

**Additional
Stakeholder
Comments**

As of February 10, 2016

To: Washington State Gambling Commission,

Members of the commission, I am writing to share my thoughts on the newly approved Group 12 games. My wife and I own Crosley Lanes Bowling Center in Vancouver WA., and Interstate Lanes in Portland Oregon.

When we purchased Crosley Lanes in 1987 it had a robust pulltab business. As we invested and increased our overall sales we saw pulltab revenue increase along with it. Eventually we were licensed to sell one million dollars in pull tabs yearly. That all changed when Oregon introduced video poker machines in the bars, taverns, and restaurants. Other pulltab retailers around the state were more affected by the expansion of tribal gaming. In the past years of video poker in Oregon we saw pulltab sales steadily decline, and then Oregon went from just video poker to adding what the Oregon Lottery calls line games which for a lack of a better description are slots. Since that time our pulltab sales have drastically dropped, as have every other licensed pulltab retailer in Clark county as well as the entire state of Washington. We currently hold a \$200,000 license.

If I could take you all on a trip across the I-5 Bridge into Oregon I could show you a commercial hub that is home to several small taverns and deli's all in a row. It is unofficially referred to as lottery row. The parking lot is full of cars with Washington license plates, many of whom are former pulltab players. We are sending millions of dollars to Oregon because they have the modern games that players want to play. Paper pulltabs are an antiquated form of gambling and punchboards are worse dating back to the 1800's.

We have installed five machines and so far are thrilled with the revenue they are generating. And our customers are having fun playing them. They really like the Nudge aspect. We have several families, churches and school groups come through our location and we have not had one single complaint about our new games. The side benefit is they are spending more time in our facility, using our other amenities that we have to offer. Local micro beers and spirits, buying more food, bowling, and kids redemption.

Pulltabs were meant as an economic stimulus for bars and taverns in the 19th and 20th century. It is time to move forward for the new generations of the computer age. The group 12 machines that we are using are already in place in several states. They are proven as great sources of income not only for the operators, but for the states as well. Small business owners need this new income to raise wages, pay for health care benefits, and improve our facilities. You had the opportunity to do a great thing for small businesses and you have already taken the first step by licensing the group 12 games. Now give us as operators a chance to prove to you that these games can be managed responsibly without overwhelming law changes and knee-jerk reaction. The state of Washington has mastered Pulltabs and Punchboards laws and regulations and this can be done too. Please value our input and suggestions as those that are in the trenches. We are definitely not a casino and have no desire to be, but we need this. We cannot just keep raising our prices 20% just to cover minimum wage pay.

Thank you for your time,

Don and Rachael Allen

February 6th, 2016

To the Washington State Gambling Commissioners,

I feel that the authorization of Group 12 games, which was accomplished after months of public comment and approved by the commissioners unanimously on a 5-0 vote, is a positive development for my small business. It is my understanding that months after this very public approval process, the commission is now being asked to repeal it.

This amusement device would help my business as I am faced with rising food, beverage and labor costs. Please keep in mind the small business owner when you consider this proposal. While I would like to see the current rules remain the same, I think we could accept option "B" in Rules Package 3.

Thank you, for your consideration.

A handwritten signature in cursive script that reads "Paul Hyle".

MADISON PUB

206-325-6537

February 2, 2016

To the WSGC:

As the owners of **The Caboose**, I would like to express our support for Group 12 games. While I would prefer to see the rules remain as they are. We would support option "B" within Rules Package 3.

As a small independent family business, it is important that we are able to continue to offer adult amusement games to our customers. Our short experience with these machines has been positive. We have seen a slight increase in both our beverage and food sales. The customers are using their winnings (normally \$50 and under) and are applying it to their bill.

These are a far cry from slot machines and are nothing more than entertaining amusement games. I like the fact that our customers can win products and merchandise that we offer. It would be a shame to see this program discontinued.

Sincerely,
Caboose Partners, LLC
115 E 1st Street
Cle Elum, WA 98922
(509) 674-0467

William Peare
Rebecca Benavides
Deborah Hamilton

NATIONAL ASSOCIATION OF FUNDRAISING TICKET MANUFACTURERS

180 EAST FIFTH STREET
SUITE 940
SAINT PAUL, MINNESOTA 55101

Tel: 651-644-4710
NAFTM.org

Ms. Susan Newer
Rules Coordinator
Washington State Gambling Commission
P.O. Box 42400
Olympia, Washington 98504

RE: Proposed Group 12 Amusement Game Rules

Dear Ms. Newer:

We appreciate the opportunity to comment further on the proposed Group 12 Amusement Device rules under consideration by the Commission. Previous comments were submitted in January, 2016 and are attached to this letter for your reference. In our previous comments, we encouraged the Commission to repeal WAC 230-13-067. We continue to believe that a repeal of the rule is the best course of action. Therefore, we support the filing of the proposed rule repealing WAC 230-13-067 that will be under consideration at the February Commission meeting.

If the Commission elects to permit the continued operation of Group 12 Amusement Devices, we encourage adoption of strict controls, a limitation on the number of devices per site, uniform licensing for manufacturers, and "hard merchandise" prizes with limited value. Since the January Commission meeting, the staff has put forth several revised amendments to the proposed rules. Our comments on those revisions are discussed below.

WAC 230-03-185. We agree with the staff's proposed amendment to license all manufacturers of Group 12 Devices and we encourage the Commission to apply the same strict licensing criteria to the manufacturers of Group 12 Devices that the Commission applies to all other manufacturers licensed in the State of Washington. The integrity of the devices, as well as the integrity of the companies and persons who manufacturer and sell them, is paramount in ensuring the public is protected from fraud, manipulation and other illegal behavior.

WAC 230-13-010. We agree that all Group 12 Devices must be submitted to the Commission for testing. However, as was abundantly clear from the testimony provided at the January Commission meeting, what constitutes “material skill” is a subjective determination. We agree with other commenters who indicated that Group 12 devices should be tested against rigorous standards. While many such technical standards exist, the rule, as proposed, contains few of them. For example, we learned that some of the approved devices contain random number generators. There exist multiple and widely accepted standards for testing randomness in electronic devices, but none of the standards (or any reference to them) are contained in the rule as proposed. Players, who may be wagering as much as \$5.00 per play, deserve to know that the devices they are playing have been subjected to extensive testing to ensure that they meet strict standards for fairness and accountability.

WAC 230-13-135. We support the imposition of wagering and prize limits for Group 12 Amusement Devices. A maximum five-dollar wager and one-thousand-dollar prize cost is not unreasonable. We note however, that even with these limits, the amount of money wagered on Group 12 Amusement Devices could be very significant, particularly if the Commission declines to limit the number of devices permitted in the state.

WAC 230-13-080. The staff has proposed that charitable and non-profit licensees be limited to twenty (20) devices and commercial licensees be permitted to have ten (10) devices. We strongly support a limitation in the rules on the number of devices per premises, but believe the numbers proposed by the staff are too high. In the last two months, the Commission has received nearly 100 applications for commercial amusement game licenses. This is in addition to a large number of applications in November, 2015. Clearly, the nature of Group 12 devices has stimulated significant interest and suggests that if not controlled, the number of devices in operation in Washington could expand exponentially in the coming months. The Commission might consider tabling applications until the necessary rules are in effect, but at a minimum, the Commission must impose a limitation on the number of devices permitted at any single premise. As mentioned in our previous comments, we believe no site should be permitted to have more than two devices. This will allow the Commission the ability to control the deployment of the devices in the state as well as provide an opportunity for the Commission and its staff to evaluate the licensing and enforcement resources needed to effectively regulate Group 12 devices.

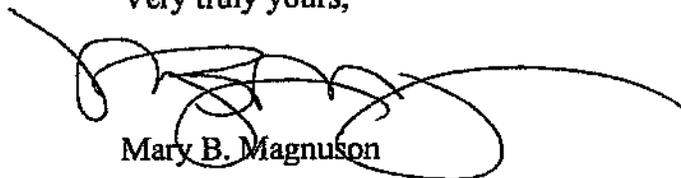
WAC 230-13-005. In our previous comments, we encouraged the Commission to adopt “Option A.” After listening to the testimony provided at the January Commission meeting, we are even more convinced that “Option A” is the necessary course. RCW 9.46.0201 defines an amusement game as a game played for entertainment in which the outcome depends on a material degree of skill and *only merchandise prizes are awarded*. Option A limits the prizes that may be awarded to hard merchandise; in other words, toys, novelties, retail items as well as food and beverages and other items sold by the operator as a normal part of their business. Option A does not permit the award of gift certificates, gift cards, pull-tabs or other gambling products available at the site. Option A is consistent with the statute and consistent with the type of merchandise prizes typically awarded in the operation of amusement devices. However, at the January meeting, every person testifying in support

of the Group 12 devices stressed the need for gift cards to be awarded as prizes, claiming that there would be no interest in the devices unless players had the opportunity to win the equivalent of cash. Most asked for no limit on prizes or at the very least \$2500 per wager. Many also admitted to awarding 'cash back' after the winner redeemed the gift card for a nominal item at the site. In fact, nearly all reported that the award of "cash" in the form of gift cards with a cash-back option is necessary for the Group 12 devices to be financially viable for the operators. These comments clearly drive home the fact that Group 12 amusement devices are not typical amusement devices. They are different. They are designed to look, operate and reward players like electronic gambling devices and the possibility of "cash" prizes offers an enticement to players looking for a slot machine-like experience.

WAC 230-13-130. In this rule, the staff proposes a definition of an electronic token card and permits the use of token cards for the accumulation of tokens that are won. Option A does not permit the use of stored tokens to be used for game play. Option B permits the token cards to be "reinserted into a group 12 amusement game for additional play," thus rendering the tokens the equivalent of cash. In our view, this is inconsistent with the statutory directive that amusement devices award only merchandise.

Again, thank you for the opportunity to provide additional comments on the proposed rule. Please feel free to contact me if you have any questions or would like additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mary B. Magnuson", with a long horizontal flourish extending to the right.

Mary B. Magnuson

Griffin, Tina (GMB)

From: Bill Clark <billc58@gmail.com>
Sent: Tuesday, February 09, 2016 9:08 PM
To: Griffin, Tina (GMB)
Subject: Letter to the WSGC

February 7, 2016

Dear Washington State Gambling Commissioners,

My name is Bill Clark, Sales Manager, Digital Music Systems, Inc.. I represent one of the many local amusement operators that have placed group 12 games in licensed locations.

I am writing this letter to help **clear up some misconceptions** in regard to Group 12 amusement games:

1. **These are not slot machines.** These machines are casual play amusement devices. The player knows what they are playing for on each and every play. It is up to the player to decide if they want to play or continue.
2. **These amusement devices do not award cash prizes.** These amusement devices only pay out in merchandise prizes. Gift certificates are considered merchandise prizes and are good only at the location. If you feel that additional restrictions on gift certificates are needed, I urge you to consider option "B" in Rules Package 3. Please do not eliminate gift certificates entirely as it is good for the locations business.
3. **Big cash prizes are being awarded.** As I mentioned above, only merchandise prizes can be awarded. The average prize is under a \$50 value and it is being used to purchase primarily food and beverages at the location, the change given to the customer after their purchase is negligible.
4. **Little tax or fees are being generated.** These amusement devices generate taxes for both the state and local municipalities. They will also generate significant fees for the WSGC. Sales tax is also being generated when goods and services are awarded as merchandise prizes.
5. **The commissioners and the public were misled.** This entire process for approval was very public and transparent. The rule change was introduced, public testimony was given at three separate monthly WSGC meetings and the Commissioners unanimously, in a 5 to 0 vote, approved it. Why were the concerns not addressed then?

Our company is very excited to provide adult amusement games to locations and their customers. This is something we asked for and pursued in good faith. The impact to my company and others like mine if this is repealed would be catastrophic. Our company alone has expended significant time, money and effort in Group 12 games.

In conclusion, I ask you to not be misled by those seeking to restrict the legal and rightful commerce of amusement operators and our customers.

Sincerely,

Bill Clark
Digital Music Systems, Inc.
Kent, WA.

Griffin, Tina (GMB)

From: dan mccoy <mccoysdis@gmail.com>
Sent: Tuesday, February 09, 2016 2:13 PM
To: Griffin, Tina (GMB)
Subject: Class 12 Amusement Devices

Hello Tina,

My name is Dan McCoy, owner of McCoy's Distributing, Inc., a licensed distributor since 1972. Since the passing of the Class 12 Amusement Devices, we have placed numerous machines in locations throughout Eastern Washington. My customers have reported some very favorable responses from the players which, in turn, has produced some very favorable results for the locations participating in the use of these machines.

The locations report that the players are enjoying the machines as indicated by the amounts of money they have been willing to spend playing these machines. And, when the players redeem their winnings, they are purchasing pull tabs, food and drink, which is exactly what the locations had been hoping to see.

As a seller of pull tabs, it is encouraging and beneficial to my company to hear from the locations that they are seeing people, who had not previously played pull tabs, in fact, buy pull tabs with their winnings simply because the bartender offered pull tabs as a redemption option.

To date, my customers have not reported any problems or complaints about the machines. And, in conversation with my customers, I can tell you they would like to see the rules remain as they are currently being enforced.

Thank you,

Dan McCoy
McCoy's Distributing, Inc.

February 8, 2016

To the WSGC:

As the owner of Brother Don's Restaurant & Bar, I would like to express my support for Group 12 games and option "B" within rules package 3.

As a small independent family business, it is important that we are able to continue to offer adult Amusement games to our customers. Our short experience with these machines has been positive. We have seen a slight increase in both our beverage and food sales. The customers are using their winnings (Normally \$50 and under) and are applying it to their bill.

These are a far cry from slot machines and are nothing more than entertaining amusement games. I like the fact that our customers can win products and merchandise that we offer. It would be a shame to see this program repealed.

Sincerely,



Geoff Tompkins
Owner Brother Don's
4200 Kitsap Way
Bremerton, WA 98312

INCL 270110-111



Muckleshoot Gaming Commission

2700 Auburn Way South + Auburn, WA 98092
(253)218-0600

January 20, 2016

Washington State Gambling Commission

Dear Commissioners;

In regards to the Group 12 Amusement Games currently in operation in the State of Washington. We requested that the Commission rescind the approval of the recently approved gambling devices. We would like to take a moment to document our understanding of the amusement game devices and why some would be considered gambling devices under state statute. In our arguments to the Washington State Gambling Commission on January 14, 2016, Dallas Burnett, a recognized court expert, outlined violations to the Washington Administrative Code to articulate why those devices needed to be rescinded. It appeared from the discussion that the Commissioners may have needed to know why we considered the devices gambling devices. As previously discussed the definition of a gambling device under RCW 9.46.0241 was "any device which, when operated for a consideration, does not return the same value for the same consideration upon each operation". It is clear that the devices approved fall within this description.

You may also know that there are exemptions to the definition. Statute RCW 9.46.0237 exempts certain activities from gambling such as, fishing derbies, pari-mutuel betting and handicapping contests, business transactions and a contest of chance specifically excluded from the definition of lottery under the chapter. The statute does not exempt amusement games from the definition.

Under RCW 9.46.0241 "Gambling Device" Section (4) Exempts a pinball machine or similar mechanical amusement device (not electronic amusement device -like the approved devices or slot skill games) which confers only an immediate and unrecorded right of replay on players thereof which;

1. Does not contain any mechanism which varies the chance of winning free games or the number of free games or vary the number of coins dispensed and;
2. Prohibits multiple winnings depending upon the number of coins inserted and;
3. Requires the playing of five balls individually upon the insertion of a nickel or dime, as the case may be, to complete any one operation thereof

The Group 12 amusement game devices in question are not exempt under definition of the statute because the device presents a number of different outcomes and does not require the playing of five balls. In addition, this device is in no way a mechanical amusement game similar to a pinball machine. It is a computerized (Electronic) device that has no similarity to a pin ball machine.

RCW 9.46.0241 defines a gambling device as any device or mechanism which, when operated for consideration, does not return the same value or thing of value for the same consideration upon each operation thereof. The fact that a player may wager the same amount of money and receive a different prize makes this a gambling device.

Furthermore, AG Opinion 1987 No.20-Oct 2, 1987, affirms that a Gambling device may be an Amusement Game and there must be some chance element if it to be subject to regulation by the Commission. All Amusement Games approved are gambling. They are subject to regulation and control as well as subject to public policy articulated in RCW (the policy to promote "public welfare by limiting the nature and scope of gambling activities"). Having a potential population of devices exceeding 1000 machines would not be limiting. The approval of the device by the Washington State Gambling Commission may be construed as an expansion of gambling in the State of Washington.

The current approved devices however still violate WAC rules that require that if an amount over the current cost of one play is inserted and there was no way to view additional prizes available for each consecutive play it will violated WAC 230-13-067. All this must be done prior to inserting any money. The meager posting of a flare of prizes does not ensure the player has the ability to win each and every play from the device. They have plays that do not return any prize. The fact that the player has to go through some navigation on the screen to understand what the immediate prize is available is not inherent to any amusement game we our aware of and can be seen as a fraudulent practice.

We also contend that the devices fail WAC 230-13-100 because the average player would not improve with repeated play. As testified at the meeting on January 14th, an average player will know the patterns and his/her ability to line up the symbols will not improve over time.

We believe these devices were obviously created to skirt existing rules and regulations in order to allow a pseudo slot looking devices into commercial businesses.

We hope this letter is useful in your consideration of rules and the gambling devices approved under Amusement Games.

Thank you for your time,



Warren Oliver
Executive Director
Muckleshoot Tribal Gaming Agency

February 3, 2016

Tina Griffin
Assistant Director
Washington State Gambling Commission

Ms. Griffin,

I am writing this letter in response to the agenda proposal posted to the website yesterday, February 2, 2016, regarding the repeal of the Rule 12 Amusement Game. Those who are involved in operating these gaming devices are a collective of many different sized companies, mostly small, single owner businesses, supporting other small businesses throughout the state; most locally owned restaurants/lounges use our services. We have battled through and worked hard to build our businesses throughout the years of economic changes and governmental decisions which adversely affected our businesses.

I was not part of this Industry until the early 90's but started in the industry working for a distributor then moved into managing the amusement route that I ultimately purchased in 2005. I went through a drastic loss of revenue when the smoking ban was enacted and experienced additional losses with the economic downturn. I mention these things because our industry has changed. In the late 90's, our restaurant/bar customers sold their businesses, rarely did they actually close their doors and leave property vacant. That is not the case today.

To survive and grow our businesses, operators in this industry must always be looking to bring new products & services to our customers in order to help them be competitive with all the other forms of entertainment; whether that's a jukebox pool table or some new & engaging video game, I've always remained focused on bar customers, 21 and over and throughout the years, I've kept my eye out for a different kind of redemption machines which would prove engaging for that crowd. I had never really seen one until the Rule 12 machine known as the Puzzle Game. As I learn more about this machine. In my opinion this is a redemption game that probably would only entertain someone of 21 plus age group. I really don't see it appealing to a younger crowd regardless of placement. With the 21 and over requirement, a different set of incentives to play is necessary to pique their interest in playing these appealing games.

Machine license fees for both the operator and the location need to be offset by reasonable revenue to make it worth pursuing. Option B has several parts to it that will make it a reasonable consideration to carry Rule 12 games and satisfy all parties' expectations and intentions. This piece is a redemption game that can entertain customers of all ages, over 21. I envision these machines giving my lounge and bar locations improved customer retention. I spend a lot of money creating promotions for my amusement equipment to do that exact thing. The longer the customer stays,

the more he spends on food and beverages as well as the amusement games and jukebox.

I am a new licensee; having applied in October. Unfortunately, due to the holidays and everything, I did not receive my license until last week, January 29th. I am financially responsible for 10 machines on order bringing my investment into this program too approximately \$50,000. Additionally, I have committed significant amounts of time to attending the meetings, trying to plan a reasonable method of operating these machines and developing methods for locations to efficiently assist in the rewards of the machine alongside the typical duties expected of bar staff. I have a few locations already in the process of obtaining their licenses now; which should provide their licenses in about 3 weeks; they could not apply until I received mine. Should this program be repealed, I would have about 2 weeks to salvage any revenue out of this program. I would have never invested this much time and effort into this if the Gambling Commission had not approved 3 machines already.

I am a midsize operator and service about 130 locations. \$50,000 into a program that I might not see any return on is a significant impact on my business, my employees and my family. Please, let's work together and come to a solution that will work for all parties involved - our struggling bar and lounge industry, our coin operated amusement operators and the companies & industries that support them as well.

With a working solution, we also put more tax dollars into the local jurisdictions and State of Washington Department of Revenue. I expect the gross volume to be significant over time, so I am sure the license fees will be significant for the type 53 operator despite the low return due to such high award percentages.

I was not at the early meetings, however I did attend the November and January meetings. The question that kept coming up in the January meeting was to get to the reasons & justifications for all of the rule changes specifically for this one redemption game. From my understanding, the 21 and over requirement request came from the Native American tribal organizations. I do not see the reason for that requirement as I do not believe it appeals to the younger customer of today, therefore as an operator I probably would not place the equipment anywhere else. I just want to take a moment to address a few of the proposed changes that I believe are the biggest concerns:

Rule Package 1

Wagering limits. Currently there are no wagering limits on redemption machines unless school aged minors are present. I believe a wagering limit would be a reasonable request. And while this is a redemption machine, there are limits established already via the Pull Tab laws of \$2,500 value.

Rules package 3

Option A would be very cumbersome and difficult on the staff of the average small business. This would also be difficult to proceed forward in a manner that is best for all parties.

For Option B, I have spent several hours in the last month coming up with ideal plan to implement parts or all of this option. I am not fully prepared to do a presentation at this time but should the repeal be denied and option B continues to be available (if not in whole but even in parts), I would like the opportunity to present some examples of how I would approach the redemption of the dispensed voucher from a Group 12 machine.

Thank you for your time & consideration. I hope that we can design a solution which is fair to the interests and concerns of all.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Rouse", with a long horizontal flourish extending to the right.

Gary Rouse
President
RJB Amusement Services Inc.

Griffin, Tina (GMB)

Subject: FW: New letter to the commissioners from Sound Amusements

From: Patrick Tompkins [mailto:ptompki59@gmail.com]
Sent: Monday, February 08, 2016 2:30 PM
To: Griffin, Tina (GMB) <tina.griffin@wsgc.wa.gov>
Subject: New letter to the commissioners from Sound Amusements

Dear Washington State Gambling Commissioners,

My name is Patrick Tompkins of Sound Amusements Inc. I am one of the many local amusement operators that have placed group 12 games in licensed locations.

I am writing this letter to help clear up some misconceptions in regard to Group 12 amusement games:

- 1) **These are not slot machines.** These machines are casual play amusement devices. The player knows what they are playing for on each and every play. It is up to the player to decide if they want to play or continue.
- 2) **These amusement devices do not award cash prizes.** These amusement devices only pay out in merchandise prizes. Gift certificates are considered merchandise prizes and are good only at the location. If you feel that additional restrictions on gift certificates are needed, I urge you to consider option "B" in Rules Package 3. Please do not eliminate gift certificates entirely as it is good for the locations business.
- 3) **Big cash prizes are being awarded.** As I mentioned above, only merchandise prizes can be awarded. The average prize is under a \$50 value and it is being used to purchase primarily food and beverages at the location, the change given to the customer after their purchase is negligible.
- 4) **Little tax or fees are being generated.** These amusement devices generate taxes for both the state and local municipalities. They will also generate significant fees for the WSGC, amplified greatly if the licensing stamp fee is increased to \$250.00 per machine. Sales tax is also being generated when goods and services are awarded as merchandise prizes.
- 5) **The commissioners and the public were misled.** This entire process for approval was very public and transparent. The rule change was introduced, public testimony was given at three separate monthly WSGC meetings and the Commissioners unanimously, in a 5 to 0 vote, approved it. Why were the concerns not addressed then?

Our industry is very excited to provide adult amusement games to locations and their customers. This is something we asked for and pursued in good faith. The impact to my company and others like mine if this is repealed would be catastrophic. My company alone has expended significant time, money and effort in Group 12 games.

Every business owner in our industry we communicate with is in strong agreement that these amusement devices remain regulated. Implementing Rules Package 3 option "B" seems like a good start.

We look forward to a continued cooperative relationship with the WSGC.

Thank you for your consideration,

Patrick Tompkins

Sound Amusements, Inc.

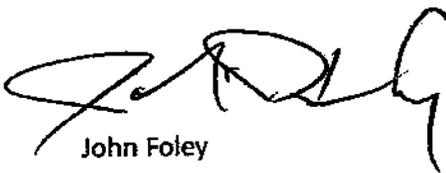
Proud Small Business Owner

To whom it may concern

I have operated my business in Federal Way for over twenty years, and believe I have a pretty good understanding of the gambling business in the State of Washington. The Indian Reservation is within five miles of my establishment, and as it has grown, my revenue from gambling has decreased. I feel whatever can be done to help business establishments compete with the Indian Casinos should be made available to all licensed businesses in Washington State. I know that the revenue generated from my business does much to improve the wages of my employees, both in tips and benefits. The profit margin to my business is actually quite low when you take into consideration the licensing fees, city tax, game cost and the cost of reporting to the state. I use the profits to provide medical and dental insurance to my employees and in the last couple of years we added an IRA plan to which I contribute 2% of their total wages each year. With higher operating costs and rising cost of goods, gambling revenue is more important than ever, since you can only raise your price so high and remain competitive.

The video machine that has been approved pays out 82 percent. It provides some of the best odds compared to other forms of gambling. It's possible that this could make businesses more competitive with the casinos. This should be what the State of Washington wants! Businesses of my type are the few that provide good livable wages to low skilled workers. We can offer flexible hours for parents that struggle to support themselves and care for their children. If we continue to lose revenue, benefits will be reduced or eliminated, and employees laid off or working less hours. This industry is going to need some innovative ideas. Raising prices is not going to be the answer. Please don't stand in the way! This industry employs a lot of people in which many are single moms. If you want all these businesses to stay open in the near future please take a little of my advice, don't be afraid of these machines and let them be & let the industry grow. This industry needs to make money the employees need benefits, Health Care and Sick Leave and Retirement. Just ask my employees.

This industry is dying, just look at the turnover of these businesses.



John Foley

Time Out Alehouse

Federal Way WA. 98023

253-640-6987