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Gambling Commission  
Comm. & Legal Division

STATE OF WASHINGTON  
GAMBLING COMMISSION

In the Matter of the Revocation of the )  
License to Conduct Gambling ) NO. CR 2014-00698  
Activities of: )  
)  
Ryan M. Lawrence ) **SETTLEMENT ORDER**  
Tacoma, Washington, )  
)  
Licensee. )  
\_\_\_\_\_ )

The Director of the Washington State Gambling Commission and the licensee, Ryan M. Lawrence, agree to this Settlement Order to resolve the administrative charges pending against him. Gregory J. Rosen, Assistant Attorney General, and Arlene Dennistoun, Staff Attorney, represent the Gambling Commission. Mr. Lawrence represents himself.

I.

The Washington State Gambling Commission issued Ryan M. Lawrence the following license: Number 68-28968, authorizing Card Room Employee activity.

The license expires on December 4, 2014, and was issued subject to Mr. Lawrence's compliance with state gambling laws and rules.

II.

On May 6, 2014, Ryan M. Lawrence was served with the Notice of Administrative Charges. On May 16, 2014, he requested an Administrative Hearing on his revocation proceedings.

III.

**SUMMARY:**

Mr. Lawrence took chips and cash while dealing poker at The Hideaway, and was observed on surveillance video doing so. Mr. Lawrence said he took between \$200 and \$400.

**VIOLATIONS:**

1) **RCW 9.46.075** provides the commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the licensee: (The following subsections apply.)

(1) Has violated, failed or refused to comply with the provisions, requirements, conditions, limitations or duties imposed by chapter 9.46 RCW and any amendments thereto, or any rules adopted by the commission pursuant thereto, or when a violation of any provision of chapter

9.46 RCW, or any commission rule, has occurred upon any premises occupied or operated by any such person or over which he or she has substantial control;

(8) Fails to prove, by clear and convincing evidence, that he is qualified in accordance with the provisions of this chapter; and

(10) Has pursued economic gain in an occupational manner or context which is in violation of the criminal or civil policy of this state if such pursuit creates probable cause to believe that the participation of such person in gambling activities would be inimical to the proper operation of an authorized gambling or related activity in this state.

**2) WAC 230-03-085** provides that the Commission may deny, suspend or revoke a license when the holder:

(The following subsections apply.)

(1) Commits any act that constitutes grounds under RCW 9.46.075 for revoking a license, or commits any other act that the Commission determines constitutes a sufficient reason in the public interest for revoking a license; and

(8) Poses a threat to the effective regulation of gaming or increases the likelihood of unfair or illegal practices, methods, and activities in the conduct of gaming activities, as demonstrated by:

(a) prior activities.

**3) RCW 9.46.196** defines cheating:

(The following subsections apply.)

“Cheating,” as used in this chapter, means to:

(1) Employ or attempt to employ any device, scheme, or artifice to defraud any other participant or any operator;

(2) Engage in any act, practice, or course of operation as would operate as a fraud or deceit upon any other participant or any operator.

**4) RCW 9.46.1961** provides:

(The following subsections apply.)

(1) A person is guilty of cheating in the first degree if he or she engages in cheating and

(b): Holds a license or similar permit issued by the state of Washington to conduct, manage, or act as an employee in an authorized gambling activity.

(2) Cheating in the first degree is a class C felony subject to the penalty set forth in RCW 9A.20.021. In addition to any other penalties imposed by law for a conviction of a violation of this section, the court may impose an additional penalty of up to twenty thousand dollars.

**5) RCW 9.46.190** provides that any person or association or organization operating any gambling activity who or which, directly or indirectly, shall in the course of such operation:

(The following subsections apply.)

(1) Employ any device, scheme, or artifice to defraud; and

(3) Engage in any act, practice or course of operation as would operate as a fraud or deceit upon any person.

**6) RCW 9.46.153(1)** provides that it shall be the affirmative responsibility of each applicant and licensee to establish by clear and convincing evidence the necessary qualifications for licensure of each person required to be qualified under this chapter, as well as the qualifications of the facility in which the licensed activity will be conducted.

The licensee, Ryan M. Lawrence, took between \$20 and \$40 from The Hideaway by employing a scheme using poker chips taken from his chip tray and those he collected from patrons to disguise the cash he took while dealing poker. His conduct and scheme were recorded on video surveillance, and viewed and confirmed by The Hideaway staff and a Commission Special Agent.

The licensee pursued economic gain in an occupational manner and employed a scheme to defraud an operator, his card room employer, and engaged in an act or course of operation as would operate as a fraud or deceit upon a person, in violation of RCW 9.46.1961, and RCW 9.46.190(1) and (3). The licensee poses a threat to the effective regulation of gaming and his actions increase the likelihood of unfair or illegal activities in the conduct of gaming activities, as demonstrated by Mr. Lawrence's prior activities of employing a scheme to disguise the alleged theft of chips and cash.

The licensee has failed to prove by clear and convincing evidence he is qualified for licensure under RCW 9.46.153(1). Grounds, therefore, exist to revoke Ryan M. Lawrence's license under RCW 9.46.075(1), (8), and (10), and WAC 230-03-085(1) and (8).

#### IV.

Ryan M. Lawrence acknowledges that he received and read the Notice of Administrative Charges in this case, and understands the facts and violations alleged in it. While not admitting to the facts and violations specified above in section III, it is the licensee's position that if the Gambling Commission established the alleged facts in the case at issue, there would be sufficient evidence of the violations as stated in the administrative charges.

Mr. Lawrence has waived his right to a hearing based on the terms and conditions of this Settlement Order and further agrees to the following:

1) Ryan M. Lawrence shall surrender his Card Room Employee license, effective June 6, 2014. After that date, he cannot conduct Card Room Employee activity.

2) In the event Ryan M. Lawrence applies for certification or a gambling license, he will be subject to all the Commission's investigative procedures for processing such application.

Furthermore, no promises or assurances have been made to Ryan M. Lawrence that he will receive a license or certification from the Commission should he apply.

3) Ryan M. Lawrence shall have no involvement whether paid or unpaid, in the ownership, operation, or financing of any activity regulated by the Washington State Gambling Commission. This does not prevent Mr. Lawrence from working in non-gambling related employment at an establishment engaged in authorized gambling activities.

4) **The signed Settlement Order must be received by Commission staff by June 6, 2014**, and mailed to Commission Headquarters at the following address:

Washington State Gambling Commission  
Attention: Communications and Legal Division  
P.O. Box 42400  
Olympia, WA 98504-2400

**Or delivered** (in person or via private courier) to the following address:


Washington State Gambling Commission  
Attention: Communications and Legal Division  
4565 7<sup>th</sup> Avenue SE; Fourth Floor  
Lacey, WA 98503

  
\_\_\_\_\_  
Dave Trujillo, Director

6-6-2014  
\_\_\_\_\_  
(Date signed)


By his signature, the licensee understands and accepts the terms and conditions of this Order.


APPROVED FOR ENTRY:

  
\_\_\_\_\_  
Ryan M. Lawrence  
Licensee

5-30-14  
\_\_\_\_\_  
(Date)

APPROVED AS TO FORM:

  
\_\_\_\_\_  
Gregory J. Rosen, WSBA# 15870  
Assistant Attorney General,  
Representing the Washington State  
Gambling Commission

  
\_\_\_\_\_  
Arlene Dennistoun, WSBA# 28760  
Staff Attorney,  
Washington State Gambling Commission