 U.S. Currency and a Silver Fall Coin Pusher, Defendant <i>in rem</i> , Washington State Gambling Commission, Seizing Agency. | NO. CR 2024-01808 FINAL ORDER OF AUTOMATIC FORFEITURE (no claim filed) |
|---|---|

I. FINDINGS OF FACT

1. On October 24, 2024, Snohomish County Superior Court Judge Marybeth Dingley authorized issuance of a search warrant (No. 2024-0831-31) requested by a Special Agent of the Washington State Gambling Commission (WSGC) following an investigation into an illegal gambling machine (coin pusher) located at Lucky’s Market in Vancouver, Washington.
2. Based on the investigation, probable cause existed to believe the following violations had occurred:
 - a. Professional gambling in the second degree, RCW 9.46.221;
 - b. Ownership or interest in Gambling Device, RCW 9.46.215;
3. WSGC Special Agents began their investigation after receiving an anonymous tip regarding the existence of a Silver Fall coin pusher located inside of Lucky’s Market located at 3200 E. Fourth Plain Blvd, Vancouver, Washington, 98661.

1 4. In October 2024, a WSGC Special Agent traveled to Lucky's Market and located
2 the coin pusher in the corner of the store assessable to customers. The Special Agent proceed to
3 place quarters in the coin pushing machine and confirmed the machine was a game of chance.
4 The Special Agent risked \$2.00 in US currency by placing the money in the coin-pusher and
5 received \$.50 in US Currency in return. The Special Agent used the quarters to play a game of
6 chance that was beyond their control and with the understanding that they would receive
7 something of value in the event of a certain outcome.

8 5. On October 29, 2024, WSGC Special Agents executed the search warrant at
9 Lucky's Market. Upon arrival, the business was open for business. WSGC Special Agents
10 contacted the cashier/employee and informed them that they were there to seize an illegal
11 gambling machine/coin pusher located inside of the business. A copy of the search warrant was
12 provided and the cashier/employee contacted the store owners Aaryan Tran and Anna Ngo.

13 6. Aaryan Tran and Anna Ngo arrived shortly after and were provided a copy of the
14 search warrant. Tran provided a key for the coin pushing machine and the Special Agents began
15 inventorying the contents. The contents included a large number of coins (U.S. Currency) and
16 several toys. The total amount of quarters and coins came to \$3,273.64. Both Tran and Ngo
17 stated that they did not know the coin pushing machine was illegal.

18 7. WSGC Special Agents provided both Tran and NGO Notices of Seizure and
19 Intended Forfeiture ("Notice"). These Notices stated that the Silver Fall Coin Pusher and
20 currency within (\$3,273.64) were seized pursuant to RCW 9.46.231. The Notice informed them
21 that they have a right to a hearing regarding the forfeiture. It informed them that to initiate the
22 hearing procedure he must notify the agency of his claim of ownership or right of possession of
23 the seized property within 45 days of the date of the seizure. The Notice also informed them that
24 failure to notify the Washington State Gambling Commission of a claim of ownership or right
25 to possession within 45 days of the date of the seizure will result in forfeiture of the seized
26 property. The Notice identified the 45-day due date as December 13, 2024.

1 **II. CONCLUSIONS OF LAW**

2 1. Under RCW 9.46.231(1)(f), all personal property, proceeds, or assets acquired in
3 whole or in part with proceeds traceable to professional gambling activity and all moneys,
4 negotiable instruments, and securities used or intended to be used to facilitate any violation of
5 the Gambling Act is subject to seizure and forfeiture and no property right exists in them.

6 2. Pursuant to RCW 9.46.231(2)(a), a law enforcement officer may seize personal
7 property incident to a search under a search warrant.

8 3. RCW 9.46.231(3) requires the agency under whose authority the seizure was
9 made to serve notice within 15 days following the seizure on the owner of the property seized
10 and any person having any known right or interest in the property. In the case of personal
11 property, RCW 9.46.231(3) provides that the notice may be served by any method authorized by
12 law or court rule.

13 4. RCW 9.46.231(4) states in relevant part:

14 If no person notifies the seizing law enforcement agency in writing
15 of the person’s claim of ownership or right to possession of [the
16 property seized] within forty-five days of the seizure in the case
of personal property . . . the item seized is deemed forfeited.

17 5. The Commission’s Special Agent obtained and executed the search warrant based
18 on probable cause of criminal offenses of the Gambling Act and general criminal offenses that
19 have a connection to gambling activities, specifically RCW 9.46.221 and RCW 9.46.215.

20 6. The seizure occurred on October 29, 2024, when the search warrant was executed.
21 Execution of the warrant resulted in WSGC Special Agents seizing a Silver Fall Coin Pusher
22 and the currency within (\$3,273.64) pursuant to RCW 9.46.231. Special Agents personally
23 served Notice of Seizure and Intended Forfeiture (“Notice”) of the above property to Aaryan
Tran and Anna Ngo. Thus, notice was served within 15 days following the seizure.

24 7. Because the seizure occurred on October 29, 2024, Aaryan Tran and Anna Ngo
25 had until December 13, 2024 (the forty-fifth day following the seizure) to notify the Commission
26 in writing of a claim of ownership or right to possession of the seized property. Neither Aaryan

1 Tran or Anna Ngo submitted a written claim or request a hearing. Failure to submit a written
2 claim within 45 days of the seizure caused the seized property to be summarily forfeited to the
3 state.

4 8. RCW 34.05.440(1) provides that a party's failure to file an application for an
5 adjudicative proceeding with the time period set forth in RCW 9.46.231 constitutes a default and
6 results in the loss of that party's right to an adjudicative proceeding, and the agency may proceed
7 to resolve the case without further notice to, or hearing for the benefit of, that party, except that
8 any default or other dispositive order affecting that party shall be served upon him or her or upon
9 his or her attorney, if any.

10 **III. FINAL ORDER OF FORFEITURE**

11 Based on the foregoing findings and conclusions, it is ORDERED that any right, title,
12 and interest to the above-referenced seized property by any person is FORFEITED to the
13 Washington State Gambling Commission. The Washington State Gambling Commission is the
14 sole entity entitled to and vested with the right, title, and interest of the Silver Fall Coin Pusher
15 and the \$3,273.64 U.S. Currency seized on October 29, 2024.

16 ENTERED this ____ day of _____, 2025.

17
18 _____
ALICIA LEVY, Chair

BUD SIZEMORE, Vice Chair

19
20 _____
MICHAEL CHARLES

ANDERS IBSEN

21
22
23 _____
SARAH LAWSON

24
25
26 NOTICE: RECONSIDERATION
Pursuant to the provisions of RCW 34.05.470 and WAC 230-17-140 you may file a petition for
reconsideration with the Commission within ten (10) days from the date this final order is

1 served upon you. Any request for reconsideration must state the specific grounds for the relief
2 requested. Petitions must be delivered or mailed to the Washington State Gambling
Commission, P.O. Box 42400, Olympia, WA 98504-2400.

3 NOTICE: PETITION FOR JUDICIAL REVIEW

4 You have the right to appeal this final order to superior court, pursuant to the petition for
judicial provisions of RCW 34.05.542. Any petition for judicial review of this final order must
5 be filed with the court and also served upon both the Commission and the Office of the
Attorney General within thirty (30) days after the date this final order is served upon you.

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

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

2 Washington State Gambling Commission
3 Legal and Records Division
4 4565 7th Avenue S.E., Lacey, WA
5 P.O. Box 42400
6 Olympia, WA 98504-2400

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

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12 **CERTIFICATE OF SERVICE**

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

15
16 LUCKY'S MARKET
17 ATTN: AARYAN TRAN AND ANNA NGO
18 3200 E. FOURTH STREET
19 VANCOUVER, WA 98661

20 EXECUTED this ____ day of January, 2025, at Lacey, Washington.

21 _____
22 Damon Metzger
23 Administrative Assistant
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