



**WASHINGTON STATE
GAMBLING COMMISSION PUBLIC
MEETING - December 2020**

Gambling Commission Headquarters
Lacey, WA

COMMISSIONERS



Bud Sizemore
Chair



Julia Patterson
Vice Chair

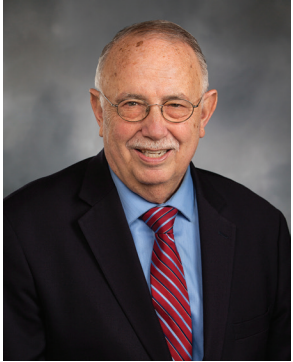


Alicia Levy



Lauren King

EX OFFICIOS



Senator
Steve Conway



Senator
Jeff Holy



Representative
Shelley Kloba



Representative
Brandon Vick



David Trujillo
Director

STAFF



Washington State Gambling Commission

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WAGamblingCommission



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STATE OF WASHINGTON

GAMBLING COMMISSION

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

December 17, 2020 Gambling Commission Meeting Agenda

[Join Microsoft Teams Meeting](#)

Please note, agenda times are estimates only. Items may be taken out of sequence at the discretion of the Chair.

Commissioners may take action on business items.

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

PUBLIC MEETING	
10:00-12:30	Executive Session – Closed to the Public <i>Bud Sizemore, Chair</i> Discuss potential agency litigation with legal counsel, including tribal negotiations.
Tab 1 1:00	Call to Order <i>Bud Sizemore, Chair</i> *Consent Agenda (Action) <ul style="list-style-type: none"> • November 17, 2020 Commission Meeting Minutes • New Licenses and Class III Employees Licenses Director Report <ul style="list-style-type: none"> • Staff Retirement – Cathee Gottfryd
Tab 2	* RULE UP FOR DISCUSSION AND POSSIBLE FILING (Action) <ul style="list-style-type: none"> • Raffle Activity <i>Ashlie Laydon, Rules Coordinator</i>
Tab 3	* RULE FOR WITHDRAWAL (Action) <ul style="list-style-type: none"> • Repeal Definitions <i>Ashlie Laydon, Rules Coordinator</i>
Tab 4	* RULE UP FOR FINAL ACTION (Action) <ul style="list-style-type: none"> • Credit Cards <i>Brian Considine, Legal and Legislative Manager</i>
Tab 5	Defaults (Action) <ul style="list-style-type: none"> • Matthew P. Williams; CR 2020-01020 • Tifannie S. Gibson; CR 2020-00673 <i>Adam Teal, Staff Attorney</i>
Tab 6	Budget Review and Financial Update <i>Christopher Stanley, Chief Financial Officer</i>
Tab 7	Legislative Update <i>Brian Considine, Legal and Legislative Manager</i>
Tab 8	Sports Wagering Discussion <i>Brian Considine, Legal and Legislative Manager</i>
Public Comment can be provided: <ul style="list-style-type: none"> • Before and during the Commission meeting you may email Julie.Anderson@wsgc.wa.gov ; or • During the meeting you may use the Microsoft Office Teams Chat Box; • If you are attending the meeting by phone, we will offer you an opportunity to comment. 	
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 and requests for special accommodations should be directed to Julie Anderson, Executive Assistant at (360) 486-3453 or TDD (360) 486-3637. Questions or comments pertaining to rule changes should be directed to the Ashlie Laydon, Rules Coordinator (360) 486-3473. **Please silence your cell phones for the public meeting***



STATE OF WASHINGTON
GAMBLING COMMISSION

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

November Gambling Commission Meeting Minutes

Gambling Commission Headquarters

Virtual Meeting

***November 17, 2020**

Commissioners Present:

Bud Sizemore, Chair (Via Teams)

Julia Patterson (Via Teams)

Alicia Levy (Via Teams)

Lauren King (Via Teams)

Ex Officio Members Present:

Senator Steve Conway (Via Teams)

Representative Shelley Kloba (Via Teams)

Staff Present:

Dave Trujillo, Director; and Julie Anderson, Executive Assistant.

Staff Present-Virtual:

Tina Griffin, Assistant Director; Brian Considine, Legal and Legislative Manager (LLM); Julie Lies, Tribal Liaison; Heather LaLiberte, Public Information Officer; Ashlie Laydon, Rules Coordinator; and Suzanne Becker, Assistant Attorney General.

Public Meeting Call to Order

Chair Sizemore called the virtual meeting to order at 9:33 AM and announced that the commissioners would go directly into executive session to discuss potential litigation, including tribal negotiations, with legal counsel. Chair Sizemore asked Director Trujillo to call the roll. He announced that the public meeting would reconvene at 1:00 PM.

Executive session adjourned at 11:55 AM. The commissioners took a break until 1:00 PM.

Public meeting reconvened at 1:05 PM.

Chair Sizemore asked Director Trujillo to call roll to ensure a quorum. All commissioners were present. The Commission observed a moment of silence for the fallen officers that have lost their lives since we last met. Chair Sizemore acknowledged the governor's proclamation announcing November as Native American Heritage Month and November 27, 2020 as Native American Heritage Day.

There were 89 people who attended the virtual meeting.

Tab 1

Consent Agenda

Commissioner Levy moved to approve the consent agenda as presented.

Commissioner King seconded the motion.

* Governor Inslee issued [Proclamation 20-28.4](#) et al that suspended certain Open Public Meeting requirements, including in-person public meetings requirements for this Commission Meeting.

The motion passed 4:0

Tab 2

Petition for Reconsideration

Mr. Gerardo Cannon failed to appear for the hearing. Based on the evidence provided, the commissioners voted to deny the petition.

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

Commissioner Levy moved to deny the petition, as recommended by staff, due to untimely submittal and response.

Commissioner King seconded the motion.

Director Trujillo called the roll.

The motion passed 4:0

Tab 3

Rule for Discussion only - Credit Cards

Brian Considine, Legal and Legislative Manager (LLM), presented the materials for this tab. LLM Considine recapped the September and October meetings where the credit card discussion had taken place. At the end of the October public meeting, commissioners asked staff to look at possible options related to responsible gaming and problem gambling policy areas presented by Maureen Greeley. At the November meeting, LLM Considine shared a chart that showed what forms of payment are accepted at gaming facilities. He then continued the discussion with commissioners and ex officio members. **Commissioner Patterson** asked if the Commission could send the issue of credit card usage to the subject matter experts in the Problem Gambling Task Force and let them weigh in before the Commission renders a final decision.

Commissioners and staff continued the discussion and decided to have the final discussion at the December public meeting. **LLM Considine** confirmed he will reach out to Roxane Waldron and her staff to ask them who would be the best person on the Problem Gambling Task Force to provide expertise and testimony at the December meeting, prior to the final vote. He will also contact licensees to invite them for their public comment.

Chair Sizemore asked for public comment.

Katie Doyle, Washington Hospitality Association, said, "Representing numerous pull-tab operators across the state, we have done our best in the last month or two to get our operators to provide their opinions on this particular topic. And pretty much everyone I've talked to is still neutral. They love the option of the flexibility that they would have with credit cards. But I do think that they hear the concerns about problem gambling." She also said, "Right now, getting further comment from the operators, which I'd love to be able to provide at the December meeting, is going to be so extremely difficult because of the position that so many of them are in and they are now obviously closed once again." She said she feels personally responsible, as the representative for many of the operators, to get them to comment on this issue. "It has been so trying for me," she said.

Chair Sizemore thanked LLM Considine for the presentation. **LLM Considine** confirmed that Commissioner Patterson would like him to bring the rule to the December meeting for final determination.

Tab 4

Rule Petition for Discussion and Possible Filing – Scientific Definition

Ashlie Laydon, Rules Coordinator (RC), presented the materials for this tab. Governor Jay Inslee signed SB 6120 on March 26, 2020, which amends RCW 9.46.0209(1)(i) to include “scientific” to the list of purposes for which a bona fide charitable or nonprofit organization may be organized and operating, and therefore qualify for licensure to operate gambling activities authorized under the Gambling Act. The Gambling Commission needs to adopt a rule defining “scientific” for charitable and nonprofit applicants. **Commissioner King** asked about the fourth component in the list of the definitions: “aiding a community or geographical area by attracting new industry to the community or area.” **Commissioners King** said, “That seems quite broadly worded and I wonder what the intent was there.” **RC Laydon** stated that the language came from the 501(c)(3) definition in the IRS tax code.

Commissioner King said she was still concerned with the breadth of that. **LLM Considine** said that the commissioners could amend the proposed language before voting to file it. The definition mirrors current federal tax 501(c)(3) exemption requirements for “scientific” organizations and this seemed like a good starting point considering most organizations who were being denied when we were looking at our agency request legislation a year ago copied the 501(c)(3) standards into their articles of incorporation. The agency already had a good definition in WAC for “religious” and now needs to start finalizing the scope of “scientific.” If the commissioners decide to modify the proposed rule language, it will be sent out to stakeholders for public comment and we can see if removing the last subsection causes any concerns.

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

Commissioner King moved to amend the rule language by removing the apostrophe at sub section three and sub-section four, in its entirety.

Commissioner Patterson seconded the motion.

Commissioner Levy voted against the motion.

The motion passed 3:1

Tab 5

Rule Petition for Discussion and Possible Filing – Pull-tab Prize Limits

Ashlie Laydon, Rules Coordinator (RC), presented the materials for this tab. At the June 2020 meeting, commissioners accepted a petition and initiated rule-making to increase single cash prize limits, merchandise prize limits, and carry-over jackpot prize limits, and to consider payout and cash reserve requirements as it pertains to pull-tab prize limits. The petitioner is proposing to increase single cash prizes and merchandise prizes from \$2,500 to \$5,000 each in WAC 230-14-080, Prize limits and percentage of winners required; and WAC 230-14-085, Calculating markup for merchandise prizes; and to increase the carry-over jackpot prize limits from \$5,000 to \$10,000 in WAC 230-14-220, Prize limits for carry-over jackpot pull-tab series.

The petitioner requests this change because the prize limits in rule have not been changed in many years. The petitioner asserts that pull-tabs are struggling to compete in today’s competitive gaming environment and that increased prize limits would attract more customers. The petitioner hopes that by increasing prize limits, small businesses can be more competitive. Furthermore, this change would complement SB 6357, passed by the Legislature this year, which increased the single chance pull-tab price from \$1 to \$5. Prize limits were last increased in 2008 when the single cash prize limit was raised from \$500 (\$750 with director’s approval) to \$2,500. The merchandise prize limit was raised from \$750 to \$2,500, and the carry-over jackpot prize limit

was raised from \$2,000 to \$5,000. Staff recommends filing the draft language for further discussion.

Chair Sizemore asked for public comment.

Katie Doyle, Washington Hospitality Association, represents thousands of hospitality businesses statewide. She thanked the Commission for its consideration of the rules petition to increase prize limits. She explained that this rule aligns with SB 6357, which increased pull-tab limits from \$1 to \$5. She is supportive of the cash reserve component and finds these additional rules to be both fair and reasonable. She also mentioned that members of the Hospitality Association are hyper aware of the problem gambling concerns in Washington.

Chair Sizemore asked if there are any \$5 pull-tab games in establishments. **Ms. Doyle** replied that there are not any games with the higher ticket prices. She said that manufacturers of pull-tabs are waiting for the prize limits to change before they're willing to sell pull-tabs at a higher cost.

Commissioner King moved to file the proposed rule language as presented and recommended by staff.

Commissioner Patterson seconded the motion.

The motion passed 4:0

Tab 6

Presentation- Gambling Commission Budget Review and Financial Update

Christopher Stanley, Chief Financial Officer (CFO), presented the agency's budget review and financial update.

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

Tab 7

Legislative Update

Brian Considine, Legal and Legislative Manager (LLM), presented the materials for this tab. **LLM Considine** recapped the approval of the agency request legislation. He said that the Governor's Office has two threshold areas for all agency legislation, is it COVID-19 related and/or necessary for 2021. The Governor's Office asked us to withdraw our legislation request because they did not feel the agency's legislation met either prong of their analysis. The Governor's Office indicated that the legislation made sense in a "normal" year and that they did not see any issues with it (during a normal year). Staff recommends that we withdraw the agency request legislation; however, our budget package will not be impacted by this change.

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

Commissioner Levy moved to withdraw the agency request legislation as recommended by staff.

Commissioner King seconded the motion.

The motion passed 4:0

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

Senator Conway asked how gambling businesses in Washington are being impacted by the current COVID restrictions. **LLM Considine** stated that we are seeing a decline in license fee revenue. He is working with staff on a presentation regarding this topic to be presented at the House Commerce & Gaming Committee work session November 30. He hopes to provide the same information to the Senate Labor & Commerce Committee. **Senator Conway** asked if all cardrooms are now closed. He also asked how pull-tabs have been impacted due to taverns closing as a result COVID restrictions. **LLM Considine** replied that at least 30 of the licensees are operating in an outside structure to accommodate the Governor's orders. LLM Considine also said he would be willing to provide additional information once staff has ascertained the impact on licensees, possibly at the December or January meeting.

Chair Sizemore announced that the next public meeting would be December 17 and to continue checking the website for the most current information.

The November meeting adjourned at 2:46 PM.



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
December 2020

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Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 16.



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Licensed and Operating		31			
	City	Commission Approval Date	License Expiration Date	Org #	License #
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2021	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2020	00-11170	67-00183
CASINO CARIBBEAN	YAKIMA	Nov 14, 2019	Sep 30, 2021	00-24513	67-00342
CASINO CARIBBEAN	KIRKLAND	Nov 14, 2019	Sep 30, 2021	00-24512	67-00341
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2020	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2020	00-24296	67-00339
CLUB HOLLYWOOD CASINO	SHORELINE	Sep 9, 2010	Jun 30, 2021	00-22132	67-00303
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2021	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2021	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2021	00-21847	67-00281
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2021	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2021	00-23465	67-00329
GOLDIE'S SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2020	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2020	00-19513	67-00194
GREAT AMERICAN CASINO/LAKEWOOD	LAKEWOOD	Aug 14, 2003	Jun 30, 2021	00-19258	67-00184
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2021	00-12554	67-00012
IRON HORSE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2020	00-19477	67-00192
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2020	00-15224	67-00006
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2021	00-21305	67-00267
MACAU CASINO	LAKEWOOD	Nov 14, 2019	Sep 30, 2021	00-24516	67-00345
MACAU CASINO	TUKWILA	Nov 14, 2019	Sep 30, 2021	00-24514	67-00344
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2020	00-13069	67-00173

Licensed and Operating						31
	City	Commission Approval Date	License Expiration Date	Org #	License #	
PALACE CASINO LAKEWOOD	LAKEWOOD	Jan 14, 1999	Dec 31, 2020	00-16542	67-00028	
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2021	00-02788	67-00004	
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2021	00-19369	67-00187	
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2021	00-17613	67-00057	
ROXY'S BAR & GRILL	SEATTLE	Nov 18, 2004	Jun 30, 2021	00-20113	67-00231	
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2021	00-22130	67-00301	
SILVER DOLLAR CASINO/MILL CREEK	BOTHELL	Sep 9, 2010	Jun 30, 2021	00-22131	67-00302	
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2021	00-22134	67-00305	
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2021	00-22128	67-00299	

Licensed but Not Currently Operating						13
	City	Commission Approval Date	License Expiration Date	Org #	License #	
ACES CASINO ENTERTAINMENT	SPOKANE VALLEY	Mar 13, 2014	Dec 31, 2020	00-23112	67-00325	
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2021	00-18357	67-00058	
CARIBBEAN CARDROOM	KIRKLAND	Nov 14, 2019	Sep 30, 2021	00-24515	67-00343	
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2021	00-23814	67-00335	
HAWKS PRAIRIE CASINO	LACEY	Jul 12, 2001	Jun 30, 2021	00-17579	67-00091	
LANCER LANES/REST AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2021	00-21681	67-00276	
LAST FRONTIER	LA CENTER	Feb 11, 1999	Sep 30, 2021	00-11339	67-00055	
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2021	00-16220	67-00336	
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2021	00-16759	67-00038	
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2021	00-16903	67-00010	
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2020	00-20009	67-00212	
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2020	00-21998	67-00287	
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2021	00-18777	67-00209	

Applications Pending**1**

	City	Commission Approval Date	License Expiration Date	Org #	License #
LUCKY DRAGONZ CASINO	SEATTLE			00-23001	67-00323

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS**RAFFLE**

AMERICAN LEGION AUX 00025
00-10414 02-21117

301 ALLEN ST
KELSO WA 98626-4114

BIG BROTHERS/BIG SISTERS ISLAND COUNTY
00-21573 02-08869

1498 NW FALLS CREEK LOOP
OAK HARBOR WA 98277-3832

CAMAS EDUCATIONAL FOUNDATION
00-20567 02-08652

8235 NE AIRPORT WAY
PORTLAND OR 97220

FOE AUX 02888
00-08539 02-01751

19223 HWY 99
LYNNWOOD WA 98036

MARSHALL CITIZEN SCIENCE INSTITUTE
00-24649 02-21125

3939 20TH AVE NW
OLYMPIA WA 98502

OKANOGAN WILD LIFE COUNCIL
00-21759 02-08912

14 VINMAL RD
OKANOGAN WA 98840

SELAH VALLEY LIONS CLUB
00-24698 02-21146

312 S 1ST STREET
SELAH WA 98942

ST PIUS X CATHOLIC CHURCH
00-00166 02-01152

22105 58TH AVE W
MOUNTLAKE TERRACE WA 9804

THE FALLEN OUTDOORS
00-24678 02-21136

144 WANDERING LN
WINLOCK WA 98596

YAKIMA CHAMBER FOUNDATION
00-24630 02-21119

10 N 9TH ST
YAKIMA WA 98908

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

CHAN'S DRAGON INN/RESTAURANT
00-18174 05-09887

1406 W 3RD AVE STE A
SPOKANE WA 99201

CITY HALL SALOON & EATERY
00-19536 05-19731

35317 314TH WAY SE
ENUMCLAW WA 98022

RICKY J'S
00-24680 05-21690

6805 176TH ST E
PUYALLUP WA 98375

SPORTSMANS PUBLIC HOUSE
00-24594 05-21658

121 N MAIN AVE
RIDGEFIELD WA 98642

THE GETAWAY
00-24684 05-21693

24309 56TH AVE W
MOUNTLAKE TERRACE WA 9804

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

THE LYMAN TAVERN
00-24560 05-21644

8328 S MAIN ST
LYMAN WA 98263

THE SULLIVAN SCOREBOARD
00-24627 05-21667

205 N SULLIVAN RD
SPOKANE VALLEY WA 99037-950

UNION TAVERN
00-24648 05-21674

1914 E SPRAGUE
SPOKANE WA 99202

NON HOUSE-BANKED CARD GAME

SPORTSMANS PUBLIC HOUSE
00-24594 65-07506

121 N MAIN AVE
RIDGEFIELD WA 98642

THE LYMAN TAVERN
00-24560 65-07503

8328 S MAIN ST
LYMAN WA 98263

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

DISTRIBUTOR REPRESENTATIVE

ROSS, WAYNE J
22-01292

MAGIC DISTRIBUTING INC
ARLINGTON WA 98223

MANUFACTURER REPRESENTATIVE

ADAMS, MELISSA K
23-03138

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

BOZARD, MA THERESA L
23-03139

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

MOFFATT, COREY J
23-03141

SCIENTIFIC GAMES
LAS VEGAS NV 89119

OBRIEN, THOMAS J
23-03137

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

OLIVER, MANUEL G
23-03136

SCIENTIFIC GAMES
LAS VEGAS NV 89119

UPADRASTA, SRAVAN
23-03140

SCIENTIFIC GAMES
LAS VEGAS NV 89119

NON-PROFIT GAMBLING MANAGER

HILL, JOSEPH W
61-04740

AMERICAN LEGION 00008
ELLENSBURG WA 98926

MAYO, MIRANDA N
61-04742

AMERICAN LEGION 00010
WENATCHEE WA 98801

CARD ROOM EMPLOYEE

BROUWER, VICTOR R
68-25640

B

GREAT AMERICAN CASINO/TUKWILA
TUKWILA WA 98168

CHONG, EDWARD Y
68-35887

B

SILVER DOLLAR CASINO/RENTON
RENTON WA 98057

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

COBLEIGH, KYLIE R 68-33848	B	RIVERSIDE CASINO TUKWILA WA 98168
COWAN, TRACY L 68-35888	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802
CYPHERS, DENNIS J 68-20392	B	IRON HORSE CASINO AUBURN WA 98002
DOPKE, RICHARD D 68-19941	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
FINK, KEVIN L 68-09894	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
GALLARDO, GABRIELLE A 68-35890	B	IRON HORSE CASINO AUBURN WA 98002
GRUETZMACHER, JANINE K 68-35873	B	CASINO CARIBBEAN KIRKLAND WA 98034
HATTON, CHRISTOPHER R 68-30604	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
HAZEN, JERI J 68-31243	B	FORTUNE CASINO - RENTON RENTON WA 98055
HENG, BORAMY 68-19990	B	MACAU CASINO TUKWILA WA 98188
HOLDER, SHAKIA I 68-35878	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
HOLROYD, TONY 68-35889	B	RIVERSIDE CASINO TUKWILA WA 98168
JONES-ROBINSON, FRANKIE 68-35891	B	ROMAN CASINO SEATTLE WA 98178
KING, RHETT N 68-35879	B	MACAU CASINO LAKEWOOD WA 98499-4457
KIRBY, WYNTERIA S 68-33461	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
LASERA, DAMON D 68-35883	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

LEAVITT, ANTHONY J 68-35061	B	NOB HILL CASINO YAKIMA WA 98902
LEIA, VOYAGER 68-35881	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
LEVITON, SEAN C 68-35874	B	FORTUNE POKER RENTON WA 98057
LIU, YUEN S 68-35884	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 9804
LORDS, CHAD A 68-35869	B	MACAU CASINO TUKWILA WA 98188
MAESTAS, CARLOS 68-32695	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
MERTZ, GUY T 68-35896	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
MEZO, PATRICK E 68-35851	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
MILLER, DOMINIQUE R 68-35516	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
MORALES-MAU, CHANLIO R 68-35871	B	RIVERSIDE CASINO TUKWILA WA 98168
NEWMAN, EVAN C 68-35882	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
NGUYEN, MINH H 68-35868	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
OFOIA, DESVILE J 68-35876	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
OMOTO, OTTO LEE K 68-35872	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
PHAIR, DELOS A 68-35649	B	IRON HORSE CASINO AUBURN WA 98002

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

PHAM, TRANG T 68-35898	B	FORTUNE CASINO - TUKWILA TUKWILA WA 98168
PRAHL, KEVIN R 68-35895	B	RIVERSIDE CASINO TUKWILA WA 98168
RIGGS, CAIDEN M 68-35897	B	RIVERSIDE CASINO TUKWILA WA 98168
SCHULER, MELVIN W 68-35901	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
SMITH, OTILIA A 68-35900	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
SMITH, ROBERT E 68-24185	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
SOEUM, MELLISSA U 68-35877	B	FORTUNE CASINO - TUKWILA TUKWILA WA 98168
STEELE, STEVEN G 68-35850	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
SYHARATH, BOUAVANH 68-08258	B	RED DRAGON CASINO MOUNTLAKE TERRACE WA 9804
TRICHANH, VICTORIA L 68-35894	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
WARD, DANIEL P 68-35870	B	CASINO CARIBBEAN YAKIMA WA 98901

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

DREWES, STEVEN G
69-49353

HORTON, AMY J
69-49266

MINKLER, DONNI L
69-47904

WEBER, GARY R
69-32302

WEILEMAN, STEVEN R
69-38979

COLVILLE CONFEDERATED TRIBES

BUCKLES, SARAH P
69-38782

BURKE, CHRISTIE J
69-22841

CAZAREZ, JOSE G
69-49301

GOCKE, GUNNAR M
69-49302

JOHNSON-PHILLIPS, DOMENICK D
69-49306

SANDOVAL, SUSANA I
69-38473

VAUGHAN, SARAH P
69-49305

WAKAN, JAZMINE N
69-49430

COWLITZ INDIAN TRIBE

ANDERSON, HOLLY E
69-49272

BLEVINS, PENNY G
69-49397

BRADY, BRYANNE S
69-49384

CAIN, NYCOLAS C
69-49187

CARLSON, JOHN J
69-49386

CHING, SHARON A
69-49261

COONS, BRETT A
69-49395

CORRIGAN, JEFFREY S
69-49271

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

DAHLBERG, JAN D
69-49262

DONEHEY, GENEVEIVE K
69-49425

FIELDS, ABIGAIL L
69-49396

GILCHRIST, RUSSELL G
69-49429

GILLIAM, JOSHUA P
69-49388

GREFE, JOSEPH A
69-49337

GUIEL, PAUL A
69-49309

HOLT, SIRINAPA
69-49310

HOPPE, RONALD W
69-18100

HUESTIES, CRYSTAL J
69-49426

HULL, KAYLA M
69-49320

JENSEN, REBECCA K
69-49330

JONES, ALIYAH I
69-49347

KNAPE, TAHNEE L
69-49332

LEMKA, MICHELE M
69-49312

MAIRS, JEREMY N
69-49333

MANGRUM, RICHARD C
69-49247

MAXSON, RUSSIA R
69-49311

MCKAY, SHANNON C
69-49335

MORGAN, JORDAN T
69-49248

ORDONA, JILLIAN
69-49313

PESCHL, BETH M
69-49274

PORTER, HUDSON D
69-49346

SHROLL-SANDLAIN, CHANDLER S
69-49344

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

SMITH, ALEXANDER M
69-43735

TAKETA, BLAZE K
69-49186

THOMPSON, SHANTEL K
69-49345

WAITE, DONALD D
69-49188

WINER, ELIZABETH K
69-49331

KALISPEL TRIBE

AKIN, THOMAS E
69-49341

AULD, KADE M
69-49276

BAILEY, KASSANDRA A
69-49403

BIGSMOKE, REDBONE
69-49366

BROCKIE, JUSTINE K
69-13724

BUTLER, ERIN K
69-49402

DICE, PAIGE M
69-49343

FEJERAN, LEIMOMI G
69-49405

JONES, HEIDI M
69-49290

MARTINEZ, DANIEL
69-49323

MARTINEZ, JOSIAH A
69-49275

ROBERG, JACQUELINE A
69-49367

SAEMAN, KATELYN J
69-49322

TODD, TREY D
69-46407

WILLIAMS, GEOFFREY M
69-49291

WILSON, TAMRA L
69-49404

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

LUMMI NATION

ALBERT, BRENDA R
69-49377

BARRETT, MICHELLE M
69-49376

LESCHER, THOMAS M
69-49378

OLINO, RAYMOND M
69-49314

MUCKLESHOOT INDIAN TRIBE

BAILEY, KATHERINE J
69-49289

BOSSHART, JONATHAN R
69-49325

CASTANEDA GARCIA, PABLO C
69-38795

CORDERO, ERIKA C
69-39379

LACLAIR, JANET R
69-49195

MARTINEZ, CARMEN
69-49197

PARKER, CALEB J
69-49288

SANCHEZ BERNAL, JUAN J
69-49327

YI, STANLEY W
69-49326

NISQUALLY INDIAN TRIBE

CHANG, TAE W
69-49251

JAMES, DEVEN A
69-49190

JOHNS, RUSSELL C JR
69-49253

PAYNE, KRISTEN G
69-49256

PELEKAI, IOLANA L
69-49257

SANTIAGO, SALLY C
69-49285

STUMP, ROSS L
69-49287

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NOOKSACK INDIAN TRIBE

JACKSON, STEVEN A
69-49206

JAMES, JUSTIN G
69-24523

KELLY, KYLE N
69-49249

PORT GAMBLE S'KLALLAM TRIBE

ANGELONE, RICHELLE
69-49300

EGAN, JOSHUA M
69-49348

HUNT, RACHELL L
69-49263

PUYALLUP TRIBE OF INDIANS

ALVAREZ, DOMINIC B
69-49372

BILLINGSLEY, BRAEDON K
69-49318

BINH, TYLEE V
69-49295

BRITT, CHARLES J
69-49421

BURRELL, SHANE M
69-49374

CAMPOS, ERIK C
69-49357

CANTU, JESSE D
69-49296

DORN, BAILEY M
69-49420

DUTRA, SARA A
69-49277

GALLION-MONTALVO, LACEE L
69-49338

GOODWIN, GRADY L JR
69-49317

HACKMAN, CHANDLER A
69-49267

HAYNES, THOMAS E
69-49373

HEYTING, MARTIN A
69-49297

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

HIGH, SHAMEL T
69-46450

JOHNS, LACHELL M
69-37358

JONES, ALONA
69-49340

KDEP, RANDY J
69-49351

KEATON, DONALD A
69-49359

KHUN, VIRUN
69-49356

KONG, RAVY
69-49298

LANDELLS, DENNIS B II
69-38084

LANDRIE, MICHAEL C
69-49401

LAU, DORIN M
69-49363

LEANG, KIMHOUR
69-49419

MC INTOSH, JOHN K
69-49375

MERIDA-MILLS, ELISE
69-49418

NATH, DAVITH
69-21593

PARKER, JOEL P
69-49268

PERDUE, SHERI R
69-49352

PHILLIPS, DAVID C
69-49258

POWELL, CENNEKA O
69-49423

QUINN, NORA M
69-49365

RADER, CRAIG A
69-49368

RADOS, MICHAEL B
69-49361

RAMOS, LINA C
69-49281

RODRIGUEZ-AYALA, WENDY Y
69-49279

ROSE, TATIYANA R
69-45167

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

SATELE, KEONA W
69-49350

SAYAHOD, PHANOMPHONE N
69-49417

SEA, DANIEL L
69-39459

SIMONETTI, HANAE T
69-49328

STEED, JOE A III
69-49299

TAASE, LAFULAFU J
69-49319

TAGALEOO, RODNEY S
69-49307

TAISAKAN, COURTNEY MILES L
69-49308

TAMAALII OCKIMEY, ELIZABETH H
69-49416

TIPTON, JONALYN D
69-49339

TURNER, MORGAN S
69-49364

TURNING ROBE, JOSEPH T
69-49371

VAN NATTA, CONNOR E
69-49280

VANDERLAAR, DANE A
69-49329

VARGAS, MILA B
69-49269

WILLIAMS, CASSANDRA A
69-49278

WILLIAMS, KRYSTINA A
69-49260

WILLIAMS, TROY O JR
69-41044

WORSWICK, KRISTIN C
69-49362

WROLSON, TAYLOR N
69-49400

QUINAULT NATION

BROWN, RICHARD K
69-49282

GIBBS, DUSTIN J
69-39244

KINGERY, JOHN J
69-49283

PETERSON, STACIA V
69-49315

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

QUINAULT NATION

WIMBERLEY, DEVIN A
69-49244

SKOKOMISH TRIBE

BROWNELL, JAMES M JR
69-49321

SNOQUALMIE TRIBE

BRIESE, DAVID J
69-29004

GRAY, KYLE J
69-49303

KEOPASEUTH, VILASACK
69-38387

ROBERTS, DYLAN M
69-38282

SPOKANE TRIBE

CARTER, JOEL T
69-49180

HILL, LAURENCE C
69-49223

HUNT, CHRISTOPHER M
69-49284

JOSEPH, RORY T
69-47283

LOPEZ-GARCIA, FRANCISCO E
69-49222

MUTLAG, DHEFFAR A
69-49179

RILLOTTA, FRANCESCO D
69-49170

SQUAXIN ISLAND TRIBE

MANN, SHANON M
69-25577

MUSULAS, KYLE R
69-45756

SAMPICA, STEPHEN C
69-49336

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

STILLAGUAMISH TRIBE

ACOSTA, THOMAS A
69-49381

DINH, DAVID Q
69-49293

FLORES, VICTOR M
69-02463

HENG, ANGELINA M
69-47621

KRAUSE, KOURTNEY R
69-49294

MCGARRITY, ROBERT T
69-49316

SAUCEDO, JONATHAN R
69-49382

SUQUAMISH TRIBE

CALLAHAN, ASHLEY R
69-49304

CARPENTER, DAVID J
69-49406

NORTHON, DEJON M
69-49380

SWINOMISH INDIAN TRIBAL COMMUNITY

BATALLA, ANTHONY E
69-49355

CLADOOSBY-PAGE, MICHAEL J
69-49436

POWELL, BRADLEY N
69-49354

THE TULALIP TRIBES

BOWERS, HERBERT J JR
69-43077

CALLAGHAN-MCCANN, KAITLYN A
69-40202

KEISNER, VICTORIA A
69-01129

MCCAFFREY, FRANCIS P
69-43272

PALMER, MATTHEW W
69-17730

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

YAKAMA NATION

CORREA, ALECIA R
69-49342

ISADORE, IRENE T
69-38023

MARQUEZ, BENJAMIN C
69-36494

ZACK, ISABELLE E
69-49398



Staff Proposed Rule-Making

WAC 230-11-025- Bundling and selling tickets at a discount.

WAC 230-11-055- Authorized alternative drawing formats.

December 2020 – Discussion & Possible Filing

January 2020 – Initiate Rule-Making

Tab 2: DECEMBER 2020 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Washington State Gambling Commission Staff

Background

Bold = Changes made after January 2020 Commission meeting.

At the January 2020 meeting, Commissioners initiated rule-making for raffles, specifically for staff to continue their review of raffle rules for bundling and selling tickets at a discount, alternative drawing formats, and progressive raffles. After thorough review, staff proposes draft language for bundling or selling tickets and alternative drawing formats. Staff has determined rules for progressive raffles are not needed at this time. Therefore, the proposed rules before you today amends:

- **WAC 230-11-025- Bundling and selling tickets at a discount, to allow additional discount levels, and**
- **WAC 230-11-055- Authorized alternative drawing formats, to authorize two additional alternative drawing formats.**

At the October 2019 Commission meeting, staff provided a raffle work session for the Commission. As part of that presentation, staff made some recommendations for potential rule changes. The Commission asked staff to prepare a summary of those recommendations.

Gambling Commission staff have been seeking input from stakeholders and staff regarding potential rule changes that could be proposed to assist nonprofit organizations. After discussing some of the obstacles nonprofits face when conducting raffles, staff proposes amending the following rules in regards to:

- Alternative drawing formats, and
- Bundling and selling tickets at a discount.

Staff also proposes adopting rules in regards to progressive raffles, such as “joker poker”.

Attachments:

- **WAC 230-11-025**
- **WAC 230-11-055**
- **Stakeholder Feedback**

Stakeholder Outreach and Feedback

The proposed changes were made based on discussions with nonprofit organizations regarding obstacles they face when conducting raffles. **Draft language was sent out to all organizations who hold a license to conduct raffles in the state on November 5, 2020.**

Staff Recommendation

Staff recommends filing this language for further discussion.

WAC 230-11-025 Bundling and selling tickets at a discount.

(1) Licensees may put tickets together in a bundle and sell them at a discount level if they:

(a) Create the discount levels ~~plan~~ before selling any raffle tickets; and

(b) Do not change the discount levels ~~plan~~ during the raffle; and

(c) Make single nondiscounted tickets available to all participants; and

(d) Use up to three ~~only one~~ discount levels ~~plan~~ for each raffle; and

(2) Booklets of bundled discounted tickets must contain the number of tickets named in the discount levels ~~plan~~; and

(3) Licensees must not remove tickets from a booklet to sell them individually; and

(4) Each booklet of bundled tickets must have the following information printed on the cover:

(a) A description of the discount levels ~~plan~~; and

(b) The number of tickets in the booklet; and

(c) The total cost of the booklet; and

(d) A consecutive number; and

(5) Licensees must establish controls and accounting procedures necessary to determine gross gambling receipts from ticket sales.

[Statutory Authority: RCW 9.46.070. WSR 06-20-040 (Order 602), § 230-11-025, filed 9/26/06, effective 1/1/08.]

WAC 230-11-055 Authorized alternative drawing formats.

Except for enhanced raffles, licensees may use the following types of alternative drawing formats or similar random selection processes:

~~*Mock races.*~~

(1) *Mock races.* The licensee sells participants consecutively numbered tickets that identify a specific corresponding numbered mock animal(s), ball(s), or other similar object(s) that can use natural elements to move the objects (water, gravity, wind) in a race. All objects must be identical in weight, size, and shape, to have an equal opportunity to win.

The licensee must release all objects simultaneously at a start line. The first numbered object to cross the finish line wins.

~~Poker runs.~~

(2) Poker runs. The licensee sells participants consecutively numbered tickets or poker tally sheets to participants. Participants travel a predetermined course with predetermined drawing stations (typically five drawing stations). At each drawing station, participants draw one playing card for each ticket purchased. Station attendants must verify the card drawn and record the card value on the poker ticket tally sheet. After all participants have completed the course, the participant with the best recorded poker hand wins.

~~Ball drops.~~

(3) Ball drops. The licensee sells participants consecutively numbered tickets that identify a specific corresponding numbered ball. All balls must be equal in size, weight, and shape, to have an equal opportunity to win. The licensee suspends all purchased numbered balls in the air and

simultaneously releases them over a target zone. The ball, closest or first, to hit the predetermined target wins.

~~*Animal plops.*~~

(4) *Animal plops.* The licensee sells participants consecutively numbered tickets that identify a specific corresponding square on a numbered grid. The licensee releases the animal into the grid area until the animal has completed its plop. The numbered square containing the plop wins.

~~*Multiple stage drawings.*~~

(5) *Multiple stage drawings.* The licensee sells participants consecutively numbered tickets. The licensee uses multiple drawing phases to eliminate participants until the licensee declares the remaining ticket holder(s) the winner(s). The licensee may use second element of chance plans as long as the plans meet the criteria set out in WAC 230-11-060.

~~*Bucket raffles.*~~

(6) *Bucket raffles.* The licensee sells participants consecutively numbered tickets. Participants place their tickets into any number of separate buckets or other receptacles for

separate prizes. We consider the multiple drawings one single raffle. If licensees use different tickets for each receptacle, we consider each drawing an individual raffle.

~~*Calendar raffles.*~~

(7) *Calendar raffles.* The licensee sells participants consecutively numbered calendars with removable stubs. The licensee places all sold calendar stubs into the drawing receptacle. On predetermined dates identified on the calendar, the licensee conducts drawings. The licensee places all winning stubs back into the drawing receptacle for future drawings.

(8) Heads/Tails raffles. The licensee sells participants consecutively numbered tickets. Every participant who purchased a ticket stands up and places their hands on either their head or their tail. The licensee then flips a coin to determine heads or tails. Participants who selected the losing outcome (heads or tails) must sit down. The process is repeated until there is only one participant standing and they win the prize.

(9) Number raffles. The licensee sells participants consecutively numbered tickets. The participants select a number

from a spot or square on a grid or from a list of numbers. The licensee then draws a number(s) that corresponds to the numbers on the grid or list to determine the winner(s).

[Statutory Authority: RCW 9.46.070 and 9.46.0209. WSR 13-19-056 (Order 692), § 230-11-055, filed 9/16/13, effective 10/17/13.

Statutory Authority: RCW 9.46.070. WSR 06-20-040 (Order 602), § 230-11-055, filed 9/26/06, effective 1/1/08.]

Laydon, Ashlie (GMB)

From: Kestell, Anna M. <AKESTELL@spokanecounty.org>
Sent: Monday, November 9, 2020 12:35 PM
To: Laydon, Ashlie (GMB)
Subject: RE: Question re: raffles

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Yes, thank you. I appreciate your clarification.

Anna

Anna Kestell
Education Coordinator
Food Preservation/Safety

WSU Extension, Spokane County
222 N Havana, #205
Spokane WA 99202-4799
Email: akestell@spokanecounty.org
Phone 509-477-2195
Fax 509-477-2087

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Spokane County

WASHINGTON STATE UNIVERSITY
EXTENSION

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From: Laydon, Ashlie (GMB) [mailto:ashlie.laydon@wsgc.wa.gov]
Sent: Monday, November 09, 2020 12:34 PM
To: 'ANNA.KESTELL@WSU.EDU' <ANNA.KESTELL@WSU.EDU>
Subject: Question re: raffles

Hello Anna,

I received your comment through our website:

Select a Topic: Staff-Proposed Rule Change: Raffles
Name: Anna Kestell
Organization: WSU Spokane County Extension 4-H

Comments: WAC 230-11-055 (9) Number Raffle. I am not understanding this raffle. It reads to me as the client buys a ticket to pick a number. Number is drawn by licensee to determine winner. Why? Is this like the animal plop...where many people can select from a grid and share the prize?

I checked in with staff and our understanding of how this type of raffle works is that after buying a ticket, the participant gets to select the number they want from a predetermined population of numbers or squares (1-500). Then the licensee draws a number or numbers from that population of numbers to determine the winner(s).

The participant gets to select their "lucky" number(s) on the board- one person per number or square- similar to how a sports board operates.

Does this help?

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



From: foe3158sec@rainierconnect.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Washington State Gambling Commission- Notice of Rule-Making
Date: Monday, November 9, 2020 3:46:04 PM

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Thank you Ashlie,
I think I got it. The bundling was what I was really questioning... What we do for second place prizes is that if we have a drawing, or if we are playing queen of hearts after drawing the winner we will draw a consolation prize. I thought we had to do that... but we will continue as it is fun!

Thanks again for explaining..
Christine King

Hello,

I checked in with staff on your questions below.

You can sell tickets individually or bundle tickets, which is already permitted under current rules. The proposed change would allow the option for more ways to bundle tickets.

I am unsure what you mean by second place prizes. Can you clarify your question?

Thank you,

Ashlie

From: foe3158sec@rainierconnect.com
Sent: Friday, November 6, 2020 9:34 AM
To: Laydon, Ashlie (GMB)
Subject: Re: Washington State Gambling Commission- Notice of Rule-Making

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Sooooo I am guessing that this means that we no longer need to do the 2nd place prizes? when someone doesn't win. and that we can bundle tickets now like 1dollar ea or 6 for 5dollar? Guess I am just needing clarification. Thank you so much.

Good afternoon,

You are receiving this email because your email address is associated with a license to conduct raffles in the state of Washington. If you have received this email in error, please

disregard it or feel free to contact me so that I can have the information in our system updated.

In October 2019, staff held a raffle work session with the Commissioners. As part of this presentation, staff made some recommendations for potential rule changes based on discussions they've had with nonprofit organizations regarding some of the obstacles faced when conducting raffles. In January 2020, the Commissioners initiated rule-making to consider amending alternative drawing formats and bundling and selling tickets at a discount.

Attached is draft language for your review which proposes to amend the following:

* WAC 230-11-025- Bundling and selling tickets at a discount; to allow additional discount levels, and

* WAC 230-11-055- Authorized alternative drawing formats; to authorize two additional alternative drawing formats.

If you would like to provide feedback on this draft language, you may do so by emailing me directly at ashlie.laydon@wsgc.wa.gov or through our website. Please provide feedback by close of business on Tuesday, December 1, 2020 if possible. Feel free to contact me by email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

* (360) 486-3473 | * ashlie.laydon@wsgc.wa.gov

[Image result for wa gambling commission]

[FB icon] [twitter icon] [instagram_2016_icon_email] [In-2C-21px-R]

From: [Jeff Brennan](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission- Notice of Rule-Making
Date: Thursday, November 12, 2020 7:56:01 PM
Attachments: [image005.png](#)
[image003.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Ashley - thanks so much for sharing this. Frankly, I like all of the changes! I definitely like the addition of the Heads/Tails raffle in section 8. I hope all the changes are accepted. Best regards to the staff for their input. Cheers - jeff

Jeff Brennan
[District 5030 Foundation Chair](#)
[Rotary Club of Mill Creek](#), President 2014-15
Rotary Academy Graduate 2013

-----Original Message-----

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Sent: Thu, Nov 5, 2020 3:02 pm
Subject: Washington State Gambling Commission- Notice of Rule-Making

Good afternoon,

You are receiving this email because your email address is associated with a license to conduct raffles in the state of Washington. If you have received this email in error, please disregard it or feel free to contact me so that I can have the information in our system updated.

In October 2019, staff held a raffle work session with the Commissioners. As part of this presentation, staff made some recommendations for potential rule changes based on discussions they've had with nonprofit organizations regarding some of the obstacles faced when conducting raffles. In January 2020, the Commissioners initiated rule-making to consider amending alternative drawing formats and bundling and selling tickets at a discount.

Attached is draft language for your review which proposes to amend the following:

- **WAC 230-11-025- Bundling and selling tickets at a discount;** to allow additional discount levels, and
- **WAC 230-11-055- Authorized alternative drawing formats;** to authorize two additional alternative drawing formats.

If you would like to provide feedback on this draft language, you may do so by emailing me directly at ashlie.laydon@wsgc.wa.gov or through our [website](#). Please provide feedback by close of business on Tuesday, December 1, 2020 if possible. Feel free to contact me by email if you have any

questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: [Jennifer Witherbee](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: RE: Washington State Gambling Commission- Notice of Rule-Making
Date: Monday, November 9, 2020 9:00:59 AM
Attachments: [image011.png](#)
[image013.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Thank you, Ashlie! I will reach out to him. Take care!

Jennifer Witherbee, Executive Director
Washington Apple Education Foundation
2900 Euclid Avenue, Wenatchee WA 98801
www.waef.org
(509) 663-7713 – office, (509) 679-8168-cell



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Proceeds support WAEF students. More on waef.org.

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Friday, November 6, 2020 1:39 PM
To: Jennifer Witherbee <jennifer.witherbee@waef.org>
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: RE: Washington State Gambling Commission- Notice of Rule-Making

Hello Jennifer,

Unfortunately, our state constitution (Article II, Section 24) prohibits all gambling unless it is authorized by the legislature. All authorized gambling can be found in our Gambling Act (chapter [9.46](#) RCW) and conducting raffles over the telephone or the internet is not authorized and likely expressly prohibited in the Gambling Act under [RCW 9.46.240](#). In short, a change such as you are proposing below would need to be done by the Legislature.

If you would like to contact our Legal and Legislative Manager, Brian Considine, at brian.considine@wsgc.wa.gov, he would be happy to explain the legislative process to you.

Thank you,

Ashlie

From: Jennifer Witherbee <jennifer.witherbee@waef.org>
Sent: Friday, November 6, 2020 7:55 AM
To: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Subject: RE: Washington State Gambling Commission- Notice of Rule-Making

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Dear Ashlie,

Thank you for sending this. Is there anything going on with discussions about loosening the methods of selling tickets to include telephone, mail or internet? We had to cancel our annual raffle this year because we weren't able to gather people together at the event where the raffle had been held traditionally.

Thank you!

Jennifer Witherbee, Executive Director
Washington Apple Education Foundation
2900 Euclid Avenue, Wenatchee WA 98801
www.waef.org
(509) 663-7713 – office, (509) 679-8168-cell



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From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Thursday, November 5, 2020 3:02 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Washington State Gambling Commission- Notice of Rule-Making

Good afternoon,

You are receiving this email because your email address is associated with a license to conduct raffles in the state of Washington. If you have received this email in error, please disregard it or feel free to contact me so that I can have the information in our system updated.

In October 2019, staff held a raffle work session with the Commissioners. As part of this presentation, staff made some recommendations for potential rule changes based on discussions

they've had with nonprofit organizations regarding some of the obstacles faced when conducting raffles. In January 2020, the Commissioners initiated rule-making to consider amending alternative drawing formats and bundling and selling tickets at a discount.

Attached is draft language for your review which proposes to amend the following:

- **WAC 230-11-025- Bundling and selling tickets at a discount;** to allow additional discount levels, and
- **WAC 230-11-055- Authorized alternative drawing formats;** to authorize two additional alternative drawing formats.

If you would like to provide feedback on this draft language, you may do so by emailing me directly at ashlie.laydon@wsgc.wa.gov or through our [website](#). Please provide feedback by close of business on Tuesday, December 1, 2020 if possible. Feel free to contact me by email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: [Laydon, Ashlie \(GMB\)](#)
To: ["Jocelyn Wood"](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: RE: Washington State Gambling Commission- Notice of Rule-Making
Date: Tuesday, November 10, 2020 9:25:06 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image013.png](#)
[image015.png](#)

Hello Jocelyn,

Unfortunately, our state constitution (Article II, Section 24) prohibits all gambling unless it is authorized by the legislature. All authorized gambling can be found in our Gambling Act (chapter [9.46](#) RCW) and conducting raffles over the telephone or the internet is not authorized and likely expressly prohibited in the Gambling Act under [RCW 9.46.240](#). In short, a change such as you are proposing below would need to be done by the Legislature.

If you would like to contact our Legal and Legislative Manager, Brian Considine, at brian.considine@wsgc.wa.gov, he would be happy to explain the legislative process to you.

Thank you,

Ashlie

From: Jocelyn Wood <JWood@washingtoncenter.org>
Sent: Tuesday, November 10, 2020 8:44 AM
To: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Subject: FW: Washington State Gambling Commission- Notice of Rule-Making

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Hi Ashlie,

Thanks for sending this.

The single biggest thing that would help us as a non-profit during the pandemic would be selling raffle tickets online. I don't see that covered, so assume that's not changing. But that would be the biggest help.

Thanks,

Jocelyn

Jocelyn Wood, Development Director
(360) 753-8585 x 103
(360) 489-8238 mobile

jwood@washingtoncenter.org

Want to meet? Schedule a time with me through [Calendly](#).



From: Jill Barnes

Sent: Monday, November 9, 2020 2:59 PM

To: Chad Carpenter <CCarpenter@washingtoncenter.org>; Jocelyn Wood <JWood@washingtoncenter.org>; Alyssa Bleckwehl <ableckwehl@washingtoncenter.org>

Subject: FW: Washington State Gambling Commission- Notice of Rule-Making

Thoughts?

From: Carrie Swindler

Sent: Friday, November 6, 2020 6:45 PM

To: Jill Barnes <jbarnes@washingtoncenter.org>

Subject: FW: Washington State Gambling Commission- Notice of Rule-Making

Did you get this email? I figure you're closer to how we handle raffles at this point so if you want to weigh in on their amendments, now is the time! 😊

Carrie Swindler, Business Manager

360-753-8585 x 105

businessmanager@washingtoncenter.org

From: Laydon, Ashlie (GMB) [<mailto:ashlie.laydon@wsgc.wa.gov>]

Sent: Thursday, November 5, 2020 3:02 PM

Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>

Subject: Washington State Gambling Commission- Notice of Rule-Making

Good afternoon,

You are receiving this email because your email address is associated with a license to conduct raffles in the state of Washington. If you have received this email in error, please disregard it or feel free to contact me so that I can have the information in our system updated.

In October 2019, staff held a raffle work session with the Commissioners. As part of this presentation, staff made some recommendations for potential rule changes based on discussions they've had with nonprofit organizations regarding some of the obstacles faced when conducting raffles. In January 2020, the Commissioners initiated rule-making to consider amending alternative drawing formats and bundling and selling tickets at a discount.

Attached is draft language for your review which proposes to amend the following:

- **WAC 230-11-025- Bundling and selling tickets at a discount;** to allow additional discount levels, and
- **WAC 230-11-055- Authorized alternative drawing formats;** to authorize two additional alternative drawing formats.

If you would like to provide feedback on this draft language, you may do so by emailing me directly at ashlie.laydon@wsgc.wa.gov or through our [website](#). Please provide feedback by close of business on Tuesday, December 1, 2020 if possible. Feel free to contact me by email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Monday, August 17, 2020 12:39:13 PM

Submitted on Monday, August 17, 2020 - 12:39pm

Submitted by anonymous user: 73.83.235.160

Submitted values are:

Select a Topic: Staff-Proposed Rule Change: Raffles

Name: Robin Graham

Organization: Louisa Boren STEM K-8 PTA

Comments: Having to bundle / keep track and manage raffle tickets for a nonprofit event is a tedious process for a nonprofit. The rules should be straight forward, limited for organizations making small amounts on raffles, and easier to report.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1762>



Staff Proposed Rule-Making

- WAC 230-06-155- Defining “gross sales.”
- WAC 230-06-160- Defining “net gambling receipts.”
- WAC 230-06-165- Defining “net gambling income.”
- WAC 230-06-175- Defining “cost.”

December 2020 – Rule for Withdrawal
February 2020 – Initiate Rule-Making

Tab 3: DECEMBER 2020 Commission Meeting Agenda.	Statutory Authority 9.46.070
--	-------------------------------------

Who Proposed the Rule Change?

Washington State Gambling Commission Staff
--

Background

Bold = Changes made after the February 2020 Commission Meeting.

At the February 2020 meeting, the Commissioners decided to initiate rule-making to consider placing the definitions below in the chapters where they are referenced in Title 230 WAC and also considered amending “net gambling receipts” and “cost” to clarify sales tax. The Commission agreed that the header existing within Chapter 230-06 WAC titled “License Renewals and Activity Reports” should be repealed since it is no longer relevant. This header has since been repealed.

Staff has completed an extensive review of Title 230 WAC and has found that the definitions “gross sales,” “net gambling receipts,” “net gambling income,” and “cost” as used in Chapter 230-06 WAC strictly pertained to rules related to activity reporting. Because the Gambling Commission has completed its transition from activity reporting to quarterly licensing reporting, these definitions are no longer relevant and should be repealed.

A header exists within Chapter 230-06 WAC titled “License Renewals and Activity Reports”. This header is no longer relevant as Activity Reports are no longer used, therefore this header should be repealed.

Staff has also identified four definitions listed under this section that are referenced in other chapters of WAC:

- WAC 230-06-155- Defining “gross sales.” is also used in Chapter 230-03 WAC.
- WAC 230-06-160- Defining “net gambling receipts.” is also used in Chapter 230-07 WAC and Chapter 230-10 WAC.
- WAC 230-06-165- Defining “net gambling income.” is also used in Chapter 230-07 WAC.
- WAC 230-06-175- Defining “cost.” Is also used in Chapter 230-14 WAC.

Staff recommends placing these definitions at the beginning of each chapter where they are referenced to assist licensees.

Staff also recommends amending the following definitions to further clarify sales tax:

- WAC 230-06-160- Defining “net gambling receipts.” and
- WAC 230-06-175- Defining “cost.”

Staff Recommendation

Staff recommends withdrawal of this rule-making. Staff will later repeal the rules through the expedited rule-making process.
--



Rule Petition to Amend

WAC 230-06-035- Credit, loans, or gifts prohibited.

WAC 230-14-047- Standards for electronic video pull-tab dispensers.

December 2020 – Final Action

November 2020 – Discussion

October 2020 – Discussion

September 2020 – Discussion & Possible Filing

September 2019 – Commission Review

August 2019 – Rule-Making Petition Received

Tab 4: DECEMBER 2020 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Steven Berven, Richland, Washington

Background

Bold = Changes made after the September 2020 Commission Meeting.

The petitioner originally proposed to amend WAC 230-06-035(3) to allow for the use of credit cards as another method of payment and allow pull-tab operators to extend credit up to \$200. At the September 2019 meeting, the Commissioners decided to initiate rule-making and explore allowing credit cards to be used for all gambling activities where it is not currently allowed. **At the September 2020 meeting, the Commissioners decided to file draft language for further discussion to accept credit cards as a payment method option for card games, pull-tabs, and bingo. At the October 2020 Commission meeting, staff provided a presentation on current practices involving the use of credit cards in gambling activities followed by a stakeholder panel discussion related to the draft language filed for further discussion at the September meeting. A presentation on the broader issue of cashless payment systems was also provided by Maureen Greeley, Executive Director, Evergreen Council on Problem Gambling. Commissioners asked staff to look at possible options related to responsible gaming and problem gambling policy areas discussed by Ms. Greeley, which included 1) Player Limits/Controls, 2) Responsible Gaming Information /Messages, 3) Self-exclusion Options, and 4) Know Your Customer: Verification and Data. Staff returned to the Commission in November 2020 to report that while Evergreen Council on Problem Gambling did provide staff with recommendations for spending/buy-in limits and restrictions on credit card advances to only be available at cashiers cages or sales kiosks, staff did not receive specific suggested language in regards to the proposed rule changes filed. Furthermore, staff reported that the original notice of rule-making filed was narrowly focused on allowing the use of credit cards as a method of payment and that the recommendations provided by Evergreen Council on Problem Gambling are outside the scope of the current rule-making. At the November 2020 Commission meeting, staff facilitated additional discussion on the current rule-making and was asked to solicit additional stakeholder input from the problem gambling task force and gambling industry.**

The draft language is before you today for final action.

Originally adopted in 1973 as WAC 230-12-050. No credit, loans, or gifts was allowed and participation in a gambling activity must be paid in full, by cash or check. A single exception was made for punch boards or pull-tabs when consideration is five dollars or less.

The rule has been amended as follows:

1974	Allow bona fide charitable or nonprofit organization members to be billed without paying full consideration upfront to participate in a licensed gambling activity if the organization's billing system is approved by the Commission.
1989	Allow the full consideration exception for punch boards and pull-tabs to be raised from five dollars to ten dollars or less.
1995	Allow for the following: <ul style="list-style-type: none"> • Charitable or nonprofit organizations to use credit cards for payment of raffle tickets; • Card rooms to give promotional gifts to customers for free or provided discounted food, drink, and/or merchandise; • Offering promotions, performances, and entertainment during bingo games, free play and "free rolls" during card tournaments, and promotional game cards.
1997	Allow electronic point-of-sale bank transfers as a method of payment.
2001	Allow nonprofits to provide free or discounted food and nonalcoholic drinks players.
2004	To include a definition of "gifts" and requirements for giving gifts and promotions.
2006	To allow gift certificates and gift cards as a method of payment.

Attachments:

- WAC 230-06-035
- WAC 230-14-047
- Stakeholder Feedback

Stakeholder Outreach

This petition was sent to all organizations that currently hold a gambling license. Six stakeholders are supportive of this petition because credit cards are a common method of payment, there is an ability for increased revenue, use of credit cards adds convenience of paying a tab for food/beverage and gambling activities, and some licensees would like to accept credit cards for the payment of bingo cards.

- Dagmar Cronn, South Park Senior Citizens
- Dan McCoy, McCoy's Distributing, Inc.
- Douglas Granstrand, Bill's Place/Granstrands Ent
- Duane B. Lusby, Loyal Order of Moose
- Jason Lajeunesse, Comet Tavern
- Wayne Larson, 13th Avenue Pub
- Susan Kingsbury-Comeau (received November 2019)

Eight stakeholders are opposed to this petition because it does not accurately reflect sales on credit card bills (for instance, if a player purchases \$15 worth of food and beverage and \$40 worth of pull-tabs, it reflects on the credit card bill that the business made a \$55 profit, when in reality, the player may have won back that \$40 through play), a 3-5% transaction fee is charged to the business for use of credit cards, possibility of the card being declined after play, nonprofit organizations do not possess a point-of-sale system to accept payment by credit card, concerns that it may reduce overall sales, it adds costs to an already declining past time, and it may contribute to problem gambling.

- Barbara Jones, White Horse Saloon
- Chris Schumacher, ShuJack's Bar & Grill

- Donald Whittington, American Legion 00015
- Frances Staley, Maxi's Restaurant
- Pete Grignon, United Way of Pierce County
- Melissa Patterson, Parrot Heads of Puget Sound
- Robert Cameron, Old Highway 99 Saloon
- Thom Gamble, Creekside Alehouse and Grill
- TeAire Baier (received October 2019)

A stakeholder meeting was convened on December 3, 2019. Stakeholders present expressed interest in the use of credit cards to purchase bingo cards, to purchase electronic pull-tabs, and to play amusement games. The language before you today was sent out to all licensed organizations on August 17, 2020 for review and comment. The following feedback was received:

Twenty-two stakeholders are in support of the proposed language. They feel that allowing the use of credit as a method of payment will increase revenue, especially considering the effects the COVID-19 pandemic has had on business, feel this is keeping up with the way the world does business as most customers use credit to pay for other items, and feel that operators should have the freedom to decide if this is a form of payment that makes sense for their business model.

- Susan Kingbury-Comeau, Mt. Si Senior Center
- Robert Materne, Jr., The Swinging Doors
- Mason Nostrom, Tims Tavern
- Carla Dodgson, Bern's Tavern
- Brian Adams, Fleet Reserve Association Br97
- Dan McCoy, McCoy's Distributing
- Fransisco Avalos, Herbs Bar & Grill
- Steve Nelson, Law Enforcement Association of SW Washington
- Melanie Keser, ZDI Gaming Inc.
- Renee Carney, Player One Amusement Group
- Ron Fryer, America for Veterans Foundation
- George Penner, Grange 01069/Oroville
- T. Christian Anthony, National Table Games Corp.
- Dagmar Cronn, South Park Senior Citizens
- Funland
- Sarah Dahleen, Hamlin Robinson School
- Renton Rotary Treasurer
- Judy A Smith, WA/ID Rainbow Foundation
- Kelly Becker, LifeWire
- Victor Mena
- Jim Marsh, Hart Novelty (support for use with amusement games only)
- 50 Calibers Washington

Eighteen stakeholders oppose the proposed language. Businesses do not want to pay the transaction fee to the credit card companies for allowing customers to use credit cards, deal with disputes and/or complaints

between customers and credit card companies, feel that there is a risk of credit card chargebacks and fraud, worry they would have reduced cash coming in but would still have to pay out cash prizes, feel that it may be difficult to track credit sales versus cash sales, worry that it may inaccurately reflect sales, and are concerned that it would contribute to problem gambling.

- Phillip DeLaRosa, Silos Sports Bar and Grill
- Marnie Hayes, Firehouse Pub
- David Winfrey
- Barbara Jones, White Horse Saloon
- Ron Franzen, Jackson Street Bar & Grill
- Denice Velasquez, Jamestown Saloon
- Tammy Hull, Litz's Bar and Grill
- Dale and Laure Simpson, Acorn Saloon & Feeding Station
- Brett Brophy, B Cubed Enterprises LLC
- Elizabeth Baxter, TJs Bar & Grill
- Eileen Kim, Log Cabin Bar & Grill
- Jan Minster, The Channel Marker Pub & Grill
- Frances Staley, Maxi's Restaurant
- William Henkens, Game Neighborhood Grill & Bar
- Gail McCoy, Lennard K's Boat
- Michael Smith, Sequim Senior Services
- Freida Sanger, Gwen's Venture LLC dba Rock the Dock Pub & Grill
- Carrie Buckel, The Lime/Who's

Katie Doyle, Washington Hospitality Association, provided public comment at the November 17, 2020 Commission meeting. "Representing numerous pull-tab operators across the state, we have done our best in the last month or two to get our operators to provide their opinions on this particular topic. And pretty much everyone I've talked to is still neutral. They love the option of the flexibility that they would have with credit cards. But I do think that they hear the concerns about problem gambling." She also said, "Right now, getting further comment from the operators, which I'd love to be able to provide at the December meeting, is going to be so extremely difficult because of the position that so many of them are in and they are now obviously closed once again."

Draft language was sent out to organizations currently licensed to conduct card games, bingo, and/or pull-tabs and to manufacturers and distributors via email on November 20, 2020.

Six stakeholders are in support of the proposed language. They feel that credit cards offer a safer, faster payment method that could reduce the risk the use of counterfeit currency (especially in card rooms), cashless payment systems have been proven to reduce the spread of COVID-19 and many businesses have already made the transition to them, merchants do not feel it is their responsibility to police patron spending, allowing this method may attract business from those who don't currently play because they only carry credit cards and would further the purpose of activities, such as pull-tabs, being conducted as a "commercial stimulant."

- Janice Carter, Charlie's Restaurant
- Maverick Gaming

- **Richard Montoya, Senior Frogs**
- **Katherine Jordan, South Park Senior Citizens**
- **Paul Manly, VFW Post 1474**
- **Dan McCoy, McCoy's Distributing, Inc.**

Thirteen stakeholders oppose the proposed language. They feel the increased fees may increase the cost of play for activities such as bingo, which may in turn increase the costs of bookkeeping and recordkeeping; the risk of debt is high because even if a patron wins, they will still owe the credit card company plus the fees and interest; this option will be bad for business because many merchants haven't made the transition to EMV-compliant POS systems yet and therefore may be liable for fraudulent claims; businesses have ATM present on-site which not only absorbs the 3% fee a credit card company would otherwise charge the merchant, but an ATM also allows the patron a chance to reconsider; and a number stakeholders expressed concerns with problem gambling.

- **Wayne Vertz, Bingo Boulevard Columbia Center Rotary**
- **Ruben Arias Jr., El Toro Restaurants**
- **The Filipino American League of Pierce County**
- **Dean Miller, FOE 00204**
- **Giovanni Diquattro, Rainbow Café**
- **Helen Brooks, Sportsman Café & Lounge**
- **Julie Lennartz-Reppen, La Conner Tavern, Inc.**
- **Linda Glein, Ale House Tacoma, LLC/Paradise Lanes Entertainment Center, Inc.**
- **Marnie Hayes, Firehouse Pub**
- **Rocko's Fireside Bar & Grill**
- **Michael Smith, Sequim Senior Services**
- **Debbie Brese, The Cloverleaf**
- **Bill Henkens, The Game Neighborhood Grill**

In total, thirty stakeholders have expressed their support of the proposed language throughout this process. They would like to have the option to accept credit cards as a method of payment and believe this will help their businesses.

Thirty-five stakeholders have expressed their opposition to the proposed language citing fees, fears of fraudulent claims and/or credit card disputes, and problem gambling as their primary concerns.

Staff Recommendation

Staff remains neutral, however recommends the Commission take final action by either:

- 1) Approving the proposed language as is, making it effective 31 days after filing with the Office of the Code Reviser (expected on or about January, 21 2021), or**
- 2) Withdraw the rule-making at this time.**

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 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 cash, check, gift certificate, gift card, credit card, or electronic point-of-sale bank transfer.

(4) If the price paid for the opportunity to play a punch board or pull-tab series is ten dollars 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.))~~

WAC 230-14-047 Standards for electronic video pull-tab dispensers. Electronic video pull-tab dispensers must be approved by us prior to use.

(1) Electronic video pull-tab dispensers must dispense a paper pull-tab as defined in WAC 230-14-010 and follow the rules for:

- (a) Pull-tabs; and
- (b) Flares; and
- (c) Authorized pull-tab dispensers.

(2) Electronic video pull-tab dispensers that use a reading and displaying function must:

- (a) Use a video monitor for entertainment purposes only; and
- (b) Open all, or a portion of, the pull-tab in order to read encoded data that indicates the win or loss of the pull-tab if the dispenser is equipped to automatically open pull-tabs; and
- (c) Dispense the pull-tab to the player and not retain any portion of the pull-tab; and
- (d) Read the correct cash award from the pull-tab either when it is dispensed or when the pull-tab is reinserted into the dispenser; and

(e) Display the cash award from the pull-tab, one pull-tab at a time; and

(f) Provide:

- (i) An electronic accounting of the number of pull-tabs dispensed; and
- (ii) A way to identify the software version and name; and
- (iii) A way to access and verify approved components; and
- (iv) Security on the dispenser to prevent unauthorized access to graphic and prize amount displays.

(3) Cash cards used in electronic video pull-tab dispensers must:

(a) Be purchased with cash, check, gift certificates, credit card, or electronic point-of-sale bank transfer before use in the dispenser; and

(b) Be convertible to cash at any time during business hours; and

(c) Subtract the purchase price of the pull-tab one pull-tab at a time.

(4) Electronic video pull-tab dispensers that accept cash cards may award any pull-tab cash prize of twenty dollars or less onto the cash card.

Stakeholder Feedback on Petition

From: [Dagmar Cronn](#)
To: [Laydon, Ashlie \(GMB\)](#); [Patricia Barker](#); [Ray Krueger](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Monday, July 29, 2019 6:14:27 PM
Attachments: [image003.png](#)
[image005.png](#)

The South Park Senior Citizens nonprofit corporation supports the petition to allow bingo players to pay for their game cards with credit card payments. We would like to be able to accept credit cards to pay for Bingo playing cards as it is awkward for players to preregister for other costs and to require cash at the door for the game cards. Thank you for passing this statement on to the Gambling Commission.

On Mon, Jul 29, 2019 at 5:08 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

If you would like to comment on this petition, you can do so by responding to me directly or by submitting a public comment through our website [here](#).

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



--

Dagmar Cronn
Treasurer, South Park Senior Center
8201 10th Ave S. - #4
Seattle, WA 98108-4449
206-767-2544 (office)
206-327-1828 (cell)

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Sunday, August 11, 2019 1:39:20 PM

Submitted on Sunday, August 11, 2019 - 1:39pm
Submitted by anonymous user: 50.35.156.105
Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts
Name: Dan McCoy
Organization: McCoy's Distributing, Inc.
Comments:
To: Ashlie Laydon
Rules Coordinator | Legal and Records Division
Washington State Gambling Commission,

I consider the reasoning behind the Petition to amend WAC 230-06-035, which prohibits credit, loans and gifts to be a viable and legitimate argument. Today, the use of credit cards is how many, if not most people pay for everything they do. I support the removal of the rule restricting credit cards from being used to pay for gambling activities as I believe it is an outdated restriction and should be removed.

Thank you,

Dan McCoy
McCoy's Distributing, Inc.
mccoysdis@gmail.com

The results of this submission may be viewed at:
<https://wsgc.wa.gov/node/19/submission/1076>

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Tuesday, July 30, 2019 2:50:28 PM

Submitted on Tuesday, July 30, 2019 - 2:50pm
Submitted by anonymous user: 69.55.222.180
Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts
Name: Douglas H Granstrand
Organization: Bill's Place / Granstrands Ent
Comments: I am in favor of allowing payment for a gambling tab via credit card.

The results of this submission may be viewed at:
<https://wsgc.wa.gov/node/19/submission/1048>

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Tuesday, July 30, 2019 11:22:40 AM

Submitted on Tuesday, July 30, 2019 - 11:22am
Submitted by anonymous user: 73.109.41.237
Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Duane B. Lusby

Organization: loyal order of Moose

Comments: I agree with this petition. It will make more money for each establishment which means more tax income for the State. win win

The results of this submission may be viewed at:
<https://wsgc.wa.gov/node/19/submission/1047>

From: [Jason Lajeunesse](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Monday, July 29, 2019 8:54:14 PM

Ashlie, as a business owner who carries several gambling licenses for the sole purpose of selling pull tabs, I agree that this rule should be amended and updated to reflect the times we live in

Jason Lajeunesse

sent from cellular
206-850-3075

On Jul 29, 2019, at 5:08 PM, Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

If you would like to comment on this petition, you can do so by responding to me directly or by submitting a public comment through our website [here](#).

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov

[<image001.jpg>](#)

[<image002.gif>](#) [<image003.png>](#) [<image004.jpg>](#) [<image005.png>](#)

[<Petition.pdf.pdf>](#)

From: [Wayne Larson](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Tuesday, July 30, 2019 11:13:50 AM

I totally agree at 13th Ave. pub and eatery 90% of our sales are by credit card I firmly agree with this change thank you

Sent from my iPhone

On Jul 29, 2019, at 5:08 PM, Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

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Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov

[<image001.jpg>](#)

[<image002.gif>](#) [<image003.png>](#) [<image004.jpg>](#) [<image005.png>](#)

[<Petition.pdf.pdf>](#)

From: [Susan Kingsbury-Comeau](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Washington State Gambling Commission - Notice of Rule Making
Date: Friday, November 22, 2019 1:20:19 PM
Attachments: [image003.png](#)
[image005.png](#)

Ashlie – I am not available December 3 but ask to be informed of other stakeholder feedback opportunities – meetings or written opportunities.

I support the use of credit cards and believe that the opposing viewpoint which was presented does not provide any issues that couldn't be easily overcome. I'd like the opportunity to provide that feedback.

Thank you.

Regards,

Susan

Susan Kingsbury-Comeau

Executive Director, Mt. Si Senior Center

411 Main Ave S | PO Box 806 | North Bend, WA 98045

Phone: 425-888-3434 | Email: susan@mtsiseniorcenter.org

Facebook: www.facebook.com/mtsiseniorcenter.org/

Website: www.mtsiseniorcenter.org/

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Friday, November 22, 2019 10:29 AM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>; Griffin, Tina (GMB) <tina.griffin@wsgc.wa.gov>; Rancour, Michelle (GMB) <michelle.rancour@wsgc.wa.gov>; Lies, Julie (GMB) <julie.lies@wsgc.wa.gov>; Antonson, Tyna (GMB) <tyna.antonson@wsgc.wa.gov>; McGregor, Bill (GMB) <bill.mcgregor@wsgc.wa.gov>
Subject: Washington State Gambling Commission - Notice of Rule Making

Good morning,

On September 12, 2019, the Commissioners voted to accept a rules petition and initiate rulemaking to consider authorizing the use of credit cards for payment for commercial and nonprofit gambling activities. This notice is being sent out to all organizations licensed with the Washington State Gambling Commission. If you are not interested, just disregard it.

Attached you'll find a copy of the following:

- notice of rulemaking with details about an upcoming stakeholder meeting on December 3, 2019,
- agenda including the petition,
- rules summary that was presented at the Commission meeting, and
- calendar scheduler.

Please RSVP to me **by November 27, 2019** if you plan to attend this meeting by phone or in person so I can plan accordingly. Feel free to contact me if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: barbarawjones@aol.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: WSGC - Notice of Rule Petition
Date: Monday, August 5, 2019 1:52:56 PM
Attachments: [image005.png](#)
[image003.png](#)

Hello Ashlie, I am not supportive of this bill. It would put my credit card balance as an earning for me when the person playing pull tabs may receive many "play backs" winning tickets which would not be reflected on the credit card bill. For example if I have a charge for food and beverage of \$15.00 that is profit to me. If the Gambler adds an additional 50.00 to his bill it would appear I have a \$65.00 profit when the Gambler may have won much or some of the money back. I may be mistaken in my reasoning but if one doesn't have the money to gamble I cannot see charging for something that is merely meant for entertainment. This would also add more risk to problem Gamblers buy not limiting their spending.

Barbara Jones
White Horse Saloon
Arlington, Washington

-----Original Message-----

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Mon, Jul 29, 2019 4:09 pm
Subject: Washington State Gambling Commission - Notice of Rule Petition



Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

If you would like to comment on this petition, you can do so by responding to me directly or by submitting a public comment through our website [here](#).

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
 (360) 486-3473 |  ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



From: [Chris Schumacher](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Washington State Gambling Commission - Notice of Rule Petition
Date: Monday, July 29, 2019 6:34:42 PM
Attachments: [image003.png](#)
[image005.png](#)

Not sure, even if this passes, I will allow credit card use in my bar for pull tabs. It's a time consuming hassle in our busy atmosphere and there is a 3-5% transaction fee. What if they rack up a \$200 "tab" and the card is rejected?

Chris Schumacher
ShuJack's Bar and Grill

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, July 29, 2019 5:08 PM
Subject: Washington State Gambling Commission - Notice of Rule Petition

Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

If you would like to comment on this petition, you can do so by responding to me directly or by submitting a public comment through our website [here](#).

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: [Donald Whittington](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Washington State Gambling Commission - Notice of Rule Petition
Date: Monday, July 29, 2019 6:40:39 PM
Attachments: [image003.png](#)
[image005.png](#)

We are a non profit business and have no Pos machine for transacting credit cards. Customers pay cash and use an Atm machine on the premesis for gambling transactions.

Sent from [Mail](#) for Windows 10

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, July 29, 2019 5:08:07 PM
Subject: Washington State Gambling Commission - Notice of Rule Petition

Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

If you would like to comment on this petition, you can do so by responding to me directly or by submitting a public comment through our website [here](#).

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: frances@maxischineserestaurant.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Monday, July 29, 2019 6:54:12 PM

We oppose to the rule change for allowing credit card as legal tender in gambling (especially in individual small business). Even though establishments get their money right a way in form credit (through credit card), the gambling individual still gambling on borrowed money, and may gambled away beyond their ability to repay their debt.

Thank you

Frances

Maxis Restaurant.

From: [Pete Grignon](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Washington State Gambling Commission - Notice of Rule Petition
Date: Tuesday, July 30, 2019 2:31:27 PM
Attachments: [image003.png](#)
[image005.png](#)

Hello Ashlie,

It appears they are thinking of pull tabs only? If so, there are quite a few lower income individuals that buy pull tabs with cash. So, I am wondering if it would reduce overall sales. That would be my concern.

Thanks for letting me comment.

Pete

Pete Grignon | Sr. VP Finance/CFO

United Way of Pierce County | 1501 Pacific Ave, Suite 400 | Tacoma, WA 98402
253-597-7486 (Direct) | 253-272-4263 (Main)

From: Laydon, Ashlie (GMB) [mailto:ashlie.laydon@wsgc.wa.gov]
Sent: Monday, July 29, 2019 5:08 PM
Subject: Washington State Gambling Commission - Notice of Rule Petition

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

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Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400

(360) 486-3473 | ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
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Protect the public by ensuring that gambling is legal and honest.



From: [PHoPS Treasurer](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Monday, August 5, 2019 2:47:58 PM
Attachments: [image003.png](#)
[image005.png](#)

Hi Ashlie,

I would agree that people use credit cards more often than cash. The issue I see is that credit cards have handling fees which vary depending on the contracts involved. The seller will not receive 100% of the proceeds.

Melissa

On Mon, Jul 29, 2019 at 5:09 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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If you would like to comment on this petition, you can do so by responding to me directly or by submitting a public comment through our website [here](#).

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
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--

Melissa Patterson

PHoPS Treasurer

treasurer@phops.com

phopstreasurer@gmail.com

Parrot Heads of Puget Sound

 www.phops.com (Seattle)

"Northwest Latitudes, Laid Back Attitudes"

From: [Robert Cameron](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Monday, July 29, 2019 7:40:46 PM
Attachments: [image003.png](#)
[image005.png](#)

Hi Laydon, thank you for the copy of the letter, Ugh! Where to start with how bad of an idea I feel this is, this change would put all off the burden on the rest/bars that sell pull tabs, the cc fees would add cost to an already declining past time and what happens when somebody's credit card comes up declined? I feel the way the State regulates the sale of pull tabs today is the best way to insure that we as the business owners don't get screwed out of more money. my gut tells me the person who is making this request has never played pull tabs and has definitely never sold pull tabs. I also feel this would help create a bigger gambling problem and encourage people to unintentionally overspend with the State being the only entity to profit. Thank you, Robert Cameron

On Mon, Jul 29, 2019 at 5:08 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
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Protect the public by ensuring that gambling is legal and honest.



From: [Thom Gamble](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Friday, August 2, 2019 5:15:13 PM
Attachments: [image003.png](#)
[image005.png](#)

I am opposed to this requested change. Margins are small enough on Pull Tab sales after all taxes, fees etc. are paid. The credit card companies also charge for processing the credit card payments, as well as our Merchant Service providers. ATM's are provided in most establishments for gamblers to draw funds from their personal accounts, i.e. debit cards, or credit lines, i.e. credit card. A stop payment dispute can easily be placed on a credit card payment, say if a person has buyers remorse after losing. Cash limits what the gambler can spend while a credit card would be like a blank check to a person with a gambling problem.

Thom Gamble
Creekside Alehouse and Grill
Lake Stevens, WA 98258
425-397-0860

On Mon, Jul 29, 2019 at 5:11 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good afternoon,

This email is to inform you that the Washington State Gambling Commission has received the attached petition for rulemaking. [RCW 34.05.330](#) is the law that governs these types of petitions and it requires that an agency hear a petition within 60 days of receipt of the petition. This petition will be heard by the Commission at the September 12th Commission Meeting in Olympia, Washington. More details regarding the September 12th meeting can be found [here](#). The agenda and materials should be posted approximately a week prior to the meeting.

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Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Friday, October 11, 2019 10:27:17 AM

Submitted on Friday, October 11, 2019 - 10:26am
Submitted by anonymous user: 131.150.236.136
Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: TeAire Baier

Organization: Fraternal Order of Eagles #2647

Comments:

Allowing Credit Cards to purchase Pull Tabs or any gambling would not be a great choice. Businesses are charged a fee anytime a credit/debit card is swiped. Some businesses increase pricing to accommodate the fee or others add a small fee at the end of the transaction. Credit/Debit Cards are mostly used in Bars to open up a Tab, which is an open end transaction. If the customer walks out without closing their tab, bars add a significant fee.

What would happen if everyone uses Credit/Debit Cards to pay for Pull Tabs and they hit it big or multiple customers pay. Bars will have to pay the customer out in Cash but how would Bars replenish the money on hand to payout the customer(s). The cash people put into Pull Tabs allows Bars the ability to easily payout when a customer(s) does win.

Yes Credit/Debit Cards use is great for the customer so they don't have to carry a significant amount of cash on them, but for any Business we have to wait to have access for the money we bill the customer sometimes 24 to 48 hours.

The results of this submission may be viewed at:
<https://www.wsgc.wa.gov/node/19/submission/1180>

From: [Cindy Inman](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Making
Date: Friday, November 22, 2019 11:30:47 AM
Attachments: [image003.png](#)
[image005.png](#)

We currently do not accept credit cards and my guess is never will as we do very little gambling activities.

Thanks

Cindy Inman Auxiliary Secretary Granite Falls Eagles

[Sent from Yahoo Mail on Android](#)

On Fri, Nov 22, 2019 at 10:37 AM, Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

On September 12, 2019, the Commissioners voted to accept a rules petition and initiate rulemaking to consider authorizing the use of credit cards for payment for commercial and nonprofit gambling activities. This notice is being sent out to all organizations licensed with the Washington State Gambling Commission. If you are not interested, just disregard it.

Attached you'll find a copy of the following:

- notice of rulemaking with details about an upcoming stakeholder meeting on December 3, 2019,
- agenda including the petition,
- rules summary that was presented at the Commission meeting, and
- calendar scheduler.

Please RSVP to me **by November 27, 2019** if you plan to attend this meeting by phone or in person so I can plan accordingly. Feel free to contact me if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State Gambling Commission

4565 7th Ave SE

Lacey, WA 98503

1st Floor Conference Room; Rainier Room

(360) 407-3780

Pin: 950119#

From: [linda davey](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Pat Rudd](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Petition
Date: Saturday, August 3, 2019 7:06:52 AM
Attachments: [image003.png](#)
[image005.png](#)

Pat and I oversee a very small bingo operation in a senior center. We don't feel qualified to comment.

Thank you,
Linda Davey
Pat Rudd

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, July 29, 2019 5:08 PM
Subject: Washington State Gambling Commission - Notice of Rule Petition

Good afternoon,

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Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: [Sam Virk](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#); [Griffin, Tina \(GMB\)](#); [Rancour, Michelle \(GMB\)](#); [Lies, Julie \(GMB\)](#); [Antonson, Tyna \(GMB\)](#); [McGregor, Bill \(GMB\)](#)
Subject: Re: Washington State Gambling Commission - Notice of Rule Making
Date: Friday, November 22, 2019 10:48:08 AM

We already shut down our business long time ago.

Thanks

Regards
Sam Virk
206-387-1000

Be Healthy, Kind & Human!!!

On Nov 22, 2019, at 10:37 AM, Laydon, Ashlie (GMB)
<ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

On September 12, 2019, the Commissioners voted to accept a rules petition and initiate rulemaking to consider authorizing the use of credit cards for payment for commercial and nonprofit gambling activities. This notice is being sent out to all organizations licensed with the Washington State Gambling Commission. If you are not interested, just disregard it.

Attached you'll find a copy of the following:

- <!--[if !supportLists]-->• <!--[endif]-->notice of rulemaking with details about an upcoming stakeholder meeting on December 3, 2019,
- <!--[if !supportLists]-->• <!--[endif]-->agenda including the petition,
- <!--[if !supportLists]-->• <!--[endif]-->rules summary that was presented at the Commission meeting, and
- <!--[if !supportLists]-->• <!--[endif]-->calendar scheduler.

Please RSVP to me **by November 27, 2019** if you plan to attend this meeting by phone or in person so I can plan accordingly. Feel free to contact me if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov

[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<Notice of Rule Making; Use of Credit Cards.pdf>

<mime-attachment>

<December 3, 2019; Agenda.pdf>

<Rules Summary; Use of Credit.pdf>

Stakeholder Feedback on Language

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Monday, August 17, 2020 12:30:54 PM

Submitted on Monday, August 17, 2020 - 12:30pm

Submitted by anonymous user: 162.17.167.22

Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Susan Kingbury-Comeau

Organization: Mt. Si Senior Center

Comments: I support allowing credit cards to be accepted as a form of payment for events like the bingo games we have run at the Center for the last 2 years.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1761>

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Monday, August 17, 2020 1:50:16 PM

Submitted on Monday, August 17, 2020 - 1:49pm

Submitted by anonymous user: 96.93.106.134

Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Robert Materne, Jr.

Organization: The Swinging Doors

Comments: In a time where we are being restricted as far as occupancy, the 10pm curfew on alcohol sales, and lack of sales due to the COVID-19 pandemic, it would be great to be able to accept credit cards as payment for pull tab sales. Anything to help small businesses STAY in business will help.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1764>

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Monday, August 17, 2020 5:36:43 PM

Submitted on Monday, August 17, 2020 - 5:36pm

Submitted by anonymous user: 50.34.156.221

Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Mason Nostrum

Organization: Tims Tavern

Comments:

I think being able to accept credit cards as form of payment for pulltabs will open the door for more revenue. I would like to voice my approval for this proposal.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1765>

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Monday, August 17, 2020 8:34:20 PM

Submitted on Monday, August 17, 2020 - 8:34pm
Submitted by anonymous user: 131.150.254.240
Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Carla Dodgson

Organization: Bern's Tavern

Comments:

Since a huge majority of our customers only use credit/debit cards, we would appreciate the rules to change allowing us to take them.

However, since our Covid-19 shutdown we don't have any play.

Any and all assistance to be gained in pull tab play sure can't hurt.... even in the future.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1766>

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Wednesday, August 19, 2020 4:03:26 PM

Submitted on Wednesday, August 19, 2020 - 4:03pm
Submitted by anonymous user: 67.183.250.244
Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts
Name: Brian Adams
Organization: Fleet Reserve Association Br97
Comments: We think it is a good idea

The results of this submission may be viewed at:
<https://wsgc.wa.gov/node/19/submission/1769>

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Thursday, August 20, 2020 11:22:10 AM

Submitted on Thursday, August 20, 2020 - 11:22am

Submitted by anonymous user: 50.35.159.211

Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Dan McCoy

Organization: McCoy's Distributing, Inc.

Comments: I support this rule change 100%. It's just keeping up with the way the world does business.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1772>

From: [F.Avalos](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:25:27 PM
Attachments: [image003.png](#)
[image005.png](#)

Yes I think accepting cards is a good idea I lose a lot of sales when I tell my customers that it's cash only really good idea

On Mon, Aug 17, 2020 at 12:22 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

You are receiving this email because your email address is associated with an organization that is currently licensed to operate gambling activities in Washington. If you have received this email by mistake, you may disregard it or contact

me with updated information and I will have that corrected in our system.

The Gambling Commission accepted a petition and initiated rulemaking to consider authorizing the use of credit cards as a payment method for commercial and nonprofit gambling activities. Attached, you will find draft language for your review

and the preproposal statement of inquiry that was filed with the Office of the Code Reviser for reference. Under current rules, nonprofits can already accept credit cards as a method of payment for raffles under

[WAC 230-06-035](#). This is not proposed to change.

You may submit your feedback to me directly or through our

[website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400



(360) 486-3473

|



ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



From: [Stephen Nelson](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:37:52 PM
Attachments: [image003.png](#)
[image005.png](#)
[image003.png](#)

Yes, I approve.

Steve Nelson

On Mon, Aug 17, 2020, 12:24 Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov

Image result for wa gambling commission



From: [Melanie Keser](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Gerow, Jay \(GMB\)](#)
Subject: RE: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:41:15 PM
Attachments: [image003.png](#)
[image005.png](#)

Good Afternoon,

I whole hearted agree that credit card transactions should be allowed as a payment method for commercial and non-profit gambling activities. It is just the way we do commerce these days. Operators should be able to decided if that form of payment makes sense for their business model.

Melanie Keser
ZDI Gaming Inc.
"Your Source for Success"
1-800-456-3973

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

Good morning,

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Protect the public by ensuring that gambling is legal and honest.



From: [Renee Carney](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:51:43 PM
Attachments: [image009.png](#)
[image011.png](#)
[image001.png](#)

I think accepting credit cards is a good idea. It will improve revenue.

Thank you,

Renee Carney | Manager, USA Administration | **Player One Amusement Group**
Direct: 805.328.2603 | 805.578.9007 ext: 304100 | WinWithP1AG.com



From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

Good morning,

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Thank you,

Ashlie Laydon
Rules Coordinator | Legal and Records Division
Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



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From: [Ron Fryer](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 1:35:18 PM
Attachments: [image003.png](#)
[image005.png](#)
[image005.png](#)

We are in full agreement with the changes. Good move.
Best Regards,
Ron Fryer
America for Veterans Foundation

On Mon, Aug 17, 2020, 12:23 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov

Image result for wa gambling commission



From: [George Penner](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 3:27:28 PM
Attachments: [image003.png](#)
[image005.png](#)

Yes, I approve.

George Penner

On Mon, Aug 17, 2020 at 12:24 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

You are receiving this email because your email address is associated with an organization that is currently licensed to operate gambling activities in Washington. If you have received this email by mistake, you may disregard it or contact me with updated information and I will have that corrected in our system.

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
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Protect the public by ensuring that gambling is legal and honest.



From: Christian@NationalTG.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 7:17:04 PM

I'm in favor and vote yes on the rule change to accept credit card payments for commercial gambling activities.

Thank you,
T. Christian Anthony
Chief Executive Officer
National Table Games Corp.
504-913-1059 Direct
www.NationalTG.com

On Aug 17, 2020, at 2:22 PM, Laydon, Ashlie (GMB)
<ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov
<[image001.jpg](#)>

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

<WAC 230-14-047; revised.docx>

<CR 101; WSR 19-19-081.pdf>

From: [Dagmar Cronn](#)
To: [Laydon, Ashlie \(GMB\)](#); [Katherine Jordan](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 11:31:46 PM
Attachments: [image003.png](#)
[image005.png](#)

Ashlie, please add our new South Park Senior Citizens Executive Director Katherine Jordan to your elist.

Thank you.

SPSC supports the proposed change to allow credit card use for our nonprofit bingo games. We are no longer holding bingo fundraisers due to Covid and have no idea at this time whether we will ever restart the fundraisers but would like the rule change in place if we do.

On Mon, Aug 17, 2020 at 12:22 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



--

Dagmar Cronn
Treasurer, South Park Senior Center
8201 10th Ave S. - #4
Seattle, WA 98108-4449
206-767-2544 (office)
206-327-1828 (cell)

From: [Funland](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Tuesday, August 18, 2020 10:44:41 AM
Attachments: [image003.png](#)
[image005.png](#)

Yes we approve of the rule changes.

On Mon, Aug 17, 2020 at 12:22 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



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--

Curtis Epping - Owner

funlandlb@gmail.com

Phone: 360-642-2223

Funland

200 S. Pacific

Long Beach, WA 98631

From: [Sarah Dahleen](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Fw: Feedback to gambling commission
Date: Tuesday, August 18, 2020 12:55:44 PM
Attachments: [Outlook-facebook.png](#)
[Outlook-twitter.png](#)
[Outlook-Image.resu.png](#)
[Outlook-FB icon.png](#)
[Outlook-twitter ic.png](#)
[Outlook-instagram .png](#)
[Outlook-In-2C-21px.png](#)
[WAC230-06-035: revised.docx](#)
[WAC 230-14-047: revised.docx](#)
[CR 101: WSR 19-19-081.pdf](#)

Ashlie,

Good afternoon,

On behalf of Hamlin Robinson School, I am submitting feedback related to the above attached proposals.

We believe accepting credit card payments for raffle activities is a necessary and important adaptation of the rules - and given the current environment.

I've also included similar feedback below.

Thank you!

Sarah Dahleen

Director of Advancement and Marketing

Hamlin Robinson School

1701 20th Ave S

Seattle, WA 98144

206-763-1167 ext 116

www.hamlinrobinson.org

Where learning has no limits.



From: Jen Fukutaki <jfukutaki@hamlinrobinson.org>

Sent: Tuesday, August 18, 2020 8:33 AM

To: Sarah Dahleen <sdahleen@hamlinrobinson.org>

Subject: Feedback to gambling commission

Sarah,

Accepting credit card payments for raffle activities is a really necessary adaptation of their rules.

Jen Fukutaki

Director of Community Services / HRS Learning Center

Hamlin Robinson School

1701 20th Ave S
Seattle, WA 98144
206-763-1167
www.hamlinrobinson.org

Where learning has no limits.

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Protect the public by ensuring that gambling is legal and honest.



From: [Rotary Treasurer](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Tuesday, August 18, 2020 3:13:19 PM
Attachments: [image003.png](#)
[image005.png](#)

Yes, I approve.
Renton Rotary Treasurer

NOTICE: The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorized. Thank you.

On Mon, Aug 17, 2020 at 12:22 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
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Protect the public by ensuring that gambling is legal and honest.



From: [Judy](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Tuesday, August 18, 2020 9:26:46 PM
Attachments: [image003.png](#)
[image005.png](#)

Dear Ashlie,

Our gambling is a raffle and the option of charging to a credit card is a good idea as many people only use their credit cards. It won't currently effect us however, I am for it.

Judy A Smith, Wa/Id Rainbow Foundation

From: Laydon, Ashlie (GMB) [mailto:ashlie.laydon@wsgc.wa.gov]
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB)
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
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From: [Kelly Becker](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: Thank you Ashlie! Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Wednesday, August 19, 2020 11:47:27 AM
Attachments: [image006.png](#)
[image007.png](#)
[image010.png](#)
[image012.png](#)

Hi Ashlie,

Thank you for sending me this information. Currently, we host a raffle each year at our annual Gala & Auction event. The acceptance of credit cards as payment for raffles under WAC 230-06-035 has been great.

This year we will not be hosting a raffle, since it will be a virtual event. Thank you!

Have a wonderful week!

Gratefully,

Kelly

[Kelly Becker](#)

LifeWire | Development Director

P.O. Box 6398 | Bellevue, WA 98008

Phone: 425-562-8840 ext. 253

Cell: 206-290-0776 | www.lifewire.org



From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

Good morning,

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: [50 Calibers Washington](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Thursday, August 27, 2020 8:14:29 AM
Attachments: [image003.png](#)
[image005.png](#)

Yes, I approve.

On Mon, Aug 17, 2020, 12:23 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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Image result for wa gambling commission



From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Monday, August 17, 2020 1:02:48 PM

Submitted on Monday, August 17, 2020 - 1:02pm
Submitted by anonymous user: 64.146.130.144
Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Phillip DeLaRosa

Organization: Silos Sports Bar and Grill

Comments: We are not interested in accepting credit cards for pull tab gambling. Leave it the way it is, CASH ONLY.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1763>

From: [marnie hayes](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:27:41 PM
Attachments: [image003.png](#)
[image005.png](#)

Hi!

I do not want to accept credit cards for Gambling. Here is why...

I have to then pay 3% to the credit card processors.

I can't stop charge backs.

I have an ATM in my building that I make money off of.

I would then have zero cash to pay out winnings.

Make sense?

Sent from my iPhone

On Aug 17, 2020, at 12:23 PM, Laydon, Ashlie (GMB)
<ashlie.laydon@wsgc.wa.gov> wrote:

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[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

<WAC 230-14-047; revised.docx>

<CR 101; WSR 19-19-081.pdf>

From: [Dave Winfrey](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:32:17 PM
Attachments: [image003.png](#)
[image005.png](#)

I don't believe credit cards or even debit cards should be used for gambling activities. You know all the arguments. You have even used the same arguments against the use of cards in the past. Now you are proposing their use.

I don't get it !!

Please don't pass this.

But as always you will do what you want.

David Winfrey

On Mon, Aug 17, 2020 at 12:23 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



--

Dave

From: barbarawjones@aol.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Rule Change: Credit
Date: Monday, August 17, 2020 12:32:40 PM
Attachments: [image005.png](#)
[image003.png](#)

Hello Ashlie, I have previously responded to this when first petitioned. I am against credit being used for gambling. I believe this may create an incorrect tally of actual income. (I.E. Customer takes out \$50 extra dollars on their dining tab to use for gambling. It would appear that I made the amount in revenue, however they may proceed to win \$150 gambling which would not be reflected in my daily sales.

Also with all the concern expressed regarding Gambling Addiction (refer to previous correspondence requesting state and local funds for gambling addiction education and treatment) the use of credit can only increase the abuse of gambling when you do not have the funds. This amounts, in my opinion, to just a "money grab" with no concern for the affect on the gambler.

-----Original Message-----

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Sent: Mon, Aug 17, 2020 11:22 am
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

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GAMBLING
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Protect the public by ensuring that gambling is legal and honest.



From: [Ronald Franzen](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:39:19 PM
Attachments: [image005.png](#)
[image003.png](#)

Ashley,
For me I don't agree. I have an old cash register and keeping gambling just cash keeps everything seperate and easy to track.
Thanks.
Ron Franzen
Jackson St.

On 17 Aug. 2020 12:23 pm, "Laydon, Ashlie (GMB)" <ashlie.laydon@wsgc.wa.gov> wrote:

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GAMBLING
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Protect the public by ensuring that gambling is legal and honest.



From: denice@buythebayrealty.net
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:42:40 PM
Attachments: [image003.png](#)
[image005.png](#)

I believe this is a terrible ideal. If people have access to an ATM they can use their credit cards and pay the fees accordingly. With gambling taxes paid on revenue, the merchant account fees is just another item the licensee will be on the hook for. I highly recommend credit cards not be permitted to be used.

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

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Virus-free. www.avg.com

From: [Tammy Hull](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:47:02 PM

Hello,

This is Tammy Hull from Litz's Bar and Grill in Spokane I'm not in favor i've taken credit cards for Pulltabs because I am not gonna pay taxes twice or three times for that matter.

So that's a straight NO answer! Thanks!

Tammy

Sent from my iPhone

On Aug 17, 2020, at 12:28 PM, Laydon, Ashlie (GMB)
<ashlie.laydon@wsgc.wa.gov> wrote:

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[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

<WAC 230-14-047; revised.docx>

<CR 101; WSR 19-19-081.pdf>

From: [Dale Simpson](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:47:28 PM
Attachments: [image003.png](#)
[image005.png](#)
[image003.png](#)

We vehemently object to the use of credit cards for use in any type of gambling activities, whether commercially or for non-profit.

Gambling is an impulse activity. It would be too easy for individuals to become financially insolvent.

Beyond that, businesses and non-profits would be at risk for credit card chargebacks and fraud.

Sincerely,

Dale and Laure Simpson
Acorn Saloon & Feeding Station
262 South Main St, Colville WA
99114
509-680-2545

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From: [Brett Brophy](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:55:55 PM

I personally don't think this is a good idea and should remain cash only. There will be tons of complaints to credit card companies etc the business owner will not be able to fight.

Respectfully

Brett Brophy

B Cubed Enterprises LLC owner

Sent from my iPhone

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[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

<WAC 230-14-047; revised.docx>

<CR 101; WSR 19-19-081.pdf>

From: [Betty Baxter](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 12:57:34 PM
Attachments: [image003.png](#)
[image005.png](#)

I think this is a very bad idea. First thing is that people could get into trouble with charging too much on a card.

We would have to pay cash out for winners, but not getting cash in. There would be more paperwork and we would have to have more cash on hand.

Elizabeth Baxter
TJs Bar & Grill

On Mon, Aug 17, 2020 at 12:23 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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GAMBLING
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From: [Hong Kim](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 1:03:20 PM
Attachments: [image003.png](#)
[image005.png](#)

Hello,

I am responding to your email about accepting credit cards for gambling.

I would not support that proposal due to too much room for abuse of credit cards by gamblers. As a licensee, I am already paying a percentage of sales in gambling taxes, and if I accepted credit cards on purchases, my profit margin would be even less. I think it would also lead to overspending by the gamblers because it would be easy to max out their credit cards. If it were an option, I would not want to use it and customers would choose to go somewhere that would accept credit cards for gambling. Please do not let this proposal pass.

Eileen Kim - Log Cabin Bar & Grill

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

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From: jminster@earthlink.net
To: [Laydon, Ashlie \(GMB\)](#)
Subject: New gambling rules
Date: Monday, August 17, 2020 1:26:03 PM

We are not in favor of allowing people to use credit cards, gifts, etc. for use in our establishment.

They are banking on winning and then have the credit card slip voided.

We as a business also, are charged from the credit card processing company fees for anyone using a credit card.

No to this change.

Jan Minster
The Channel Marker Pub & Grill
120 W. Dayton St.
D-1
Edmonds, Wa. 98020

From: frances@maxischineserestaurant.com
To: [Laydon, Ashlie \(GMB\)](mailto:Laydon,Ashlie@wsgc.wa.gov)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 3:14:30 PM

Re :Feed back on rule change:

To Ms. Laydon,

opposed to authorizing the use of credit cards as payment method for gambling activities.

1: house will have to pay credit card fee on amount charged

2. not totally on board with the ideas of money borrowed/advanced to gamble, and take cash in return when win.

3. the new rule with encourage bad gambling habits (gamble on borrowed fund)

Frances. Maxis Restaurant.

----- Original Message -----

Subject: Request for Feedback- Rule Change: Credit, loans, and gifts
From: "Laydon, Ashlie (GMB)" <ashlie.laydon@wsgc.wa.gov>
Date: Mon, August 17, 2020 12:22 pm
To:
Cc: "Considine, Brian (GMB)" <brian.considine@wsgc.wa.gov>

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>

> You may submit your feedback to me directly or through our website<https://wsgc.wa.gov/news/request-public-comment?_ga=2.139815286.432453741.1597690358-463894118.1534802297>. I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

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> [FB icon]<<https://www.facebook.com/WAGamblingCommission/>> [twitter icon] <<https://twitter.com/WAGambling>>

> [instagram_2016_icon_email] <<https://www.instagram.com/wagambling/>> [In-2C-21px-R] <<https://www.linkedin.com/company-beta/16262525/>>

>

>

>

>

>

From: weh1221@aol.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 3:19:05 PM

At a 2.5% fee... No thanks

On Monday, August 17, 2020 Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

 (360) 486-3473 |  ashlie.laydon@wsgc.wa.gov

From: [Gail Whitney McCoy](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Monday, August 17, 2020 5:25:29 PM
Attachments: [image003.png](#)
[image005.png](#)

Hi Ashlie,

I am not supportive of accepting credit cards for Pull Tab gamblers for several reasons.

- 1) It increases the amount of carried cash on hand required for establishments to ensure funds are available for payouts and therefore increases overall security risk.
- 2) Paying credit card fees on gross sales of Pull Tabs is not something I am interested in doing. On average, we retain less than 25% of sales. For \$100 in sales, I have \$25 to cover the cost of games, local and federal taxes, B&O Taxes, licensing fees and incremental labor, Accepting \$100 in credit card payment, would cost me an additional \$2.50, or 10%, of the net sales. I do realize that may be more than offset by the increased revenue brought in by gamblers willing to max out a credit card...which brings me to the final and gravest reason I am opposed.
- 3) I feel that it accepting credit cards for gambling poses a substantial and unnecessary increased risk for problem gamblers and therefore putting service workers that care about the well being of their guests in a very uncomfortable position.

Thank you.

Gail McCoy
Lennard K's Boat

On Mon, Aug 17, 2020 at 12:24 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Good morning,

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Thank you,

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☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



From: sequimsr@olympen.com
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: RE: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Wednesday, August 19, 2020 4:45:12 PM
Attachments: [image003.png](#)
[image005.png](#)

We see allowing people to potentially and conveniently go into debt in order to gamble as a BAD IDEA.

Gambling is easy enough as it is and addiction, especially among the elderly and youth is all too real.

People could run up their credit cards, hoping to “hit the big one” to pay it all off and fail to win and be ruined.

We would be against these changes.

If people don't have cash, they should not play, in our opinion.

Michael Smith

*Michael M. Smith, Executive Director
Sequim Senior Services, dba Shipley Center
921 E. Hammond St./PO Box 1827
Sequim, WA 98382*

*360-683-6806, ext. 11
msmith@shipleycenter.org*

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Request for Feedback- Rule Change: Credit, loans, and gifts

Good morning,

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Saturday, August 22, 2020 3:52:28 PM

Submitted on Saturday, August 22, 2020 - 3:52pm

Submitted by anonymous user: 98.237.133.46

Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Frieda Sanger

Organization: Gwen's Venture / DBA Rock the Dock Pub & Grill

Comments: I am strictly against the idea of allowing pulltab players to pay by a credit card.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/19/submission/1774>

From: [Carrie Buckel](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Request for Feedback- Rule Change: Credit, loans, and gifts
Date: Tuesday, August 25, 2020 7:18:10 PM
Attachments: [image005.png](#)
[image003.png](#)

Hello -

I do not think credit cards should be accepted for gambling. What happens if the customer disputes the charge? We have had charge backs even with the chip reader and a signed receipt.

Regards,
Carrie Buckel

On Monday, August 17, 2020, 12:25:29 PM PDT, Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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You may submit your feedback to me directly or through our [website](#). I would appreciate your input by close of business Friday, August 28, 2020. Feel free to contact me if you have any questions. Email is the best way to contact me at this time.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Washington State
GAMBLING
COMMISSION

Protect the public by ensuring that gambling is legal and honest.



From: dan.heisel@watech.wa.gov on behalf of [WSGC Web](#)
To: [Rules Coordinator \(GMB\)](#)
Subject: Request for Public Comment Submission from wsgc.wa.gov
Date: Thursday, September 3, 2020 1:25:41 AM

Submitted on Thursday, September 3, 2020 - 1:25am

Submitted by anonymous user: 73.109.61.8

Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts

Name: Richard Neal

Organization: G.F.Y 4EVER

Comments: I feel that casinos are pure evil and sap the economic potential out of economically deprived people and families and must be put to an end.

The results of this submission may be viewed at:

<https://www.wsgc.wa.gov/node/19/submission/1806>

Additional Stakeholder Feedback
(Response to November 20, 2020 Email)

From: [Dick Montoya](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Friday, November 20, 2020 3:08:02 PM
Attachments: [image003.png](#)
[image005.png](#)

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Hi Ashlie

Dick Montoya from Senor Frogs in Lake Chelan

Thank you for asking me to comment.

I am a 41 year veteran of the Gambling Commission. Yes I have had a gambling and beer and wine and eventually a liquor license for all those years.

I am also a 40 year veteran of the Washington State Bar Assoc. Yes a practicing atty as well but nearing retirement.

As a long term veteran of this business, and having a my business in a small town like Lake Chelan, I would welcome the credit card income to support my patrons in their gambling activities.

Many years ago, our industry did well and welcomed the business. But the advent of a Casino within a short distance, has been a downfall in this industry.

Maybe this credit card industry could assist in revival of this clientele.

In all my years in this industry, I do not think I have ever seen a patron so immersed in gambling to inhibit his family or business relationships.

My patrons who partake in this activity do so as a leisure part time recreational mode.

I would welcome the credit card usage to finance in part this activity.

Thank you for your time and consideration of my comments.

Richard Montoya

On Friday, November 20, 2020, 02:34:37 PM PST, Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

Hello,

You are receiving this email because your email address is associated with a license to conduct bingo, pull-tab, and/or card room activities in the state of Washington or because you hold a manufacturer or distributor license.

As you may be aware, the Commission accepted a petition and initiated rule-making to explore the option of allowing credit cards as a method of payment to be used for all gambling activities where it is not currently allowed. In September 2020, the Commission filed draft language for further discussion which proposes to authorize credit cards as a form of payment that can be used for card games, bingo, and pull-tabs in addition to raffles which is already allowed by rule. Please refer to the [CR-102 for draft language](#) for more detail.

The agency's Commissioners expressed concerns with the proposed rules during their October and

November public meetings because the rules did not include additional responsible gaming or problem gambling policies for an increase in gambling if credit cards are authorized as a form of payment for card games, bingo, and pull-tabs.

The Commissioners asked for staff to reach out to members of the Problem Gambling Task Force and the gambling industry for additional input on whether the current rules should be adopted or withdrawn at the agency's December 17, 2020 public meeting. During the public meeting discussion this month, a majority of Commissioners each individually discussed their concerns and likely opposition to the proposed rules without further problem gambling and industry feedback on these rules.

Therefore, Commission staff encourages you to submit written comments or virtually appear at our December 17, 2020 public meeting to provide comments on these rules if you believe these rules should be adopted or withdrawn. If you would like to submit written comments, please submit that feedback to me directly at ashlie.laydon@wsgc.wa.gov or through our [website](#) by close of business on December 7, 2020. If you would like to appear virtually at our December 17, 2020 Commission meeting to provide comments, you can do so by accessing the link our [website](#). This site will be updated approximately one week prior to the meeting to include the start time, agenda, meeting materials, and link to the virtual meeting.

Feel free to contact me via email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: [Janice Carter](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Saturday, November 21, 2020 11:55:56 AM
Attachments: [image003.png](#)
[image005.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Our customers routinely use our ATM to get cash, in order to play Pulltabs. Most credit cards allow for taking cash advancements. Because of this I see no real difference in allowing the credit card to be run on the business's credit card machine instead of the ATM. Possibly a limit on how much in a day a single customer could take out (1000.00 a day), would be an answer. We really feel that it is not our job to police our customers and the amount of money they are spending. We know our customers very well and we feel that our biggest gamblers can well afford to spend the money that they are spending on Pulltabs. Please contact me if I can help in any other way.

Janice Carter

Charlie's Restaurant

113 E Main St
Puyallup, WA 98372
(253)845-0588

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Friday, November 20, 2020 2:32 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Notice of Rule-Making- Credit Cards as a Method of Payment

Hello,

You are receiving this email because your email address is associated with a license to conduct bingo, pull-tab, and/or card room activities in the state of Washington or because you hold a manufacturer or distributor license.

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Feel free to contact me via email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: Qm@vfw1474.org
To: [Laydon, Ashlie \(GMB\)](mailto:Laydon.Ashlie@GMB)
Subject: RE: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Saturday, November 21, 2020 4:41:16 PM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Ashlie,

Thank you for the opportunity for input.

For our VFW we would see no problem using credit cards for bingo except that it might have a problem with cash-flow if there were too many.

For pull-tabs I would not want to encourage it.

Paul Manly

Quartermaster

VFW Post 1474

Spokane WA

----- Original Message -----

From: Laydon, Ashlie (GMB) [mailto:ashlie.laydon@wsgc.wa.gov]

To:

Cc: brian.considine@wsgc.wa.gov

Sent: Fri, 20 Nov 2020 22:18:35 +0000

Subject: Notice of Rule-Making- Credit Cards as a Method of Payment

Hello,

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gaming or problem gambling policies for an increase in gambling if credit cards are authorized as a form of payment for card games, bingo, and pull-tabs.

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Feel free to contact me via email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Laydon, Ashlie (GMB)

From: dan.heisel@watech.wa.gov on behalf of WSGC Web <no.reply@wsgc.wa.gov>
Sent: Monday, November 23, 2020 1:47 PM
To: Rules Coordinator (GMB)
Subject: Request for Public Comment Submission from wsgc.wa.gov

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Submitted on Monday, November 23, 2020 - 1:46pm Submitted by anonymous user: 73.225.12.195 Submitted values are:

Select a Topic: Petition for Rule Change: Credit, loans and gifts
Name: Katherine Jordan
Organization: South Park Senior Citizens
Comments:
RE: Notice of Rule-Making- Credit Cards as a Method of Payment

As the Executive Director of South Park Senior Citizens, I am writing in support of adopting these rules. As I am unable to attend the Dec 7th virtual meeting, please take my statement here as support of this rule change.

Katherine Jordan
katherine@spseniors.org

The results of this submission may be viewed at:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwsgc.wa.gov%2Fnode%2F19%2Fsubmission%2F1979&data=04%7C01%7Crules.coordinator%40wsgc.wa.gov%7C62f8b43708db4fb8db2d08d88ff94631%7C11d0e217264e400a8ba057dcc127d72d%7C0%7C0%7C637417648074021787%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C1000&reserved=0>

December 3, 2020

Hello Ashlie,

I am a licensed WSGC pull tab distributor writing in support of allowing credit cards to be used as a method of payment for pull tabs and other gaming activities. I believe all standard payment options should be made available for businesses to offer their customers. Consumers can then intelligently decide for themselves how they wish to purchase goods or services.

The food and beverage business has always been a tough way to make a living, especially now, so anything we can do to help should be considered. For many operators, a successful pull tab operation is essential and has proven instrumental in helping keep their businesses afloat during covid-19. Pull tabs were originally allowed as a “Commercial Stimulant” to encourage people to go into food and beverage businesses and it has worked very well over the years. Pull tab players, because they are busy opening tickets, tend to drink slower and be in the establishment for a longer period of time which often leads to food sales. Allowing people to use credit cards to purchase pull tabs will add to the “Commercial Stimulant” effect pull tabs were originally intended to be.

As noted, pull tab revenue is very important to many operators and appealing to a wide market is crucial. Today’s 20 – 35 year olds use nearly 100% credit or debit cards and many never carry cash at all. As a result, 20 – 35 year olds don’t typically play pull tabs. But, if they could put a pull tab purchase with their food and beverage on their credit card bill, some may be more likely to play pull tabs and come in more often as a result. As we all know, this is an industry in need and every little bit helps.

Another point is because of covid-19 most people don’t even want to handle cash and, if allowed, many would use credit cards instead. According to the financial website www.statista.com, as published 11/19/20, credit cards were the most highly utilized form of payment in the US in 2019, followed by debit cards, followed by cash. Common sense would suggest, due to Covid-19 the use of cash will continue to decline. Additionally, credit cards are already allowed for purchasing Raffle tickets, so why restrict other forms of gaming from the use of credit cards?

To address your request for comments regarding problem gambling, the issue of addiction is an ongoing complicated social issue. While there is no easy solution to addiction problems, depriving everyone else of America’s most common form of payment is not going to solve the problem. People have always been faced with making responsible choices regarding credit cards, and the use of them should not be stricken as a payment option for anything. Credit cards are just another form of payment and it should be the consumer’s choice to use them or not.

Thank you,

Dan McCoy, McCoy’s Distributing, Inc.



12/08/2020

WSR 20-19-084 Proposed Rule Change

Attention Ashlie Laydon:

I would like to submit a response to the proposed rule change involving the use of credit cards as a form of payment used for card games, bingo, and pull-tabs. We believe this rule change should be adopted to provide a safer and faster payment method that allows for minimal risk of fraud.

In the cardroom industry, the passing of counterfeit bills happens often and by having the ability to use credit card cuts the possibility of this happening. When a counterfeit bill gets passed at a business it causes a loss to that business, too many counterfeits passed can cause a hardship. Besides counterfeit currency, the risk of carrying large amounts of cash would be minimal by allowing credit cards as a form of payment. These two examples would allow protections for both the consumer and business.

We are evolving into a cashless society, especially in these unprecedented times of Covid-19. The more options that allow for a touchless system, which have been proven to be helpful in reducing the spread of this virus and other infectious diseases. Many businesses are converting to allow credit cards as the only form of payment for these reasons and many other reasons.

We agree with the proposed rule change and would like to see it adopted.

Thanks,

Maverick Gaming

From: [marnie hayes](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Friday, November 20, 2020 2:39:07 PM
Attachments: [image003.png](#)
[image005.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

As a small bar, we are not interested.

The fee's from the credit card processing company's eats into my profit.

And what happens when they dispute the charges?

No thank you.

Sent from my iPhone

On Nov 20, 2020, at 2:32 PM, Laydon, Ashlie (GMB)
<ashlie.laydon@wsgc.wa.gov> wrote:

Hello,

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The agency's Commissioners expressed concerns with the proposed rules during their October and November public meetings because the rules did not include additional responsible gaming or problem gambling policies for an increase in gambling if credit cards are authorized as a form of payment for card games, bingo, and pull-tabs.

The Commissioners asked for staff to reach out to members of the Problem Gambling Task Force and the gambling industry for additional input on whether the current rules should be adopted or withdrawn at the agency's December 17, 2020 public meeting.

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Feel free to contact me via email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov

[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

From: sequimsr@olympen.com
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: OPPOSED! RE: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Friday, November 20, 2020 3:28:46 PM
Attachments: [image003.png](#)
[image005.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

For Dec. 17 meeting, written comments:

Hi Ashley, Brian, and Commissioners,

At an earlier point in this process, I indicated that I would NOT be in favor of credit cards being allowed for gambling.

That continues to be our position.

It sounds like a recipe for failure for people who have a problem with gambling.

It could also turn regular gamblers into problem gamblers, and would enrich only the casino/gambling operators.

Those who currently “only bet what they can afford to lose” might turn INTO problem gamblers and face financial ruin when the credit card bills come due and they don’t have the money to pay the card off.

Michael

*Michael M. Smith, Executive Director
Sequim Senior Services, dba Shipley Center
921 E. Hammond St./PO Box 1827
Sequim, WA 98382*

*360-683-6806, ext. 11
msmith@shipleycenter.org*

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>

Sent: Friday, November 20, 2020 2:19 PM

Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>

Subject: Notice of Rule-Making- Credit Cards as a Method of Payment

Hello,

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As you may be aware, the Commission accepted a petition and initiated rule-making to explore the option of allowing credit cards as a method of payment to be used for all gambling activities where it is not currently allowed. In September 2020, the Commission filed draft language for further discussion which proposes to authorize credit cards as a form of payment that can be used for card games, bingo, and pull-tabs in addition to raffles which is already allowed by rule. Please refer to the [CR-102 for draft language](#) for more detail.

The agency's Commissioners expressed concerns with the proposed rules during their October and November public meetings because the rules did not include additional responsible gaming or problem gambling policies for an increase in gambling if credit cards are authorized as a form of payment for card games, bingo, and pull-tabs.

The Commissioners asked for staff to reach out to members of the Problem Gambling Task Force and the gambling industry for additional input on whether the current rules should be adopted or withdrawn at the agency's December 17, 2020 public meeting. During the public meeting discussion this month, a majority of Commissioners each individually discussed their concerns and likely opposition to the proposed rules without further problem gambling and industry feedback on these rules.

Therefore, Commission staff encourages you to submit written comments or virtually appear at our December 17, 2020 public meeting to provide comments on these rules if you believe these rules should be adopted or withdrawn. If you would like to submit written comments, please submit that feedback to me directly at ashlie.laydon@wsgc.wa.gov or through our [website](#) by close of business on December 7, 2020. If you would like to appear virtually at our December 17, 2020 Commission meeting to provide comments, you can do so by accessing the link our [website](#). This site will be updated approximately one week prior to the meeting to include the start time, agenda, meeting materials, and link to the virtual meeting.

Feel free to contact me via email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



Protect the public by ensuring that gambling is legal and honest.



From: rarias@eltorofamily.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: RE: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Friday, November 20, 2020 4:18:41 PM
Attachments: [image003.png](#)
[image005.png](#)
[bottom.letterhead](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Hi Ashie,

I am writing in opposition to allowing credit cards as a form of payment for pull tabs at my bars for the following reasons:

Allowing people that have gambling problems to use expensive credit loans to pay for their gambling activities is a terrible idea for the individual, the businesses and society as a whole.

1. It will send individual gamblers into further debt. They will access money they don't have to place wagers. If they lose the wager, they will not only owe that money back to their bank, but the interest and fees on it as well. One might think this is good for financial institutions due to more interest and fee dollars collected, however, most likely the bad debt defaults will outweigh this. If the gambler wins, the gambler will not repay the credit card debt, the gambler will continue to gamble the "winnings" and in the end will lose, most likely more than they initially spent due to the interest and fees.

2. Bad for business. Although, traditionally one would think that selling more gambling pull tabs is good because the restaurant on the whole usually comes out ahead in these activities (as well as the government benefit of collecting more tax on wagering and gambling taxes), the source of the money is problematic due to higher rates of fraudulent use of credit cards. In the restaurant business, due to the EMV liability shift (which many have not adapted to yet) we lose sales to fraudulent claims every month. This will continue to happen with the purchase gambling wagers. It will be another instrument for fraudsters to turn stolen credit card numbers into unreported cash.

In addition, if the credit card used is reported as fraud, the business is liable. The financial institution collects their money from the business through a fraudulent charge back. The government still gets paid their taxes. The business gets caught in the middle and pays.

3. We have a homeless problem that needs to be solved. Addiction and mental health issues, are the root causes. I see this as adding to the problem, not helping it. In the end, the financial institutions and governments get paid, but the business lose, and the public has yet more problems getting the homeless out of their public parks. Who will pay for this in the end?

Thanks for listening,

Ruben Arias Jr.
Executive Manager
El Toro Restaurants

CONFIDENTIALITY NOTICE: This electronic communication is intended for the sole use of the individual and/or entity to whom it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. You are hereby notified that any dissemination, distribution or duplication of this communication by someone other than the intended addressee or its designated agent is strictly prohibited. If you have received this electronic communication in error please notify sender by reply to this communication.

----- Original Message -----

Subject: Notice of Rule-Making- Credit Cards as a Method of Payment

From: "Laydon, Ashlie (GMB)" <ashlie.laydon@wsgc.wa.gov>

Date: Fri, November 20, 2020 3:32 pm

To:

Cc: "Considine, Brian (GMB)" <brian.considine@wsgc.wa.gov>

Hello,

You are receiving this email because your email address is associated with a license to conduct bingo, pull-tab, and/or card room activities in the state of Washington or because you hold a manufacturer or distributor license.

As you may be aware, the Commission accepted a petition and initiated rule-making to explore the option of allowing credit cards as a method of payment to be used for all gambling activities where it is not currently allowed. In September 2020, the Commission filed draft language for further discussion which proposes to authorize credit cards as a form of payment that can be used for card games, bingo, and pull-tabs in addition to raffles which is already allowed by rule. Please refer to the [CR-102 for draft language](#) for more detail.

The agency's Commissioners expressed concerns with the proposed rules during their October and November public meetings because the rules did not include additional responsible gaming or problem gambling policies for an increase in gambling if credit cards are authorized as a form of payment for card games, bingo, and pull-tabs.

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Therefore, Commission staff encourages you to submit written comments or

virtually appear at our December 17, 2020 public meeting to provide comments on these rules if you believe these rules should be adopted or withdrawn. If you would like to submit written comments, please submit that feedback to me directly at ashlie.laydon@wsgc.wa.gov or through our [website](#) by close of business on December 7, 2020. If you would like to appear virtually at our December 17, 2020 Commission meeting to provide comments, you can do so by accessing the link our [website](#). This site will be updated approximately one week prior to the meeting to include the start time, agenda, meeting materials, and link to the virtual meeting.

Feel free to contact me via email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division
Washington State Gambling Commission
P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



From: [giovanni.diquattro](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Use of credit cards for pull tabs.
Date: Friday, November 20, 2020 6:15:24 PM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

I do not think it is a good idea to let customers use debit or credit cards for pull taps. I know some people would be in financial trouble.

Sent from my T-Mobile 4G LTE Device

From: weh1221@aol.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Charge cards for pull tabs.
Date: Friday, November 20, 2020 9:55:23 PM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Hi, I've had pull tabs in my business for the last 21 year's.
This is a very bad idea, not only would it increase access for problem gamblers. As a seller.. I would also have to pay the 2% fee for taking a card.
No matter what is decided, I will not take charge cards for pull tab purchases.
Bill Henkens
Owner
The Game Neighborhood Grill.

From: rockosfireside@yahoo.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Credit cards
Date: Saturday, November 21, 2020 12:32:32 AM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

I've owned several bars with pull tabs since 2004. Allowing pull tab players to use a credit card is the same as allowing an alcoholic to drink in your establishment until they pass out. For the sake of those gamblers who have a problem with gambling, I'm opposed to this.

From: [Aerie Foe](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Credit Card usage for gambling
Date: Monday, November 23, 2020 8:43:50 AM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Good Morning,

FOE 00204 License # 00-00026 Would like to voice a no on using credit cards for gambling. We are concerned that it would not be good for someone with a gambling problem and it would increase our credit card fees.

Thank you for your time,

Dean Miller, Aerie Secretary

From: [Helen Brooks](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: CC FOR GAMBLING
Date: Monday, November 23, 2020 10:30:20 AM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

I don't like the idea of using the cards for gambling. For the gambler it's too easy to spend more than intended because you don't see a card the same as spending actual cash. For the house, depending on your set up ,its much more of a hassle not to mention the card expense. I don't see it as a good thing for either side.

From: info@cloverleafpizza.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Credit cards for gambling
Date: Monday, November 23, 2020 10:46:19 AM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Hi Ashlie,

The Cloverleaf only has 8 pull tab games so this ruling has less affect on my business than others. My business will not accept credit cards for gambling regardless of the outcome of the ruling. I hope if this is passed that I retain my right to be cash only. Also, I believe a positive ruling would be doing a disservice to people with issues and it is not the businesses job to moniter their addictions. Furthermore, I am not paying credit card fees on customer gambling which would reduce my overall income. I have a cash machine for their convenience. If you would like any additional feedback, please contact me.

Thank you,
Debbie Brese
The Cloverleaf

From: [Linda Glein](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: CR-102
Date: Wednesday, November 25, 2020 2:22:04 PM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

My husband and I are partners in two businesses that have Pull Tabs. The Pull Tab income is an important source of revenue.

I also have two relatives who have overcome gambling addiction. In both cases their addiction came close to destroying both their financial futures and their marriages.

I'm coming down on the "NO" side of allowing gamblers to pay with a credit card for the following reasons:

While gambling for many is an amusement, for others it is a destructive addiction. If at least they are limited to 'cash on hand' that might hinder them from developing a crippling personal financial situation.

It's an additional expense for the business establishment -- about 3% --on what already is a thin margin when taxes, game cost, and employee labor is considered.

We have an ATM in the building, so gamblers can use a credit card to get cash. What's the difference? Two-fold. The user of the ATM, instead of the business, absorbs the 3% fee, but more importantly it creates a slim, but hopefully meaningful line that gives the gambler the opportunity to think twice about going beyond his/her limits.

Linda

From: thelaconnerpub@gmail.com
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Notice of Rule Making - Credit Cards
Date: Wednesday, December 2, 2020 1:30:12 PM

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Dear Ashlie,

We do not support this change of rule making to introduce credit cards as payment for pull-tab use.

To continue responsible gambling habits on behalf of our patrons, credit card use will potentially encourage extended play when financially they should not. Business's have the option of ATM systems or check cashing, which allows the individual to soundly make their financial decision to gamble.

As a business owner, the last thing I want to encourage is the further use of credit cards, which incur a variety of fee's paid for at the business owners expense.

Thank you for your consideration,
Julie Lennartz-Reppen
La Conner Tavern, Inc
360-466-9932

Sent from [Mail](#) for Windows 10

From: [Dauber Wayne](#)
To: [Laydon, Ashlie \(GMB\)](#)
Subject: Re: Washington State Gambling Commission- Notice of Rule-Making
Date: Monday, December 7, 2020 5:56:59 PM
Attachments: [image003.png](#)
[image005.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Hi Ashley,

I hope this gets to you on time.

We think the use of credit cards to pay for playing is ill advised for the following reasons:

1. The operator will have to be aware of the fees that go with the use of cards and set the playing costs accordingly. This will increase the complexity and cost from a book keeping and record keeping activity as well. This creates a cost impact to licensed non profit bingo entities.
2. The impact on those who use the credit cards can be severe with results on their ability to handle the incurred debt and the other similar economic results.

It is our opinion that the use of the credit card feature should be rejected as a practice for direct payment of gambling activities.

Thank you

Wayne Vertz GM Bingo Boulevard Columbia Center Rotary

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Thursday, November 5, 2020 3:02 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Washington State Gambling Commission- Notice of Rule-Making

Good afternoon,

You are receiving this email because your email address is associated with a license to conduct raffles in the state of Washington. If you have received this email in error, please disregard it or feel free to contact me so that I can have the information in our system updated.

In October 2019, staff held a raffle work session with the Commissioners. As part of this presentation, staff made some recommendations for potential rule changes based on discussions they've had with nonprofit organizations regarding some of the obstacles faced when conducting raffles. In January 2020, the Commissioners initiated rule-making to consider amending alternative drawing formats and bundling and selling tickets at a discount.

Attached is draft language for your review which proposes to amend the following:

- **WAC 230-11-025- Bundling and selling tickets at a discount;** to allow additional discount levels, and
- **WAC 230-11-055- Authorized alternative drawing formats;** to authorize two additional alternative drawing formats.

If you would like to provide feedback on this draft language, you may do so by emailing me directly at ashlie.laydon@wsgc.wa.gov or through our [website](#). Please provide feedback by close of business on Tuesday, December 1, 2020 if possible. Feel free to contact me by email if you have any questions.

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov





Date: December 7, 2020

To: Ashlie Layton
Rules Coordinator
Legal and Records Division
Washington State Gambling Commission

From: Caesar Picardal
President
The Filipino American League of Pierce County

Re: CREDIT CARD AS PAYMENT FOR CARD GAMES, BINGO AND PULL-TABS

The members of THE FILIPINO AMERICAN LEAGUE have unanimously voted **NO** to the use of Credit Card as payment for card games, bingo and pull-tabs.

Thank you.

Respectfully yours,

Caesar Picardal

Caesar Picardal
President

From: [FOE 2338 Club Manager](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Considine, Brian \(GMB\)](#)
Subject: Re: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Friday, November 20, 2020 2:23:08 PM
Attachments: [image003.png](#)
[image005.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Thank you for the information!

On Fri, Nov 20, 2020, 2:19 PM Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov> wrote:

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Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

P.O. Box 42400 | Olympia, WA 98504-2400

☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov

Image result for wa gambling commission



From: [licensing](#)
To: [Laydon, Ashlie \(GMB\)](#)
Cc: [Chinggay Andrada-Gurango](#); [Jason Cooper](#); [licensing](#)
Subject: RE: Notice of Rule-Making- Credit Cards as a Method of Payment
Date: Friday, November 20, 2020 3:22:01 PM
Attachments: [image003.png](#)
[image005.png](#)

This message has originated from an External Source. Please use caution when opening attachments, clicking links, or responding to this email. Contact your desktop support or IT security staff for assistance and to report suspicious messages.

Thank You Ashlie.

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Friday, November 20, 2020 2:36 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
Subject: Notice of Rule-Making- Credit Cards as a Method of Payment

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Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov





STATE OF WASHINGTON
GAMBLING COMMISSION

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

December 17, 2020

TO: COMMISSIONERS:
Bud Sizemore, Chair
Julia Patterson, Vice Chair
Alicia Levy
Lauren King

FROM: Adam Teal, Staff Attorney
Legal and Records Division

SUBJECT: Matthew P. Williams, CR 2020-01020
Final Order – December 17, 2020 Commission Meeting

Matthew P. Williams has a gambling certification authorizing Class III Employee activity for the Nisqually Indian Tribe and the Cowlitz Indian Tribe. His certification expires on January 21, 2021.

A WSGC Special Agent received notice from the Nisqually Tribal Gaming Agency (NTGA) that on July 28, 2020 they revoked the license of one of their employees, Matthew P. Williams. According to the documents provided to the Agent, a slot attendant notified his supervisor that Williams had found a \$100 ticket on the gaming floor and intended to cash it out. According to the reporting party, Williams had previously told him he had kept cash that he had found on the floor on two separate occasions, \$100 one time, and \$20 the next. Williams provided a written statement to the NTGA stating that he “did accidentally and unintentionally pocket \$20 and forgot to turn it in.” Williams failed to request a hearing when the NTGA took administrative action to revoke his license, and thus his license revocation was finalized. Williams failed to notify the WSGC of this administrative action within the required 30 days.

Director Trujillo issued Williams a Notice of Administrative Charges on September 17, 2020, by regular and certified mail to his last known address on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by October 12, 2020. To date, the Commission has received no communication from Williams.

Matthew P. Williams’s failure to respond to the charges or timely request a hearing is a waiver of Williams’s right to a hearing in Case No. CR 2020-01020. Williams had his gambling license revoked by the Nisqually TGA and failed to report that action, and subsequent revocation to the WSGC. Based on his conduct, Williams cannot show by clear and convincing evidence that he is qualified to keep his Class III certification. Therefore, staff recommends that the Commission sign the proposed final order and revoke Matthew P. Williams’s Class III certification, Number 69-48197.

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**STATE OF WASHINGTON
GAMBLING COMMISSION**

7 In the Matter of:

NO. CR 2020-01020

8
9 MATTHEW P. WILLIAMS,
License No. 69-48197

FINAL ORDER OF THE
GAMBLING COMMISSION

10
11 Class III Employee.

12 This matter having come before the Washington State Gambling Commission
13 (Commission) on December 17, 2020, the Commission makes the following Findings of Fact,
14 Conclusions of Law, and issues its Final Order:

15
16
I. FINDINGS OF FACT

17 1. The Washington State Gambling Commission issued Matthew P. Williams
18 License No. 69-48197, authorizing Class III Employee activity for the Nisqually Indian Tribe.

19 2. This license, which expires on January 21, 2021, was issued subject to Williams’
20 compliance with state gambling laws and Commission rules, and the Nisqually Tribal-State
21 Compact.

22 3. Williams has been licensed since 2020.

23 1. A WSGC Special Agent was assigned to review whether Matthew Williams
24 continued to qualify for certification following the revocation of his Nisqually tribal license.

25 2. A review of Williams’ licensing file showed that he had been certified since
26 January 22, 2020, and had been working at the Nisqually Red Wind Casino during that time until

1 he was terminated on July 28, 2020. Williams then transferred his certification to allow him to
2 work for the Cowlitz tribe on July 29, 2020.

3 3. Upon issuance of their Personnel Termination Notification (PTN) on July 28, the
4 Nisqually Tribal Gaming Agency (TGA) provided the WSGC with copies of the termination
5 letter, the related incident report and statements, as well as Williams's voluntarily provided
6 statement.

7 4. A review of the documents shows that a Red Wind Casino slot attendant notified
8 his supervisor that on or about June 5, 2020, Williams had approached him saying that he "found
9 a \$100 ticket on the floor." Williams told the attendant that he was going to cash out the ticket
10 but "didn't know how to cash it without getting caught."

11 5. The attendant informed his supervisor that Williams had on other occasions told
12 him that he had found \$100 cash and \$20 cash, both times keeping the money for himself.

13 6. The Nisqually TGA asked Williams to provide a written statement addressing the
14 accusations. In it, Williams admitted that he "did accidentally and unintentionally pocket \$20
15 and forgot to turn it in." He stated that he didn't say anything because he was scared of losing
16 his job.

17 7. On July 5, 2020, Nisqually TGA issued a letter to Williams notifying him that his
18 license was suspended, and that he was barred from the premises of the Red Wind Casino. The
19 letter stated that Williams had a right to appeal the decision within 15 days.

20 8. On July 29, 2020, after receiving no appeal and no request for a hearing from
21 Williams, Nisqually TGA issued a letter that his license had been revoked through a default
22 judgment.

23 9. Williams failed to report his suspension, and subsequent revocation to the
24 WSGC, as is required. The WSGC contacted the Cowlitz TGA regarding Williams. Cowlitz
25 TGA then issued their own PTN for Williams.
26

1 10. Director David Trujillo issued administrative charges on September 16, 2020
2 alleging that William's actions constituted a violation of RCW 9.46.075 and WAC 230-03-085.
3 Further, that he could not show by clear and convincing evidence that he was qualified for
4 certification as required by RCW 9.46.153(1), and that his actions warranted revocation of his
5 certification pursuant to RCW 9.46.075(1) and (8), WAC 230-03-085(1), (8), (9)(a), (c), and (d),
6 and in accordance with Section V.C. (1) and V.C. (3) of the Nisqually Tribal-State Gaming
7 Compact.

8 11. Williams was sent the charges by regular and certified mail on September 17, 2020
9 to the last address the Gambling Commission had on file.

10 12. Pursuant to WAC 230-17-010, a response was required to be received by the
11 Commission by October 12, 2020. To date, the Commission has received no communication
12 from Williams.

13 II. CONCLUSIONS OF LAW

14 1. Matthew P. Williams received proper notice of the charges within three days of
15 September 17, 2020 via regular and certified mail pursuant to RCW 34.05.413, RCW 34.05.434,
16 WAC 230-17-005, WAC 230-17-010, and WAC 10-08-130.

17 2. The Commission can take final action against Matthew P. Williams's Class III
18 certification under Case Number CR 2020-01020 pursuant to RCW 9.46.075, RCW
19 34.05.440(1), RCW 34.05.461, WAC 230-03-085, and Section 5(c) of the Nisqually Tribal-State
20 Compact.

21 3. Matthew P. Williams's Class III certification should be revoked under Case
22 Number CR 2020-01020 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1),
23 RCW 34.05.461, WAC 230-03-085, and Section 5(c) of the Nisqually Tribal-State Compact.

24 //
25 //
26 //

ORDER

This matter having come before the Commission at its December 17, 2020, Commission meeting, the Commissioners having heard arguments, been given the chance to review the administrative record, and being fully advised in this matter, now therefore:

It is hereby **ORDERED** that Matthew P. Williams’s Class III certification, Number 69-48197, is **REVOKED**.

DATED this 17th day of December, 2020.

BUD SIZEMORE, Chair

JULIA PATTERSON, Vice Chair

ALICIA LEVY

LAUREN KING

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NOTICE

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

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

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

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

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

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

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

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2 **CERTIFICATE OF SERVICE**

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

5 MATTHEW P WILLIAMS
6 6225 57TH AVE SE
7 LACEY, WA 98513

8 EXECUTED this ____ day of December, 2020, at Lacey, Washington.

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10 _____
11 Ashlie Laydon
12 Rules Coordinator
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**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

December 17, 2020

TO: COMMISSIONERS:
Bud Sizemore, Chair
Julia Patterson, Vice Chair
Alicia Levy
Lauren King

FROM: Adam Teal, Staff Attorney
Legal and Records Division

**SUBJECT: Tifannie S. Gibson, CR 2020-00673
Final Order – December 17, 2020 Commission Meeting**

Tifannie Gibson has a gambling license authorizing Public Card Room Employee activity at Emerald Downs in Auburn, Washington and Roxy’s Bar & Grill in Seattle, Washington. Her license expires on October 20, 2021.

On March 27, 2020 a WSGC Special Agent received a call from the General Manager of Palace Casino in Lakewood, Washington, to report that they cashed a check that was returned because a “stop payment” had been placed on it. The Agent was able to determine that the check in question was issued by licensee Tifannie Gibson’s employer. Gibson had requested that her employer send a check immediately because her pay check hadn’t been deposited into her account, and that she needed the money immediately to pay her bills. When Gibson didn’t receive the paper check within a week, the employer placed a stop payment on that check, and issued a replacement check, sending it overnight via FedEx. Gibson proceeded to deposit the replacement check into her bank account, and then cashed the first paper check at Palace Casino, immediately gambling the entirety of the check within ten minutes.

Director Trujillo issued Gibson a Notice of Administrative Charges on September 16, 2020, by regular and certified mail to her last known address on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by October 12, 2020. To date, the Commission has received no communication from Gibson.

Tifannie Gibson’s failure to respond to the charges or timely request a hearing is a waiver of Gibson’s right to a hearing in Case No. CR 2020-00673. You may take final action against her gambling license. Gibson cashed a check that she knew had a stop placed on it, and proceeded to gamble with the funds that she received. In doing so, she violated both RCW 9A.56.040, Theft in the Second Degree, and RCW 9A.56.060, the Unlawful Issuance of Checks. Based on her conduct, Gibson cannot show by clear and convincing evidence that she is qualified to keep her gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Tifannie Gibson’s Public Card Room Employee license, Number 68-23344.

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6 **STATE OF WASHINGTON
GAMBLING COMMISSION**

7 In the Matter of:

NO. CR 2020-00673

8 TIFANNIE S GIBSON,
9 License No. 68-23344,

FINAL ORDER OF THE
GAMBLING COMMISSION

10
11 Licensee.

12 This matter having come before the Washington State Gambling Commission
13 (Commission) on December 17, 2020, the Commission makes the following Findings of Fact,
14 Conclusions of Law, and issues its Final Order:

15 **I. FINDINGS OF FACT**

16 1. The Washington State Gambling Commission issued Tifannie Gibson License
17 No.: 68-23344 authorizing Public Card Room Employee activity at Emerald Downs in Auburn,
18 Washington and Roxy's Bar & Grill in Seattle, Washington.

19 2. This license, which expires on October 20, 2021, was issued subject to Gibson's
20 compliance with state gambling laws and Commission rules.

21 3. Gibson has been licensed since 2006.

22 4. On March 27, 2020, a WSGC Special Agent received a call from Ronald "Tony"
23 Johns, the General Manager of Palace Casino in Lakewood. Johns was reporting that the casino
24 had accepted and cashed a paycheck that was later returned with a "stop payment."¹

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¹ Casinos are authorized to cash paychecks, although do so at their own discretion.

1 5. According to Johns, on February 5, 2020, Tifannie Gibson, a licensed Card Room
2 Employee, had asked the shift supervisor, Anthony Szrama to cash a paycheck for her. Szrama
3 had known Gibson for years. On top of playing frequently at Palace, she had previously worked
4 at Chips Casino, which is both physically attached to and owned by the same group as Palace.

5 6. Johns believed at the time that Szrama was asking about a Palace Casino
6 employee named “Tiffany”, not Gibson. On February 14, 2020, Johns discovered that it was
7 Gibson who cashed the check using her driver’s license. At the time it was cashed, a copy of
8 Gibson’s license was taken, and her identification information was transcribed onto the check.

9 7. On March 30, 2020, Palace’s Staff Accountant, Jennifer Hohenschuh, emailed
10 the Special Agent with copies of Gibson’s license, the returned check, and an email from an
11 employee of Catholic Health Initiatives (CHI) outlining that a stop was placed on the check on
12 February 6, 2020.

13 8. On April 6, 2020, Alexander Hicks, a payroll employee for CHI responded to an
14 email sent by the Special Agent asking a series of bulleted questions.

15 9. Hicks informed the Special Agent that initially the \$1,017 check was to be direct
16 deposited into an account, but could not be because the account listed by Gibson was not valid.
17 Gibson had requested a paper check be issued immediately because she “has bills and absolutely
18 cannot wait.” In response, Hicks issued the check numbered 6582227 to Gibson by mail on
19 January 23, 2020.

20 10. Gibson reported that she had not received the check in the mail on January 30,
21 2020. In response, CHI printed and mailed a replacement check, check number 6585977
22 overnight via FedEx on January 31, 2020.

23 11. According to Hicks, check number 6585977 was deposited into a new account by
24 Gibson on February 5, 2020. This means that Gibson had deposited the replacement check,
25 6585977 earlier in the day, and then proceeded to cash the original check with the stop placed
26 on it, number 6582227, later that evening at Palace.

1 12. On April 7, 2020, the Department of Licensing (DOL) responded to a request
2 from the Special Agent. The DOL confirmed that Gibson had never reported her driver's license
3 lost or stolen.

4 13. On April 20, 2020, Gibson agreed to speak with the Special Agent over the phone.
5 Gibson told the agent that she received both checks within three days of a new and unrelated
6 check being direct deposited into her new account. She claimed that she hadn't been paid in
7 over a month, and that the two paper checks were for the pay she was owed.

8 14. Gibson told the Special Agent that she told Szrama to call her if there were any
9 issues with the check. He had not called her. Gibson told the Special Agent that she was unaware
10 that check 6582227 had been returned to Palace. This was confirmed by Johns, as Palace had
11 closed due to the COVID-19 pandemic on March 17, 2020 and had yet to reopen. Gibson told
12 the Special Agent that she intended to contact Palace to repay the \$1,017.

13 15. A review of Gibson's Sonoma player tracking software showed that on February
14 5, 2020 she bought in for a total of \$220 at one of Palace's Pai Gow tables. She continued to
15 play until she cashed check 6582227 at 8:57 p.m. Gibson proceeded to buy in the entire \$1,017
16 she had cashed out from 8:57 p.m. until 9:07 p.m., losing the entirety of the cashed money in
17 about ten minutes.

18 16. On June 20, 2020, Gibson agreed to a follow up interview with the Special Agent.
19 Gibson told the Special Agent that she had missed two paychecks (not including the check that
20 was successfully direct deposited). When asked why this contradicted with CHI's records
21 showing only one missed paycheck, she did not respond.

22 17. When asked whether she was given specific instructions by CHI to return or
23 destroy check 6582227 if she received it following the issuance of the replacement check
24 numbered 6585977, Gibson said she could neither confirm nor deny that she was.
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1 18. When asked if the reason that she had told CHI to immediately issue her a paper
2 check (which became check 6582227) was that she had bills and was at risk for eviction, Gibson
3 confirmed that was true.

4 19. The Special Agent asked why she cashed and immediately spent the entirety of
5 her paycheck when she was at risk for eviction, Gibson responded that she was trying to make
6 extra money.

7 20. Gibson has worked in the gambling industry since 2006. In addition, Gibson's
8 Sonoma player tracking records show her 2020 losses to be over \$2,000, with lifetime losses of
9 over \$26,000. When pressed about the legitimacy about her claim that she wanted to make extra
10 money, Gibson did not respond.

11 21. On June 17, 2020, Johns emailed the Special Agent to inform him that Gibson
12 had made her third and final payment to Palace for the returned \$1,017. Johns expressed that he
13 wished to continue to pursue administrative action against Gibson.

14 22. Director David Trujillo issued administrative charges on September 16, 2020
15 alleging that Gibson's actions constituted a violation of RCW 9.46.075 and WAC 230-03-085.
16 Further, that she could not show by clear and convincing evidence that she was qualified for
17 certification as required by RCW 9.46.153(1), and that her actions warranted revocation of her
18 certification pursuant to RCW 9.46.075(1) and (8), and WAC 230-03-085(1) and (9)(a), (c), and
19 (d).

20 23. Gibson was sent the charges by regular and certified mail on September 17, 2020
21 to the last address the Gambling Commission had on file.

22 24. Pursuant to WAC 230-17-010, a response was required to be received by the
23 Commission by October 12, 2020. To date, the Commission has received no communication
24 from Gibson.

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1 **II. CONCLUSIONS OF LAW**

2 1. Tifannie Gibson received proper notice within three days of September 17, 2020
3 charges via regular and certified mail pursuant to RCW 34.05.413 RCW 34.05.434, WAC 230-
4 17-005, WAC 230-17-010, and WAC 10-08-130.

5 2. The Commission can take final action against Tifannie Gibson’s gambling license
6 under Case Number CR 2020-00673 pursuant to RCW 9.46.075, RCW 34.05.440(1), RCW
7 34.05.461, and WAC 230-03-085.

8 3. Tifannie Gibson’s license should be revoked under Case Number CR 2020-00673
9 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC
10 230-03-085.

11 **III. ORDER**

12 This matter having come before the Commission at its December 17, 2020, Commission
13 meeting, the Commissioners having heard arguments, been given the chance to review the
14 administrative record, and being fully advised in this matter, now therefore:

15 It is hereby **ORDERED** that Tifannie Gibson’s gambling license, Number 68-23344, is
16 **REVOKED.**

17 DATED this 17th day of December, 2020.

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20 _____
BUD SIZEMORE, Chair

JULIA PATTERSON, Vice Chair

21
22 _____
ALICIA LEVY

LAUREN KING

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

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

CERTIFICATE OF SERVICE

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

TIFANNIE GIBSON
8710 TERRACE RD SW
LAKEWOOD WA 98498

EXECUTED this ____ day of December, 2020, at Lacey, Washington.

Ashlie Laydon
Rules Coordinator



Budget Review & Financial Update

December 17, 2020
Christopher Stanley
Chief Financial Officer



FY 2021 continues to improve over time

FY 2021 Revenue by Category/Subsource

Total Revenue by Category	2021 Expected Revenue	2021 Actual Revenue	2021 Projected Remaining	2021 Revenue Variance
Activity Licenses - Commercial	\$ 4,632,920	\$ 1,227,324	\$ 2,765,121	\$ (2,515,277)
Activity Licenses - Non-Profit	\$ 956,652	\$ 166,726	\$ 576,704	\$ (609,562)
Individual Licenses	\$ 2,692,116	\$ 1,027,258	\$ 1,252,556	\$ 103,410
Vendor Licenses	\$ 1,450,927	\$ 299,466	\$ 626,163	\$ (409,113)
Tribal Reimbursements	\$ 3,766,508	\$ 1,496,380	\$ 2,503,450	\$ 233,322
Other Sources*	\$ 292,632	\$ 31,463	\$ 40,524	\$ (261,169)
Agency Total	\$ 13,791,755	\$ 4,248,617	\$ 7,764,518	\$ (1,778,620)

Anticipated revenue losses have declined by ~\$200k since the last report to the Commission in November.

FY 2021 continues to reflect underspend

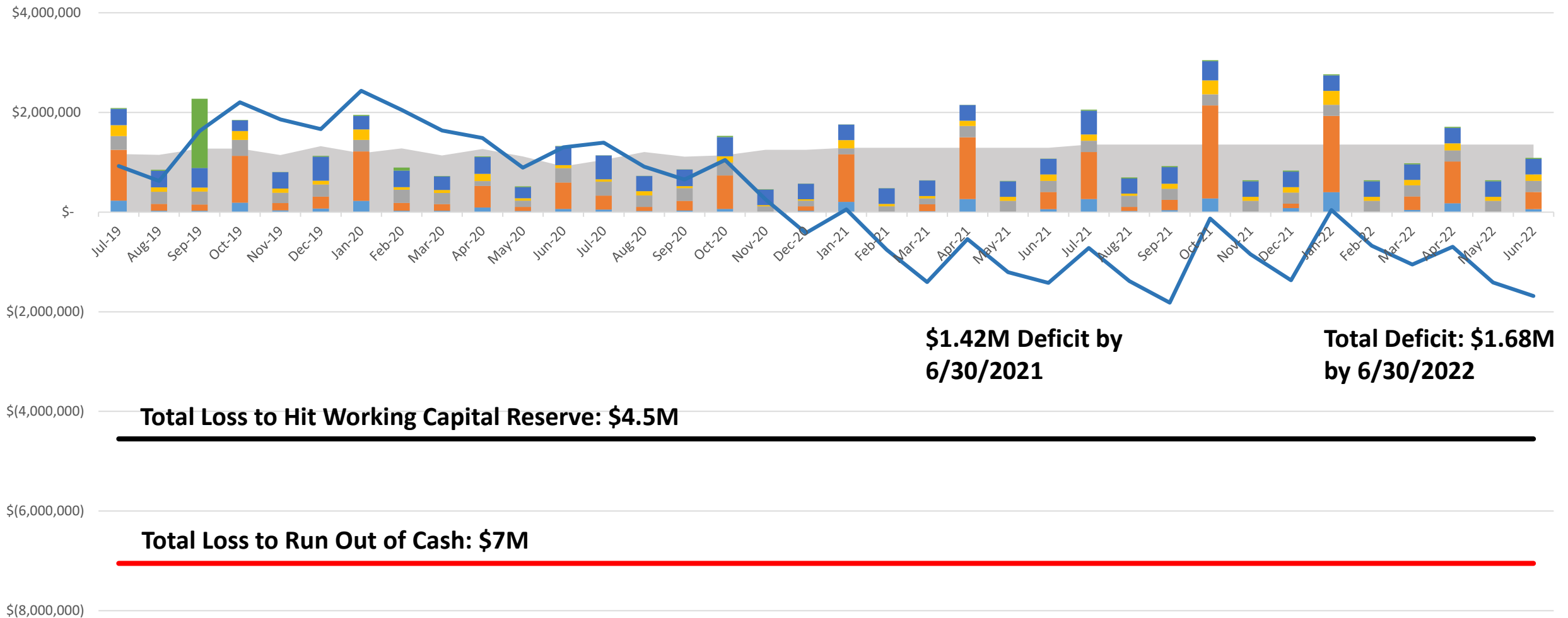
FY 2021 Sub-Program / Program Index-Level View

Agency Total by Object	2021 Total Budgeted	2021 Spent To-Date	2021 Projected Remaining	2021 Variance (Bd-Sp-Pr=Var)
FTEs	119.25	98.68		20.57
Salaries	\$ 9,884,986	\$ 2,554,689	\$ 6,260,491	\$ 1,069,806
Benefits	\$ 3,395,212	\$ 957,994	\$ 2,150,301	\$ 286,917
Contracts	\$ 14,700	\$ -	\$ 9,310	\$ 5,390
Goods & Services	\$ 2,517,992	\$ 834,825	\$ 1,594,728	\$ 88,438
Travel	\$ 318,360	\$ 6,434	\$ 201,628	\$ 110,298
Capital Expenses	\$ 461,794	\$ 149,132	\$ 292,470	\$ 20,193
Grants & Benefits	\$ 2,712	\$ 1,100	\$ 1,718	\$ (106)
Agency Total	\$ 16,595,756	\$ 4,504,174	\$ 10,510,645	\$ 1,580,937

The agency has underspent its budget for FY 2021 by 10% due to the July furloughs and vacancy savings.

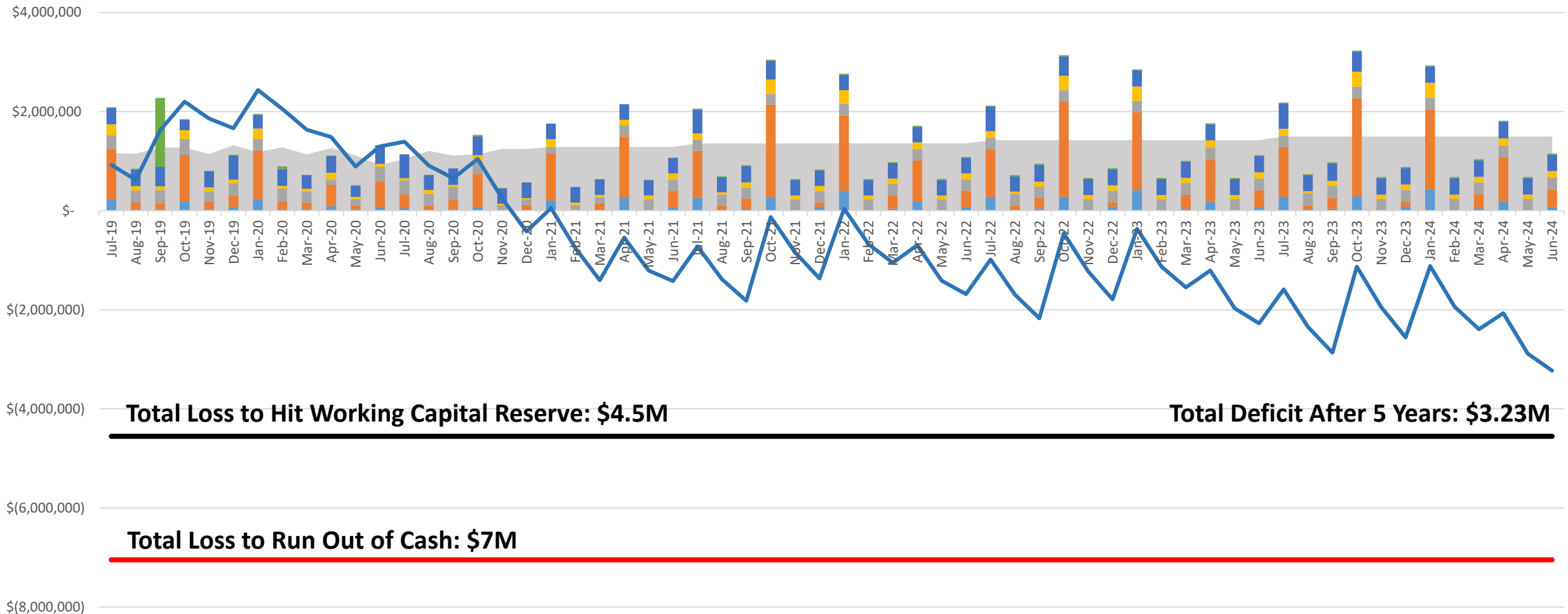
Gambling Revolving Fund Short-Term Forecast

**Based on Estimated Revenue and Expenditure Levels with Inflation*



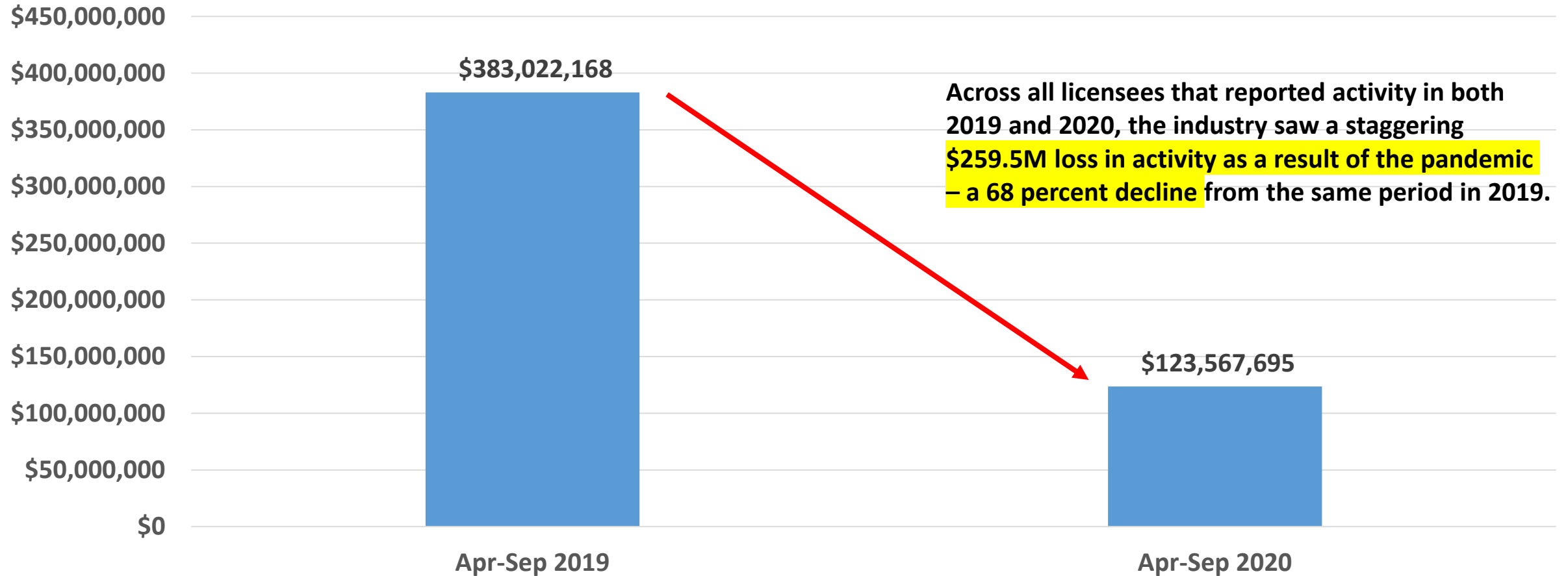
Gambling Revolving Fund Long-Term Forecast

**This 5-year view is less certain the further out the forecast runs.*



Total Activity During COVID-19

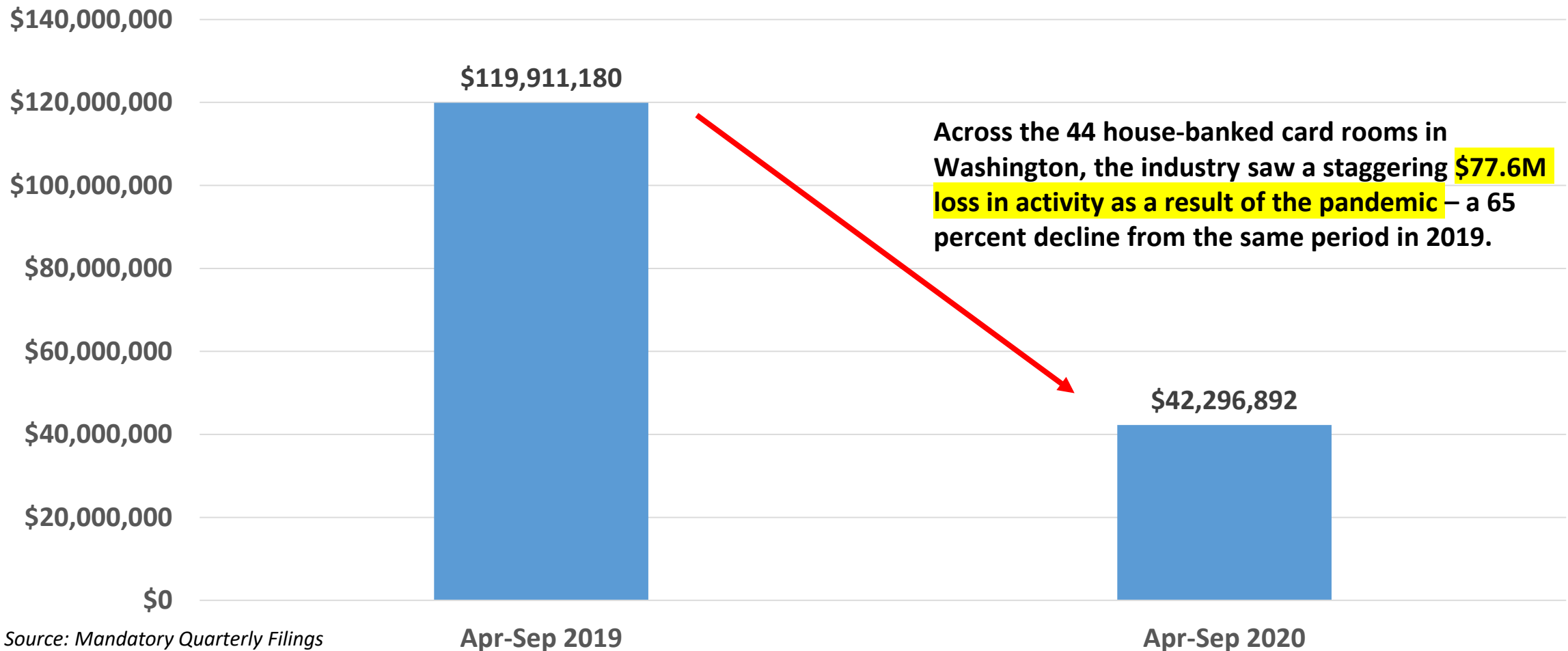
Staggering Financial Losses Will Take Time to Recover



Data Source: Mandatory Quarterly Filings

House-Banked Card Rooms During COVID-19

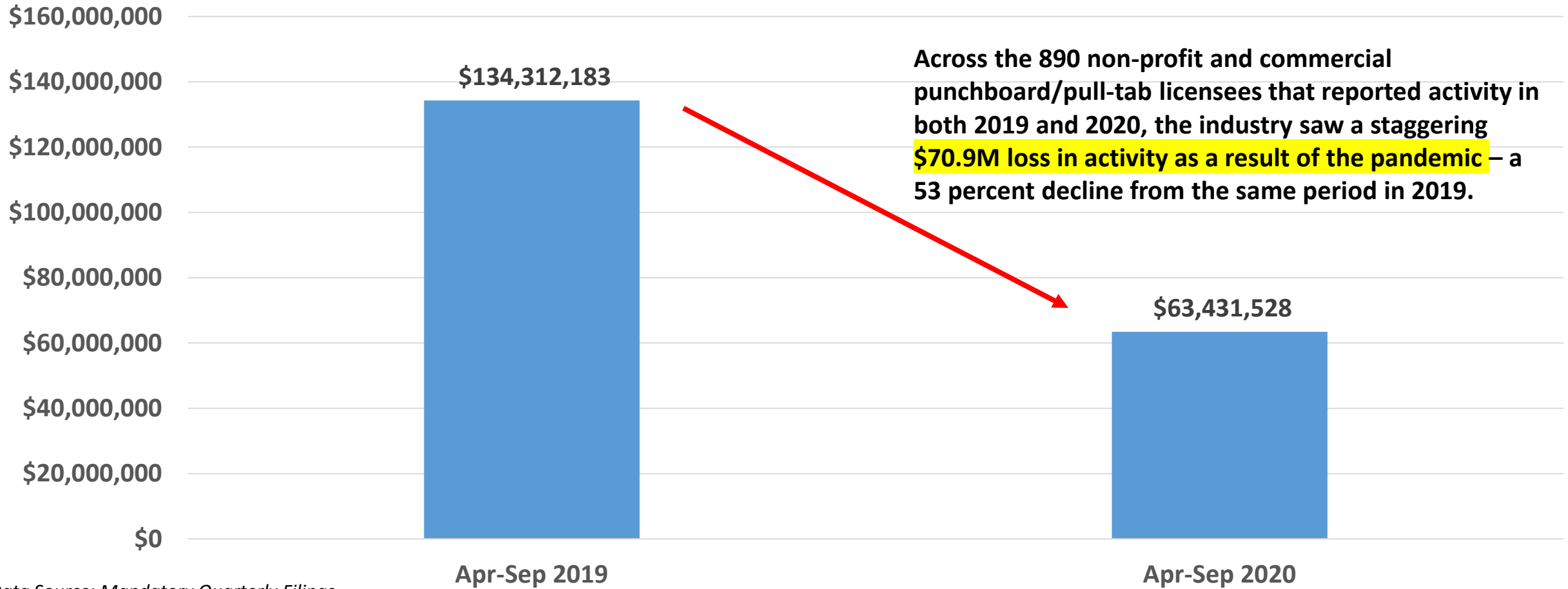
Staggering Financial Losses Will Take Time To Recover



Data Source: Mandatory Quarterly Filings

Punchboard/Pull-Tabs During COVID-19

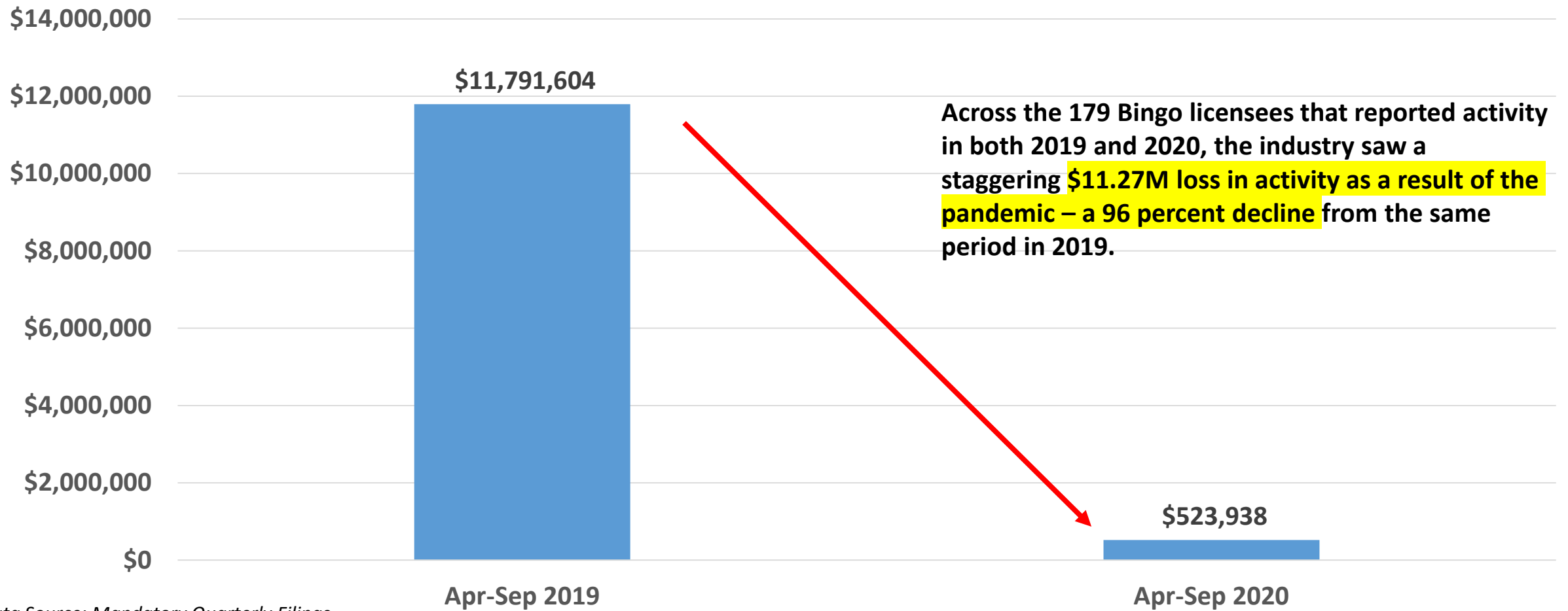
Staggering Financial Losses Will Take Time To Recover



Data Source: Mandatory Quarterly Filings

Bingo During COVID-19

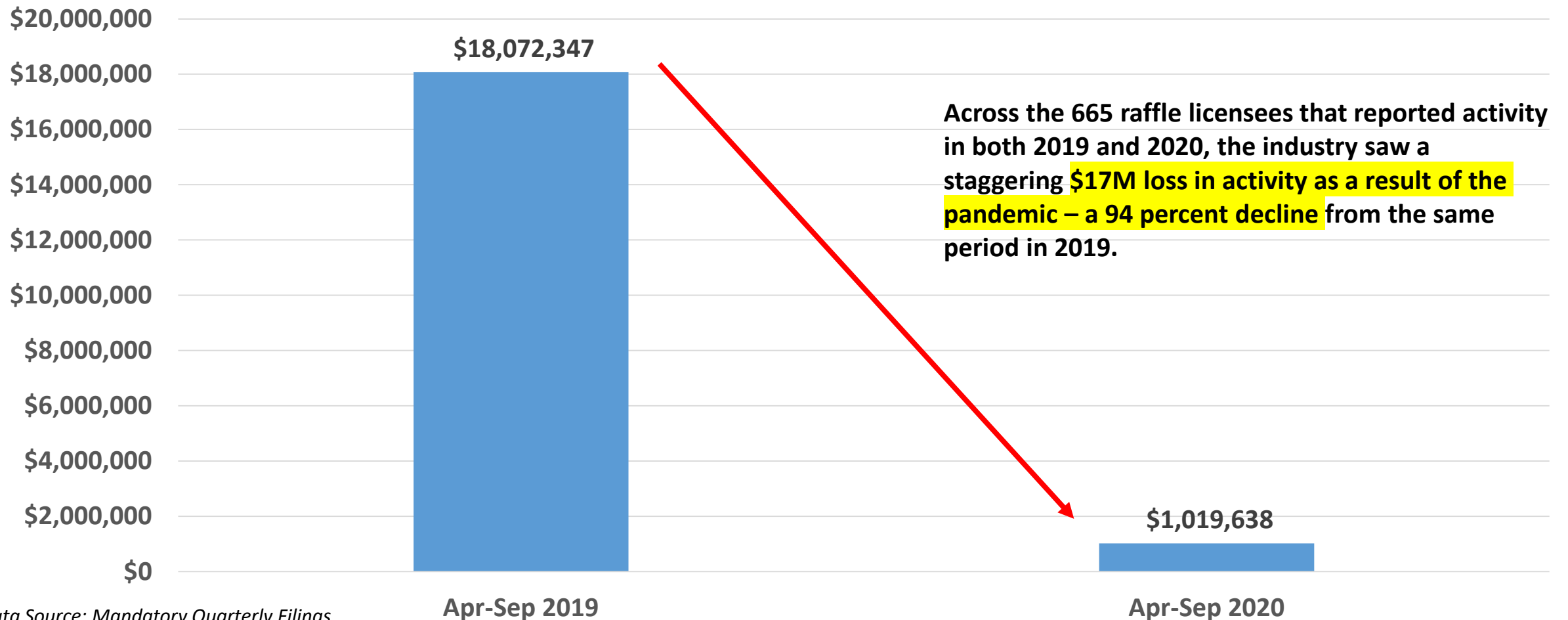
COVID-19 Has Decimated Bingo Licensees



Data Source: Mandatory Quarterly Filings

Raffles During COVID-19

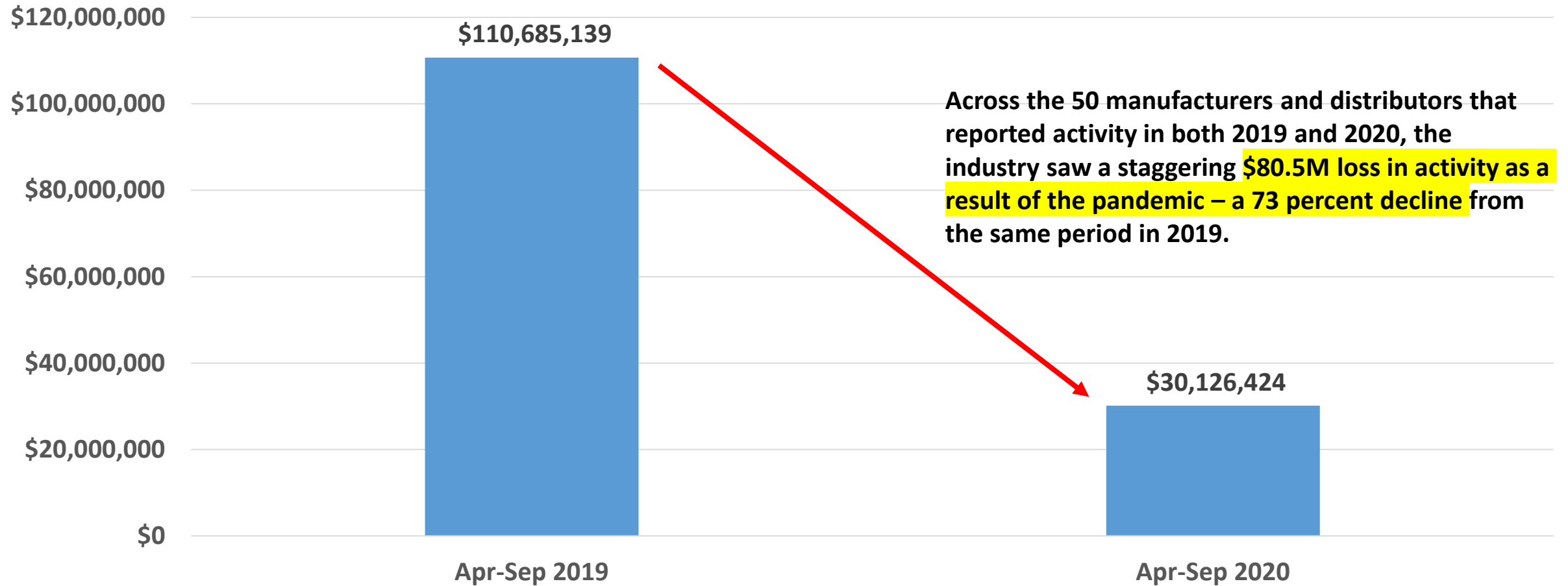
COVID-19 Has Decimated Raffles Licensees



Data Source: Mandatory Quarterly Filings

Manufacturers & Distributors During COVID-19

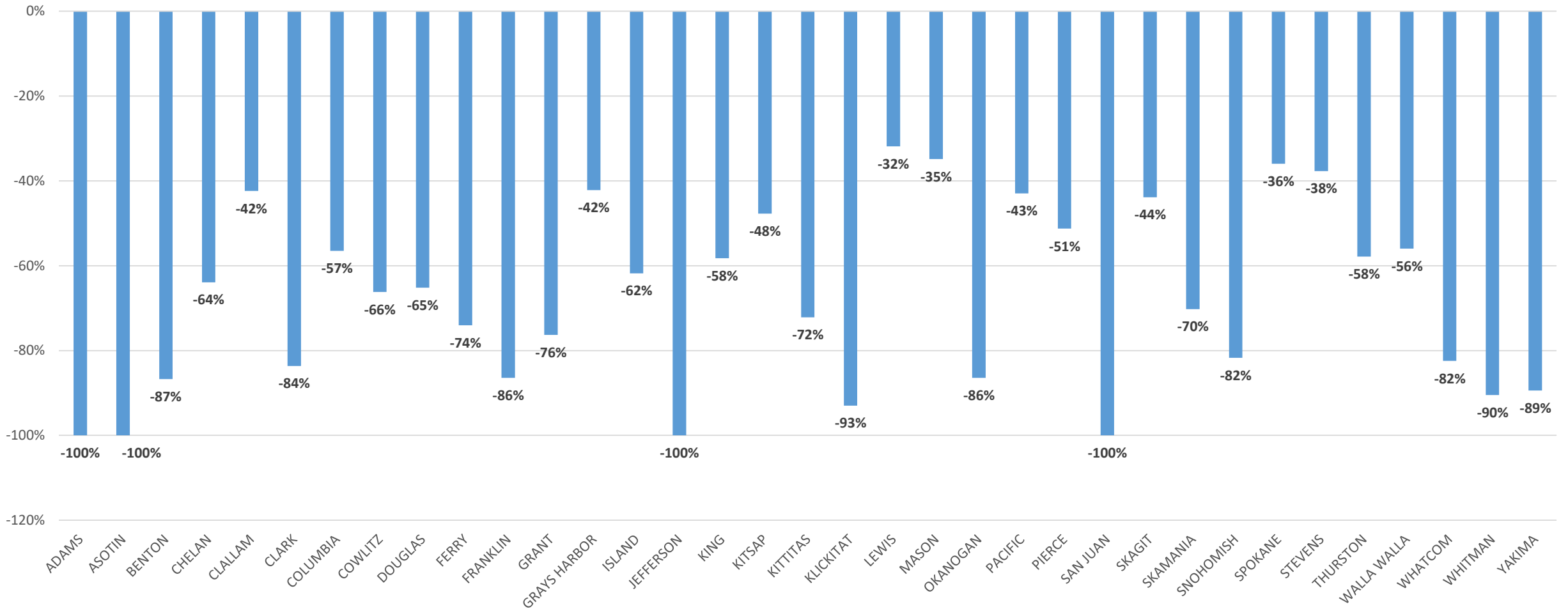
Staggering Financial Losses Will Take Time to Recover



Data Source: Mandatory Quarterly Filings

Local Gambling Tax Collections Collapsed

Most Local Jurisdictions Have Taken Losses Greater Than 50 Percent



Data Source: Mandatory Quarterly Filings



Questions?

Christopher Stanley
Chief Financial Officer



