



**WASHINGTON STATE GAMBLING
COMMISSION MEETING**

May 11 & 12, 2023

Olympia, Washington



STATE OF WASHINGTON

GAMBLING COMMISSION

“Protect the Public by Ensuring that Gambling is Legal and Honest”

Gambling Commission Meeting Agenda

May 11th and 12th, 2023

Day-1 meeting will be held virtually through Teams and in person at the Hampton Inn & Suite 4301 Martin Way E., Olympia

Day-2 meeting will be held at the Gambling Commission Headquarters 4565 7th Avenue SE, Lacey

To join the meeting virtually through TEAMS Click [here](#)

The Chair may take items out of order and the Commissioners may take action on business items. Administrative Procedures Act Proceedings are identified by an asterisk (*)

Thursday, May 11, 2023
PUBLIC MEETING

9:30 AM	Call to Order	<i>Alicia Levy, Chair</i>
Tab 1	<p>*Consent agenda (Action)</p> <ul style="list-style-type: none"> April 13, 2023, Commission Meeting Pg. 4 New Licenses and Class III Employees Pg. 8 Major Sports Wagering Representatives Pg. 28 Non-profit officer working in multiple organizations Pg. 35 <p><i>Public Comment</i></p> <p>Director’s Report Pg. 36</p> <p><i>Tina Griffin, Director (Action)</i></p> <p>Election of Officers (Action)</p> <ul style="list-style-type: none"> Chair Vice Chair <p><i>Public Comment</i></p>	
Tab 2 Pg. 37	<p>*PETITION UP FOR FINAL ACTION (Action)</p> <ul style="list-style-type: none"> Debit Card Rules AToM <p><i>Lisa McLean, Legislative and Policy Manager</i></p> <p><i>Public Comment</i></p>	
Tab 3 Pg. 63	<p>*PETITION UP FOR FINAL ACTION (Action)</p> <ul style="list-style-type: none"> Staff Proposed License Fee and Sports Wagering Vendor License Fee Adjustments <p><i>Lisa McLean, Legislative and Policy Manager</i></p> <p><i>Public Comment</i></p>	
Approx. 11:30-1:30 2 hrs.	<p>Executive Session – Closed to the Public (Working Lunch)</p> <p>To discuss current and potential agency litigation with legal counsel, including tribal negotiations.</p>	
Tab 4 Pg 71	<p>*PETITION UP FOR DISCUSSION AND POSSIBLE FILING (Action)</p> <ul style="list-style-type: none"> Progressive Jackpot <p><i>Lisa McLean, Legislative and Policy Manager</i></p> <p><i>Public Comment</i></p>	

15 min	Break
Tab 5 Pg. 90	PETITION TO INITIATE RULE MAKING (Action) <ul style="list-style-type: none"> Bingo HB 1707 <p style="text-align: right;"><i>Lisa McLean, Legislative and Policy Manager</i></p> <p><i>Public Comment</i></p>
Tab 6 Pg. 95	PETITION TO INITIATE RULE MAKING (Action) <ul style="list-style-type: none"> Definition of “qualified sports teams” for electronic raffles <p style="text-align: right;"><i>Lisa McLean, Legislative and Policy Manager</i></p> <p><i>Public Comment</i></p>
Tab 7 Pg. 100	2023 Legislative Wrap-up and 2024 Agency Request Legislation <p style="text-align: right;"><i>Tommy Oakes, Interim Legislative Liaison</i> <i>Lisa McLean, Legislative and Policy Manager</i></p>
Tab 8 Pg. 101	OPMA Training for Commissioners <p style="text-align: right;"><i>Susanne Becker, Assistant Attorney General</i></p>
Tab 9 Pg. 102 3:00 PM	Presentation – 50 Years of Gambling in Washington <p style="text-align: right;"><i>Tina Griffin, Director</i></p>
	Public Comment
	Public Comment can be provided via: <ul style="list-style-type: none"> Email before the start of the meeting on May 11, 2023, to askus@wsgc.wa.gov Microsoft Office Teams Chat Box. By phone; or In person.
	Adjourn

Gambling Commission Meeting Agenda

May 12th, 2023

This meeting will be held virtually through Teams and in person at the
Gambling Commission Headquarters 4565 7th Avenue SE, Lacey.

The Chair may take items out of order and Commissioners may take action on business items.

Administrative Procedures Act Proceedings are identified by an asterisk ()*

Friday, May 12, 2023	
PUBLIC MEETING	
9:30 AM	Call to Order <i>Alicia Levy, Chair</i>
Tab 10 Pg. 103	Presentation - Strategic Plan 2023-2028 (Action) <i>Tina Griffin, Director</i>
	Executive Session – Closed to the Public (Working Lunch) To discuss current and potential agency litigation with legal counsel, including tribal negotiations and potential employee performance, if time allows.
	Adjourn

Upon advance request, the Commission will pursue reasonable accommodations to enable persons with disabilities to attend Commission meetings.

Questions or comments pertaining to the agenda, rule changes and requests for special accommodations should be directed to Julie Anderson,

Executive Assistant at (360) 486-3453 or TDD (360) 486-3630. If you would like to submit public comment via email, please submit them to

askus@wsgc.wa.gov

Please silence your cell phones and mute your mics for public meetings.



STATE OF WASHINGTON
GAMBLING COMMISSION

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

April Gambling Commission Meeting Minutes
Hybrid Meeting held at the
Washington Liquor and Cannabis Board
April 13 , 2023

Commissioners Present:

Chair Alicia Levy
Vice Chair Julia Patterson
Bud Sizemore
Sarah Lawson
Anders Ibsen

Ex Officio Members Present:

Representative Shelley Kloba (Via Teams)

Staff Present:

Tina Griffin, Director
Lisa McLean, Legislative and Policy Manager
Tommy Oakes, Interim Legislative Liaison
Matt Kernutt, Assistant Attorney General (AAG)
Suzanne Becker, Assistant Attorney General (AAG)
Julie Lies, Tribal Liaison
George Schultz, IT
Julie Anderson, Executive Assistant

Staff Present Virtually:

Gary Drumheller, Assistant Director; Julie Lies, Tribal Liaison; Kriscinda Hansen, CFO; Jess Lohse, Special Agent, Dan Wegenast, Agent in Charge, Jeanine Sugimoto, Special Agent,

There were 9 people in the audience and 49 people attended virtually.

Chair Levy welcomed everyone to the Washington State Liquor and Cannabis Board for the Washington State Gambling Commission's April 13th, 2023, meeting. The meeting began at 10:09 AM and she called the roll to ensure a quorum. Chair Levy introduced our new Commissioner Anders Ibsen and asked him to tell us about himself.

Tab 1

Petition for Review – Chanmalaty Touch, Case No. CR 2021-01221

Doug Van de Brake, AAG represented Commission Staff. Mr. Francis Huguenin, attorney, represented Petitioner Touch.

*Following oral argument and review of the parties' pleadings, the Commission Grants Commission Staff's Motion to Strike. 4:0
Commissioner Ibsen recused himself from this review.*

The matter to Deny the Petition for Review came before the Commissioners on April 13, 2023, on Petitioner Chanmalaty Touch's Petition for Review & Request for New Evidentiary Hearing of the Administrative Law Judge's December 22, 2022, Initial Order.

The Commission had before them the record of the prior proceedings relating to this matter, as well as additional pleadings prepared for this Petition for Review. Oral argument was held.

*Following oral argument and review of the record, the Commission DENIES Petitioner Chanmalaty Touch's Petition for Review. 4:0
Commissioner Ibsen recused himself from this matter.*

Tab 2

Presentation - Rocky Mountain Elk Foundation

Jim Melville, Special Agent and Kurt Murphy, Director of Field Operations for the Northwest Region presented the materials for this tab.

Commissioner Patterson inquired about the amount of funds spent on lobbying.

*Commissioner Lawson moved to approve that the Rocky Mountain Elk Foundation offer raffle prizes in excess of \$300,000 for their license year.
Commission Sizemore seconded the motion.
The motion passed unanimously. 5:0*

Tab 3

Consent Agenda

Chair Levy asked the Commissioners if they had any changes to the consent agenda. Commissioners had no changes.

Chair Levy asked for public comment. There was no public comment.

*Commissioner Patterson moved to approve the March minutes as presented by staff.
Commissioner Sizemore seconded the motion.
The motion passed unanimously. 4:0
Commissioner Ibsen abstained.*

*Commissioner Sizemore moved to approve the New License and the Class III Employee list, the 2023 WSGC meeting dates and location, and the nonprofit officers.
Commissioner Patterson seconded the motion.
The motion passed unanimously. 5:0*

The Director's Report

Director Griffin gave a brief announcement about the Agencies 50th year in Gambling. She mentioned that staff will prepare a presentation that will be given at the May Commission Meeting. She also mentioned that there would be a presentation on Self-Exclusion at the July Commission Meeting. Among the other handouts in the packet was the 2022 Employee Satisfaction Survey Results. Noting that the Gambling Commission rated well. Lastly, she said that Tulalip Tribe is the 3rd casino in the state to have the mobile app for Sports Wagering.

Chair Levy announced at 11:47AM that the Commissioners would be adjourning to

Executive Session, which will last approximately one and a half hours to discuss current potential agency litigation with legal counsel, including travel negotiations.

Chair Levy reconvened the commission meeting at 1:15PM and called the roll to ensure a quorum.

Tab 4

Petition for Discussion Only– Debit Card Rules AToM

Lisa C. McLean, Legislative/Policy Manager and Rules Coordinator (LPM) presented the materials for this tab. This petition was submitted in April 2022, and it was proposing to amend WAC 230-15-150 to allow chips to be sold using debit cards. In May 2022, the Commission agreed to initiate rulemaking, and at the time staff noted that other rules in addition to WAC 230-15-150 needed to be amended. Staff brought some draft language for amending rules, and in addition to that adding new rules.

This petition was up for discussion only.

Chair Levy asked for comments from the Commissioners, and they had none. She asked for public comment, and there was none.

Tab 7

Petition for Discussion and Possible Filing – Wagering Limits for House-Banked Card Games

Lisa C. McLean, Legislative/Policy Manager and Rules Coordinator (LPM) presented the materials for this tab. This tab is about increasing the maximum single wager limit from \$300 to \$500 for all house-banked gaming tables.

Commissioner Lawson stated her concerns. Commissioner Sizemore indicated that he didn't approve of the \$500.00 dollar wager but would consider \$400.00.

Chair Levy asked for public comment.

Victor Mena, from Frontier Casino, spoke about the industry being highly regulated.

Commissioner Patterson moved to approve the Wagering Limits for House Banked Card Games to \$400.00 to be effective 31 days after filing with the code revisor.

Commissioner Sizemore seconded the motion.

The motion passed 3:0

Commissioner Lawson voted no.

Commissioner Ibsen abstained.

Tab 5

Petition for Discussion Only – Progress Jackpot

Lisa C. McLean, Legislative/Policy Manager and Rules Coordinator (LPM) presented the materials for this tab. In February, we received a petition from Tiffini Cox, representing Galaxy Gaming from Las Vegas, Nevada, who was proposing to amend WAC 230-15-685(4)(b) to allow house-banked card rooms licensees to connect more than one progressive jackpot of different

card games. Currently, the rule only allows licensees to connect a progressive jackpot on different card games, so they are asking to connect more than one to different card games. **Chair Levy** asked for further comment from the Commissioners. They had none. She asked for public comment. There was none.

Tab 6

Petition for Discussion Only – Staff proposed License Fee and Sports Wagering Vendor License Fee Adjustments

Lisa C. McLean, Legislative/Policy Manager and Rules Coordinator (LPM) and Kriscinda Hansen, Chief Financial Officer (CFO) presented the material for this tab. At the January Meeting the Commissioners accepted a staff recommendation to initiate rulemaking to address licensees. **LPM McLean** gave an overview of the stakeholdering by staff by holding separate meetings with tribal partners and stakeholders, both on February 13, 2023, and on February 27, 2023.

Chair Levy asked for further comment from the Commissioners. They had none. She asked for public comment. There was none.

Tab 8

2023 Legislative Update

Tommy Oakes, Interim Legislative Liaison (ILL) presented the materials for this tab. ILL Oakes gave an update on the our agency request legislation SHB 1132 Relating to the oversight and training requirements for limited authority peace officers. He also updated the Commissioners on bills with direct gambling industry impacts.

- HB 1824, Authorizing bona fide charitable or nonprofit organizations. **2SHB 1681 did not make it to a floor vote.**
- 2SHB 1681/2SSB5634 Relating to Problem Gambling. **2SSB 5634 has passed the Legislature and is being sent to the Governor.**
- HB 1707 Relating to bingo conducted by bona fide charitable or nonprofit organizations. **This bill has been passed by the Legislature and is being sent to the Governor.**

ILL Oakes will be back at the May Commission meeting to provide a wrap up of the 2023 legislative session.

Chair Levy adjourned the meeting at 3:06 PM.



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
May 2023

Index

	<u>PAGE</u>
NONPROFIT ORGANIZATIONS & COMMERCIAL BUSINESSES.....	1-2
MANUFACTURER REPRESENTATIVE	3-4
CALL CENTER REPRESENTATIVE	4
MAJOR SPORTS WAGERING REPRESENTATIVE.....	4-5
NON-PROFIT GAMBLING MANAGER	5
SERVICE SUPPLIER REPRESENTATIVE.....	5-6
CARD ROOM EMPLOYEE	6-9
CLASS III GAMING EMPLOYEE	10-19

PAGES:19

Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 19.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**BINGO**

FOE 02618
00-00362 01-00927

258 E MAIN ST
DAYTON WA 99328-1353

FOE 03144
00-00701 01-00556

18134 VASHON HWY SW
VASHON WA 98070

RAFFLE

AMERICAN LEGION 00043
00-08986 02-02429

701 MURDOCK ST
SEDRO WOOLLEY WA 98284

FOE 02618
00-00362 02-00475

258 E MAIN ST
DAYTON WA 99328-1353

KENNEWICK GRID KIDS ASSOCIATION
00-25089 02-21319

910 E 10TH AVE
KENNEWICK WA 99336

PROGRESSIVE ANIMAL WELFARE SOCIETY
00-16990 02-02825

15305 44TH AVE W
LYNNWOOD WA 98087

PROSSER SENIOR CITIZENS CLUB
00-06601 02-02344

1231 DUDLEY AVE
PROSSER WA 99350

PUNCHBOARD/PULL-TAB NONPROFIT

AMERICAN LEGION 00043
00-08986 05-04196

701 MURDOCK ST
SEDRO WOOLLEY WA 98284

FOE 02618
00-00362 05-01423

258 E MAIN ST
DAYTON WA 99328-1353

FOE 02927
00-00333 05-03092

100 E SOUTH HILL RD
SUNNYSIDE WA 98944

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

6 BUCKS
00-25073 05-21815

19944 S PRAIRIE RD
BONNEY LAKE WA 98391

BUZZ INN STEAKHOUSE
00-25018 05-21799

1065 STATE AVE
MARYSVILLE WA 98270

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

DINO'S PUB
00-24993 05-21794

1800 NE 44TH ST STE 101
RENTON WA 98056

LANDMARK TAVERN
00-25070 05-21813

313 SUSSEX AVE W
TENINO WA 98589

RIVERSIDE BOWLING LANE
00-25036 05-21805

225 RIVERSIDE LN
MT VERNON WA 98273

ZINANI SIT N BULL BAR & GRILL
00-24983 05-21790

308 N MAIN ST
CONCONULLY WA 98819

DISTRIBUTOR

DSP INTL LLC
21-00320 21-00320

6785 S EASTERN AVE STE 4
LAS VEGAS NV 89119

COMMERCIAL AMUSEMENT GAMES OPERATOR

WEST SEATTLE ARCADE
00-25022 53-21565

2758 ALKI AVE SW
SEATTLE WA 98116

NON HOUSE-BANKED CARD GAME

FOE 02618
00-00362 60-00200

258 E MAIN ST
DAYTON WA 99328-1353

SPORTSMANS PUBLIC HOUSE
00-24594 65-07506

121 N MAIN AVE
RIDGEFIELD WA 98642

ANCILLARY SPORTS WAGERING VENDOR

ONFIDO INC
10-00319 83-00031

14-18 FINSBURY SQUARE
LONDON EC2A 2AH

SUZHOPP GAMING SOLUTIONS, LLC
10-00393 83-00034

1385 PAMA LANE UNIT 100
LAS VEGAS NV 89119

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

ADCOCK, JOHN R
 23-03646

EVERI GAMES INC.
 AUSTIN TX 78746

APPAVOO, ARTHI
 23-03642

LIGHT & WONDER
 LAS VEGAS NV 89119

AUTEN, JENNIFER L
 23-03655

ARISTOCRAT TECHNOLOGIES INC
 LAS VEGAS NV 89135

BRYANT, DEREK C
 23-03649

EVERI PAYMENTS INC
 LAS VEGAS NV 89113-2175

CHIPURUPALLI, LAVANYA
 23-03641

LIGHT & WONDER
 LAS VEGAS NV 89119

CORRIGAN, JONATHAN R
 23-03627

ARISTOCRAT TECHNOLOGIES INC
 LAS VEGAS NV 89135

FERNANDEZ, REESE L
 23-03645

ARIES TECHNOLOGY LLC
 GROVE OK 74344-6251

JOHNSON, JONATHAN K
 23-03643

PASSPORT TECHNOLOGY USA INC
 GLENDALE CA 91203

KEUSCH, KRISTOFFER E
 23-03647

EVERI PAYMENTS INC
 LAS VEGAS NV 89113-2175

LOGAN, CHARLES E
 23-02310

EVERI PAYMENTS INC
 LAS VEGAS NV 89113-2175

MAHALIK, PRAHLAD
 23-03653

LIGHT & WONDER
 LAS VEGAS NV 89119

PALANISAMY, ANAND
 23-03652

LIGHT & WONDER
 LAS VEGAS NV 89119

PATEL, JANISH R
 23-03650

EVERI PAYMENTS INC
 LAS VEGAS NV 89113-2175

SMITH, ARNE E
 23-02616

IGT
 LAS VEGAS NV 89113

SOUZA, JEFFERY F
 23-03644

ARIES TECHNOLOGY LLC
 GROVE OK 74344-6251

SUNDARAMANI, ANBU RAJA
 23-02979

LIGHT & WONDER
 LAS VEGAS NV 89119

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

TIWARI, MANISH
23-03640

LIGHT & WONDER
LAS VEGAS NV 89119

UBERPAKKER, RODNEY J
23-03648

AGS LLC
LAS VEGAS NV 89118

WILLIAMS, DANIEL J
23-03651

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

CALL CENTER REPRESENTATIVE

AMOS, KRYSTAL M
32-00083

INCEPT CORPORATION
CANTON OH 44718

DOUGHTY, JESSICA L
32-00079

INCEPT CORPORATION
CANTON OH 44718

FREMBERG, VERRONICA L
32-00080

INCEPT CORPORATION
CANTON OH 44718

GILL, CARA A
32-00078

INCEPT CORPORATION
CANTON OH 44718

RUSCITTI, ANGELA D
32-00084

INCEPT CORPORATION
CANTON OH 44718

SMITH, MELISSA A
32-00082

INCEPT CORPORATION
CANTON OH 44718

TIPPIE, SAMANTHA L
32-00081

INCEPT CORPORATION
CANTON OH 44718

MAJOR SPORTS WAGERING REPRESENTATIVE

CARVAJAL-AMADOR, WINSTON G
33-00529

FANDUEL SPORTSBOOK
LOS ANGELES CA 90045

GEORGAKOPOULOS, VASILEIOS
33-00533

NYX DIGITAL GAMING (USA), LLC
BEVERLY HILLS CA 90210

PARAGIOUDAKIS, JOHN S
33-00508

DRAFTKINGS
BOSTON MA 02116

OUIINN, ANA E
33-00527

FANDUEL SPORTSBOOK
LOS ANGELES CA 90045

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MAJOR SPORTS WAGERING REPRESENTATIVE

RANDOLPH, CHRISTOPHER P
33-00531

IGT
LAS VEGAS NV 89113

NON-PROFIT GAMBLING MANAGER

ALBERTS, JACQUELYN Z
61-04833

AMVETS 00001
TACOMA WA 98409

CARMONA, LUIS A
61-04837

RAVE FOUNDATION
SEATTLE WA 98134

DAVIS, PATRICIA L
61-04835

FOE 02681
KIRKLAND WA 98083

GUYOT, PAT L
61-04840

FLEET RESERVE ASSOCIATION 00170
EVERETT WA 98203-0000

HOUGHTALING, WILLIAM S
61-04836

FOE 00649
CLE ELUM WA 98922-0000

STUTSMAN, CINDY L
61-04776

FOE 04197
OCEAN SHORES WA 98569-9347

SERVICE SUPPLIER REPRESENTATIVE

ARECHIGA, ALEX
63-01100

TECHNOLOGENT
IRVINE CA 92618

ARREDONDO-CERVANTES, OCTAVIO
63-01094

TECHNOLOGENT
IRVINE CA 92618

BRAVO VARGAS, MAURICIO O
63-01096

TECHNOLOGENT
IRVINE CA 92618

ESPINOZA SIERRA, JUAN L
63-01084

TECHNOLOGENT
IRVINE CA 92618

ESPINOZA SIERRA, MIGUEL A
63-01083

TECHNOLOGENT
IRVINE CA 92618

HELLUM, MITCHELL D
63-01106

MAVERICK WASHINGTON
KIRKLAND WA 98034

HERNANDEZ RIOJA, IRAM
63-01095

TECHNOLOGENT
IRVINE CA 92618

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

SERVICE SUPPLIER REPRESENTATIVE

KENNEDY, CASSANDRA
63-01108

MAVERICK WASHINGTON
KIRKLAND WA 98034

LEWIS, DALE W
63-01104

MAVERICK WASHINGTON
KIRKLAND WA 98034

CARD ROOM EMPLOYEE

ALVARADO, JOSE E JR
68-37176

B

GREAT AMERICAN CASINO/EVERETT
EVERETT WA 98204

ANDERSON, TAYLIN R
68-33993

B

CASINO CARIBBEAN
KIRKLAND WA 98034

BAYS, ELIZABETH E
68-10077

B

CASINO CARIBBEAN
YAKIMA WA 98901

BROOKS, JILLIAN M
68-37165

B

CARIBBEAN CARDROOM
KIRKLAND WA 98034

BROWNING, CHRISTOPHER S
68-29231

B

CLEARWATER SALOON & CASINO
EAST WENATCHEE WA 98802

CABARDO, JUDIMAR A
68-37170

B

GREAT AMERICAN CASINO/TUKWILA
TUKWILA WA 98168

CHANN, ENNY
68-37178

B

MACAU CASINO
TUKWILA WA 98188

CHEN, JIAOLAN
68-37151

B

RED DRAGON CASINO
MOUNTLAKE TERRACE WA 98044

CLARK, DEBRA A
68-15511

B

JOKER'S CASINO SPORTS BAR & FIESTA
RICHLAND WA 99352-4122

COLE, ZACHARY J
68-37171

B

BLACK PEARL RESTAURANT & CARD I
SPOKANE VALLEY WA 99206-4719

COMEAU, TRINITY D
68-37162

B

ALL STAR CASINO
SILVERDALE WA 98383

DICE, WALKER J
68-37179

B

ZEPPOZ
PULLMAN WA 99163

FINAMORE, NICHOLAS J
68-37183

B

MACAU CASINO
TUKWILA WA 98188

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

GARRINGER, JENNIFER K 68-37153	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
GREENE, DYLAN A 68-31699	B	LAST FRONTIER LA CENTER WA 98629-0000
HANBY, GALEN R 68-37175	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
HERBER, JERRID B 68-23576	B	NEW PHOENIX LA CENTER WA 98629
HILL, CHRISTIAN J 68-07551	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 9804
ILIASOV, NIAZ 68-37158	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 9804
KHA, LEON S 68-32755	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
KOZOREZOV, IL'YA P 68-37150	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
LE, HUYEN-TRAN T 68-30375	B	FORTUNE CASINO - RENTON RENTON WA 98055
LIANG, ZHICHAO 68-37156	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
LIU, XIAOYA 68-37177	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804
LUCAS, TODD M 68-37155	B	ROMAN CASINO SEATTLE WA 98178
LUONG, LAN M 68-36361	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
MAHAR, JAMESON M 68-37168	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
MANCUSO, ISABELLA O 68-37138	B	ZEPPOZ PULLMAN WA 99163
MATUU, ANDRE P 68-37167	B	IMPERIAL PALACE CASINO AUBURN WA 98002

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

MOORE, GARETH D 68-37166	B	CASINO CARIBBEAN KIRKLAND WA 98034
MUZIO, DOMINICK C 68-37121	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 98044
NELSON, MICHAEL B JR 68-37163	B	ROMAN CASINO SEATTLE WA 98178
NENDEL, KYLE P 68-18774	B	NEW PHOENIX LA CENTER WA 98629
NGUON-KROUCH, NYLA 68-36211	B	MACAU CASINO TUKWILA WA 98188
NGUYEN, KHANG M 68-11177	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 98044
NGUYEN, LIEN T 68-33725	B	FORTUNE CASINO - RENTON RENTON WA 98055
OBRA, JOSEPH P 68-35571	B	HOLLYWOOD CARDROOM SHORELINE WA 98133
OLSEN, KURSTYN F 68-37184	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 98044
PATTERSON, STEVEN F 68-35796	B	IMPERIAL PALACE CASINO AUBURN WA 98002
POWRIE, ROBERT R 68-17624	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
PRESSEY, MALCOLM T 68-37169	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
PROTASOV, ALEKSANDR V 68-37164	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
SHELBY, ANTHONY A 68-34816	B	HOLLYWOOD CARDROOM SHORELINE WA 98133
STEIN, PATRICIA A 68-37172	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
TRAN, VAN T 68-17611	B	ROMAN CASINO SEATTLE WA 98178

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

WAMEGO, TAYLOR M 68-37161	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
WANG, CHUN 68-37152	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 9804.
WILCE, TRACY L 68-37182	B	NEW PHOENIX LA CENTER WA 98629
WILKINSON, JAQUALYNN N 68-37180	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 9804.
WILLARD, SPENCER C 68-37157	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
ZHEN, QING M 68-23842	B	FORTUNE CASINO - TUKWILA TUKWILA WA 98168

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

CHAPIN, GABRIEL A
69-54533

CLARK, RICHARD L JR
69-54535

GRENIER, HELENE M
69-54531

HOWE, HANNAH G
69-44974

PESCI, JOSEPH A
69-54573

RIDGEBEAR, DENISE S
69-54713

SANDERS, DUSTIN G
69-54714

COLVILLE CONFEDERATED TRIBES

BINDER, MICHELL M
69-54634

BROWN, TYLER A
69-54707

CLARK, STEPHEN L
69-32008

DICK, HARLEN J
69-54616

EDWARDS, LAWRENCE D
69-44331

FRIEDLANDER, MARY S
69-33591

JORDAN, TYLER D
69-54615

MCDANIEL, CHASE W
69-54614

MENDOZA NEGRETE, JAVIER
69-49182

MONTELONGO-GUZMAN, RAMON N
69-54706

MOOMAW, SAPPHIRE E
69-54611

SAUER, KRYSTALYN N
69-54612

COWLITZ INDIAN TRIBE

BARAJAS, SERENA R
69-54569

BARR, JACK L
69-54626

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

BROWN, TERESA A
69-54636

CAMPBELL, VICTORIA H
69-54524

CHAMPION, DYLAN P
69-54665

DACUS, GABRIEL J
69-54624

DEBUSE, CHRISTOPHER J
69-50078

DIMARTINO, BRANDON A
69-54516

ELLOWAY, JAMES R
69-54657

FISHER, QUINN M
69-54597

GALLUZZO, PHILLIP A JR
69-54572

GONZALEZ, OSWALDO C
69-54638

HALLBERG, BRIAN O
69-44277

HAMMACK, ETHAN W
69-54637

HANDBURY, JOHN G
69-54596

HOLLIBAUGH, KYLEE A
69-54625

HOUSE, TRAVIS D
69-54664

LOVEALL, MATTHEW T
69-54660

MANZANO, PERLA I
69-54520

MENDEZ, EMMANUEL C
69-54635

MILLER, JACOB L
69-54530

MORRISON, SAMANTHA A
69-54547

MYERS, KEEGAN A
69-54598

PACK, LEVI S
69-54628

POTTER, JULIE A
69-54668

OUENTON, MILES C
69-54552

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

REARDON, MARDEISY
69-54627

RUSSELL, ROBERT J
69-54661

SCHEIDT, MICHAEL T
69-45214

SETTLES, KATHRYN E
69-54659

SIMMONS, AMBER N
69-54656

SPIES, MICHAEL P
69-54544

VALLEJO-BUTLER, OPHELIA I
69-49784

VENTURA, JASON W
69-54658

WATSON, MARIE A
69-54517

WEAVER, BRITTNEE D
69-54599

WILSON, GLORIA M
69-54602

WOODS, TESA L
69-54519

KALISPEL TRIBE

AULD, SKY M
69-54558

BERRY, RYAN P
69-54555

CHIAMULON, RILEY A
69-54560

FRICK, AMANDA R
69-54666

GARCIA-REID, NICKLAUS E
69-54579

GRAY, ANDREW J
69-54663

GRUVMAN, NOEMI D
69-54639

JOHNSON, MATTHEW K
69-54583

LASARTE, ANALYSE F
69-54642

LEATO, CASEY P
69-54641

MCGEE, AMBER N
69-54562

PEDERSON, JANINE C
69-54518

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

PORTER, ELIZABETH A
69-54679

ROASTINGSTICK-SIMON, JALEN S
69-45707

ROJA, MICHAEL G
69-54556

ROWLEY, JOSHUA A
69-54554

SCHAFFER, JENNA L
69-54606

SCONAWAH WHITE, MARION
69-54578

SPISAK, DANIELLE M
69-54585

STEWART, BARRON C
69-54580

SULLIVAN, HUNTER J
69-54581

TALAMONI, SUTTERMERY F
69-54662

THAW, KAW
69-54559

WANG, XIAOYIN
69-54557

LUMMI NATION

ACUNA, CHRISTINE
69-54696

AMADOR, VIDAL O
69-54695

DAVIDSON, DEAN P
69-54691

GREENLEAF, CHRISTIAN T
69-54618

HILLAIRE, LIVINA D
69-54617

OLSON, MYA R
69-54694

RAU, DARRIUS J
69-54692

SOLOMON, ALAYLA A
69-54693

MUCKLESHOOT INDIAN TRIBE

ADHIKARI, HARI B
69-43105

ARANTON, MEDARD M
69-54686

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

MUCKLESHOOT INDIAN TRIBE

FEARN, CIAN M
69-54589

GRAY, BRIAN L
69-54622

HOCKING, DALLISA C
69-54687

LI, NING
69-54623

ROLLAND, ANGEELIE V
69-34602

SAM, SHERINA D
69-54594

NISQUALLY INDIAN TRIBE

AGUSTIN, MARILYN I
69-54651

EARLYWINE, RICHARD E JR
69-54711

GRUNDL, JESSE M
69-54584

GUTIERREZ, MILKY S
69-45943

HANCOCK, NAOMI L
69-54592

HINES, JENNIFER S
69-54566

PERRY, JILLIAN H
69-54683

PORT GAMBLE S'KLALLAM TRIBE

DORSEY, MIRANDA L
69-54479

HOSTLETTLER, NICOLE B
69-54480

HUDGENS, ALEXANDER W
69-54653

NICHOLS, MEAGHAN N
69-54652

WATSON, ELYSE L
69-54481

PUYALLUP TRIBE OF INDIANS

BROWN, TYLER E
69-54504

CAREY, JEDEDIAH M
69-54604

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

CLAXTON, BRANDON R
69-54760

COLLIE, WAYNE D
69-54729

ESCOBEDO, DAVID O
69-52212

GORDON, KEVIN K
69-54728

HOLMES, MARK R
69-54620

LINDLEY, THOMAS D
69-54503

MAUSISA, LITO F
69-54727

MONROE, SHEREN D
69-54645

MORGAN, NICHOLAS A
69-54688

NARAYAN, PRANISH
69-54587

NJENGA, VICTOR K
69-54654

RATEKIN, EMILEE C
69-31947

RIVERA, AUTUMN R
69-40428

ROSEN, DAVID M
69-54576

SMITH, NICOLE J
69-54726

STEHLIK, DAKOTA E
69-54588

THACH, JEFFREY S
69-54705

TRAN, OUY V
69-54621

VAN MECHELEN, JOSHUA M
69-54689

VIBOCH LUCAS, TOSHA R
69-54671

YANCEY, ROBERT A JR
69-44319

QUINAULT NATION

BAILEY, TOMMY P JR
69-54603

BARNETT, JENNY T
69-54667

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

QUINAULT NATION

CULLUM, WILLIAM V
69-54564

DAVIS, LARRY H JR
69-54565

GOMEZ LOPEZ, BALTAZAR P
69-20257

SNOQUALMIE TRIBE

BROWN, NATALIE T
69-33103

CHO, YOUNG KWAN
69-54678

CROOK, BRENDON C
69-54676

DICKERSON, QUINTON D
69-54582

DOI, MYCOLE M
69-54629

HUTSELL, ADAM G
69-54674

JINTRANAN, RATCHADA
69-54631

PLACKOV, MARKO
69-54525

TERRONES, ALEJANDRO A
69-54675

TUN, VIRAK M
69-54526

YOUSSE, MICHAEL A
69-54677

SPOKANE TRIBE

BROCK, MICHAEL A
69-54497

BUCHMANN, NICOLE L
69-54553

DEHNEL, BLAKE A
69-54700

GIBSON, BENJAMIN T
69-43577

GROVE, CHRISTOPHER T
69-54702

JACKSON, CHARLENE R
69-41405

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

JEWETT-WHITE, DESTINEY D
69-54684

ROZZELL, HEATHER L
69-54685

WAKAN, SYDNEY R
69-54609

WYNNE, TRAVIS W
69-54701

ZEUG, MEGAN C
69-54586

SQUAXIN ISLAND TRIBE

BAYLY, DANE C
69-54607

BLUEBACK, ROSE M
69-54648

CALHOUN, JENNIPHER L
69-54512

PAULSEN, ZACHARY R
69-54650

PETERSON, MADILYNN E
69-54471

SCHUMACHER, MICHAEL L
69-54649

SMID, CHRISTOPHER M
69-54509

SUQUAMISH TRIBE

ALARCON, HAZEL G
69-54536

BECKSTEAD, STEVEN M
69-54574

FIorentino, BRANDY L
69-54550

LENSICO, JOHN RAFAEL M
69-54548

LINCE-MALING, IAN C
69-54640

MABALAY, KENNETH BRYCE B
69-54551

RIDENOUR, KEILANIE D
69-54680

RIZZO, GUY M JR
69-54549

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SWINOMISH INDIAN TRIBAL COMMUNITY

BILL, LEONARD J JR
69-45833

CABER, WILLIE
69-54591

GOINGS, JERRY R
69-54590

HOLDEN, STEVEN H
69-54669

MONTGOMERY, KIMBERLY K
69-54528

MURDOCK, MASON W
69-54646

ROBBINS, BRADON J
69-48068

SMITH, WINSTON B
69-54647

TEJADA, RIGOBERTO
69-42487

THE TULALIP TRIBES

CRUZ ANDERSON, JOSE A
69-54561

DABY, PATRICIA L
69-54527

GISVOLD, SAMUEL D
69-29570

GOULD, MYRIAH M
69-37410

GREEN, HAILEY R
69-54670

HANUS, JOHN D
69-37062

JEWELL, JUSTIN L
69-54570

MENDOZA, MARILOU B
69-54730

MJELDE, JOSIAH N
69-54600

NEISINGER, TREVOR N
69-54571

PARIS, MIKHAIL K
69-45610

SHAY, MASON W
69-54545

THOMAS, JEFFREY M
69-54523

ULLMAN, MICHELLE S
69-42844

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

WRIGHT, THOMAS H
69-54529

UPPER SKAGIT INDIAN TRIBE

ARCHER, OLIVIA M
69-54724

BURNS, EVELYN M
69-25513

EDIN, HEATH B
69-54632

GOMEZ-BOS, VERONICA A
69-54723

LARSON, CADEN B
69-54725

LOBERIZA, NIMFA A
69-54619

MCGILL, ABBIE R
69-54699

PEHRSON, TIMOTHY K
69-54712

YAKAMA NATION

CUEVAS SANCHEZ, CRISTIAN E
69-54568

DIAZ ROBLES, KARLA D
69-54758

DOMINGUEZ, CRUZ J
69-54710

GUILLEN, NOEL R
69-54708

JUAREZ, GINA D
69-54567

LARA, ABEL L
69-54757

MARTINEZ, DIANA S
69-54709

NAPOLEON, VICTORIA J
69-07876

STRONG, SAMANTHA S
69-30613

THOMPSON, RAVEN M
69-07991

TOBIA, DAVID J
69-15946



**Washington State Gambling Commission
Pre-Licensing Report
Ancillary Sports Wagering Vendor**

**Part I
Licensing/Organization Information**

Type of Approval Ancillary Sports Wagering Vendor License	Premises/Trade Name/Address Onfido, Inc. 14-18 Finsbury Square London EC2A 2AH
Date of Application August 2, 2022	

APPLICANT INFORMATION

Name Onfido, Inc.	License Application # 10-00319	Business Phone # (240) 335-7426
Address 14-18 Finsbury Square London EC2A 2AH		

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Ancillary Sports Wagering Vendor License	Exp. Date 03/31/2024	License Number(s) 83-00031
----------------------------------------------------------------------	--------------------------------	--------------------------------------

COMMISSION STAFF

Licensing Specialist Michael Moore	Special Agents Julie Sullivan
----------------------------------------------	-----------------------------------------



Background/Structure

General Information:

Onfido, Inc. applied for an Ancillary Sports Wagering Vendor license to provide Know Your Customer (KYC) or identity verification services for on-premises mobile sports wagering.

Ownership/corporate structure of Onfido Inc.

Title	Name	% Ownership
CEO, Secretary, Director	Michael Tuchen	0%
CFO, Director	Faisal Chughtai	0%
Shareholder	Onfido Limited	100%
	Total	100%

Other Jurisdictions Licensed:

Onfido Inc. is licensed in several other jurisdictions including Arizona, Colorado, and New York.

Part II
Licensing Investigations Summary

A Special Agent from the Commission’s Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure, reviewing financial and business records. The investigation found:


- No unreported people or businesses involved (i.e., substantial interest holders).
- No undisclosed ownership or undisclosed involvement in other activities/businesses.
- No disqualifying administrative history.
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold a license.

Source of Funds:

The company’s source of funds came from cash on hand from operations.

Part III
Staff Recommendations

Based upon the criminal history and financial background investigations, staff recommends licensing Onfido Inc. with an Ancillary Sports Wagering Vendor license.

Prepared By Jennifer LaMont, Agent in Charge Licensing Unit	Signature 	Date May 1, 2023
--------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------	----------------------------



**Washington State Gambling Commission
Pre-Licensing Report
Ancillary Sports Wagering Vendor**

**Part I
Licensing/Organization Information**

Type of Approval Ancillary Sports Wagering Vendor License	Premises/Trade Name/Address SuzoHapp Gaming Solutions, LLC 1385 Pama Lane #100 Las Vegas, NV 89119
Date of Application November 29, 2022	

APPLICANT INFORMATION

Name SuzoHapp	License Application # 10-00393	Business Phone # (702) 597-4840
Address 1385 Pama Lane #100 Las Vegas, NV 89119		

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Ancillary Sports Wagering Vendor License	Exp. Date 3/31/2024	License Number(s) 83-00034
----------------------------------------------------------------------	-------------------------------	--------------------------------------

COMMISSION STAFF

Licensing Specialist Michelle Davis	Special Agents Nathan Kresse
-----------------------------------------------	----------------------------------------



Background/Structure

General Information:

SuzoHapp Gaming Solutions LLC (“SuzoHapp”) applied for an Ancillary Sports Wagering Vendor license to distribute kiosks for use in sports wagering operations.

Ownership/corporate structure of Gaming Solutions LLC:

Title	Name	% Ownership
President	James M. Brendel	100%

Other Jurisdictions Licensed:

SuzoHapp is licensed in one-hundred and thirteen (113) other state and Tribal jurisdictions including in Arizona, California, Colorado, Florida, Nevada, and New Jersey.

**Part II
Licensing Investigations Summary**

A Special Agent from the Commission's Licensing Unit conducted a criminal history and financial investigation focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigation included verifying the ownership structure, reviewing financial and business records. The investigation found:

- No unreported people or businesses involved (i.e., substantial interest holders).
- No undisclosed ownership or undisclosed involvement in other activities/businesses.
- No disqualifying administrative history.
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold a license.


Source of Funds:

The company's source of funds came from cash on hand from operations.

**Part III
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommend licensing SuzoHapp with an Ancillary Sports Wagering Vendor license.

Prepared By
Jennifer LaMont, Agent in Charge
Licensing Unit

Signature


Date
May 1, 2023



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Licensed and Operating			38		
	City	Commission Approval Date	License Expiration Date	Org #	License #
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2023	00-18357	67-00058
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2023	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2023	00-11170	67-00183
CARIBBEAN CARDROOM	KIRKLAND	Nov 14, 2019	Sep 30, 2023	00-24515	67-00343
CASINO CARIBBEAN	KIRKLAND	Nov 14, 2019	Sep 30, 2023	00-24512	67-00341
CASINO CARIBBEAN	YAKIMA	Nov 14, 2019	Sep 30, 2023	00-24513	67-00342
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2023	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2023	00-24296	67-00339
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2024	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2024	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2024	00-21847	67-00281
FORTUNE CASINO - LACEY	LACEY	Jul 14, 2022	Mar 31, 2024	00-24868	67-00347
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2023	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2023	00-23465	67-00329
GOLDIES SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2023	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2023	00-19513	67-00194
GREAT AMERICAN CASINO/LAKEWOOD	LAKEWOOD	Aug 14, 2003	Jun 30, 2023	00-19258	67-00184
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2023	00-12554	67-00012
IMPERIAL PALACE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2023	00-19477	67-00192
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2023	00-15224	67-00006
LANCER LANES/REST AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2023	00-21681	67-00276
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2023	00-21305	67-00267

Licensed and Operating			38		
	City	Commission Approval Date	License Expiration Date	Org #	License #
MACAU CASINO	TUKWILA	Nov 14, 2019	Sep 30, 2023	00-24514	67-00344
MACAU CASINO	LAKEWOOD	Nov 14, 2019	Sep 30, 2023	00-24516	67-00345
NEW PHOENIX	LA CENTER	Oct 6, 2022	Jun 30, 2023	00-24981	67-00349
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2023	00-13069	67-00173
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2023	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2024	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2023	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2024	00-17613	67-00057
ROXBURY LANES AND CASINO	SEATTLE	Nov 18, 2004	Jun 30, 2023	00-20113	67-00231
SILVER DOLLAR CASINO/MILL CREEK	MILL CREEK	Sep 9, 2010	Jun 30, 2023	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2023	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2023	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2023	00-16759	67-00038
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2023	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2023	00-20009	67-00212
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2024	00-18777	67-00209

Licensed but Not Currently Operating			4		
	City	Commission Approval Date	License Expiration Date	Org #	License #
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2024	00-23814	67-00335
LUCKY DRAGONZ CASINO	SEATTLE	Mar 10, 2022	Jun 30, 2023	00-23001	67-00323
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2023	00-22130	67-00301
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2023	00-21998	67-00287

Applications Pending**2**

	City	Commission Approval Date	License Expiration Date	Org #	License #
IMPERIAL PALACE CASINO	TUKWILA			00-24893	67-00348
RED DRAGON CASINO	MOUNTLAKE TERRACE			00-22459	67-00315



STATE OF WASHINGTON
GAMBLING COMMISSION

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

DATE: April 25, 2023

TO: **COMMISSIONERS**
Alicia Levy, Chair
Julia Patterson, Vice-Chair
Bud Sizemore
Sarah Lawson
Anders Ibsen

EX OFFICIO MEMBERS
Senator Steve Conway
Senator Jeff Holy
Representative Shelley Kloba
Representative Skyler Rude

FROM: Jennifer^{JL} LaMont, Agent in Charge, Licensing Unit

SUBJECT: Non-Profit Individual Working for Multiple Organizations Approval List

<u>Individual</u>	<u>Organizations</u>	<u>License No.</u>
Marty Marsolek	AMERICAN LEGION 00129	00-00308
	FLEET RESERVE ASSOCIATION 00097	00-01550
Steven Daschle	SW YOUTH & FAMILY SERVICES	00-24522
	WEST SEATTLE ROTARY SERVICE FOUNDATION	00-25077



STATE OF WASHINGTON
GAMBLING COMMISSION

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

DATE: May 11, 2023

TO: **COMMISSIONERS** **EX OFFICIOS**
 Alicia Levy, Chair Senator Steve Conway
 Julia Patterson, Vice Chair Senator Jeff Holy
 Bud Sizemore, Commissioner Representative Shelley Kloba
 Sarah Lawson, Commissioner Representative Skyer Rude

FROM: Tina Griffin, ^{AG} Director

SUBJECT: Director's Report - May

Commissioner Levy's Re-Appointment

On May 2, 2023, Governor Inslee reappointed Commissioner Alicia Levy to the Gambling Commission effective July 3, 2023, for a term ending June 30, 2029.

Website Redesign

In 2022, we were informed that our website platform would not be supported by WA Tech after November 2023. Anthrotech, a contractor through WA Tech, is helping us create, redesign, and develop a new agency website with a new agency brand.

On April 21, 2023, we launched our 38-week journey toward launching a new website. The project will include:

- A user survey,
- Website content inventory and audit,
- Content improvement,
- Brand focus group and redesign,
- Site development, and
- Usability and accessibility evaluation.

Many of the above steps will include seeking feedback from website users to ensure the new website is usable, visually pleasing, easy to comprehend, easy to navigate, responsive, accessible, and easy to maintain.

We encourage licensees, tribal partners, and frequent users of our website to take the survey, which is available on our website through the end of the month.

New Sports Wagering Operation

In early April 2023, the Swinomish Tribe became the 15th Tribe to offer sports wagering at their gambling facility.



Rule Petition to Amend

- WAC 230-03-200 – Defining “gambling equipment.”
- WAC 230-06-035 – Credit, loans, or gifts prohibited.
- WAC 230-15-150 – Selling and redeeming chips.
- WAC 230-15-280 – Surveillance requirements for house-banked card games
- WAC 230-15-500 – Accounting for table inventory.
- WAC 230-15-505 – Selling gambling chips to players.
- WAC 230-15-585 – Using drop boxes.
- WAC 230-15-615 – Conducting the count.
- WAC 230-15-620 – Concluding the count.

Rule Petition for New Rules

- WAC 230-06-006 – Defining “debit card.”
- WAC 230-15-151 – Accepting checks in exchange for chips at non-house-banked card games.
- WAC 230-15-506 – Using debit cards to purchase chips on house-banked card games.
- WAC 230-15-507 – Debit card reading devices used on house-banked card games.

May 2023 – Final Action

April 2023 – Discussion Only

March 2023 – Discussion and Possible Filing

May 2022 – Commission Review

April 2022 – Rule-Making Petition Received

Tab 2: MAY 2023 Commission Meeting Agenda.	Statutory Authority 9.46.070
---------------------------------------------------	-------------------------------------

Who Proposed the Rule Change?

Jan Espejo, Light and Wonder, Las Vegas, Nevada

Background

BOLD = Changes made after the April 2023 Commission Meeting.

Jan Espejo, Light and Wonder, of Las Vegas, Nevada, is proposing to amend WAC 230-15-150, Selling and redeeming chips, to allow chips to be sold using debit cards.

The petitioner feels this change is needed because Light and Wonder has a new product called AToM, which is a tabletop ATM (automated teller machine) that allows players to pay for chips using a debit card without leaving the table.

The petitioner feels the effect of this rule change would be the ability to purchase chips at the gaming table using a debit card.

Currently, only cash is allowed to purchase chips at gaming tables. WAC 230-06-035(3) allows for debit card transactions (i.e., electronic point-of-sale bank transfer), however, at cardrooms, all other transactions are taking place at the cashier’s cage or at an ATM. There are no requirements regarding where an ATM is located within each cardroom. Players may obtain cash or cash advances from their debit or credit cards at an ATM.

Allowing debit card transactions at tables may allow for more control over cash withdrawals. In Nevada, operators can set daily limits on the amount of cash patrons are allowed to withdraw from their accounts. Those limits are set for each patron and require a 24-hour waiting period prior to any change to their limits. Currently, any limits on ATM withdrawals would be imposed by the patron’s bank. In addition, a responsible gaming message is displayed either near the system or on a printed item given to the patron.

Other potential controls with the use of debit transactions may be less cash being transferred between patrons and operators and less chance of operators accepting counterfeit bills.

Staff noted that other rules in addition to WAC 230-15-150 may need to be amended to allow for debit transactions.

Before you today is draft language which:

- Classifies debit card reading devices as gambling equipment; and
- Defines debit card; and
- Describes procedures regarding how debit cards can be used to purchase chips on house-banked-card games; and
- Describes technical controls related to debit card reading devices on house-banked card games; and
- Updates language on authorized payment methods for gambling to include debit cards; and
- Updates language on how chips may be sold to players at house-banked gaming tables; and
- Clarifies payment methods utilizing checks for nonhouse-banked card gaming tables; and
- Requires surveillance coverage for debit card reading devices at gaming tables; and
- Updates language on how table inventory is accounted for; and
- Clarifies what items are placed in drop boxes to include debit card transactions receipts; and
- Updates language related to soft count procedures, which includes debit card transactions receipts.

At the March 2023, Commissioners directed staff to file amended and new rules for further discussion.

At the April 2023 meeting, Commissioners expressed interest in seeing some research on the correlation between speed of play and problem gambling. Staff reviewed the following studies and presents several highlights from them:

Gainsbury, Sally M. and Alex Blaszczynski, “Digital Gambling Payment Methods: Harm Minimization Policy Considerations,” Gambling Law Review, Vol. 24, No. 7, September 16, 2020, <https://www.liebertpub.com/doi/abs/10.1089/qlr2.2020.0015?journalCode=qlr2>: “Digital transactions are argued to foster the capacity for individuals losing control of urges to make impulsive decisions to spend more than initially intended and rapidly replenish funds to chase losses when in an emotionally ”hot state.” Easy access to funds, such as through close proximity to ATMs, is also correlated with increased spending by individuals with gambling problems.”

Rollins, Barbara, “Payment Processors Have a Role in Reducing Gambling Harms,” published as News on website of the National Council on Problem Gambling, February 2, 2020, [Payment Processors Have a Role in Reducing Gambling Harms - National Council on Problem Gambling \(ncpgambling.org\)](https://www.ncpgambling.org): “Each type of payment used for gambling—from cash to credit cards to PayPal—can impact how quickly and easily individuals may access more money, how much they can obtain at a time, and add additional costs, such as ATM fees or interest charges. Recent payment innovations such as e-wallets, along with the availability of on-demand access to digital payments, could increase the willingness of consumers to spend more or gamble beyond their means in the heat of play.

Harris, Andrew & Mark D. Griffiths, [The Impact of Speed of Play in Gambling on Psychological and Behavioural Factors: A Critical Review | SpringerLink](https://doi.org/10.1007/s10826-017-0311-1), Journal of Gambling Studies, Issue 34, published online June 22, 2017: “There was a consistent finding across [11] studies that games with

faster speeds of play were preferred and rated as more exciting for all gamblers, ranging from non-problem to problem gamblers. Of concern, was the repeated finding that fast games are particularly appealing to those suffering with a gambling problem.”

Attachments:

- Petition
- Draft “amended” rules to include: WAC 230-03-200, 230-06-035, 230-15-150, 230-15-280, 230-15-500, 230-15-505, 230-15-585, 230-15-615, and 230-15-620.
- Draft “new” rules to include: WAC 230-06-006, 230-15-151, 230-15-506, and 230-15-507.
- Petitioner-provided photos of device
- **Light & Wonder PowerPoint Presentation**

Stakeholder Feedback

On September 28, 2022, staff held a stakeholder meeting to discuss the debit card petition. There were 14 participants from the gaming industry. The consensus was support for the petition to authorize debit cards as a payment method to receive gaming chips on house-banked card gaming tables. No participant in the meeting was against the petition.

On September 28, 2022, staff held a meeting with tribal partners to discuss three outstanding petitions, including the debit card petition.

On September 29, 2022, staff received an email from Paul Milbourn, no affiliated organization noted. Milbourn was against the petition to authorize debit cards to purchase gaming chips. Per Milbourn, *“This change would further abstract a gambler’s conception of money they own vs. money they can afford to lose. With the existing system one is allowed a brief moment of reflection during the process, reducing that threshold of effort to tap on a screen would be a small convenience with a massive cost – particularly for problem gamblers lost in the moment and especially for their families at home.”*

At the March 12, 2023 meeting, Tana Russell, Assistant Director with the Evergreen Council on Problem Gambling, a Certified Gambling Counselor, and Gambling Disorder Trainer, commented that she had recently read a study about self-imposed limit-setting devices and tools versus agency-imposed limit-setting devices and tools. She noted that “there was some evidence that suggests that setting limits is helpful for players in terms of a responsible gaming resource and tool. There are certain circumstances where it seems to have backfired in terms of increasing risk. Some of those include the agency may set limits higher than what players tend to set for themselves. So an agency may set a limit for \$100 or \$500 but a player if given the opportunity to set it for themselves might set it at \$20 or \$50.” She continued, there is also some consideration in terms of just how the tool displays options for limit-setting to a player if it sorts them in order of highest to lowest, such that the player sees the highest limit as the first option. That can also increase risks for the player in terms of spending more than they can afford just because of the way it is shown to them.”

Attachment:

- Milbourn Email

Policy Considerations

Pursuant to RCW 9.46.070 (11), the Commission has the power and authority to “*establish the type and scope of and manner of conducting gambling activities authorized by this chapter, including but not limited to, the extent of wager, money, or thing of value which may be wagered or contributed or won by a player...*”

Staff has the following policy considerations:

- Will need to put controls in place to account for debit card transactions in gaming records (calculating win/loss for table (i.e., gross gambling receipts)).
- Changing current practice of cash-only at tables and allowing debit card transactions.
- Address responsible gaming with daily transfer limits, messaging, and other industry best practices.

Problem Gambling Implications

Staff reached out to the Evergreen Council on Problem Gambling for feedback and further resources to determine the impacts of problem gambling should the purchase of playing chips at gaming tables through the use of a debit card be allowed. ECPG were not aware of any research on the specific device, however referenced studies on the correlation between speed of play and problem gambling. ECPG noted that, having access to an ATM at the table allows players to continue to play without a break to have to go to the cage – and thereby increases the speed of play.

Staff Recommendation

Your options are to:

- 1) Take final action;**
- 2) Request staff to continue to work on the petition;**
- 3) File amended language (make changes during the public meeting); or**
- 4) Deny the petition in writing, a) stating the reasons for the denial, specifically addressing the concerns stated in the petition, or b) indicating alternative means by which the agency will address the concerns raised in the petition.**

Laydon, Ashlie (GMB)

From: no-reply@wsgc.wa.gov on behalf of WSGC Web <no.reply@wsgc.wa.gov>
Sent: Wednesday, April 6, 2022 2:50 PM
To: Rules Coordinator (GMB)
Subject: Request a Rule Change Submission from wsgc.wa.gov

External Email

Submitted on Wednesday, April 6, 2022 - 2:50pm Submitted by anonymous user: 208.78.228.100 Submitted values are:

Petitioner's Name: Jan Espejo

Mailing Address: 6601 Bermuda Road

City: Las Vegas

State: NV

Zip Code: 89119

Phone:

Email: jespejo@lnw.com

Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.

==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: 230-15-150

I am requesting the following change: In addition to cash and checks, Light and Wonder would like to request that chips may be sold using debit cards.

This change is needed because: Light and Wonder has an upcoming product called AToM, which is a tabletop ATM. This product will allow players to pay for chips with a debit card without having to leave the table.

The effect of this rule change will be: Debit cards will be allowed to purchase chips.

The results of this submission may be viewed at:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wsgc.wa.gov%2Fnode%2F18%2Fsubmission%2F3287&data=04%7C01%7Crules.coordinator%40wsgc.wa.gov%7C17885753901e46b7665c08da1817776c%7C11d0e217264e400a8ba057dcc127d72d%7C0%7C0%7C637848786312945252%7CUnknown%7CTWFpbGZsb3d8eyJWljiM C4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEkaWwWwLCJXVCi6Mn0%3D%7C3000&odata=qqiUZRloGnxyVCC3FT0QzL5V pm5gOJlbnJIPTBEfall%3D&reserved=0>

WAC 230-03-200 Defining "gambling equipment." "Gambling equipment" means any device, gambling-related software, expendable supply, or any other paraphernalia used as a part of gambling or to make gambling possible. "Gambling equipment" includes, but is not limited to:

(1) Amusement games;
(2) Punch boards and pull-tabs;
(3) Devices for dispensing pull-tabs;
(4) Electronic devices for conducting, facilitating, or accounting for the results of gambling activities including, but not limited to:

(a) Components of a tribal lottery system;
(b) Electronic devices for reading and displaying outcomes of gambling activities; and

(c) Accounting systems that are a part of, or directly connected to, a gambling system including, but not limited to:

- (i) Bet totalizers; or
 - (ii) Progressive jackpot meters; or
 - (iii) Keno systems;
- (5) Bingo equipment;
(6) Electronic raffle systems;

(7) Devices and supplies used to conduct card games, fund-raising events, recreational gaming activities, or Class III gaming activities, as defined in the Indian Gaming Regulatory Act at U.S.C. 25 chapter 29 § 2703 and in tribal-state compacts including, but not limited to:

- (a) Gambling chips;
- (b) Cards;
- (c) Dice;
- (d) Card shuffling devices;
- (e) Graphical game layouts for table games;
- (f) Ace finders or no-peek devices;
- (g) Roulette wheels;
- (h) Keno equipment; and
- (i) Tables manufactured exclusively for gambling purposes;

(8) Debit card reading devices used at gambling tables to sell chips to players.

WAC 230-06-035 Credit, loans, or gifts prohibited. (1) Licensees, employees, or members must not offer or give credit, loans, or gifts to any person playing in an authorized gambling activity or which makes it possible for any person to play in an authorized gambling activity.

(2) Gifts are items licensees give to their customers. Licensees must not connect these gifts to gambling activities we regulate unless the gifts are:

- (a) Gambling promotions; or
- (b) Transportation services to and from gambling activities; or
- (c) Free or discounted food, drink, or merchandise which:
 - (i) Costs less than (~~five hundred dollars~~) \$500 per individual item; and
 - (ii) Must not be traded back to you for cash; and
 - (iii) Must not give a chance to participate further in an authorized gambling activity.

(3) You must collect the price required to participate in the gambling activity in full before allowing someone to participate. (~~Licensees must collect~~) Authorized payment methods include cash, check, gift certificate, gift card, or (~~electronic point-of-sale bank transfer~~) debit card.

(4) If the price paid for the opportunity to play a punch board or pull-tab series is (~~ten dollars~~) \$10 or less, licensees may collect the price immediately after the play is completed.

(5) If a charitable or nonprofit organization has a regular billing system for all of the activities of its members, it may use its billing system in connection with the playing of any licensed activities as long as the organization limits play to full and active members of its organization.

(6) Charitable or nonprofit organizations may allow credit cards, issued by a state regulated or federally regulated financial institution, for payment to participate in raffles.

AMENDATORY SECTION (Amending WSR 07-10-034, filed 4/24/07, effective 1/1/08)

WAC 230-15-150 Selling and redeeming chips. ~~((1))~~ Card game licensees must:

~~((a))~~ (1) Sell chips and redeem chips at the same value; and
~~((b))~~ (2) Sell chips for cash at gambling tables. Provided that house-banked card game licensees may allow players to use debit cards to purchase chips at house-banked card game tables in accordance with WAC 230-15-506 and 230-15-507; and

~~((e))~~ (3) Keep all funds from selling chips separate and apart from all other money received; and

~~((d))~~ (4) Not extend credit to a person purchasing chips, including to card room employees playing cards ~~(; and~~

~~(2) Licensees may accept checks, if the checks meet the requirements of WAC 230-06-005. They must:~~

~~(a) Deposit any check retained after the close of business no later than the second banking day after the close of business. Checks deposited to an armored car service no later than the second banking day after the close of business meet this requirement; and~~

~~(b) Count each transaction for the purchase of chips as a separate transaction. (Example: They must not allow a player's check to be altered after it is exchanged for chips.)~~

AMENDATORY SECTION (Amending WSR 07-09-033, filed 4/10/07, effective 1/1/08)

WAC 230-15-280 Surveillance requirements for house-banked card games. House-banked card game licensees must use a closed circuit television system (CCTV) to closely monitor and record all gambling activities and areas, including, at least:

(1) Each table, including:

(a) Cards; and

(b) Wagers; and

(c) Chip tray; and

(d) Drop box openings; and

(e) Table number; and

(f) Card shoe; and

(g) Shuffling devices; and

(h) Players; and

(i) Dealers; and

(j) Debit card reading devices at gambling tables; and

(2) The designated gambling areas; and

(3) The cashier's cage, including:

(a) Outside entrance; and

(b) Fill/credit dispenser; and

(c) Customer transactions; and

(d) Cash and chip drawers; and

(e) Vault/safe; and

(f) Storage cabinets; and

(g) Fill or credit transactions; and

(h) Floor; and

(4) The count room, including:

- (a) The audio; and
- (b) Count table; and
- (c) Floor; and
- (d) Counting devices; and
- (e) Trolley; and
- (f) Drop boxes; and
- (g) Storage shelves/cabinets; and
- (h) Entrance and exit; and
- (5) The movement of cash, gambling chips, and drop boxes; and
- (6) Entrances and exits to the card room.

AMENDATORY SECTION (Amending WSR 07-09-033, filed 4/10/07, effective 1/1/08)

WAC 230-15-500 Accounting for table inventory. (1) House-banked card game licensees must establish procedures to ensure proper accounting for chips and coins stored at gambling tables, known as the "table inventory."

(2) Licensees must not add or remove chips or coins from the table inventory except:

(a) In exchange for cash from players; or

(b) In exchange for debit card transactions from players according to WAC 230-15-506; or

(c) To pay winning wagers and collect losing wagers made at the gambling table; or

~~((e))~~ (d) In exchange for chips received from a player having an equal total face value (known as "coloring up" or "coloring down"); or

~~((d))~~ (e) In compliance with fill and credit procedures.

AMENDATORY SECTION (Amending WSR 14-11-021, filed 5/9/14, effective 7/1/14)

WAC 230-15-505 Selling gambling chips to players. House-banked card game licensees must accurately account for all chips, debit card transaction receipts, and cash when they sell chips to players. Licensees must sell chips only at the gambling table.

AMENDATORY SECTION (Amending WSR 07-09-033, filed 4/10/07, effective 1/1/08)

WAC 230-15-585 Using drop boxes. (1) House-banked card game licensees must use a drop box to collect all cash, chips, coins, debit card transaction receipts, requests for fill, fill slips, requests for credit, credit slips, and table inventory forms.

(2) The dealer or the floor supervisor must deposit these items in the drop box.

WAC 230-15-615 Conducting the count. (1) All house-banked card room licensees must have a three person count team except as set forth in subsections (2) and (3) of this section. The three person count team must conduct the count as follows:

(a) The contents of drop boxes must not be combined before the count team separately counts and records the contents of each box; and

(b) As each drop box is placed on the count table, a count team member must announce the game, table number, and shift, if applicable, loudly enough to be heard by all persons present and to be recorded by the audio recording equipment; and

(c) A count team member must empty the contents onto the count table; and

(d) Immediately after the contents are emptied onto the count table, a count team member must display the inside of the drop box to the closed circuit television camera, and show it to at least one other count team member to confirm that all contents of the drop box have been removed. A count team member must then lock the drop box and place it in the drop box storage area; and

(e) Count team member(s) must separate the contents of each drop box into separate stacks on the count table by denominations of coin, chips, and ~~((currency))~~ cash and by type of form, record, or document; and

(f) At least two count team members must count, either manually or mechanically, each denomination of coin, chips, ~~((and currency))~~ cash, and debit card transaction receipts separately and independently. Count team members must place individual bills and coins of the same denomination and debit card transaction receipts on the count table in full view of the closed circuit television cameras, and at least one other count team member must observe and confirm the accuracy of the count orally or in writing; and

(g) As the contents of each drop box are counted, a member of the count team must record the total amount of coin, chips, ~~((and currency))~~ cash, and debit card transaction receipts counted (the drop) on the master games report; and

(h) If a cage cashier has recorded the opener, closer, fill slips, and credit slips on the master game report before the count, a count team member must compare the series numbers and totals recorded on the master game report to the fill slips, credit slips, and table inventory slips removed from the drop boxes, confirm the accuracy of the totals, and must record, by game and shift, the totals we require on the master game report. Otherwise, the count team must complete all required information on the master game report; and

(i) The accounting department may complete the win/loss portions of the master game report independently from the count team if this is properly documented in the approved internal controls.

(2) The two person count team for licensees with card game gross gambling receipts of less than \$5 million in their previous fiscal year must conduct the count as follows:

(a) The contents of drop boxes must not be combined before the count team separately counts and records the contents of each box; and

(b) As each drop box is placed on the count table, a count team member must announce the game, table number, and shift, if applicable,

loudly enough to be heard by all persons present and to be recorded by the audio recording equipment; and

(c) A count team member must empty the contents onto the count table; and

(d) Immediately after the contents are emptied onto the count table, a count team member must display the inside of the drop box to the closed circuit television camera, and show it to at least one other count team member to confirm that all contents of the drop box have been removed. A count team member must then lock the drop box and place it in the drop box storage area; and

(e) A count team member must separate the contents of each drop box into separate stacks on the count table by denominations of coin, chips, and ~~((currency))~~ cash and by type of form, record, or document; and

(f) One count team member must count, either manually or mechanically, each denomination of coin, chips, ~~((and currency))~~ cash, and debit card transaction receipts separately and independently. The count team member must place individual bills and coins of the same denomination and debit card transaction receipts on the count table in full view of the closed circuit television cameras, and the other count team member must observe and confirm the accuracy of the count orally or in writing; and

(g) As the contents of each drop box are counted, a member of the count team must record the total amount of coin, chips, ~~((and currency))~~ cash, and debit card transaction receipts counted (the drop) on the master games report; and

(h) As the count is occurring, a surveillance employee must record in the surveillance log the total chip ~~((and currency count of))~~ cash, and debit card transaction receipts counted for each drop box and the announcement by the count team of the combined dollar count of all drop boxes; and

(i) If a cage cashier has recorded the opener, closer, fill slips, and credit slips on the master game report before the count, a count team member must compare the series numbers and totals recorded on the master game report to the fill slips, credit slips, and table inventory slips removed from the drop boxes, confirm the accuracy of the totals, and must record, by game and shift, the totals we require on the master game report. Otherwise, the count team must complete all required information on the master game report; and

(j) The accounting department may complete the win/loss portions of the master game report independently from the count team if this is properly documented in the approved internal controls.

(3) The two person count team for licensees with card game gross gambling receipts between \$5 million and \$15 million in their previous fiscal year and use a currency counter must conduct the count as follows:

(a) The currency counter to be used must meet the following requirements:

(i) Automatically provides two separate counts of the funds at different stages in the count process. If the separate counts are not in agreement during the count process and the discrepancy cannot be resolved immediately, the count must be suspended until a third count team member is present to manually complete the count as set forth in subsection (1) of this section until the currency counter is fixed; and

(ii) Displays the total bill count and total dollar amount for each drop box on a screen, which must be recorded by surveillance.

(b) Immediately prior to the count, the count team must verify the accuracy of the currency counter with previously counted currency for each denomination actually counted by the currency counter to ensure the counter is functioning properly. The test results must be recorded on the table games count documentation and signed by the two count team members performing the test; and

(c) The currency counter's display showing the total bill count and total dollar amount of each drop box must be recorded by surveillance during the count; and

(d) The contents of drop boxes must not be combined before the count team separately counts and records the contents of each box; and

(e) As each drop box is placed on the count table, a count team member must announce the game, table number, and shift, if applicable, loudly enough to be heard by all persons present and be recorded by the audio recording equipment; and

(f) A count team member must empty the contents onto the count table; and

(g) Immediately after the contents are emptied onto the count table, a count team member must display the inside of the drop box to the closed circuit television camera, and show it to the other count team member to confirm that all contents of the drop box have been removed. A count team member must then lock the drop box and place it in the drop box storage area; and

(h) Count team member(s) must combine all ((~~currency~~)) cash into one stack and separate the contents of each drop box into separate stacks on the count table by denomination of coin and chips, by type of form, record, or document; and

(i) Count team members must place all of the ((~~currency~~)) cash from a drop box into the currency counter which will perform an aggregate count by denomination of all of the currency collected from the drop box; and

(j) One count team member must count each denomination of coin ((~~and~~)), chips, and debit card transaction receipts separately and independently by placing coins and chips of the same denomination on the count table in full view of the closed circuit television cameras, and the other count team member must observe and confirm the accuracy of the count orally or in writing; and

(k) As the contents of each drop box are counted, a member of the count team must record the total amount of coin, chips, ((~~and currency~~)) cash, and debit card transaction receipts counted (the drop) on the master games report; and

(l) As the count is occurring, a surveillance employee must record in the surveillance log the currency counter accuracy information in (b) of this subsection, currency verification amount, debit card transaction receipt amount, total bill and dollar count of each drop box and the announcement by the count team of the combined dollar count of all drop boxes; and

(m) If a cage cashier has recorded the opener, closer, fill slips, and credit slips on the master game report before the count, a count team member must compare the series numbers and totals recorded on the master game report to the fill slips, credit slips, and table inventory slips removed from the drop boxes, confirm the accuracy of the totals, and must record, by game and shift, the totals we require on the master game report. Otherwise, the count team must complete all required information on the master game report; and

(n) The accounting department may complete the win/loss portions of the master game report independently from the count team if this is properly documented in the approved internal controls.

AMENDATORY SECTION (Amending WSR 14-11-021, filed 5/9/14, effective 7/1/14)

WAC 230-15-620 Concluding the count. (1) After the count team finishes their count, the cage cashier or accounting department employee must verify the contents of the drop boxes.

(2) In the presence of the count team and before looking at the master game report, the verifier must recount the cash, coin, chips, and debit card transaction receipts either manually or mechanically.

(3) The verifier must sign the master game report verifying that the cash (~~count is~~) and debit card transaction receipt counts are accurate.

(4) Each count team member must sign the report attesting to the accuracy of the information recorded.

(5) After the report is signed, the master game report must be taken directly to the accounting department, along with the debit card transaction receipts, requests for fills, the fill slips, the requests for credit, the credit slips, and the table inventory slips removed from drop boxes. The cage cashiers must not be allowed access to any of these records.

NEW SECTION

WAC 230-06-006 Defining debit card. "Debit card," as used in this title, means a physical payment card linked to and issued by a bank, mutual savings bank, or credit union regulated by the department of financial institutions or any federally regulated commercial institution, for the purposes of making payments for purchases or services electronically in place of cash. Debit cards must be linked to checking or savings accounts with funds on deposit and available to be withdrawn.

NEW SECTION

WAC 230-15-151 Accepting checks in exchange for chips at non-house-banked card games. Nonhouse-banked card game licensees may accept checks for the purchase of chips if the checks meet the requirements of WAC 230-06-005. Licensees must:

(1) Deposit any check retained after the close of business no later than the second banking day after the close of business. Checks deposited to an armored car service no later than the second banking day after the close of business meet this requirement; and

(2) Count each transaction for the purchase of chips as a separate transaction. Licensees must not allow a player's check to be altered after it is exchanged for chips.

NEW SECTION

WAC 230-15-506 Using debit cards to purchase chips on house-banked card games. House-banked card game licensees may allow a player to use a debit card to purchase chips at house-banked card games under the following conditions:

(1) The licensee must use approved debit card reading devices to process the debit card transactions; and

(2) The debit card transaction must be initiated at an approved gambling table; and

(3) A supervisor must be present at the gambling table during the debit card transaction; and

(4) The dealer or supervisor must examine the player's identification to confirm the player's identity. The dealer or supervisor must verify that the name on the identification matches the name on the debit card; and

(5) Verify the player is not on the state-wide self-exclusion list; and

(6) Not execute a debit card transaction upon notification from the player's financial institution that the available funds in the player's account associated with the debit card are less than the amount requested by the player; and

(7) A single debit card transaction is limited to \$500 or less. Furthermore, aggregated debit card transactions at gambling tables for a single player cannot exceed \$2,500 during a 24-hour period; and

(8) The licensee must prominently post all fees charged by the gaming establishment or system provider associated with the transfer at the gambling table or on the approved debit card reading device; and

(9) The debit card transaction receipt must be deposited into the drop box attached to the gambling table; and

(10) Licensees are required to post at all tables in which the debit transaction may be completed signage with the problem gambling helpline and how to register for the state-wide self-exclusion program at the licensee's establishment. The signage must be in at least the same font as all other signage on the table; and

(11) Conspicuously display on or at the gaming device or game, and on a printed item given to the patron, notice that funds may be approved for transfer from sources other than the account associated

with the patron's debit instrument, as determined by the patron's financial institution; and

(12) Licensees must submit internal controls to us in the format we require.

NEW SECTION

WAC 230-15-507 Debit card reading devices used on house-banked card games. House-banked card game licensees may use approved debit card reading devices on house-banked card games to sell chips to players in accordance with WAC 230-15-506. Licensees must use debit card reading devices that:

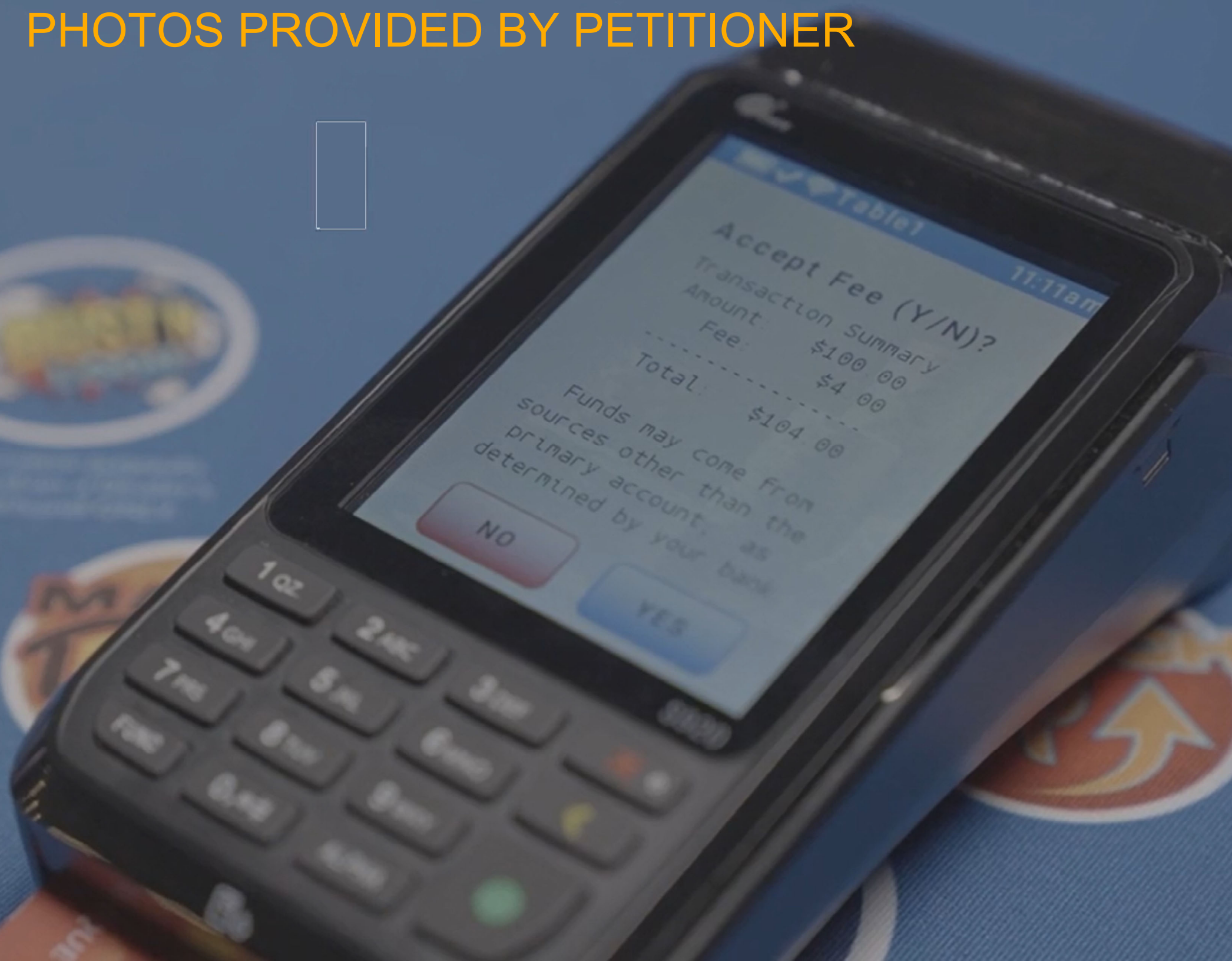
- (1) Are approved and documented in internal controls; and
- (2) Execute all transactions in accordance with all applicable state and federal electronic funds transfer requirements including, receipting and fee disclosure requirements; and
- (3) Provide real-time accounting reports for each debit card reading device to include patron transaction history by date and time; and
- (4) Do not interfere with gaming system interfaces and device operations; and
- (5) Do not accept signature debit, credit, and EBT cards; and
- (6) Are not used for the purchase of live gaming vouchers that can be used for other authorized gambling activities at the card room; and
- (7) Do not execute a transaction for funds that exceed the available amount of funds from the linked bank account; and
- (8) Provide a daily monetary transfer limit per patron that does not exceed the limits in WAC 230-15-506. A fee charged by the gaming establishment or system provider associated with a transfer does not contribute to the transfer limit; and
- (9) Employ data encryption that meets or exceeds current industry standards for all data that is transmitted.

PHOTOS PROVIDED BY PETITIONER

Quick and Easy to Install



PHOTOS PROVIDED BY PETITIONER



Tablet 11:11am

Accept Fee (Y/N)?

Transaction Summary

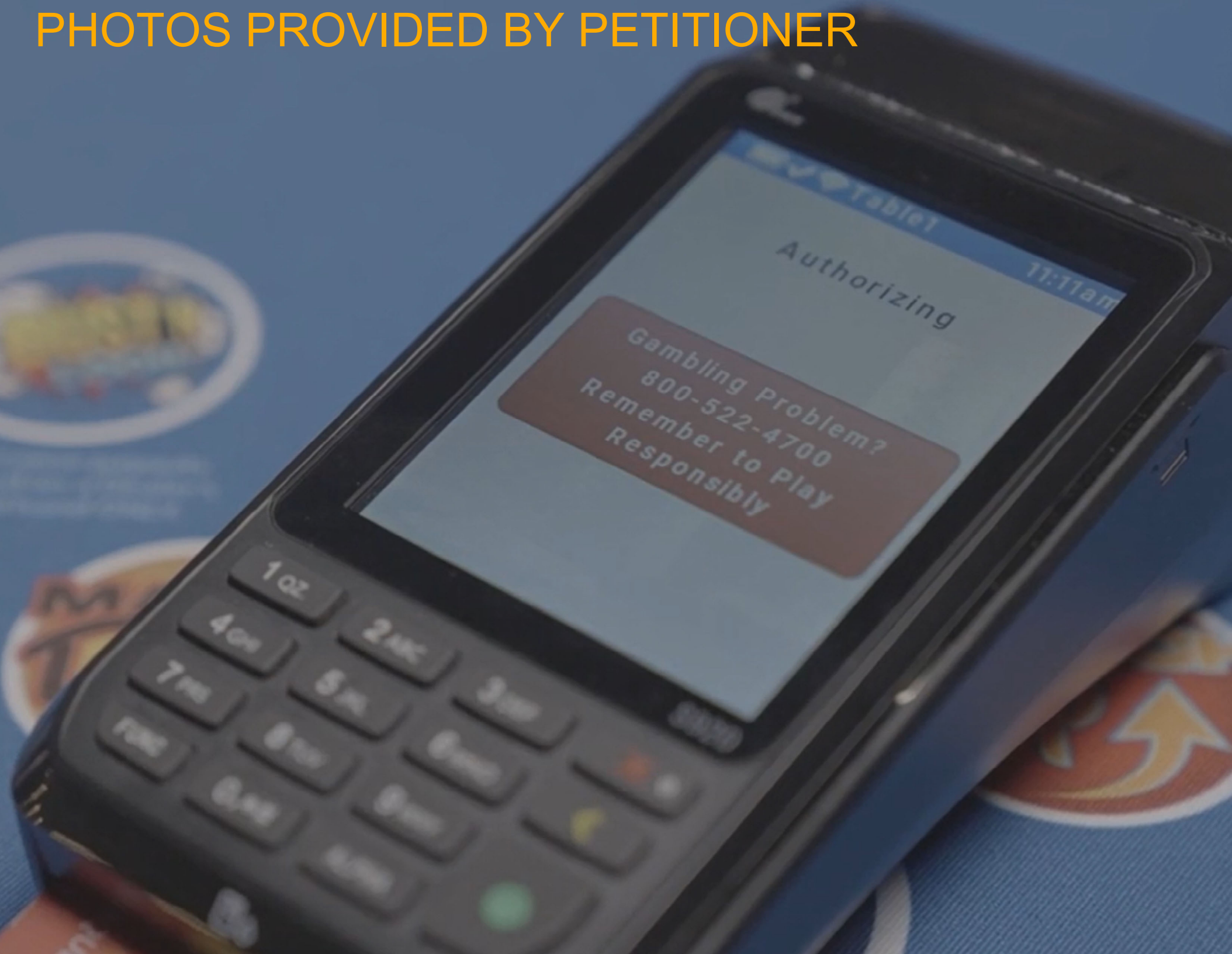
Amount:	\$100.00
Fee:	\$4.00
Total:	\$104.00

Funds may come from sources other than the primary account, as determined by your bank.

NO

YES

PHOTOS PROVIDED BY PETITIONER



LIGHT &
WONDER™

ATOM™

Chips and Credits



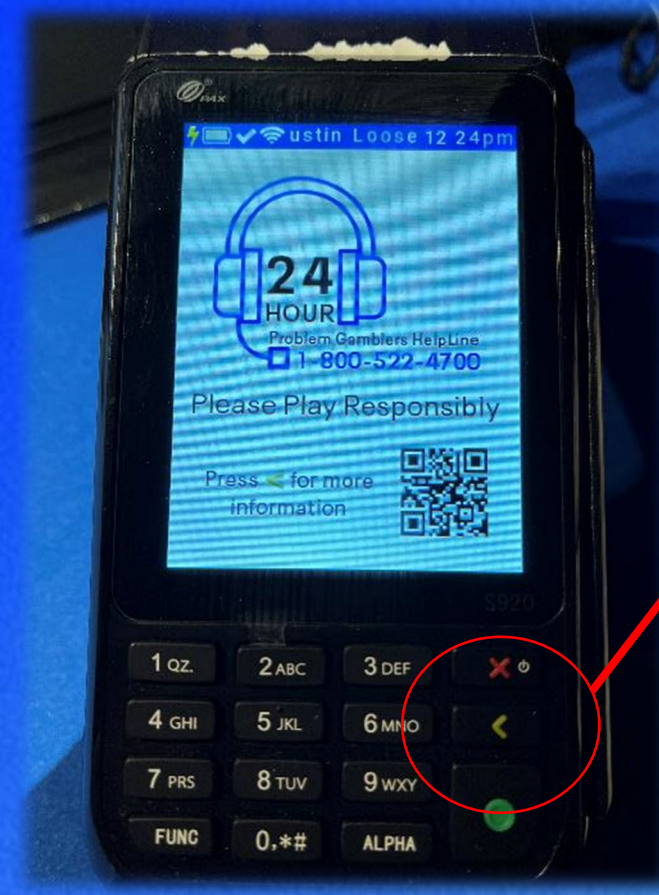
Screen Saver

Main Screen

- Product Name
- Battery Level
- Signal Strength
- Table Name / Game Theme
- Time

Problem Gaming

- Phone Number
- QR Code
- Printable Contact Information
- Adjustable to meet regulatory standards



Screen Saver

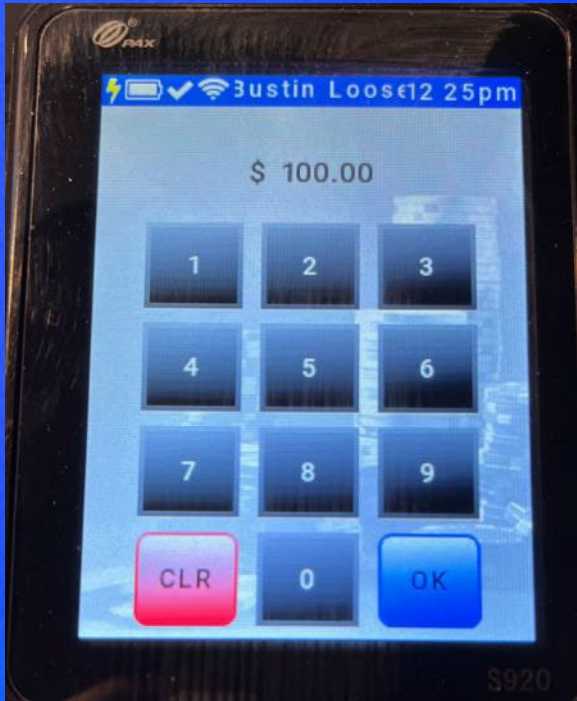
Promotional Messaging

- Can be modified to meet regulatory requirements

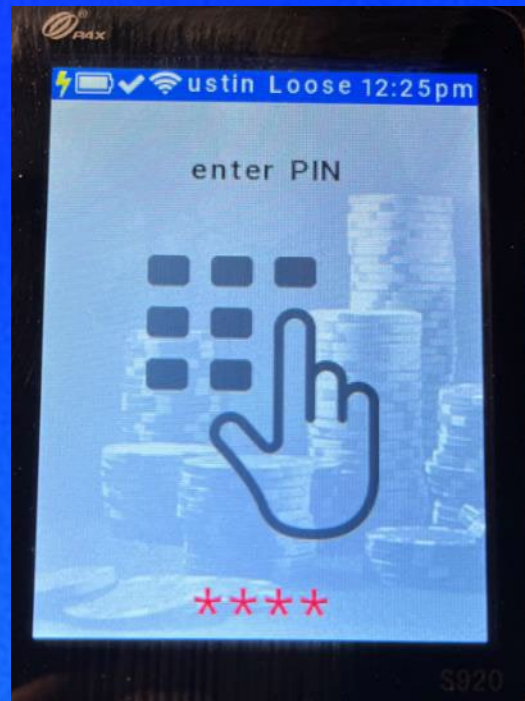


Transaction Process

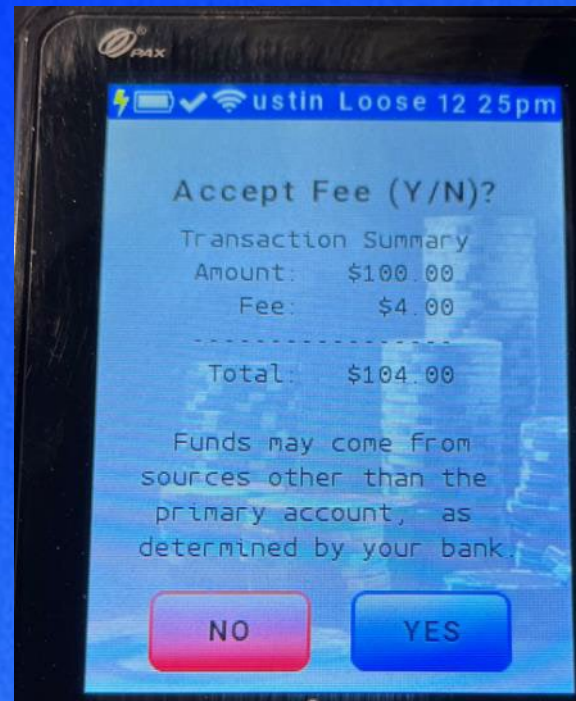
Enter Debit Card
Enter Dollar Amount



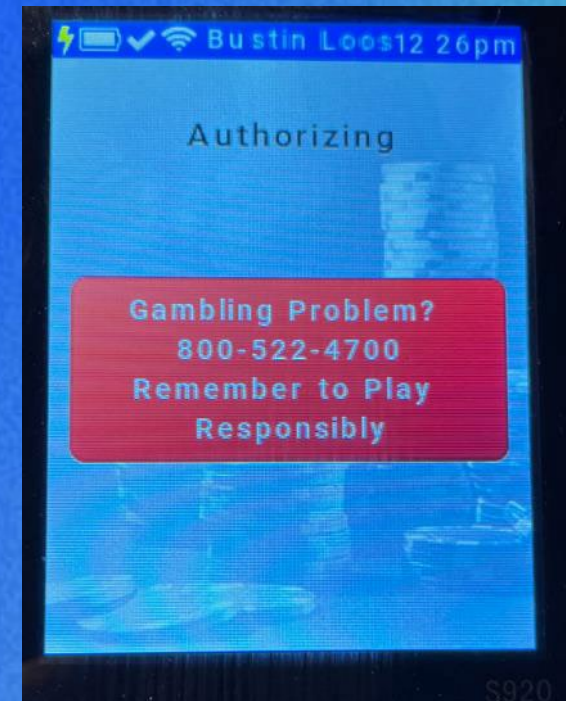
Enter PIN Number



Accept or Decline Transaction



Problem Gaming Message



Print Outs

Patron Receipt

- Property Name
- Property Contact Information
- Table Name / Game Theme
- Transaction Date / Time
- Patron Name
- Transaction Amount
- Transaction ID
- Fee Amount
- Problem Gaming Resource
 - Email
 - Phone Number
 - Adjustable to meet regulatory standards



Transaction Voucher

- Casino Name
- Table Name / Game Theme
- Patron Name
- Transaction Amount
- Transaction ID



Thank You!

Lohse, Jess (GMB)

From: no-reply@wsgc.wa.gov on behalf of WSGC Web <no.reply@wsgc.wa.gov>
Sent: Thursday, September 29, 2022 5:08 PM
To: Rules Coordinator (GMB)
Subject: Request for Public Comment Submission from wsgc.wa.gov

External Email

Submitted on Thursday, September 29, 2022 - 5:08pm Submitted by anonymous user: 98.225.54.72 Submitted values are:

Select a Topic: Petition for Rule Change: Use of debit cards to purchase chips
Name: Paul Milbourn
Organization:
Comments:

This change would further abstract a gambler's conception of money they own vs money they can afford to lose . With the existing system one is allowed a brief moment of reflection during the process, reducing that threshold of effort to taps on a screen would be a small convenience with a massive cost - particularly for problem gamblers lost in the moment and especially for their families at home.

If this change must go through please consider a requirement for win/loss statements to be automatically snail-mailed to the gamblers that choose to use the service, to be sent for every monthly period their debit card is used in this manner. The data already exists , promotional mailings are already being sent and there must be some kind of balance afforded - those families at home deserve your consideration.

The results of this submission may be viewed at:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wsgc.wa.gov%2Fnode%2F19%2Fsubmission%2F3564&data=05%7C01%7Crules.coordinator%40wsgc.wa.gov%7C7c301918a2d84fe8886f08daa277dd37%7C11d0e217264e400a8ba057dcc127d72d%7C0%7C0%7C638000932951607179%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Iik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=n8w6jQwUc5Q07MLNh2Nh68fziF4XIQsrST1H%2BsWaGQ4%3D&reserved=0>



Staff Proposed Rule-Making

WAC 230-05-160 - Charitable or nonprofit organization fees.

WAC 230-05-165 - Commercial stimulant organization fees.

WAC 230-05-170 - Fees for other businesses.

May 2023 – Final Action

April 2023 – Discussion Only

March 2023 – Discussion and Possible Filing

January 2023 – Initiate Rule-Making

Tab 3: MAY 2023 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Washington State Gambling Commission Staff

Background

BOLD = Changes made after April 2023 Commission Meeting

This rules summary incorporates the rules summary related to adjusting fees for sports wagering vendors. The reason for this incorporation is that both fee adjustment rule packages propose to change WAC 230-05-170, which requires a single and unified code revision process.

At the January 2023 meeting, Commissioners accepted a staff recommendation to initiate rule-making to adjust license fees. Based on a thorough analysis of the agency’s anticipated costs related to its licensing, regulatory, and enforcement roles, staff proposes the following increases for all licenses, except electronic raffles:

- 10% increase in the base fee;
- 6% increase in gross gambling receipt rate;
- 60% increase in the maximum fee; and,
- 10% increase in fees for changes and duplicate licenses.

Electronic raffles are a new type of raffle, which were first granted licenses in September 2022. After a re-evaluation of the actual costs associated with the electronic raffle regulatory program, staff proposes to change the fees as set out below with billing for actual expenses related to verifying and investigating electronic raffle operating and system requirements (i.e., pre-operational expenses). Billing for actual costs incurred in verifying equipment compliance reduces the base rate so it is not a barrier to entry but allows us to recoup the actual costs for the inspections based on the licensee’s set-up.

	Current	Proposed
Base Fee	\$5,000	\$5,500
Gross Gambling Receipts Rate	0.043%	3.583%
Maximum Annual License Fee	\$32,000	\$51,200
		The commission will bill for actual expenses related to verifying/investigating electronic raffle operating and system requirements.

Sports wagering was also a new gambling activity in 2021, requiring the establishment of fees for three types of sports wagering vendors. Effective August 30, 2021, the Commission amended WAC 230-05-170 (1) to add license fees for three different types of sports wagering vendors:

- Major Sports Wagering Vendor - \$65,000
- Mid-Level Sports Wagering Vendor - \$10,000
- Ancillary Sports Wagering Vendor - \$5,000

A major sports wagering vendor provides integral sports wagering goods or services. A mid-level sports wagering vendor provides services or equipment related to data, security, and integrity. An ancillary sports wagering vendor provides necessary sports wagering support services.

At the time of adoption, Tribal partners and stakeholders expressed concern regarding the high license fees. Due to the concerns expressed, the Commission agreed to reevaluate the license fees for sports wagering vendors before the second year of renewal at the end of June 2023 since there was not enough data on the actual costs incurred before the first renewal period.

Based on a thorough analysis of the first year of agency costs related to licensing, regulation, and enforcement of the sports wagering vendors, staff proposes to adjust vendor fees downward as follows:

- Major Sports Wagering Vendor - ~~\$65,000~~ \$30,000
- Mid-Level Sports Wagering Vendor - ~~\$10,000~~ \$5,000
- Ancillary Sports Wagering Vendor - ~~\$5,000~~ \$2,000

The proposed changes regarding license fees for charitable or nonprofit organizations, commercial stimulant organizations, sports wagering vendors, and other businesses are reflected in the attached amended WACs 230-05-160, 230-05-165, and 230-05-170. All adjusted fees would be assessed at the time of license renewal.

RCW 9.46.070(5) requires the Commission to set fees to generate funds necessary to cover all costs of regulation, licensing, and enforcement. Tribal compacts generally stipulate that Tribes are to reimburse the Gambling Commission for all reasonable costs and expenses actually incurred by the Commission in carrying out its responsibilities authorized under the compacts and their appendices.

In the last 20 years, the Commission has increased fees approximately every five years (1998, 1999, 2002, 2003, 2007, and 2014). The last fee increase was an across-the-board increase of 6 percent effective November 2014.

At its inception, a license fee structure was created primarily based on a “class” system with 25 fees. By 2017, the fee structure had grown to approximately 194 different fees for commercial organizations, nonprofit organizations, and individuals. In September 2017, staff introduced to the Commissioners several new and amended rules designed to simplify the fee structure and eliminate the “class” system and advance payment of annual fees. Commissioners voted to file the draft rules for further discussion.

In January 2018, Commissioners approved the new and amended rules, creating a new license fee structure. The simplified license fee structure established base fees by license type, set fee rates as a percentage of gross gambling receipts, and established maximum annual fees. This new license fee structure became effective in May 2018.

Although the gambling industry has largely recovered from a significant contraction due to the COVID-19 pandemic, the number of licensees has decreased. While there were 2,920 organizational licensees as of September 30, 2019, the number has declined to 2,545 as of September 30, 2022. This decline in licensees

has caused revenues to flatten. At the same time, operating costs continue to increase in this inflationary period to include increases in salaries and benefits, supplies and equipment, and government services from agencies such as the Attorney General's Office and Department of Enterprise Services.

Attachments:

1. WAC 230-05-160 - Charitable or nonprofit organization fees, WAC 230-05-165 - Commercial stimulant organization fees, and WAC 230-05-170 - Fees for other businesses as filed for amendment
2. Rules Summary for non-sports wagering vendor license fee adjustment from March 2023 meeting
3. Rules Summary for sports wagering license fee adjustment from March 2023 meeting

Stakeholder Feedback

Commission staff held meetings with Tribal partners and stakeholders February 13, 2023 and February 27, 2023. There were a number of questions related to fees and their correlation to level of effort.

Specific issues raised included:

1. Card room licensees raised concern about balancing the Commission's need to raise its license fees against the card rooms' petitions to reduce their own costs through adoption of proposed system efficiencies, which they said have contributed to the reduction in licensees.
2. Electronic raffle licensees asked the Commission to consider a slower ramp up of costs until the overall expansion of the electronic raffle program across all sports clubs is complete.
3. A pull-tab distributor asked the Commission to review the costs of licensing and regulating pull-tab distributors.

There were no specific objections or concerns raised at any of the meetings regarding the proposed adjustments in sports wagering vendor fees.

The Commission received written commentary in the form of letters and emails from the following individuals and organizations (listed in the order they were received).

- Jeff Ifrah, General Counsel for iDEA Growth, related to the need to decrease sports wagering vendor fees (letter)
- Wendy Winsor, CFO, WOW Distributing, related to the proposed increased license fee for pull tab distributors (letter)
- Brian Keller, Let It Ride Casinos, Inc., related to the proposed increased fee for fundraising events (email)
- Ernest C. Matthews IV, Vice President & General Counsel for ISI, Ltd., related to the need to decrease sports wagering vendor fees (letter)
- Carolyn Kenyon, Freedom Flies LLC, related to the proposed fee increases and its impact on businesses (email)
- Richard E. Fritton II, Home Plate Clubs, Inc. (email)
- John Schoeffler, Swinging Doors (email)
- Bob Materne, Jr., Swinging Doors (email)

Finally, Commission staff met with representatives operating electronic raffles on February to hear their concerns about the proposed increases that were expected to be a barrier to expanding the electronic raffle program to additional teams in the state.

Commission staff received the following additional feedback on the proposed fee adjustment:

- Dennis Stanger, Stangcorp, related to decreasing profit margins for pull-tab operators (email)
- Dustin Klatush, Chairman of the Confederated Tribes of the Chehalis Reservation, supporting the proposal to reduce license fees for sports wagering vendors (letter)
- Michael Rasmussen, CEO of Willapa Bay Enterprises Corporation, supporting the proposal to reduce license fees for sports wagering vendors (letter)
- Todd Phelps, Screaming Yak, Morty’s Tab & Grille, and Fieldhouse Pizza & Pub, objecting to the proposed license fee increase for pull-tab operators (email)
- Barbara Jones, unidentified affiliation, expressing concern regarding pull-tab fee increase on top of increased price of pull tab games (email)
- Mari Horita, Fred Rivera, Drew Johnston, and Maya Mendoza-Exstrom, respectively representing the Seattle Kraken, Seattle Mariners, Seattle Seahawks, and Seattle Sounders FC, welcoming dialogue with the Commission, asking for Commission to track its licensing costs, and cautioning against high fees that could make the activity cost prohibitive (letter)

The Commission has received no additional comments since the April 2023 Commission meeting.

Attachments:

1. February 13, 2023 letter from Jeff Ifrah, General Counsel, iDEA Growth
2. February 14, 2023 letter from Wendy Winsor, WOW Distributing
3. February 14, 2023 email from Brian Keller, Let It Ride Casinos, Inc.
4. February 27, 2023 letter from Ernest C. Matthews IV, Vice President & General Counsel for ISI, Ltd.
5. February 28, 2023 email from Carolyn Kenyon, Freedom Flies LLC
6. February 28, 2023 email from Richard E. Fritton II, Home Plate Clubs, Inc.
7. March 1, 2023 email from John Schoeffler, Swinging Doors
8. March 1, 2023 email from Bob Materne, Jr., Swinging Doors
9. March 1, 2023 email from Dennis Stanger, StangCorp
10. March 7, 2023 letter from Dustin Klatush, Chairman of the Confederated Tribes of the Chehalis Reservation
11. March 8, 2023 letter from Michael Rasmussen, CEO of Willapa Bay Enterprises Corporation
12. March 10, 2023 email from Todd Phelps, Screaming Yak, Morty’s Tab & Grille, and Fieldhouse Pizza & Pub
13. March 28, 2023 email from Barbara Jones, affiliation unknown
14. April 5, 2023 letter from Seattle Kraken, Seattle Mariners, Seattle Seahawks, and Seattle Sounders FC

Policy Considerations

The current license fees for charitable or nonprofit organizations, for commercial stimulant organizations, and for other businesses are not projected to be sufficient to cover the agency’s costs of licensing, regulation, and enforcement beginning in fiscal year 2024.

As sports wagering is an authorized Class III gambling activity, the costs to the Gambling Commission for licensing and enforcement must be supported by licensing fees collected from sports wagering vendors. The

expenses related to licensing and enforcement should not be passed on to the licensees not benefiting from the activity. The amount of the vendor fees established in 2021 was based on the Commission's best estimate of the costs associated with both licensing and enforcement of a new gambling activity and its best guess of the number of vendors who would apply for each license type. Now that the Commission has experienced a year of licensing and enforcement of these vendors, it has the necessary information to propose an adjustment to vendor fees.

Staff Recommendation

Staff recommends that the Commission take final action on the proposed changes to WAC 230-05-160, WAC 230-05-165, and WAC 230-05-170 after holding a public hearing. Rules would take effect 31 days after filing with the Office of the Code Reviser – on or about June 15, 2023. Adjusted fees would be assessed at the time of license renewal.

AMENDATORY SECTION (Amending WSR 21-21-079, filed 10/18/21, effective 11/18/21)

WAC 230-05-160 Charitable or nonprofit organization fees. Bona fide charitable and nonprofit organizations must pay the following fees:

(1) Annual licenses:

License Type	Base License Fee	Gross Gambling Receipts Rate	Maximum Annual License Fee
Amusement games	(\$65) \$70 plus (\$65) \$70 per approved location	(0.730%) 0.774%	(\$1,000) \$1,600
Bingo	(\$65) \$70	(0.460%) 0.488%	(\$11,000) \$17,600
Card games - House-banked	(\$10,000) \$11,000	(1.462%) 1.550%	(\$40,000) \$64,000
Card games - Nonhouse-banked	(\$65) \$70	(0.430%) 0.456%	(\$1,000) \$1,600
Combination	(\$125) \$140	-	-
Fund-raising equipment distributor	(\$270) \$295	(1.430%) 1.516%	(\$700) \$1,120
Punch board/pull-tabs	(\$650) \$715	(1.430%) 1.516%	(\$10,000) \$16,000
Raffles	(\$65) \$70	(3.380%) 3.583%	(\$2,000) \$3,200
Raffles - Credit Union	(\$65) \$70	(3.380%) 3.583%	(\$2,000) \$3,200
<u>Raffles - Enhanced</u> <u>((raffles))</u>	(\$5,000) \$5,500	(0.430%) 0.456%	(\$32,000) \$51,200
<u>Raffles - Electronic*</u> <u>((raffles))</u>	(\$5,000) \$5,500	(0.430%) 3.583%	(\$32,000) \$51,200

* Commission will bill for actual expenses related to verifying/investigating electronic raffle operating and system requirements.

(2) Event licenses or permits:

License Type	Base License Fee	Gross Gambling Receipts Rate	Maximum Annual License Fee
Fund-raising event	(\$180) \$200	(3.130%) 3.318%	(\$1,000) \$1,600
Recreational gaming activity	(\$65) \$70	-	-
Special property bingo/ change of bingo premises	(\$30) \$35	-	-

(3) Change fees:

Change of:	Fee
Name	(\$100) \$110
Location	(\$100) \$110
Fund-raising event location, date, or time	(\$50) \$55

(4) Other fees:

Transaction	Fee
Add a new amusement game location	(\$65) \$70
Duplicate license	(\$50) \$55
Review, inspection, and/or evaluation of gambling equipment, supplies, services, games, or schemes	Deposit and cost reimbursement

AMENDATORY SECTION (Amending WSR 18-05-026, filed 2/9/18, effective 5/1/18)

WAC 230-05-165 Commercial stimulant organization fees. All commercial stimulant organizations must pay the following fees:

(1) Annual licenses:

License Type	Base License Fee	Gross Gambling Receipts Rate	Maximum Annual License Fee
Card games - Nonhouse-banked	((\$65) <u>\$70</u>)	((1.462%) <u>1.550%</u>)	((\$20,000) <u>\$32,000</u>)
Card games - House-banked	((\$10,000) <u>\$11,000</u>)	((1.462%) <u>1.550%</u>)	((\$40,000) <u>\$64,000</u>)
Punch boards/pull-tabs	((\$700) <u>\$770</u>)	((1.430%) <u>1.516%</u>)	((\$13,000) <u>\$20,800</u>)

(2) Change fees:

Change of:	Fee
Name	((\$100) <u>\$110</u>)
Location	((\$100) <u>\$110</u>)
Business classification (same owners)	((\$100) <u>\$110</u>)
Corporate stock/limited liability company shares/units	((\$100) <u>\$110</u> , and cost reimbursement for <u>investigating the transaction and qualification of each substantial interest holder</u>)
License transfers	((\$100) <u>\$110</u>)

(3) Other fees:

Transaction	Fee
Duplicate License	((\$50) <u>\$55</u>)

AMENDATORY SECTION (Amending WSR 21-16-072, filed 7/30/21, effective 8/30/21)

WAC 230-05-170 Fees for other businesses. All other business organizations must pay the following fees:

(1) Annual licenses or permits:

License Type	Base License Fee	Gross Gambling Receipts Rate	Maximum Annual License Fee
Agricultural fair bingo (annual permit)	((\$200) <u>\$220</u>)	-	-
Call centers for enhanced raffles	((\$4,800) <u>\$5,280</u>)	-	-
Commercial amusement games	((\$500) <u>\$550</u> plus ((\$65) <u>\$70</u> per approved location)	((1.130%) <u>1.198%</u>)	((\$11,000) <u>\$17,600</u>)
Distributor	((\$700) <u>\$770</u>)	((1.430%) <u>1.516%</u>)	((\$7,000) <u>\$11,200</u>)
Fund-raising event distributor	((\$280) <u>\$310</u>)	((1.430%) <u>1.516%</u>)	((\$1,000) <u>\$1,600</u>)
Linked bingo prize providers	((\$1,500) <u>\$1,650</u>)	((.046%) <u>0.048%</u>)	((\$20,000) <u>\$32,000</u>)

License Type	Base License Fee	Gross Gambling Receipts Rate	Maximum Annual License Fee
Manufacturer	((\$1,500) <u>\$1,650</u>)	((1.430%) <u>1.516%</u>)	((\$25,000) <u>\$40,000</u>)
Manufacturer's special sales permit	((\$250) <u>\$275</u>)	-	-
Punch board/pull-tab service business permit	((\$250) <u>\$275</u>)	-	-
Gambling service supplier	((\$300) <u>\$330</u>)	((1.430%) <u>1.516%</u>)	((\$7,000) <u>\$11,200</u>)
Major sports wagering vendor	((\$65,000) <u>\$30,000</u>)	-	-
Mid-level sports wagering vendor	((\$10,000) <u>\$5,000</u>)	-	-
Ancillary sports wagering vendor	((\$5,000) <u>\$2,000</u>)	-	-

(2) Events or permits:

License or Permit Type	Base License Fee	Gross Gambling Receipts Rate	Maximum Annual License Fee
Recreational gaming activity	((\$65) <u>\$70</u>)	-	-
Special property bingo	((\$30) <u>\$35</u>)	-	-

(3) Change fees:

Change of:	Fee
Name	((\$100) <u>\$110</u>)
Location	((\$100) <u>\$110</u>)
Business classification (same owners)	((\$100) <u>\$110</u>)
Corporate stock/limited liability company shares/units	((\$100) <u>\$110</u> , and cost reimbursement for <u>investigating the transaction and qualification of each substantial interest holder</u>)
License transfers	((\$100) <u>\$110</u>)

(4) Other fees:

Transaction	Fee
Add a new amusement game location	((\$65) <u>\$70</u>)
Defective punch board/pull-tab cost recovery fees	Up to ((\$100) <u>\$110</u>)
Duplicate license	((\$50) <u>\$55</u>)
Pre- and post-licensing investigations	Cost reimbursement
Review, inspection, and/or evaluation of gambling equipment, supplies, services, games, schemes, or group 12 amusement games	Deposit and cost reimbursement



Rule Petition to Amend

Chapter WAC 230-15-685 – Restrictions on progressive jackpots.

May 2023 – Discussion and Possible Filing

April 2023 – Discussion Only

March 2023 – Initiate Rule Making

February 2023 – Rule-Making Petition Received

Tab 4: MAY 2023 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Tiffini Cox, representing Galaxy Gaming, Inc of Las Vegas, NV

Background

BOLD = Changes made after April 2023 Commission Meeting

Tiffini Cox, representing Galaxy Gaming, Inc., is proposing to amend WAC 230-15-685(4)(b) to allow house-banked card room licensees to connect more than one progressive jackpot on different card games. Currently, the rule only allows licensees to connect one progressive jackpot on different card games.

According to WAC 230-15-685(4):

- Progressive jackpots are considered “connected” when jackpot prize displays at gaming tables incrementally increase at the same time after players place jackpot wagers.
- Connected progressive jackpot displays must show the same prize amounts.
- Licensees may only connect progressive jackpots when:
 - Offered on the same card game on multiple tables within the same licensed location; or
 - Offered on different card games on multiple tables within the same licensed location. One progressive jackpot may be operated on a card game at a time, and the card games must have:
 - The same probability of winning the jackpot prize; and
 - The same winning hand.

Currently, licensees can connect multiple progressive jackpots when operated on the same card game. However, licensees can only connect one progressive jackpot when operated on different card games.

The petitioner feels this change is needed for several reasons:

- WAC 230-15-685(4)(a) already allows licensees to connect multiple progressive jackpots when offered on the same game. The proposed amendment in section (4)(b) would agree with what is already authorized in subsection (4)(a).
- WAC 230-15-685(4)(b) already establishes requirements for connected progressive jackpots on different card games. If a licensee connected more than one progressive jackpot to different card games, they would still need to ensure that each jackpot had the same probability of winning the jackpot and the same winning hand.
- Many approved house-banked card games offer multiple progressive jackpots. However, operators are limited to utilizing only one progressive jackpot when they want to connect jackpots across different games. This limits the games operators can offer to their customers.

The petitioner feels the effect of this rule change will enable operators to offer and connect more than one jackpot per table across different card games in the same fashion as is currently allowed across the same card games.

At the March 2023 Commission meeting, Commissioners agreed to initiate rule making on the petition for further discussion.

Progressive jackpots currently authorized include (see attached photos):

- 1) A single gambling table with multiple progressive jackpots;
- 2) Multiple progressive jackpots connected to the same game across multiple gambling tables; and,
- 3) Different gambling tables offering different card games connected to one progressive jackpot.

Attachments:

- Petition
- **Draft “amended” WAC 230-15-685**
- Photos of progressive jackpots currently authorized
- Galaxy Gaming PowerPoint

Policy Considerations

The current language in WAC 230-15-685(4)(b) became effective in November 2015 when the commission authorized progressive jackpots on different card games on multiple tables. There was no specific policy discussion on the issue raised in the current petition; and when the WAC provision was amended in 2021, there were no specific policy concerns raised.

From a regulatory standpoint, the commission already has approved recordkeeping processes for progressive jackpots that this petition would not alter in any way.

At the March 2023 meeting, Commissioners inquired about whether there should be a limit on the number of progressive jackpots that can be connected to different card games (if more than one). Staff does not have any specific regulatory concerns about allowing more than one progressive jackpot to be connected to different card games. WAC rules currently do not restrict the number of progressive jackpots that can be offered on a single table. Furthermore, WAC rules do not restrict the number of progressive jackpots that can be connected across multiple tables for the same game.

The Commission must review and approve progressive jackpot systems. Furthermore, the Commission must review and approve all card games offering progressive jackpots. The Commission requires card rooms to keep detailed records related to progressive jackpots, and regulatory agents conduct annual inspections of all progressive jackpot games in play.

Staff Recommendation

Staff recommends filing language for further discussion.

McLean, Lisa (GMB)

From: no-reply@wsgc.wa.gov on behalf of Washington State Gambling Commission via Washington State Gambling Commission <no-reply@wsgc.wa.gov>
Sent: Tuesday, February 7, 2023 5:12 PM
To: Rules Coordinator (GMB)
Subject: Request a Rule Change Submission from wsgc.wa.gov

External Email

Submitted on Tuesday, February 7, 2023 - 5:12pm Submitted by anonymous user: 24.120.171.202 Submitted values are:

Petitioner's Name: Tiffini Cox - Galaxy Gaming, Inc.

Mailing Address: 6480 Cameron St., Suite 305

City: Las Vegas

State: NV

Zip Code: 89118

Phone: 702-938-1748

Email: tcox@galaxygaming.com

Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.

==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: WAC 230-15-685

I am requesting the following change:

To remove the portions of section 4b that limit linked progressive jackpots on different card games to only one progressive jackpot per table. Specifically, the following language: “Only one progressive jackpot may be operated on a card game at a time and”

Section 4b will now read: “When offered on different card games on multiple tables within the same licensed location when the following requirements are met. The card games must have:”

This change is needed because:

The requirements to link progressive jackpots on different games are currently set in WAC 230-15-685, section 4b (i) and (ii). If the requirements are followed, there should not be a limitation to operating a single jackpot only when linking on different games. Currently, operators that are interested in adding new games to link to their existing multi-jackpot tables, must decide whether to remove a jackpot, create standalone jackpots for the new game, or reconsider adding the new game in general.

In general, if the requirements for section 4b (i) and (ii) are met, there is no difference between a linked jackpot on the same game or on a different game. Likewise, as linking different games is already allowed with one jackpot, adding more jackpots that follow the requirements, does not alter any requirement, probability, etc.

The effect of this rule change will be:

Operators will be able to link more than one jackpot per table, when linking across different games, in the same fashion as is currently allowed across the same games.

Thank you for your time and consideration. Please feel free to reach out to me anytime with questions.

The results of this submission may be viewed at:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wsgc.wa.gov%2Fnode%2F18%2Fsubmission%2F3791&data=05%7C01%7Crules.coordinator%40wsgc.wa.gov%7Cda569e7f0eb348e163b408db097181dc%7C11d0e217264e400a8ba057dcc127d72d%7C0%7C0%7C638114155336291101%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=fzoyB8qJf2TsnHkiQx48JdP%2FnLBkZWAUuu3ou8vYd18%3D&reserved=0>

WAC 230-15-685 Restrictions on progressive jackpots.

House-banked card room licensees operating progressive jackpots must follow these restrictions and procedures:

(1) Progressive jackpot funds must accrue according to the rules of the game.

(2) At each gambling table, licensees must prominently post the amount of the progressive jackpot that players can win along with any associated pay tables.

(3) Licensees may establish a maximum limit on a progressive jackpot prize. If licensees establish a limit, they must make the amount equal to, or greater than, the amount of the jackpot when they imposed the limit. They must prominently post a notice of the limit at or near the game.

(4) Licensees may connect progressive jackpots. Progressive jackpots are considered "connected" when jackpot prize displays at gaming tables incrementally increase at the same time after players place jackpot wagers. Connected progressive jackpot displays must show the same prize amounts. Licensees may only connect progressive jackpots:

(a) When offered on the same card game on multiple tables within the same licensed location; or

(b) When offered on different card games on multiple tables within the same licensed location. The card games offering the progressive jackpot(s) when the following requirements are met. ~~Only one progressive jackpot may be operated on a card game at a time and the card games~~ must have:

- (i) The same probability of winning the jackpot prize; and
- (ii) The same winning hand.

(5) When gambling equipment will allow a progressive jackpot between different manufacturers, the gambling equipment must be submitted for testing for interoperability in accordance with WAC 230-06-050.

[Statutory Authority: RCW 9.46.070. WSR 21-11-057, § 230-15-685, filed 5/14/21, effective 6/14/21. Statutory Authority: RCW 9.46.070 and 9.46.0282. WSR 15-21-005 (Order 715), § 230-15-685, filed 10/8/15, effective 11/8/15; WSR 13-13-060 (Order 688), § 230-15-685, filed 6/18/13, effective 7/19/13. Statutory Authority: RCW 9.46.070. WSR 07-09-033 (Order 608), § 230-15-685, filed 4/10/07, effective 1/1/08.]

Multiple Progressive Jackpots on Single Table



Progressive Jackpots

BONUS 21	
7+ Card 21	3-1
6 Card 21	2-1
5 Card 21	3-2
6-7-8 Diamonds	3-1
6-7-8 Suited	2-1
6-7-8 Mixed	3-2

Connecting Multiple Progressive Jackpots to the Same Game

Table 1

Progressive Jackpots

\$5 JACKPOT	\$47,603.27
\$1 JACKPOT	\$27,932.72

BONUS 21

7+ Card 21	3-1
6 Card 21	2-1
5 Card 21	3-2
6-7-8 Diamonds	3-1
6-7-8 Suited	2-1
6-7-8 Mixed	3-2

Table 2

Progressive Jackpots

\$5 JACKPOT	\$47,603.27
\$1 JACKPOT	\$27,932.72

BONUS 21

7+ Card 21	3-1
6 Card 21	2-1
5 Card 21	3-2
6-7-8 Diamonds	3-1
6-7-8 Suited	2-1
6-7-8 Mixed	3-2

Table 3

Progressive Jackpots

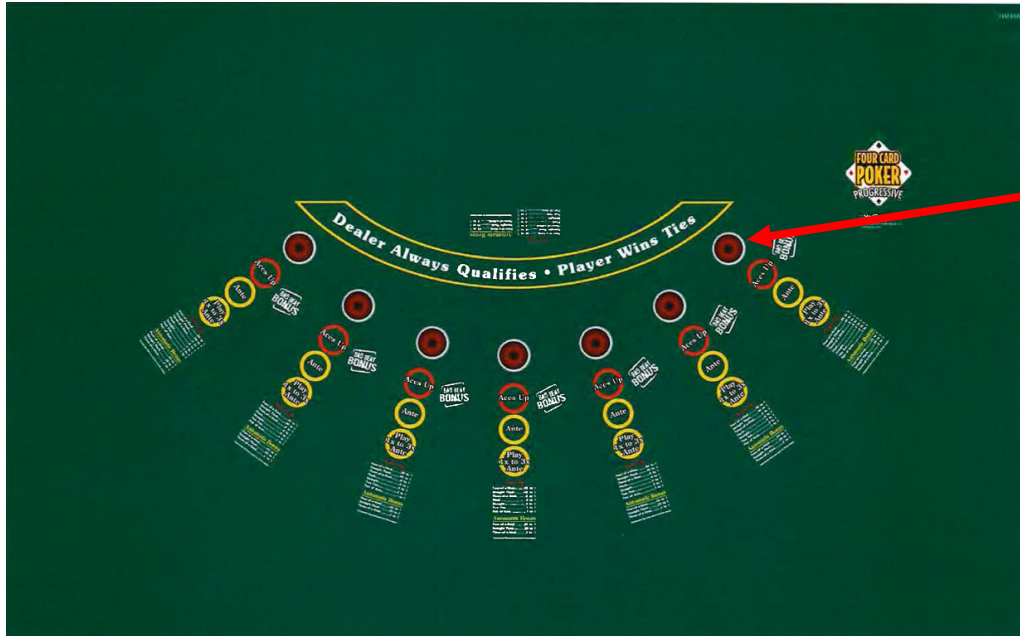
\$5 JACKPOT	\$47,603.27
\$1 JACKPOT	\$27,932.72

BONUS 21

7+ Card 21	3-1
6 Card 21	2-1
5 Card 21	3-2
6-7-8 Diamonds	3-1
6-7-8 Suited	2-1
6-7-8 Mixed	3-2

Connecting One Progressive Jackpot to Different Card Games

Four Card Poker

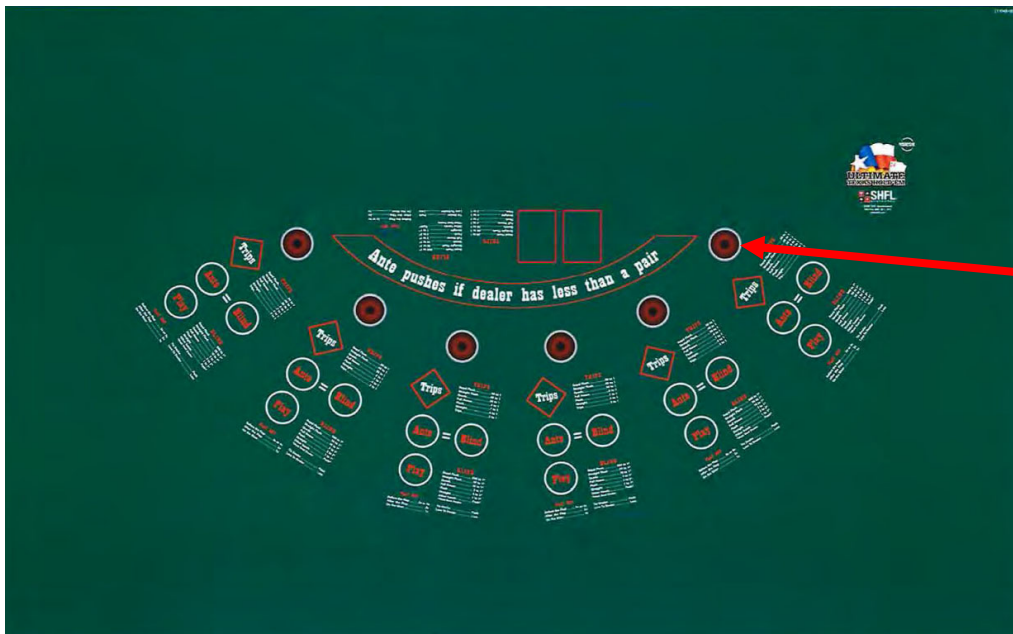


Progressive Jackpot (only one)

Must use same pay table for progressive jackpot.

Paytable 01		
Hand	Pays*	Envy**
Royal Flush	100%	\$1,000
Straight Flush	10%	\$300
Four of a Kind	300 For 1	
Full House	50 For 1	
Flush	40 For 1	
Straight	30 For 1	
Three of a Kind	9 For 1	
*Original wager is NOT returned		
**Envy payouts are multiplied by Wager Amount		

Ultimate Texas Hold 'Em



Progressive Jackpot (only one)

RULE PETITION TO AMEND

WAC 230-15-685 – RESTRICTIONS ON PROGRESSIVE JACKPOTS

Steve Cvetkoski, Tiffini Cox

4/13/23



AGENDA

1. Current rules
2. Examples
3. Proposed change
4. Questions

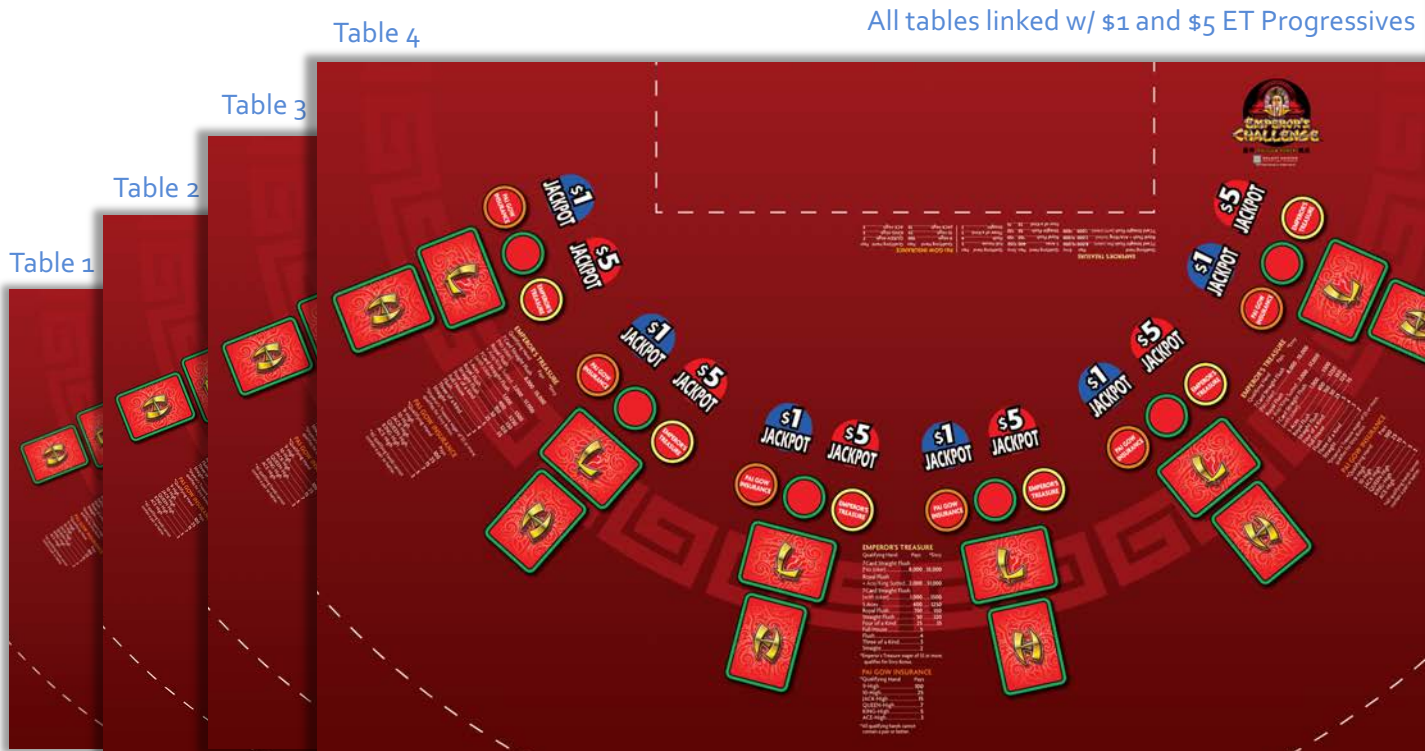
WAC 230-15-685 (4b)

Current Rule

- When offered on different card games on multiple table within the same licensed location when the following requirements are met. Only one progressive jackpot may be operated on a card game at a time and the card game must have:
 - (i) The same probability of winning the jackpot prize; and
 - (ii) The same winning hand.

Emperor's Challenge (EC)

- 2 jackpots linked across multiple tables (Multi-Denom)



All tables linked w/ \$1 and \$5 ET Progressives



皇帝 PAI GOW POKER 挑战

\$5 JACKPOT \$1,234,567.89

\$1 JACKPOT \$13,768.75

WINNING HAND	\$1 JACKPOT	\$5 JACKPOT
7 Card Straight Flush (No Joker)	100%	100%
Royal Flush (with Natural Ace/King suited)	50%	50%
7 Card Straight Flush (with Joker)	25%	25%
5 Aces	\$2,500	\$12,500
Royal Flush	\$200	\$1,000
Straight Flush	\$100	\$500
Four-of-a-Kind	\$75	\$375
Full House	\$6	\$30

Must place a \$1 and/or \$5 Progressive Jackpot Wager to be eligible.
Only the highest payout is paid per hand, per wager. Progressive Jackpot Wager not returned.

G GALAXY GAMING | © 2022 Copyright GALAXYGAMING, INC.

Emperor's Challenge Exposed (ECE)

- 2 jackpots linked across multiple tables (Multi-Denom)



All tables linked w/ \$1 and \$5 ET Progressives

EMPEROR'S CHALLENGE

EXPOSED

\$5 JACKPOT \$1,234,567.89

\$1 JACKPOT \$13,768.75

WINNING HAND	\$1 JACKPOT	\$5 JACKPOT
7 Card Straight Flush (No Joker)	100%	100%
Royal Flush (with Natural Ace/King suited)	50%	50%
7 Card Straight Flush (with Joker)	25%	25%
5 Aces	\$2,500	\$12,500
Royal Flush	\$200	\$1,000
Straight Flush	\$100	\$500
Four-of-a-Kind	\$75	\$375
Full House	\$6	\$30

Must place a \$1 and/or \$5 Progressive Jackpot Wager to be eligible.
Only the highest payout is paid per hand, per wager. Progressive Jackpot Wager not returned.

GALAXY GAMING | © 2022 Copyright GALAXYGAMING, INC.

Emperor's Challenge (EC)

- 2 jackpots linked across multiple tables (Dual-Game)

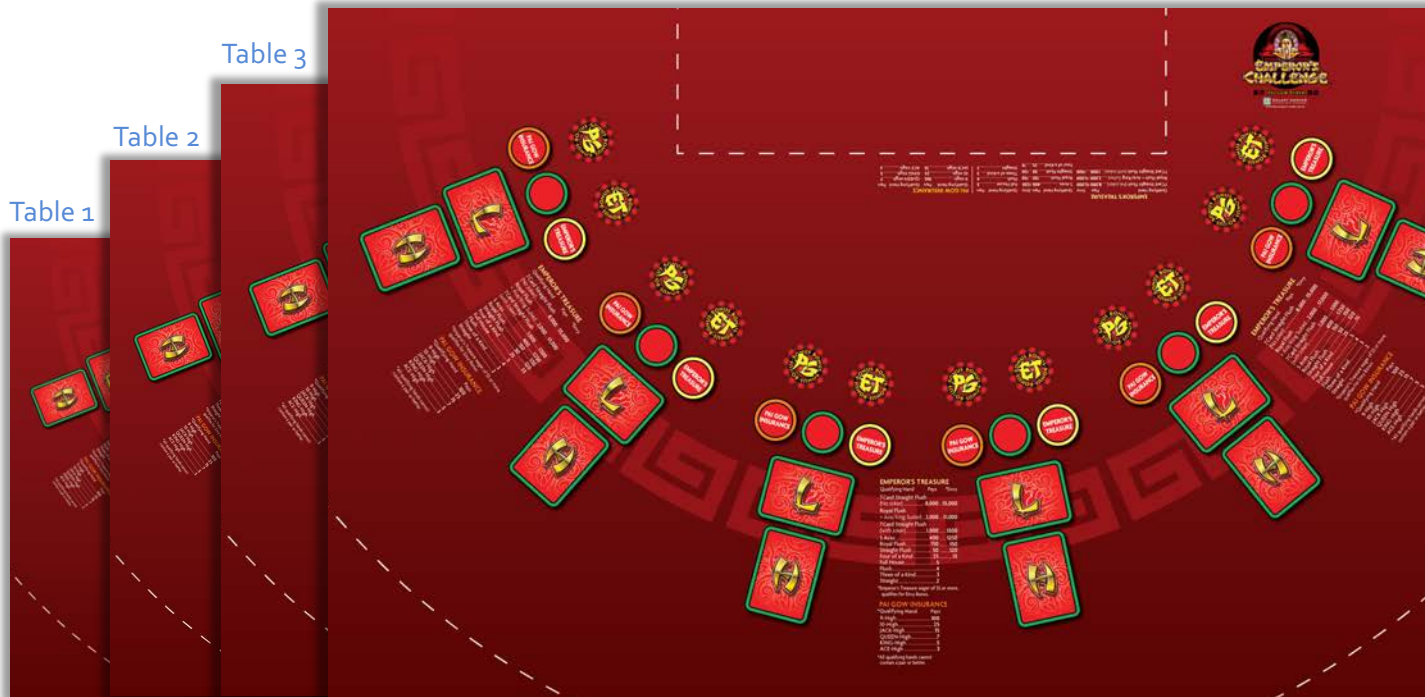
Table 4

All tables linked w/ ET and PG Progressives

Table 3

Table 2

Table 1





皇帝 PAI GOW POKER 挑战

ET \$1,234,567.89

PG \$1,234,567.89

WINNING HAND	
7 Card Straight Flush (No Joker)	100%
Royal Flush (w/Natural Ace/King Suited)	50%
7 Card Straight Flush (w/ Joker)	25%
Five Aces	\$2,500
Royal Flush	\$200
Straight Flush	\$100
Four-of-a-Kind	\$75
Full House	\$6
9 High Pai Gow (Same Color)	100%
9 High Pai Gow (Other)	\$500
10 High Pai Gow	\$125
Jack High Pai Gow	\$25
Queen High Pai Gow	\$5

Must place a \$1 Progressive Jackpot Wager to be eligible.
Only highest payout paid per hand. Progressive Jackpot Wager not returned.

GALAXY GAMING | © 2021 Copyright GALAXYGAMING, INC.

Emperor's Challenge Exposed (ECE)

- 2 jackpots linked across multiple tables (Dual-Game)



All tables linked w/ ET and PG Progressives

EXPOSED

EMPEROR'S CHALLENGE

\$1,234,567.89

\$1,234,567.89

WINNING HAND

7 Card Straight Flush (No Joker)	100%
Royal Flush (w/Natural Ace/King Suited)	50%
7 Card Straight Flush (w/ Joker)	25%
Five Aces	\$2,500
Royal Flush	\$200
Straight Flush	\$100
Four-of-a-Kind	\$75
Full House	\$6
9 High Pai Gow (Same Color)	100%
9 High Pai Gow (Other)	\$500
10 High Pai Gow	\$125
Jack High Pai Gow	\$25
Queen High Pai Gow	\$5

Must place a \$1 Progressive Jackpot Wager to be eligible.
Only highest payout paid per hand. Progressive Jackpot Wager not returned.

GALAXY GAMING | © 2021 Copyright GALAXYGAMING, INC.

Linking Across EC and ECE

- Both progressive games (ET and PGI) can be used on either game as shown.
- These are approved optional bonus wagers on both games, and meet linked progressive criteria:
 - Use the same hand evaluations
 - Same paytables
 - Same probabilities
 - Same winning hands
- **However**, when linking across EC and ECE, regardless of whether it is Dual-Game or Multi-Denom, operators must choose **ONLY ONE PROGRESSIVE** option on each table.



WAC 230-15-685 (4b)

Proposed Language

- When offered on different card games on multiple table within the same licensed location when the following requirements are met. The card game must have:
 - (i) The same probability of winning the jackpot prize; and
 - (ii) The same winning hand.



QUESTIONS





Staff Proposed Rule Making
WAC 230-10-460 – Shared bingo facilities.

MAY 2023 – Initiate Rule Making

Tab 5: MAY 2023 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Washington State Gambling Commission Staff	
Background	
<p>On April 20, 2023, Governor Jay Inslee signed HB 1707 (an act relating to bingo conducted by bona fide charitable and nonprofit organizations) into law with an effective date of July 23, 2023. The bill amends RCW 9.46.0205, removing the limitation on conducting bingo only in the county in which the organization is principally located. Now, a bona fide charitable or nonprofit organization must only be principally located in the state of Washington and may not be approved for more than three licenses to conduct bingo activities.</p> <p>The statutory change necessitates an amendment to WAC 230-10-460 regarding shared bingo facilities to bring it into line with the statute as amended. The fifth paragraph of the WAC reads: “(5) Locate their head office or principal location in the same county where they operate bingo, or as otherwise defined in RCW 9.46.0205.”</p> <p>Attachments:</p> <ul style="list-style-type: none">• WAC 230-10-460• House Bill 1707 An Act relating to bingo conducted by bona fide charitable and nonprofit organizations.	
Staff Recommendation	
Staff recommends initiating rule making to adjust rules to the statute as amended.	

WAC 230-10-460 Shared bingo facilities. Multiple bingo licensees must enter into a written agreement before sharing a facility. Before operating in a shared facility, licensees must:

(1) Send us written notification of intent to share facilities at least thirty days before operating bingo in a shared facility. The notification must include, at least:

(a) The name of all organizations sharing the facility; and

(b) Names and signatures of the highest ranking officer for each organization involved; and

(c) Copies of any written agreements between organizations; and

(d) The method used to share expenses.

(2) Maintain management over their individual gambling activities.

(3) Be solely responsible for their individual records, inventory, management, equipment, and operation of the gambling activities for which they hold a license.

(4) Complete a separate quarterly activity report according to the gambling receipts and expenses it is responsible for under the terms of the written agreement between the licensees.

(5) Locate their head office or principal location in the same county where they operate bingo, or as otherwise defined in RCW 9.46.0205.

[Statutory Authority: RCW 9.46.070. WSR 07-10-033 (Order 610), § 230-10-460, filed 4/24/07, effective 1/1/08.]

CERTIFICATION OF ENROLLMENT

HOUSE BILL 1707

68th Legislature
2023 Regular Session

Passed by the House March 4, 2023
Yeas 96 Nays 0

**Speaker of the House of
Representatives**

Passed by the Senate April 6, 2023
Yeas 44 Nays 1

President of the Senate

Approved

Governor of the State of Washington

CERTIFICATE

I, Bernard Dean, Chief Clerk of the House of Representatives of the State of Washington, do hereby certify that the attached is **HOUSE BILL 1707** as passed by the House of Representatives and the Senate on the dates hereon set forth.

Chief Clerk

FILED

**Secretary of State
State of Washington**

HOUSE BILL 1707

Passed Legislature - 2023 Regular Session

State of Washington

68th Legislature

2023 Regular Session

By Representatives Kloba, Reed, and Eslick

Read first time 02/01/23. Referred to Committee on Regulated Substances & Gaming.

1 AN ACT Relating to bingo conducted by bona fide charitable or
2 nonprofit organizations; and amending RCW 9.46.0205.

3 BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF WASHINGTON:

4 **Sec. 1.** RCW 9.46.0205 and 2002 c 369 s 1 are each amended to
5 read as follows:

6 "Bingo," as used in this chapter, means a game (~~conducted only~~
7 ~~in the county within which the organization is principally located~~)
8 in which prizes are awarded on the basis of designated numbers or
9 symbols on a card conforming to numbers or symbols selected at random
10 and in which no cards are sold except at the time and place of
11 ~~(said)~~ the game, when ~~(said)~~ the game is conducted by a bona fide
12 charitable or nonprofit organization, or if an agricultural fair
13 authorized under chapters 15.76 and 36.37 RCW, which does not conduct
14 bingo on more than twelve consecutive days in any calendar year, and
15 except in the case of any agricultural fair as authorized under
16 chapters 15.76 and 36.37 RCW, no person other than a bona fide member
17 or an employee of said organization takes any part in the management
18 or operation of said game, and no person who takes any part in the
19 management or operation of said game takes any part in the management
20 or operation of any game conducted by any other organization or any
21 other branch of the same organization, unless approved by the

1 commission, and no part of the proceeds thereof inure to the benefit
2 of any person other than the organization conducting said game. (~~For~~
3 ~~the purposes of this section, the organization shall be deemed to be~~
4 ~~principally located in the county within which it has its primary~~
5 ~~business office. If the organization has no business office, the~~
6 ~~organization shall be deemed to be located in the county of principal~~
7 ~~residence of its chief executive officer: PROVIDED, That any~~
8 ~~organization which is conducting any licensed and established bingo~~
9 ~~game in any locale as of January 1, 1981, shall be exempt from the~~
10 ~~requirement that such game be conducted in the county in which the~~
11 ~~organization is principally located)) The bona fide charitable or
12 nonprofit organization must be principally located in the state of
13 Washington and may not be approved for more than three licenses to
14 conduct bingo activities.~~

--- END ---



Rule Petition to Amend
WAC 230-03-138 – Defining “qualified sports team.”

MAY 2023 – Commission Review
APRIL 2023 – Rule-Making Petition Received

Tab 6: MAY 2023 Commission Meeting

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Andy Billig, on behalf of Spokane Chiefs Hockey Club, Spokane, WA

Background

In January 2020, the major league sports teams in Washington state petitioned the Gambling Commission for changes to the rules to allow for electronic 50/50 raffles operated by their affiliated nonprofit foundations. After much work and deliberation, the Commission adopted rules responsive to the petition in November 2021. In the two-year-long discussion about adoption of the new and amended rules, there was explicit mention of reasoning for limiting electronic 50/50 raffles to “qualified sports teams” defined as “major league or highest level team organized in Washington state.” At the time, the limitation was intended to enable the Commission to work with a limited number of teams to ensure that it had devised adequate rules and internal controls to regulate this activity properly. The first electronic 50/50 raffles launched in September 2022 with the beginning of the NFL season and, in October, for the NHL season.

On behalf of the Spokane Chiefs Hockey Club, Andy Billig of Spokane, WA has now submitted a petition to amend WAC 230-03-138 to expand the definition of a “qualified sports team” to include the four teams of the affiliated professional minor league baseball and the four teams of the Western Hockey League. This change would allow charitable or nonprofit organizations established by or directly affiliated with these sports teams to apply for a license to operate electronic raffles.

Currently, the rule (WAC 230-03-138) defines “qualified sports team” as major league or highest level team organized in Washington State and excludes “lower level teams, including, but not limited to, minor, farm, or development league teams.” The petitioner suggests adding minor league baseball and major junior hockey and eliminating the exclusion.

The petitioner feels this change is needed for several reasons:

- To ensure fairness by enabling all teams and communities in Washington state to operate electronic 50/50 raffles, which are easier and more efficient than traditional 50/50 raffles.
- To help all spectator sports teams in Washington state, as well as their fans and the players, to benefit from the electronic 50/50 raffle.
- To allow the communities where these teams exist to benefit from the charitable efforts that flow from the electronic 50/50 raffle proceeds.

Adopting the petitioner’s suggested change may enable an additional eight nonprofits affiliated with in-state teams to engage in electronic 50/50 raffles.

Attachments:

- Petition

- WAC 230-03-138

Staff Recommendation

Staff recommends that Commissioners initiate rule-making proceedings for further discussion.

McLean, Lisa (GMB)

From: no-reply@wsgc.wa.gov on behalf of Washington State Gambling Commission via Washington State Gambling Commission <no-reply@wsgc.wa.gov>
Sent: Tuesday, April 25, 2023 9:37 AM
To: Rules Coordinator (GMB)
Subject: Request a Rule Change Submission from wsgc.wa.gov

External Email

Submitted on Tuesday, April 25, 2023 - 9:37am Submitted by anonymous user: 98.203.179.180 Submitted values are:

Petitioner's Name: Andy Billig on behalf of the Spokane Chiefs Hockey Club Mailing Address: 700 W. Mallon
City: Spokane
State: WA
Zip Code: 99203
Phone: 5099909219
Email: abillig@brettsports.com

Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.

==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: WAC 230-03-138

I am requesting the following change: We are requesting that that WAC 230-03-138 be amended to include all Minor League Baseball and Major Junior Hockey teams. Specifically, we are requesting that the last line of this WAC ("This does not include lower-level teams including, but not limited to, minor, farm, or development league teams") be deleted and "Minor League Baseball" and "Major Junior Hockey" be added to the list of allowable leagues. Further, if the commission felt a further limitation were needed so it was restricted only to large sporting events, it would be possible to also add a minimum for the number of seats for the facilities where teams play. That limitation could be written as, "An eligible team must play a majority of its home games in a facility with a minimum capacity of no less than 3000 people."

This change is needed because: This change is needed for fairness. It does not make sense that some teams and communities in our state would have access to electronic 50/50 while others do not. The change will help all spectator sports teams in Washington state, their fans and players to benefit from electronic 50/50, which comes with much greater efficiency and ease compared to traditional 50/50. Most importantly, this change will allow the communities where these teams exist to benefit from the charitable efforts that flow from the 50/50 proceeds. The effect of this rule change will be: The effect of this rule change will be to allow the option for all Professional and Major Junior teams that play in large facilities in our state to use electronic 50/50 raffles and their communities will benefit from the charitable efforts that flow from the 50/50 proceeds.

The results of this submission may be viewed at:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwsgc.wa.gov%2Fnode%2F18%2Fsubmission%2F3995&data=05%7C01%7Crules.coordinator%40wsgc.wa.gov%7C0dc7eda6e5c84696f8e608db45ab5d07%7C11d0e217264e400a8ba057dcc127d72d%7C0%7C0%7C638180374528940956%7CUnknown%7CTWFpbGZsb3d8eyJWljoijMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6k1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=qioji2F%2BPTONHLKMKI2bxKrCO8y8o1TSrHWLBIZn6xk%3D&reserved=0>

WAC 230-03-138 Defining "qualified sports team." "Qualified sports team" as used in WAC 230-03-153 means a Major League or highest-level team organized in Washington state as a member of Major League Baseball, National Hockey League, National Football League, National Basketball Association, Women's National Basketball Association, Major League Soccer, or National Women's Soccer League. This does not include lower-level teams including, but not limited to, minor, farm, or development league teams.

[Statutory Authority: RCW 9.46.070. WSR 21-21-079, § 230-03-138, filed 10/18/21, effective 11/18/21.]



STATE OF WASHINGTON
GAMBLING COMMISSION

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

The materials for Tab 7 will be
presented at the meeting



STATE OF WASHINGTON
GAMBLING COMMISSION

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

The materials for Tab 8 will be
presented at the meeting



STATE OF WASHINGTON
GAMBLING COMMISSION

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

The materials for Tab 9 will be
presented at the meeting

WSGC 2023-2028 Strategic Plan (Draft)

Goal 1: Become an employer of choice that attracts and retains a highly skilled, valued, and diverse workforce.

Objectives	Strategies
1. Attract and retain a highly skilled, diverse workforce	<ul style="list-style-type: none">• Recruit staff using effective, efficient recruitment practices• Recognize and celebrate our employees• Explore professional development and growth opportunities for staff at all levels• Promote work-life balance
2. Advance institutional knowledge	<ul style="list-style-type: none">• Implement a plan to identify, assess, and develop talent to enhance succession planning and foster leadership continuity• Emphasize a continued learning culture
3. Create a culture that embraces diversity, equity, inclusion, and belonging	<ul style="list-style-type: none">• Develop and implement diversity, equity, and inclusion strategies• Develop and implement agency-wide cultural competencies• Foster a sense of belonging

WSGC 2023-2028 Strategic Plan (Draft)

Goal 2: Be a leader in gambling licensing, regulation, and enforcement.

Objectives	Strategies
1. Promote a licensing, regulatory, and enforcement environment that is equitable and inclusive	<ul style="list-style-type: none"> • Develop and maintain industry expertise and stay abreast of emerging areas • Engage stakeholders for feedback • Actively participate in national and other regulatory groups
2. Develop and implement innovative strategies to conduct business efficiently	<ul style="list-style-type: none"> • Engage internal and external stakeholders and tribal partners to identify areas of efficiency • Pursue improvements and innovations in the use of technology and agency resources • Adopt Organizational Change Management principles and embrace practical application
3. Develop sustainable funding strategies	<ul style="list-style-type: none"> • Analyze similarly funded agencies • Explore rulemaking to allow fees to be responsive to economic shifts • Improve billing methods and processes
4. Improve prosecution of illegal gambling activities	<ul style="list-style-type: none"> • Engage with prosecutors early in the investigative process • Explore other ways to seek prosecution • Develop systems to capture data on enforcement efforts

WSGC 2023-2028 Strategic Plan (Draft)

Goal 3: Promote responsible gambling.

Objectives	Strategies
1. Enhance access to problem gambling resources	<ul style="list-style-type: none">• Collaborate with other agencies to keep resource materials updated and accessible• Update signage for licensees to post• Update rules regarding problem gambling signage
2. Participate in problem gambling workgroups	<ul style="list-style-type: none">• Actively participate in workgroups to promote responsible gambling.• Support implementation and integration of responsible gaming initiatives from the work groups
3. Enhance the state-wide self-exclusion program	<ul style="list-style-type: none">• Identify ways to enhance the state-wide program for current and future participants• Explore rulemaking to expand program to other licensed gambling activities

WSGC 2023-2028 Strategic Plan (Draft)

Goal 4: Strengthen partnerships with governmental agencies, licensees, and the public.

Objectives	Strategies
1. Engage with tribal governments and federal, state, and local agencies	<ul style="list-style-type: none">• Expand upon current engagement activities• Promote awareness of the agency and the work they do to keep gambling legal and honest in Washington
2. Enhance communication and information accessibility to improve service	<ul style="list-style-type: none">• Engage with licensees and tribal partners to discover how to make it easier to do business with us• Expand reach of WSGC communications• Update and modernize licensee training programs• Identify and remove barriers to increase accessibility of information