

STATE OF WASHINGTON  
GAMBLING COMMISSION

In the Matter of the Revocation of the )  
Certification to Conduct Gambling Activities of: ) NO. CR 2010-00850  
)  
Doris Bilow ) **FINDINGS, CONCLUSIONS,**  
Stanwood, Washington, ) **DECISION, AND FINAL**  
) **ORDER IN DEFAULT**  
Class III Employee. )

---

THE MATTER of the revocation of the certification to conduct gambling activities of Doris Bilow having come before the Commission on October 14, 2010, the State being represented by Jerry Ackerman, Senior Counsel, Office of the Attorney General, the Commission makes the following Findings of Fact, Conclusions of Law, and issues the following Decision and Order:

**FINDINGS OF FACT**

I.

The Washington State Gambling Commission issued Doris Bilow certification<sup>1</sup> number 69-26714, authorizing Class III Employee activity, formerly with the Tulalip Tribe.

The certification expires on December 17, 2010, and was issued subject to the Class III Employee's compliance with state gambling laws and rules and Tulalip Tribal/State Compact.

II.

On August 30, 2010, Director Rick Day issued administrative charges to Doris Bilow, by certified and regular mail. The administrative charges notified Ms. Bilow that failure to respond would result in the entry of a default order revoking her certification. Doris Bilow did not respond to the charges.

By not responding, Doris Bilow waived her right to a hearing on such charges and pursuant to RCW 34.05.440, this final order may be entered in default.

III.

1) On November 5, 2009, Ms. Bilow was working as a Poker Cage Cashier when a casino patron turned in money found at the casino that was not the patron's. Ms. Bilow told the patron to take the money to the Main Cage Employee Services window, as required by casino procedures. However, the patron refused to do this and Ms. Bilow instead placed the money in the cage toke<sup>2</sup> box.

---

<sup>1</sup> The Commission issues Class III Certifications to employees working at Tribal casinos. Certifications allow similar activities as Card Room Employee (CRE) licenses issued to persons working at commercial house-banked card rooms. Class III Employees may transfer their certifications to a CRE license and work at commercial card rooms by sending Commission staff a transfer form and the accompanying fee.

<sup>2</sup> Tokes are gratuity received from players or patrons.

2) The Tulalip Tribal Gaming Agency (TTGA) determined that Ms. Bilow failed to follow casino procedures and that she misapplied and wrongfully deprived money from the Tulalip Gaming Operations. As a result of her actions, on November 16, 2009, the TTGA revoked Ms. Bilow's Tribal Gaming License.

3) Because of her actions and revocation of her Tribal Gaming License, Ms. Bilow has failed to establish by clear and convincing evidence the necessary qualifications for certification under RCW 9.46.153(1).

4) Therefore, under Section 5(c), (i), (vi), and (viii) of the Tulalip Tribal/State Compact, RCW 9.46.075(1) and (8) and WAC 230-03-085(1) and (8), grounds exist to revoke Doris Bilow's certification.

**Section 5(c) of the Tulalip Tribal/State Compact states:**

The State Gaming Agency may revoke, suspend or deny a State Certification for any reason or reasons it deems to be in the public interest. These reasons shall include, but not be limited to when a holder of certification:

(The following subsections apply.)

(i) Has violated, failed or refused to comply with the provision, requirements, conditions, limitations or duties imposed by chapter 9.46 RCW and any amendments thereto, or any rules adopted by the State Gaming Agency pursuant thereto, or any provision of a Tribal/State Compact has occurred upon any premises occupied or operated by any such person or over which she had substantial control.

(vi) Fails to prove, by clear and convincing evidence, that she is qualified in accordance with the provisions of this Section.

(viii) Has had a Tribal license revoked during the preceding twelve months.

**RCW 9.46.075 Denying, suspending, or revoking an application, license or permit**

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 applicant or licensee, or any person with any interest therein:

(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, she or it is qualified in accordance with the provisions of this chapter.

**WAC 230-03-085 Denying, suspending, or revoking an application, license or permit**

We may deny, suspend, or revoke any application, license or permit, when the applicant, licensee, or anyone holding a substantial interest in the applicant's or licensee's business or organization: (The following subsections apply.)

(1) Commits any act that constitutes grounds for denying, suspending, or revoking licenses or permits under RCW 9.46.075.

(8) Poses a threat to the effective regulation of gambling, or creates or increases the likelihood of unfair or illegal practices, methods, and activities in the conduct of gambling activities, as demonstrated by: (a) Prior activities; or (b) Criminal record; or (c) Reputation; or (d) Habits; or (e) Associations.

**RCW 9.46.153(1) Applicants and licensees-Responsibilities and duties**

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

IV.

**CONCLUSIONS OF LAW**

The circumstances specified in the Findings of Facts in section III above constitute grounds for the revocation of Doris Bilow's certification to conduct gambling activities under the authority of Tulalip Tribal/State Compact, RCW 9.46.075 and WAC 230-03-085.

**DECISION AND ORDER**

The Washington State Gambling Commission HEREBY ORDERS: Doris Bilow's Class III certification to conduct gambling activities is REVOKED.

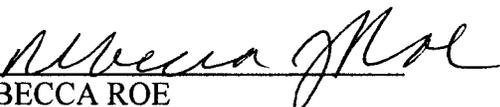
DATED this 14 day of October, 2010.

  
\_\_\_\_\_  
JOHN ELLIS, Chair

\_\_\_\_\_  
KEVEN ROJECKI, Vice Chair

  
\_\_\_\_\_  
MIKE AMOS

\_\_\_\_\_  
MICHAEL REICHERT

  
\_\_\_\_\_  
REBECCA ROE

**NOTICE:** RCW 34.05.440(3) provides that within seven (7) days after service of a default order the party against whom it was entered may file a written motion requesting that the order be vacated and stating the grounds relied upon. WAC 230-17-040(3) requires that motions be served on the parties listed below:

Washington State Gambling Commission  
Communications & Legal Division  
PO Box 42400  
Olympia, Washington 98504-2400

H. Bruce Marvin  
Assistant Attorney General  
P.O. Box 40100  
Olympia, WA 98504-0100