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STATE OF WASHINGTON
GAMBLING COMMISSION

In the Matter of:

GIANG H. LANG
License No. 68-16913,

NO. CR 2017-00129

STIPULATED SETTLEMENT
AGREEMENT

Licensee.

The Washington State Gambling Commission represented by its attorneys, ROBERT W. FERGUSON, Attorney General, GREG ROSEN, Assistant Attorney General, and its Director, DAVE TRUJILLO, and the Licensee, GIANG H. LANG, pro se, hereby enter into this stipulation and settlement agreement for Case Number CR 2017-00129.

I. INTRODUCTION

In the above-referenced case, the Washington State Gambling Commission issued a Summary Suspension and Notice of Administrative Charges dated February 22, 2017, and a First Amended Notice of Administrative Charges dated September 26, 2017, alleging that Mr. Lang's commission of an assault and his failure to report being charged criminally warranted revocation of his Public Card Room Employee gambling license, License Number 68-16913, under WAC 230-06-085(1), RCW 9.46.153(1); RCW 9.46.075(1), (4), (7), and (8); and WAC 230-03-085(1), (2), (7) and (8).

II. AGREEMENT OF THE PARTIES

The Gambling Commission and the Licensee agree to the following:

1. The Washington State Gambling Commission and the Licensee enter into this agreement to avoid the time and expense of further litigation.

STIPULATED SETTLEMENT AGREEMENT
IN RE: GIANG H. LANG
NO. 2017-00129

Washington State Gambling Commission
4585 1st Avenue S.E., Lacey, WA 98503
P.O. Box 2400
Olympia, WA 98504

1 2. The Licensee explicitly waives the right of further administrative review of all
2 matters related to the above-referenced Summary Suspension, Administrative Charges, and
3 Amended Administrative Charges. The Licensee hereby voluntarily withdraws his request for a
4 hearing on this matter.

5 3. The Licensee does not dispute the truth of the allegations contained in the
6 Complaint, and Licensee agrees that, were this matter to proceed to hearing, there is a substantial
7 likelihood that the Washington State Gambling Commission would be able to prove that it had
8 the authority to revoke the licensee's PCRE gambling license under WAC 230-06-085(1), RCW
9 9.46.153(1), RCW 9.46.07(1), (4), (7), and (8); and WAC 230-03-085(1), (2), (7) and (8).

10 4. The parties agree that the Washington State Gambling Commission will consider
11 that the violations set forth in the First Amended Notice of Administrative Charges, as specified
12 in this paragraph, have been sustained and will become a part of the Licensee's licensing record.

13 5. Pursuant to this settlement, the Licensee agrees to withdraw his hearing request
14 and have the Office of Administrative Hearings dismiss with prejudice Case Number 2017-
15 00129.

16 6. The Licensee understands his license will be surrendered effective on the date of
17 signing this agreement. Upon signing this settlement agreement, the parties agree that the
18 Licensee will not be authorized to engage in any PCRE or Class III gambling activities unless
19 he applies for and receives a new gambling license.

20 7. In the event the Licensee subsequently applies for certification or a gambling
21 license, he will be subject to all the Washington State Gambling Commission's investigative
22 procedures for processing such application. Furthermore, no promises or assurances have been
23 made to the Licensee that he will receive a license or certification from the Washington State
24 Gambling Commission should he apply.

25 8. The Licensee agrees that he shall have no involvement whether paid or unpaid,
26 in the ownership, operation, or financing of any activity regulated by the Washington State

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1 Gambling Commission. This does not prevent the Licensee from working in non-gambling
2 related employment at an establishment engaged in authorized gambling activities or in Class II
3 tribal gaming activities.

4 9. This agreement constitutes the final written expression of all the terms of this
5 agreement and is a complete and exclusive statement of these terms.

7 ROBERT W. FERGUSON
8 Attorney General

9 *Greg Rosen*

10 GREG ROSEN, WSBA #15870
11 Assistant Attorney General
12 Attorneys for Washington State
13 Gambling Commission

11/27/17
DATE

14 *David Trujillo*

15 DAVID TRUJILLO
16 Director
17 Washington State Gambling
18 Commission

11/27/17
DATE

19 *Giang H. Lang*
20 GIANG H. LANG
21 Licensee

11-26-2017
DATE

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STATE OF WASHINGTON
GAMBLING COMMISSION

In the Matter of:

GIANG H. LANG
License No. 68-16913,

NO. CR 2017-00129

STIPULATION AND ORDER FOR
DISMISSAL

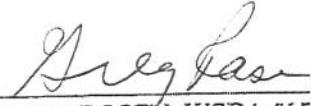
Licensee.

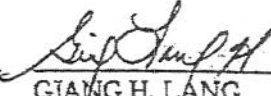
STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between the Licensee, GIANG H. LANG, pro se, and WASHINGTON STATE GAMBLING COMMISSION, by and through its attorneys of record, ROBERT W. FERGUSON, Attorney General, GREG ROSEN, Assistant Attorney General, and its Director, DAVE TRUJILLO, that the parties in this case seek dismissal of this administrative case, with prejudice, in accordance with the Settlement Agreement entered in the above-entitled action.

DATED this 27 day of NOV, 2017.

DATED this 26 day of NOV, 2017.


GREG ROSEN, WSBA #15870
Assistant Attorney General
Attorney for Washington State Gambling
Commission


GIANG H. LANG
Licensee

STIPULATED SETTLEMENT AGREEMENT
IN RE: GIANG H. LANG
NO. 2017-00129

Washington State Gambling Commission
4505 7th Avenue S.E., Lacey, WA 98523
P.O. Box 42400
Olympia, WA 98504


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ORDER

THIS MATTER having come before the Office of Administrative Hearings on the stipulation of the parties, and requesting a dismissal, with prejudice, of this administrative case, the Licensee and Washington State Gambling Commission having come to an agreement settlement, and the Office of Administrative Hearings having been advised fully advised, now, therefore,

IT IS HEREBY ORDERED, that the above-referenced administrative case is hereby dismissed with prejudice.

DATED this 26 day of NOVEMBER, 2017.

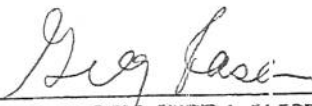


Administrative Law Judge

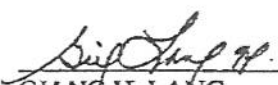
Presented by:

Approved as to Form

ROBERT W. FREGUSON
Attorney General



GREG ROSEN, WSBA #15870
Assistant Attorney General
Attorneys for Washington State
Gambling Commission



GIANG H. LANG,
Licensee