

DEC 12 2018

RECORDS

**STATE OF WASHINGTON
GAMBLING COMMISSION**

In the Matter of:

TOMMY Q. LE DANG
License No. 68-22619,

Licensee.

Docket No. 11 -2018-GMB-00073
NO. CR 2018-01395

STIPULATED SETTLEMENT
AGREEMENT

The Washington State Gambling Commission represented by its attorneys, ROBERT W. FERGUSON, Attorney General, GREGORY J. ROSEN, Senior Counsel, and its Director, DAVID TRUJILLO, and the Licensee, TOMMY Q. LE DANG, hereby enter into this stipulation and settlement agreement for Case Number CR 2018-01395.

I. INTRODUCTION

In the above-referenced case, the Washington State Gambling Commission issued a Notice of Administrative Charges dated October 4, 2018, alleging that Mr. Le Dang's unlawful attempts to withdraw money from an ATM using another's financial transaction card and resulting criminal charge warranted revocation of his Public Card Room Employee (PCRE) gambling license, License Number 68-22619, under RCW 9.46.153(1); RCW 9.46.075(1), (7) and (8); and WAC 230-03-085(1) and (9)(a).

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.

1 2. The Licensee explicitly waives the right of further administrative review of all
2 matters related to the above-referenced Administrative Charges. The Licensee hereby
3 voluntarily withdraws his request for a hearing on this matter and requests that the Office of
4 Administrative Hearings dismiss with prejudice the above entitled case.

5 3. The Licensee admits to the facts or violations alleged in the above-referenced
6 Administrative Charges, and Licensee agrees that, were this matter to proceed to hearing, there
7 is a substantial likelihood that the Washington State Gambling Commission would be able to
8 prove that it had the authority to revoke the Licensee's PCRE gambling license under RCW
9 9.46.153(1); RCW 9.46.075(1), (7), and (8); and WAC 230-03-085(1) and (9)(a).

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

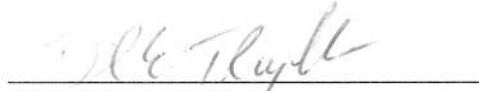
13 5. The Licensee agrees to surrender his license as the date of signing this agreement,
14 and acknowledges the Washington State Gambling Commission will consider his license is
15 revoked effective on the date of signing. Upon signing this settlement agreement, the parties
16 agree that the Licensee will not be authorized to engage in any PCRE or Class III gambling
17 activities unless he applies for and receives a new gambling license.

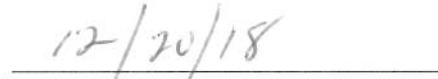
18 6. In the event the Licensee subsequently applies for certification or a gambling
19 license, he will be subject to all the Washington State Gambling Commission's investigative
20 procedures for processing such application. Furthermore, no promises or assurances have been
21 made to the Licensee that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

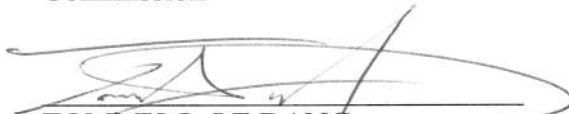
23 7. The Licensee agrees that he shall have no involvement whether paid or unpaid,
24 in the ownership, operation, or financing of any activity regulated by the Washington State
25 Gambling Commission. This does not prevent the Licensee from working in non-gambling
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1 related employment at an establishment engaged in authorized gambling activities or in Class II
2 tribal gaming activities.

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

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7 DAVID TRUJILLO
8 Director
9 Washington State Gambling
Commission

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11 DATE

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TOMMY Q. LE DANG
Licensee

12/7/2018
DATE