



STATE OF WASHINGTON  
GAMBLING COMMISSION

*"Protect the Public by Ensuring that Gambling is Legal and Honest"*

November 23, 2021

MIAO LI  
8628 BEACON AVE S  
SEATTLE, WA 98118

**RE: ADMINISTRATIVE ACTION; CR 2021-00310**

Dear Miao Li:

Enclosed is an Order of Default entered by the Commission on November 16, 2021, revoking your certification to conduct gambling activities. This action occurred because you requested your appeal be withdrawn at a previously scheduled hearing on September 10, 2021.

You have the right to move to vacate this Order. If you do so, we must receive your request by the 10<sup>th</sup> day after the Order was mailed. Your motion must include the specific grounds upon which relief is requested and must be submitted to:

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

You also have the right to submit a Petition for Judicial Review. If you do this, you must submit it within 30 days of the date the Order was mailed. RCW 34.05.514 explains where you must file this petition and RCW 34.05.546 explains what information your Petition must include.

This is not meant to be a full explanation of all the statutes and regulations you would need to understand to move to vacate or Petition for Judicial Review. Please call me at (800) 345-2529, extension 3473, with any questions.

Sincerely,

  
Ashlee Laydon, Rules Coordinator  
Legal & Records Division

Enclosure

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**STATE OF WASHINGTON  
GAMBLING COMMISSION**

In the Matter of:

NO. CR 2021-00310

MIAO J LI,  
License No. 69-24640,

FINAL ORDER OF THE  
GAMBLING COMMISSION

Class III Employee.

This matter having come before the Washington State Gambling Commission (Commission) on November 16, 2021, the Commission makes the following Findings of Fact, Conclusions of Law, and issues its Final Order:

**I. FINDINGS OF FACT**

1. The Washington State Gambling Commission issued Miao J. Li certification No. 69-24640 authorizing Class III Employee activity for the Muckleshoot Tribe of Indians.

2. This license, which expires on February 1, 2022, was issued subject to Li's compliance with state gambling laws and Commission rules in accordance with the Muckleshoot Tribal-State Gaming Compact.

3. Li has held this certification since 2007.

4. On October 21, 2019, the WSGC received a letter from attorney Steven W. Kim notifying the agency that his client, Class III Certification holder Miao Li, was facing criminal prosecution. According to the letter, Li received notice on October 3, 2019 that she was being charged with one count of Violation of the Uniform Controlled Substance Act (VUCSA) by the King County Prosecutor's Office.

FINAL ORDER OF THE  
GAMBLING COMMISSION

1           5.       Upon receiving the notice, a WSGC Special Agent was assigned to investigate  
2 whether or not Li remained qualified to hold her Class III certification. As part of this  
3 investigation, the Agent requested certified copies of the pleadings from Li's criminal case.

4           6.       On November 8, 2019, the Agent received the certified copies, and began  
5 reviewing them. The Information and Probable Cause for the case, King County Superior Court  
6 case number 19-1-00517-0 KNT, showed that Li was being charged with VUSCA, a class C  
7 felony in Washington.

8           7.       The articulated basis for the charge was that Li and four co-defendants unlawfully  
9 and feloniously manufactured marijuana. The parties were growing marijuana in various  
10 residential homes, and transporting it away from the homes for sale. Li is the owner of four of  
11 the homes alleged to being used for growing, and the owner of at least two vehicles associated  
12 with the grow operation.

13           8.       On December 5, 2019, the Muckleshoot Tribal Gaming Agency (MTGA) sent the  
14 WSGC a copy of a letter they had issued to Li regarding her Class IIIA license. The letter stated  
15 that following a hearing, the MTGA "ruled in favor of reinstating your Class IIIA License,  
16 pending the outcome of your recent felony charges filed in the King county Superior Court."  
17 The letter continued, "This is also dependent on the Washington State Gambling Commission's  
18 final decision regarding your recent felony charges. Should the WSGC seek revocation of your  
19 Class IIIA Gaming License, and revoke in the future. The Muckleshoot Gaming Commission  
20 will also seek revocation."

21           9.       Since that letter was issued, Li's VUSCA case has been continued multiple times  
22 for months at a time. The MTGA submitted a Personnel Termination Notice in August 2020,  
23 but subsequently relinked her since her certification was not scheduled to expire until February  
24 1, 2021.

25           10.       On March 2, 2021, the Agent spoke with a member of the MTGA staff to inform  
26 them that while the WSGC is renewing Li's certification, it would also be moving forward with

1 a revocation case. This is due to the ongoing nature of the criminal case, and the violation that  
2 is being alleged.

3 11. Former Director Dave Trujillo issued administrative charges on March 29, 2021  
4 alleging that Li's actions constituted a violation of RCW 9.46.075(1) and (8) and WAC 230-03-  
5 085. Further, that Li could not show by clear and convincing evidence that she was qualified for  
6 certification as required by RCW 9.46.153(1), and that her actions warranted revocation of her  
7 certification pursuant to RCW 9.46.075(1) and (8), WAC 230-03-085, and Section V.C.(1) of  
8 the Muckleshoot Tribal-State Gaming Compact.

9 12. Li was sent the charges by regular and certified mail on March 29, 2021 to the  
10 last address the Gambling Commission had on file.

11 13. Li filed a Request for Administrative Hearing on April 21, 2021, opening a case  
12 in front of the Office of Administrative Hearings (OAH). On September 10, 2021, while at a  
13 hearing in front of OAH, Li requested that her Request be withdrawn. As a result, OAH issued  
14 an Order Dismissing Li's Appeal on September 14, 2021.

## 15 II. CONCLUSIONS OF LAW

16 1. Miao Li received proper notice of the charges within three days of March 29,  
17 2021 via regular and certified mail, pursuant to RCW 34.05.413 RCW 34.05.434, WAC 230-17-  
18 005, WAC 230-17-010, and WAC 10-08-130.

19 2. The Commission can take final action against Miao Li's gambling certification  
20 under Case Number CR 2021-00310 pursuant to RCW 9.46.075, RCW 34.05.440(1), RCW  
21 34.05.461, WAC 230-03-085, and Section V.C.(1) of the Muckleshoot Tribal-State Gaming  
22 Compact.

23 3. Miao Li's certification should be revoked under Case Number CR 2021-00310  
24 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC  
25 230-03-085.

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**III. ORDER**

This matter having come before the Commission at its November 16, 2021, Commission meeting, the Commissioners having heard arguments, been given the chance to review the administrative record, and being fully advised in this matter, now therefore:

It is hereby **ORDERED** that Miao Li's gambling certification, Number 69-24640, is **REVOKED**.

DATED this 19<sup>th</sup> day of November, 2021.

*Bud Sizemore*

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BUD SIZEMORE, Chair

*Julia Patterson*

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JULIA PATTERSON, Vice Chair

*Alicia Levy*

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ALICIA LEVY

*Kristine Reeves*

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KRISTINE REEVES

*Sarah Lawson*

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SARAH LAWSON

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**NOTICE**

Reconsideration: RCW 34.05.470 and WAC 230-17-140 provide that a party may file a petition for reconsideration of a final order. A petition for reconsideration must be received no later than thirteen (13) days after the date this final order is mailed. Any motion for reconsideration must state the specific grounds supporting the party’s request for reconsideration.

Stay of Final Order: Filing for reconsideration does not stay the effectiveness of this Order. WAC 230-17-145 provides that a party may petition the Commission for a stay of a final order. Any petition for a stay should be received by the Commission within thirteen (13) days after the date this final order is mailed.

Judicial Review: RCW 34.05.542 provides that a party may appeal this final order by filing a petition for judicial review within thirty (30) days after service of this order. A petition for judicial review must be filed with the appropriate superior court and served upon both the Commission and the Office of the Attorney General.

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

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

Washington State Gambling Commission  
Legal and Records Division  
4565 7<sup>th</sup> Avenue S.E., Lacey, WA  
P.O. Box 42400  
Olympia, WA 98504-2400

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

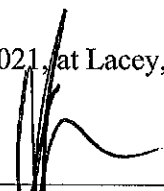
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**CERTIFICATE OF SERVICE**

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

MIAO J LI  
8628 BEACON AVE S  
SEATTLE WA 98118

EXECUTED this 23 day of November, 2021, at Lacey, Washington.



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Ashlie Wraydon  
Rules Coordinator