



**WASHINGTON STATE
GAMBLING COMMISSION PUBLIC
MEETING - February 7, 2022**

Gambling Commission Headquarters
Lacey, WA



STATE OF WASHINGTON

GAMBLING COMMISSION

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

Special Gambling Commission Meeting Agenda

Monday, February 7, 2022

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

Tab 1 8:30 AM	Call to Order <i>Bud Sizemore, Chair</i> *Consent agenda (Action) <ul style="list-style-type: none"> January 13, 2022 Commission Meeting Minutes January 20, 2022 Special Meeting Minutes New Licenses and Class III Employees License Sports Wagering Vendor Reports Interim Director Report <ul style="list-style-type: none"> Strategic Plan 2018-2022 Progress Report (Action) <i>Tina Griffin, Interim Director</i>
Tab 2	*PETITION FOR RULE CHANGE (Action) Rule Petition to Amend <ul style="list-style-type: none"> Sports Wagering and iGaming <i>Ashlie Laydon, Rules Coordinator</i> <i>Todd Schuerman, Petitioner</i>
Tab 3	Legislative Update <i>Tommy Oakes, Interim Legislative Liaison</i>
Tab 4	Director Hire Update <i>Lisa Benavidez, HR Director</i>
	Public Comment
	Executive Session – Closed to the Public <i>Bud Sizemore, Chair</i> Discuss potential agency litigation with legal counsel, including tribal negotiations.
	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"

January Gambling Commission Meeting Minutes

Virtual Meeting

*January 13, 2022

Commissioners Present:

Bud Sizemore, Chair (Via Teams)

Alicia Levy (Via Teams)

Kristine Reeves (Via Teams)

Sarah E. Lawson (Via Teams)

Ex Officio Members Present:

Senator Steve Conway (Via Teams)

Senator Holy (Via Teams)

Representative Shelley Kloba (Via Teams)

Staff Present – Virtually:

Tina Griffin, Interim Director (ID); Kriscinda Hansen, Chief Financial Officer (CFO); Lisa Benavidez, HR Director (HRD); Julie Lies, Tribal Liaison (TL); Oakes, Interim Legislative Liaison; Roger Suave, Special Agent; Tony Czar, Special Agent; Tony Hughes, Special Agent Supervisor; Ashlie Laydon, Rules Coordinator (RC); Julie Anderson and Suzanne Becker, Assistant Attorney General (AAG).

Special Executive Session

Chair Sizemore called the public meeting to order at 9:03AM. Interim Director Griffin called the roll to ensure a quorum for the Special Executive Session. Chair Sizemore, Commissioners Levy, Reeves and Lawson joined Representative Kloba to discuss potential agency litigation with legal counsel, including tribal negotiations. The Special Executive Session adjourned at 9:50AM. Commissioners took a 10-minute break.

Public Meeting

Chair Sizemore reconvened the public meeting at 9:58AM. He asked ID Griffin to call the roll to ensure a quorum. He asked for a moment of silence to acknowledge any law enforcement officers that have been lost since the last time the commission met.

Tab 1

Consent Agenda

Commissioner Reeves moved to approve the consent agenda as presented by staff.

Commissioner Levy seconded the motion.

The motion passed. 4:0

Tab 2

Presentation – Special Olympics of Washington

Roger Sauve, Special Agent, presented the materials for this tab along with Mary Do, Chief Operating Officer, and Mark Sinay, VP Accounting and Administration. SA Sauve stated that the Special Olympics of Washington (SOWA) is requesting approval to conduct a “Dream House Raffle,” an enhanced raffle in Western Washington. The proceeds will be used to further drive the vision of SOWA. Mary Do explained that the pandemic has slowed down the in-person

* 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.

activities for their athletes and is looking forward to smaller local tournaments and getting back on track. She also stated that they are looking forward to the possibility of launching this raffle again in the next couple weeks. SOWA is requesting approval to hold a “Dream House” raffle. Commissioner Reeves inquired about the disclosure about the actual percentage of ticket holders that actually win the Grand Prize and reminded her that she made a verbal commitment last year to disclose on SOWA advertising material about the probability of winning the “Dream House”. Mary Do explained that the information is stated on their website.

Public Comment

There was no public comment.

Commissioner Reeves reiterated, the importance of transparency in this process and appreciates the work that SOWA does to serve this critical element of the community, but recognize that when we talk about gambling, particularly as we're going to go into a topic on self-exclusion next, we recognize that there are folks who are going to participate in this process and making sure that we are transparent about the probabilities of winning these items is important.

Commissioner Levy moved to approve Special Olympics of Washington to conduct an Enhanced Raffle for a Dream House.

Commissioner Lawson seconded the motion.

The motion passed 4:0

Tab 3

Presentation - Self-Exclusion

Tony Hughes, Special Agent Supervisor, presented the materials for this tab. SAS Hughes presented the proposed statewide Self-Exclusion program measurables. The program is scheduled to begin in May of 2022. Commissioners were given the opportunity to comment on the proposed program measurables before staff started developing the program.

Public Comment

Dallas Burnett asked via the chat function in Teams if those that are self-excluded, have to submit another form to be removed from the Self-Exclusion program? He also asked, why would it be required if they choose upfront the time periods offered? **SAS Hughes** replied that that is the way the WAC is written.

Tab 4

Default

Adam Teal, Interim Legal Manager presented the materials for this tab.

Chair Sizemore asked if Cuong Dang was present. He was not.

Commissioner Levy moved to revoke Cuong Dang's Public Card Room Employee license; Number 68-07669 as presented by staff.

Commissioner Reeves seconded the motion.

The motion passed. 4:0

Tab 5

Rule Petition to Amend Card Room Surveillance

Ashlie Laydon, Rules Coordinator presented the materials for this tab along with Tim Merrill of Maverick Gaming. RC Laydon stated that the petitioner is proposing to amend existing rules to allow for the ability to monitor card room gambling activity from one card room to a centralized surveillance room. The petitioner feels this change is needed because the ability to have staff in a central location allows for the surveillance observers to be under experienced surveillance management that can provide consistent training. The petitioner stated that the surveillance management team would be able to work together when it comes to investigating, reporting, writing, and reviewing any questionable footage. The petitioner feels that a centralized surveillance monitoring location would be an opportunity to promote consistency and allow instant communication to gaming agents and allow the surveillance management an opportunity to respond to equipment malfunctions quickly and effectively, which will streamline reporting to the Gambling Commission. The petitioner also showed a presentation of what the central server would look like.

Chair Sizemore inquired about staffing. Mr. Merrill stated that in his industry there is a lot of staff turnover and with centralizing his surveillance he believes he could retain staff by hiring more qualified personnel.

Commissioner Reeves reiterated what she thought Mr. Merrill to say was that his proposition to the commission is that this would create expedited efficiencies in compliance. Mr. Merrill confirmed.

Public Comment

There was no public comment.

Commissioner Levy moved to initiate rule-making proceedings as proposed for further discussion.

Commissioner Lawson seconded the motion.

The motion passed. 4:0

Commissioner Levy commented that this sounded like a good idea, and is interested to dig further into some of the policy decisions.

Tab 6

Petition to Amend WAC 230-15-140 Wager Limits for House-Banked Card Rooms

Ashlie Laydon, Rules Coordinator presented the materials for this tab along with Tim Merrill of Maverick Gaming. RC Laydon stated that the petitioner is proposing to amend WAC 230-15-140, Wagering limits for house-banked card games, and WAC 230-15-135, Wagering limits for non-house-banked card games, to increase the single wager limit and bonus wager limit, and the maximum amount of a single wager on poker at Class F and house-banked card game licensees, from \$300 to \$500 on all tables with the ability to raise the limit to \$1,000 on 25% of the tables (rounded to the nearest whole number).

He feels this change is needed to keep the wagering limits for card rooms fair and consistent with competitors. The petitioner feels that raising the wager limits will allow the card room industry to continue to be competitive in the gambling market, which will allow the card rooms to keep jobs in local communities.

Commissioner Reeves asked Mr. Merrill to elaborate on the petition that was presented to the commission in 2016 that was withdrawn based on concerns. Mr. Merrill stated that Maverick Gaming has implemented a problem gambling centralized system on self-exclusion. Chair Sizemore asked Mr. Merrill if he could describe how this proposal fits in with the legislative declaration. Mr. Merrill said, *“The only difference is we have a small population of customers that do bet up to the maximum already and would like to bet higher. And if we don't provide them that product, then we may lose those customers to the tribal facilities where higher limits (?) have already been approved by the commission. And so, we're fighting to remain relevant in the communities in which we operate and keep those customers in our facility so that we can keep our team members employed.”*

Public Comment

RC Laydon read public comment into the record.

1. *“Jerry Howe on behalf of Jokers Casino in Richland, Knob Hill casino in Yakima, Roxy's Casino in Seattle, Lancer Casino in Clarkston, Wild Goose Casino in Ellensburg, Clearwater Saloon and Casino in East Wenatchee, and Club 48 Poker Room in Yakima is in support of this petition to amend 230-15-135 in WAC, 230-15-140 to allow for increased wager limits in Class F in-house banked card rooms.”*
2. *“David Hill owner of Fortune Casinos and Fortune Poker in Hawks Prairie, who stated the following: I would like to express my opinion that the request for a limit increase proposed by Tim Merrill of Maverick Gaming takes things too far at this time. Understand Mr. Merrill's desire to increase the betting limits in order to be on a more even ground with the tribal casinos in Washington State, but I do not agree that the privately held card rooms must, should be treated the same as the tribal casinos that are operated by sovereign nations on Federal lands for the benefits of thousands of tribal members. As the owner of four WSGC licensed card rooms, I want to go on the record to state that I have no affiliation with Maverick and their representatives, and I do not support this request for Maverick Gaming.”*
3. Neil's comment from the chat is, *“I also would like the wager limits to increase.”*

Public Comment Provided by:

1. **David Hill**, owner of the Fortune Casinos and Fortune Poker, and part owner of Hawks Prairie now. *“So, I wanted to address my comment. My concern is that I understand that, you know, card rooms and obviously it's a financial benefit for me if limits are raised, but the card rooms have kind of gone up, not in lockstep, but always following tribal. My concern was the thousand dollars limits. I think it's asking for too much. I think very few tribes, I believe only four at this time, are currently offering over \$500 limits. There's a process they have to go through in order to have higher limits. I don't believe anyone is regularly offering over a thousand. So, what I am comfortable with is \$500 limits. I would very much support the \$500 limit universally. I think the thousand-dollar unlimited tables is difficult to enforce. It's the reason that the Gambling Commission got rid of, back in I believe '06, when they got rid of the limited number of tables because of enforcement issues. But one of the biggest benefits, not only for being able to wager higher, but currently we have stacks of chips everywhere with \$300 limits. We have commissions on Pai Gow, potentially, and on Baccarat, with \$300. It's an odd amount. \$500 is a simple amount. It is a standardized chip. And basically, every casino in the world, 300 is an awkward number. But to me that's another positive for raising the limit to 500. But what I don't*

support is the thousand dollars. I think that's taking things a step too far to where we're effectively in line with the tribes. And I don't think that's the right move for us at this time."

2. **Roxanne Waldron**, Problem Gambling Program Manager at the Healthcare Authority. *"I always must advocate from the point of view of problem gambling. And it's always a concern when wager limits are being raised and their opportunities to spend more money faster. So, I have deep concerns about this, but I'd need some more time to look at the research to be able to comment on any proposed rule change."*

4. **Max Faulkner**, Managing Partner at Atomic Ball and Jokers here in Richland. *"I represent a lot of the small mom and pop casinos, many casinos, and has card rooms we have in the state. By that, I mean, we're, you know, here we're small card room, but we have a bowling center, arcade, comedy club nightclub. So, I have 134 employees just right here. And I looked at the seven places that I'm affiliated with as probably well over 400 employees in the seven little mini casinos here. Also, we paid the City of Richland last year, \$421,000 in gaming tax too, so, you know, we're nice, and we consider ourselves the community asset here too, have a lot of events and marriage, and stuff like that. I go back to the early days when we, we had a \$25 limit when you opened your card room. And, and then after about six months, if you pass all the requirements, you could go to hundred dollars. When they we're trying to get, when the card rooms get \$300 limits several years ago, I thought, wow, that really doesn't, you know, I'm okay with it, but it really doesn't apply to me. We don't have any players that big. You know, I'm kind of, I like to gamble, but I'm like a five- and ten-dollar player. Well, I was wrong. We have a lot of \$300 players and they often, they're betting \$300 on more than a couple of spots. And we even had to go to purple \$500 chips here that we can bring out to the table if somebody's on a winning streak, they have stacks of hundred dollars, black and \$25 green chips and it takes a lot of time to do the fills and stuff like that. So, we've got the purple \$500 chips, even that's the kind of play. And I think some of those people, maybe they went to Vegas, in a life before, but you know, now that we can accommodate some of that, they stay here. I'm just speculating on that though. But as many of you know, the minimum wage keeps going up and it's gone up again, another 80 cents and, and that's fine. I just did a little math this morning in the back of my head on what that would cost us, because we are just going to raise everybody surveillance, security. So, we have about 15 people average, roughly, employees in the casino day give or take 15, 16 hours, 17 hours. So, it's going to cost us in payroll well over \$70,000 just in Jokers this year. So that's another \$70,000 that we got out of cover somehow, if we're going to stay in business. And you know, in gambling, our win, we have a gross win then we pay our expenses out that. Our gross win is basically the edge on a bet, the house edge on blackjack is about 2%, roughly, times average bet size to cover minimum wage. We can raise the price of a hamburger to cover that. But in, in the casino, in the house bank card room, it's still only a 2% edge on that blackjack bet. You can't change that. Number of bets, we can promote, you know, market, try to get more people in, but average bet size, if we accept Tim Merrill and Maverick's \$500 limit, again, that's only a very small portion of the people, but, but it's something, you know, it will increase our, our average bet size a little bit. We're in support of that \$500 limit to help cover basically, to help cover the huge, I mean, 80 cents doesn't seem like much and, and I'm glad that people have it, but when you multiply it over all the hours, we're open, all the employees, we got to cover 70,*

80, \$90,000 in more payroll this year. So that, that will help us cover that payroll and stay in business. So, thank you. And all right. Any questions? I can talk about this all day.”

Commissioner Levy moved to initiate rule making for further discussion.

Chair Sizemore seconded the motion.

Commissioner Reeves would like to find another way, in which to get to some more of that quantitative data that draws the correlation for us into the changing economic status that would warrant this petition being approved. Interim Director explained that the agency could pull together stakeholders for a more in-depth conversation outside of rulemaking. **Commissioner Lawson** agreed that a more informal conversation outside of rulemaking would flesh out these issues. **Chair Sizemore** said he was committed to putting in effort and time on this discussion outside of the rulemaking process. He asked the petitioner how he wanted to proceed. The petitioner asked how the commission was comfortable allowing limits to increase for tribal facilities and not private enterprise. **ID Griffin** stated that that was through negotiations.

The petitioner withdrew his petition. The Commissioners withdrew their motions.

Tab 7

Petition to Amend- Use of an iDROP Kiosk

Ashlie Laydon, Rules Coordinator presented the materials for this tab. Tim Merrill of Maverick Gaming in Kirkland, Washington is proposing to amend several rules to allow for the use of ticket-in/ticket-out using the iDROP kiosk device in card rooms to purchase and redeem tickets for table games play. According to the petitioner, iDROP enables players to purchase chips directly at the live gaming table from the dealer and brings ticket-in/ticket-out to live gaming tables, thus allowing players move directly from live game to live game without having to go to the cage cashier. The petitioner shared a short video demonstrating the iDROP device.

Commissioner Reeves asked staff if this sort of device was offered anywhere else in our state. **ID Griffin** said that this was not authorized in commercial, nonprofit or tribal gaming facilities. Ticket-in, ticket-out is authorized for tribal lottery systems, but nothing is authorized in the state of Washington for table games.

Public Comment

There was no public comment.

Commissioner Reeves moved to initiate rule-making proceedings as proposed for further discussion.

Commissioner Levy seconded the motion.

The motion passed 4:0

Tab 8

Chapter 230-19 WAC- Sports Wagering.

Ashlie Laydon, Rules Coordinator presented the materials for this tab. RC Laydon stated at the October 2021 public meeting, Commissioners chose to file draft language for further discussion. Language was filed with the Office of the Code Reviser on October 19, 2021, to be published in the Washington State Register (issue 21-21-094) and was posted on our agency website. At the December 2021 public meeting, Commissioners chose to file changes to the proposed rules for

further discussion based on comments from tribal partners and vendor stakeholders. Language was filed with the Office of the Code Reviser on December 22, 2021, to be published in the Washington State Register. Staff met with tribal partners to get feedback on the proposed rules on January 6 and 7, 2022. Based on that feedback staff recommends filing for discussion and possible action on the proposed changes to WAC 230-03-085 and withdrawing the proposed Chapter 230-19 WAC.

Commissioner Lawson moved to file the draft rule language withdrawing WAC 230-19 and amending WAC 230-03-085 for further discussion as presented by staff.

Commissioner Levy seconded the motion.

The motion passed 4:0

Tab 9

Legislative Update

Tommy Oakes, Interim Legislative Liaison presented the materials for this tab. ILL Oakes updated the commissioners on the Agency Request Legislation as well as legislation impacting the Special Agents involved in law enforcement.

Public Comment

There was no public comment.

Tab 10

Agency Director Hiring Update

Lisa Benavidez, HR Director, presented the materials for this tab. HRD Benavidez updated the Commissioners of the ongoing process to hire a new WSGC Director. Both candidates chosen to move forward in the hiring process have accepted the opportunity for a second interview. They will be interviewed by the Commissioners during executive session of a special commission meeting the following week. Immediately following those interviews, the commissioners will have the option to make a motion on which, if any of those candidates they would like to move forward. If a decision is made to move candidates forward, then HR staff will move the finalist through the reference checks and other background checks and examinations required for the position. An update is planned for the February Commission meeting.

Commissioner Reeves thanked the commission staff and HRD Benavidez for all the work that everyone has done, whether it's drafting the questions, et cetera, and really engaging the commission in the process and she looks forward to the opportunity to connect next week.

Public Comment

Roxanne Waldron state problem gambling program manager. Stated, *“One is on the HB 1674, which is authorizing sports wagering and commercial card rooms and horse racing at horse racing venues. I'm not going to address this being an expansion of a new gambling activity. I know it's a much larger discussion. However, I did have some specific concerns about it that I wanted to bring to your attention. One is that the 1-800-GAMBLER number is the helpline number for West Virginia, not Washington state. Secondly, there is no steady funding tied to problem gambling based on volume. In fact, it offers 50% of unclaimed winnings that sit for a year. So, that has nothing to do with the volume of sports wagering. And secondly, or thirdly, it's*

not clear as it's written, if it supersedes the BNO tax, and that's really unclear to me in analyzing this bill. So, I just wanted to bring that to your attention that as the state problem gambling program manager, I see some issues with that bill around how it is written. Secondly, I just want to say for future consideration, and I know we're moving forward with the sports wagering rules right now. And so, I didn't want to bring this up during this conversation, but I think in future consideration, it will win and if you look at the rules again, I might think about looking and adopting a sports better's bill of rights. There is one in Virginia, that's a great model. It's only one page, but it covers protection for sports betters. So, I wanted to bring that up as something to think about for the future."

There was no further public comment.

Chair Sizemore stated that the commissioners would recess for 10 before Executive Session and will return to the Public Meeting for the sole purpose of adjournment.

There were 99 people that joined the meeting.

Chair Sizemore adjourned the meeting at 2:02 PM.



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January Special Gambling Commission Meeting Minutes
Virtual Meeting
*January 20, 2021

Commissioners Present:

Julia Patterson (Federal Way Office)
Alicia Levy (Federal Way Office)
Kristine Reeves (Federal Way Office)
Sarah E. Lawson (Federal Way Office)

Ex Officio Members Present:

Staff Present – Federal Way Office:

Lisa Benavidez, HR Director (HRD)

Special Executive Session

Vice Chair Patterson called the public meeting to order at 8:45AM. Vice Chair Patterson Commissioners Levy, Lawson and Reeves were in the Federal Way Office in person along with Human Resources Director Lisa Benavidez for the sole purpose of continuing to evaluate the candidate qualifications for our open director position. **Vice Chair Patterson** announced that the Executive Session would adjourn at approximately 1:00 PM.

Executive Session was extended 10 minutes.

The meeting was opened to the public at 1:10 PM.

Vice Chair Patterson called the roll to ensure a quorum. **Vice Chair Patterson** restated the purpose of the meeting and asked if any Commissioners had any comments to share.

Commissioner Reeves thanked both candidates for their exceptional interviews and stated that both candidates were outstanding.

MOTION

Commissioner Levy moved to approve candidate A 11 as the apparent best candidate for the director position and authorize our HR director to engage in initial negotiations and background evaluations with this candidate.

Commissioner Lawson seconded the motion.

The motion passed. 3:1

Vice Chair Patterson adjourned the meeting at 1:14 PM.

* 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.



COMMISSION APPROVAL LIST
(New Licenses & Class III Gaming Employees)
February 2022

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Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 18.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

BINGO

HIGH PRAIRIE COMMUNITY COUNCIL
00-23486 01-02809

701 STRUCK RD
LYLE WA 98635

RAFFLE

CUSICK HIGH SCHOOL ASB
00-17819 02-21131

305 MONUMENTAL RD
CUSICK WA 99119-9761

MULTICARE HEALTH FOUNDATION
00-16272 02-02718

409 S J ST
TACOMA WA 98405

NEWPORT HOSPITAL & HEALTH SERVICES FOUNDATION
00-24823 02-21211

714 W PINE ST
NEWPORT WA 99156

ONE ROOF FOUNDATION
00-24762 02-21177

10601 5TH AVE NE
SEATTLE WA 98125

PROGRESSIVE ANIMAL WELFARE SOCIETY
00-16990 02-02825

PO BOX 1037
LYNNWOOD WA 98046

ROTARY CLUB/BELLINGHAM BAY
00-14489 02-02492

2911 HEIGHTS DR
BELLINGHAM WA 98226

SOROPTIMIST INTERNATIONAL OF OAK HARBOR
00-09408 02-02740

1645 NW OUTRIGGER LOOP
OAK HARBOR WA 98277-8929

PUNCHBOARD/PULL-TAB NONPROFIT

LOOM 00493
00-00232 05-02812

150 W AXTON RD STE 4
BELLINGHAM WA 98226

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

ANDY'S NORTH
00-24842 05-21736

3321 W COURT ST
PASCO WA 99301

MOON'S MONGOLIAN GRILL & LOUNGE
00-24846 05-21739

6429 N DIVISION ST
SPOKANE WA 99208

ROADHOUSE II
00-24778 05-21745

18810 MERIDIAN E 110
PUYALLUP WA 98375

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

SPECIAL K PUB & GRILL
00-24845 05-21738

3817 N MARKET ST
SPOKANE WA 99207

MAJOR SPORTS WAGERING VENDOR

BETFRED SPORTS
10-00006 81-00007

105 E RENO AVENUE
LAS VEGAS NV 89119

FANDUEL SPORTSBOOK
10-00075 81-00009

6701 CENTER DR W
LOS ANGELES CA 90045

MID-LEVEL SPORTS WAGERING VENDOR

SPORTSCONTENTCO LLC
10-00202 82-00015

518 S OXFORD VALLEY ROAD
FAIRLESS HILLS PA 19030

ANCILLARY SPORTS WAGERING VENDOR

SIGHTLINE PAYMENTS
10-00137 83-00002

6750 VIA AUSTI PKWY
LAS VEGAS NA 89119

UNITED TOTE COMPANY
10-00040 83-00009

600 N HURSTBOURNE PARKWAY
LOUISVILLE KY 40222

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

ADAMS, WILLIAM T
23-03329

VIDEO KING
OMAHA NE 68154

COLSON, CALEB A
23-03330

VIDEO KING
OMAHA NE 68154

DJERNES, SHAWN L
23-03332

VIDEO KING
OMAHA NE 68154

FIRESTONE, HEATHER D
23-00749

IGT
LAS VEGAS NV 89113

GILBERT, GRANT A
23-03334

IGT
LAS VEGAS NV 89113

HEADY, RANDALL B
23-03335

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

MARFISI, JOHN D
23-03333

VIDEO KING
OMAHA NE 68154

MARTIN, MATHEW G
23-03336

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

RAMOS, FERNANDO
23-02187

AINSWORTH GAME TECHNOLOGY INC
LAS VEGAS NV 89118

STILES, JOHN D
23-03331

VIDEO KING
OMAHA NE 68154

VANGELDER, JONATHAN D
23-02546

VIDEO KING
OMAHA NE 68154

CALL CENTER REPRESENTATIVE

CREWSON, RACHEL D
32-00056

INCEPT CORPORATION
CANTON OH 44718

DANNER, AMBER N
32-00052

INCEPT CORPORATION
CANTON OH 44718

HALL, BARBARA E
32-00055

INCEPT CORPORATION
CANTON OH 44718

HAWK, ALYSSA R
32-00051

INCEPT CORPORATION
CANTON OH 44718

PERSON'S NAME
LICENSE NUMBEREMPLOYER'S NAME
PREMISES LOCATION**NEW APPLICATIONS****CALL CENTER REPRESENTATIVE**HUNTER, KAMBRIANNE M
32-00053INCEPT CORPORATION
CANTON OH 44718MILLER, ANTWANE T
32-00054INCEPT CORPORATION
CANTON OH 44718**MAJOR SPORTS WAGERING REPRESENTATIVE**BANNIGAN, JAMIE D
33-00141FANDUEL SPORTSBOOK
LOS ANGELES CA 90045BELSER, OSCAR C
33-00156CAESARS SPORTSBOOK
LAS VEGAS NV 89118BENINTENTE, CASSIDY
33-00132FANDUEL SPORTSBOOK
LOS ANGELES CA 90045BLAKEMAN, DAVID D
33-00226CAESARS SPORTSBOOK
LAS VEGAS NV 89118BRADLEY, SEAN P
33-00120FANDUEL SPORTSBOOK
LOS ANGELES CA 90045BUEZO SANCHES, JOSELYN
33-00139FANDUEL SPORTSBOOK
LOS ANGELES CA 90045BURCHELL, CHRISTOPHER
33-00119FANDUEL SPORTSBOOK
LOS ANGELES CA 90045BUXHOEVEDEN, JENNIFER
33-00123FANDUEL SPORTSBOOK
LOS ANGELES CA 90045CASTANEDA, ALDO R
33-00225CAESARS SPORTSBOOK
LAS VEGAS NV 89118CAWTHRAYS, SAM
33-00130FANDUEL SPORTSBOOK
LOS ANGELES CA 90045CHASE, BRIAN
33-00117FANDUEL SPORTSBOOK
LOS ANGELES CA 90045CIKOTA, NEMANJA
33-00162IGT
LAS VEGAS NV 89113COLE, DYLAN J
33-00126FANDUEL SPORTSBOOK
LOS ANGELES CA 90045

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

MAJOR SPORTS WAGERING REPRESENTATIVE

COLON, LUIS A
 33-00125

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

FRANCIS, MALLORY
 33-00122

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

GATES, DAVID J
 33-00127

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

GONZALEZ, BYRON E
 33-00118

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

HOOSE, JEFFREY S
 33-00124

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

JOHNSON, WILLIAM L
 33-00134

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

KLJAJIC, SAM
 33-00133

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

LEDAN, REGINALD
 33-00131

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

LOWICH, JEFFREY
 33-00121

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

MAICHIN, JOHN C
 33-00136

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

MANAIZA, ROMUALDO
 33-00129

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

MARKS, ALVIN L JR
 33-00128

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

MASNIKOSA, ALEKSANDAR
 33-00163

IGT
 LAS VEGAS NV 89113

MCDONNELL, STEPHEN
 33-00137

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

MUSTICA, GIORGIO J
 33-00135

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

POWER, FIONA M
 33-00140

FANDUEL SPORTSBOOK
 LOS ANGELES CA 90045

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MAJOR SPORTS WAGERING REPRESENTATIVE

ŠEKULARAC, NEMANJA
33-00164

IGT
LAS VEGAS NV 89113

TEŠANOVIĆ, MOMCILO
33-00166

IGT
LAS VEGAS NV 89113

TORRES SERNA, JOSE J
33-00138

FANDUEL SPORTSBOOK
LOS ANGELES CA 90045

MID-LEVEL SPORTS WAGERING REPRESENTATIVE

LOWERY, CHRISTOPHER W
34-00012

DRUVSTAR
LAS VEGAS NV 89119

ROSASCO, NICHOLAS
34-00011

BULLETPROOF SOLUTIONS INC
FAIRFAX VA 22031

NON-PROFIT GAMBLING MANAGER

BAIER, ALEXANDER H
61-04769

ROCKY MOUNTAIN ELK FOUNDATION
BILLINGS MT 59106

BERRY, LYNDA L
61-04777

FOE 03418
LANGLEY WA 98260

BRYLEY, WILLIAM E
61-04775

FOE 03480
ORTING WA 98360

CARTER, ANDREA K
61-04607

FOE 03564
DEER PARK WA 99006

EDEN, DIANE L
61-04485

AMERICAN LEGION 00096
SNOHOMISH WA 98290

GIPSON, RUBY G
61-04593

FOE 02809
GIG HARBOR WA 98332

HOLMES, JAMES H
61-04350

FOE 01722
RENTON WA 98057-2130

LE MAY, WESLEY H
61-04773

BPOE 02171
LYNNWOOD WA 98036

MAROUARDT, LARRY L
61-04774

FOE 03158
EATONVILLE WA 98328

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

NON-PROFIT GAMBLING MANAGER

MCCALL, DEBORAH J 61-04771	FOE 03865 OROVILLE WA 98844-0000
MOBERG-ROSSMAIER, SANDRA L 61-04770	FOE 04144 YELM WA 98597
RILEY, KENNETH M 61-04772	FOE 03324 REDMOND WA 98052
SPRINGER, ERICA M 61-04741	BPOE 01204 ANACORTES WA 98221
STANTON, MICHAEL L 61-04497	VFW 02100 EVERETT WA 98201
STATLER, SHANNON L 61-04779	FOE 03004 OKANOGAN WA 98841
STUTSMAN, CINDY L 61-04776	FOE 04197 OCEAN SHORES WA 98569-9347

SERVICE SUPPLIER REPRESENTATIVE

GOMEZ, ADRIAN 63-01011	SURVEILLANCE SYSTEMS ROCKLIN CA 95677
KOKX, LAWRENCE F II 63-00821	SURVEILLANCE SYSTEMS ROCKLIN CA 95677
LOWERY, CHRISTOPHER W 63-01024	DRUVSTAR LAS VEGAS NV 89119
MARTIN, STEVEN J 63-01023	GAMING MANAGEMENT LAKEWOOD WA 98499

CARD ROOM EMPLOYEE

ADAMS, FLORENA L 68-07192	B	FORTUNE CASINO - TUKWILA TUKWILA WA 98168
ARMSTEAD, JEREMY L 68-36522	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
BEARD, RYDER W 68-26784	B	MACAU CASINO TUKWILA WA 98188

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

BENNETT, SYDNEY A 68-34840	B	ALL STAR CASINO SILVERDALE WA 98383
BROOKS, DALLAS K 68-09505	B	LAST FRONTIER LA CENTER WA 98629-0000
BRUSH, GEOFFREY D 68-03694	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
BURTON, DAVID S 68-36540	B	ALL STAR CASINO SILVERDALE WA 98383
CARTER, MICHAEL S 68-04548	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
CLARK, KEVIN J 68-36542	B	FORTUNE CASINO - RENTON RENTON WA 98055
DAVIS, GRACELYN R 68-36553	B	JOKER'S CASINO SPORTS BAR & FIEST RICHLAND WA 99352-4122
DEAN, CHRISTINA G 68-36539	B	ROMAN CASINO SEATTLE WA 98178
DENGEL, RYAN D 68-36557	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
DO, HUNG O 68-36104	B	RIVERSIDE CASINO TUKWILA WA 98168
ELKINS, JERAMIE M 68-36543	B	NOB HILL CASINO YAKIMA WA 98902
HAMILTON, JACOB W 68-29360	B	JOKER'S CASINO SPORTS BAR & FIEST RICHLAND WA 99352-4122
HOUSE, NATHAN L 68-36559	B	CASINO CARIBBEAN YAKIMA WA 98901
ISRAEL, FULNESS L 68-36554	B	WILD GOOSE CASINO ELLENSBURG WA 98926
JENKINS, JESSICA M 68-36548	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057
KARPEH, SAYDEE JR 68-36546	B	SILVER DOLLAR CASINO/RENTON RENTON WA 98057

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

KIM, EUNHYE 68-36565	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
LAM, THANH 68-36511	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
LAO, QIYA 68-35410	B	RIVERSIDE CASINO TUKWILA WA 98168
LARA, AYLSSA M 68-36538	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
LARSON, BRIANNE J 68-33854	B	HAWKS PRAIRIE CASINO LACEY WA 98516
LI, MEI H 68-36555	B	ROMAN CASINO SEATTLE WA 98178
LIU, XIULIAN 68-36552	B	ROMAN CASINO SEATTLE WA 98178
LOPEZ, JAMIE A 68-32911	B	RC'S AT VALLEY LANES SUNNYSIDE WA 98944
MATANANE, LILLIAN A 68-36566	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
MENDOZA BETONCOURT, FIDEL 68-36545	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
MOORE, MIRANDA L 68-36556	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
PAGE, AARON L 68-36541	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
PENN, DAVID JR 68-26622	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
SAU, MANNRASY 68-23878	B	ROXY'S BAR & GRILL SEATTLE WA 98126
SENRUD, ERIC T 68-26247	B	ROXY'S BAR & GRILL SEATTLE WA 98126
SHANLEY, TAMMY A 68-10919	B	BUZZ INN STEAKHOUSE/EAST WENAT EAST WENATCHEE WA 98802

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

SIMPKINS, TANNER A 68-36551	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
SMITH, KATRENIA M 68-36558	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
STUDEMAN, MICHAEL G 68-33551	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
TOWN, GEORGE E 68-36562	B	CLUB 48 YAKIMA WA 98908
VICKERS, MINORETTA J 68-35456	B	ROMAN CASINO SEATTLE WA 98178
WARREN, KEVIN E 68-36563	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
WILLIAMS, TAALILI O 68-36528	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

BENEZE, CHRISTOPHER J
69-40385

BOYD, FAUFAU I
69-22889

COLLINS, DEREK S
69-51655

DOWNING, DAVID D
69-51757

ERDMAN, GARY N
69-36519

KICKING WOMAN, LISSA L
69-51724

LOCKE, ROBERT L
69-51727

MALMBERG, KAYLE L
69-51725

MOREHOUSE, ERIN D
69-51636

RIGGS, SAMANTHA M
69-44587

VON SEGGERN, STEVEN P
69-51656

COLVILLE CONFEDERATED TRIBES

AGOSTO, TYLER J
69-51793

BELTRAN, ELENA R
69-51721

LIND, ERIC S JR
69-51723

STANGER, HAYLEE J
69-51794

VARGAS, SHERWIN C
69-51722

COWLITZ INDIAN TRIBE

AUFILL, HUGH A
69-51736

BLAKESLEE, CARSON J
69-51700

FERGUSON, LAWRENCE J
69-51760

FISCHER, ADAM C
69-51707

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

FLEMING, KEVIN S
69-51719

GARCIA, ALEJANDRO A
69-51711

GLASER, WILLIAM D
69-51713

HARRISON, MORGAN A
69-51681

HEKMAN, ELIZABETH
69-51745

HILDEBRAND, JORDAN M
69-51709

KODA, CHESTER A
69-51733

KUANG, SU JUAN
69-51746

LLAMAS, MARK T
69-51708

NEWTON, MICKEY D
69-51699

SABLAN, KAYKOA M
69-51718

SANTOS, REYNALDO S
69-51712

SCARAMELLA, DOMINIC J
69-51758

SMITH ELLIS, TREVOR A
69-51710

WINSLOW, CELESTE M
69-51732

ZAINFELD, BRADEN M
69-51759

KALISPEL TRIBE

ASKEW, SAMUEL B
69-16706

CARTER, JESSICA L
69-51750

ERVIN, CHERI L
69-51749

FLAMBOURAS, JOHANNAH M
69-51751

GONZALEZ, JOESPH V
69-51799

HOHENSTEIN, ASHLEY J
69-51747

NEWMAN, ALLISON F
69-43387

OSNESS, MARSHAL J
69-42822

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

KALISPEL TRIBE

REAVIS, CORTNEY J
69-51771

ROGERS, LESLIE A
69-51816

SPRENKEL, VIENNA M
69-38434

STEPHENS, THOMAS D
69-44272

MUCKLESHOOT INDIAN TRIBE

ANDERSON, BYRON R
69-14398

ANNI, IDA N
69-40235

BULAONG, RUDYANNE C
69-51692

CHEN, WEIZHEN
69-51743

DEATRY, JOAN J
69-51697

DUCKWORTH, STEVEN C
69-51696

GEGG, CURTIS J
69-51742

HUDAKORN, PATTANA
69-51813

JARAMILLO, ALEX M
69-51809

LEGER, MELISSA K
69-51694

LIPARI, JOSEPH A
69-38493

MCINTOSH, VAZHIA S
69-36969

MICHEL, BERNADINE
69-51695

MOI, SIAKISONE F
69-51741

SAKUMA, HONGZHUAN L
69-51810

SIMPSON, TAYLOR M
69-51693

SOLIAI, MOSES N
69-51744

TAY, BUNREN
69-51811

YOUCKTON, GERALDINE G
69-51812

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

NISQUALLY INDIAN TRIBE

BELMAREZ, KESHIA M
69-35526

CRONIN, GABRIEL J
69-51800

CRUZ, TRISTEN J
69-51802

FASSETT, ARIEL U
69-51806

GILLY, ROBERT A
69-51801

GOFF, RICHELE R
69-51805

HENSON, PARKER K
69-51803

HOY, MARY E
69-51786

KNITTLE, HEIDI Y
69-51808

MENDOZA, ERICA
69-51804

PINK, HAVEN N
69-51807

NOOKSACK INDIAN TRIBE

DURONSO, CAIN N
69-51772

HERNANDEZ, EDDIE R
69-20033

LATHAM, MICHAEL J
69-26294

RACINE, JAMEZ J
69-51701

PORT GAMBLE S'KLALLAM TRIBE

DANSECO, WINSTON M
69-51691

FOSTER, TYLER O
69-51717

HARRIS, FAWN T
69-44614

RENTZ, JUSTIN W
69-51716

PUYALLUP TRIBE OF INDIANS

ERICKSON, DEBORA J
69-51705

HALSETH, MARIA J
69-51720

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

LEON GUERRERO, JUSTIN C
69-51706

MERCADO, RAMONA L
69-51704

OGILVIE, CARLA B
69-51766

TAAPE, DYNA J
69-51795

WAGNER, CHRISTIAN J
69-51740

WATTS, RONALD L
69-51785

QUINAULT NATION

CARRIGAN, GERALD W
69-51756

GREEN, ANTHONY
69-51755

SKOKOMISH TRIBE

RICE, PAXTON G
69-51714

SNOQUALMIE TRIBE

CHEN, CAIZHEN
69-51768

CHEN, GUOHAO
69-51769

GARRITY, MICHAEL J
69-51738

PASKEY, SHAWN M
69-51734

POKRANDT, ALEXANDER J
69-51767

SHAFER, GLEN A
69-51792

SPOKANE TRIBE

BISHOP, BRANDON S
69-51774

BROWN, TASHINA W
69-51764

EARLE, ALEXANDER C
69-51703

EVANS, ANTHONY L
69-51702

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

HAMMOND, PAULA S
69-51762

JOHN, WACEKIYA-WI E
69-51680

JOHNSON, JAMES C
69-51763

SIJOHN, DESSIRAE J
69-43752

SQUAXIN ISLAND TRIBE

BURNS, PATRICK J
69-51748

FIELDS, BETHANIA R
69-51682

RICHEY, MARK W
69-51683

SHARP, TAMARA L
69-39961

SMITH, SKYLER J
69-51761

SUQUAMISH TRIBE

CLARK, DENNIS M
69-51798

FRALICK, NATHAN D
69-51796

HOANG, VIET H
69-51730

LORENTZ-FORNI, DANIEL F
69-51797

SKAGGS, JOHN B
69-51731

SWINOMISH INDIAN TRIBAL COMMUNITY

BERKMAN, CHRISTINA R
69-51770

LINDSTROM, SHELTON P
69-19127

THE TULALIP TRIBES

ABERCROMBIE, JEFFERY C
69-51614

ANDERSON, BRYAN D
69-51649

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

THE TULALIP TRIBES

BENTJEN, WILLIAM O
69-51753

BURKETT, DAN
69-34868

COLEMAN, MACEO A
69-51639

CRUZ, CHRISTIAN J
69-51779

DAVIS, ROBERT S
69-51735

FAJARDO, LIZA M
69-51778

FRYBERG, TINA M
69-00785

GARNER, JENNIFER N
69-51641

GISVOLD, TRAVIS A
69-51754

HAMILTON, DONOVAN R
69-45162

HING, SYLA
69-51613

HUYNH, NHUNG N
69-51780

JETT, GABRIEL A
69-51777

LABODA, JESSACA A
69-51611

LOVESTEDT, TRAVIS N
69-51737

MURILLO, FERNANDO JR
69-51648

PHAN, THANH C
69-51685

PHAYSITH, PETER I
69-51643

POLK, GARRISON L
69-51640

SIMMONS, LUKE D
69-51612

SPENCER, CHRISTINA L
69-03096

SPRUELL, BRENDA L
69-51686

THOMPSON, RYAN N
69-51781

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

UPPER SKAGIT INDIAN TRIBE

BANKS, BENJAMIN L
69-51783

BOUROUE, CASEY J
69-51830

DUKE, JUSTIN G
69-51826

WALKER, DAN L
69-17189

YAKAMA NATION

GEORGE, DELROY J
69-42927

JOHNLEY, STEPHAN G
69-51729

OWENS, JEREMY J
69-51739

SLOCKISH, CHANTAY M
69-13355

SPENCER, MICHELLE M
69-11462

UMEMOTO, ELYSE L
69-51728

WHITE, WAYNE C
69-07973



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Licensed and Operating		39			
	City	Commission Approval Date	License Expiration Date	Org #	License #
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2022	00-18357	67-00058
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2022	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2022	00-11170	67-00183
CARIBBEAN CARDROOM	KIRKLAND	Nov 14, 2019	Sep 30, 2022	00-24515	67-00343
CASINO CARIBBEAN	KIRKLAND	Nov 14, 2019	Sep 30, 2022	00-24512	67-00341
CASINO CARIBBEAN	YAKIMA	Nov 14, 2019	Sep 30, 2022	00-24513	67-00342
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2022	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2022	00-24296	67-00339
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2022	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2022	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2022	00-21847	67-00281
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2022	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2022	00-23465	67-00329
GOLDIES SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2022	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2022	00-19513	67-00194
GREAT AMERICAN CASINO/LAKEWOOD	LAKEWOOD	Aug 14, 2003	Jun 30, 2022	00-19258	67-00184
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2022	00-12554	67-00012
HAWKS PRAIRIE CASINO	LACEY	Jul 12, 2001	Jun 30, 2022	00-17579	67-00091
IRON HORSE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2022	00-19477	67-00192
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2022	00-15224	67-00006
LANCER LANES/REST AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2022	00-21681	67-00276
LAST FRONTIER	LA CENTER	Feb 11, 1999	Sep 30, 2022	00-11339	67-00055

Licensed and Operating**39**

	City	Commission Approval Date	License Expiration Date	Org #	License #
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2022	00-21305	67-00267
MACAU CASINO	TUKWILA	Nov 14, 2019	Sep 30, 2022	00-24514	67-00344
MACAU CASINO	LAKEWOOD	Nov 14, 2019	Sep 30, 2022	00-24516	67-00345
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2022	00-13069	67-00173
PALACE CASINO LAKEWOOD	LAKEWOOD	Jan 14, 1999	Dec 31, 2022	00-16542	67-00028
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2022	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2022	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2022	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2022	00-17613	67-00057
ROXY'S BAR & GRILL	SEATTLE	Nov 18, 2004	Jun 30, 2022	00-20113	67-00231
SILVER DOLLAR CASINO/MILL CREEK	BOTHELL	Sep 9, 2010	Jun 30, 2022	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2022	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2022	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2022	00-16759	67-00038
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2022	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2022	00-20009	67-00212
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2022	00-18777	67-00209

Licensed but Not Currently Operating**4**

	City	Commission Approval Date	License Expiration Date	Org #	License #
CLUB HOLLYWOOD CASINO	SHORELINE	Sep 9, 2010	Jun 30, 2022	00-22132	67-00303
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2022	00-23814	67-00335
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2022	00-22130	67-00301
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2022	00-21998	67-00287

Applications Pending**2**

	City	Commission Approval Date	License Expiration Date	Org #	License #
HAWKS PRAIRIE CASINO	LACEY			00-24868	67-00347
LUCKY DRAGONZ CASINO	SEATTLE			00-23001	67-00323



Washington State Gambling Commission
Pre-Licensing Report
Major Sports Wagering Vendor

Part I
Licensing/Organization Information

Type of Approval Major Sports Wagering Vendor License	Premises/Trade Name/Address Betfred Sports 105 E Reno Ave. Las Vegas, NV 89119
Date of Application October 9, 2021	

APPLICANT INFORMATION

Name Betfred Sports	License Application # 10-00006	Business Phone # (725) 221-0161
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Address
105 E Reno Ave.
Las Vegas, NV 89119

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Major Sports Wagering Vendor License	Exp. Date 12/31/2022	License Number(s) 81-00007
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COMMISSION STAFF

Licensing Specialist Michael Moore	Special Agents Edward Ward Donna Khanhasa
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Background/Structure

General Information:

Betfred Group was started in the UK in the 1960s by founder Fred Done. Betfred Sports (Washington), LLC, doing business as Betfred Sports, is a newly formed entity to provide sports wagering services in Washington State. They applied for a Major Sports Wagering Vendor license. They plan to be a Tribe's partner or primary consultant who provides substantial sports wagering related services; provide bookmaking services; and provide sports wagering risk management services.

Organizational/Ownership Structure:

Betfred Sports (Washington) LLC

Title	Name	% Ownership
Manager	Mark Stebbings	0
Manager	Nicola Barr	0
Shareholder	Betfred USA Sports (TWO) LLC	100%
	Total	100%

Betfred USA Sports (TWO) LLC

Title	Name	% Ownership
Manager	Mark Stebbings	0
Manager	Nicola Barr	0
Shareholder	Betfred USA Sports LLC	100%
	Total	100%

Betfred USA Sports LLC

Title	Name	% Ownership
Manager	Mark Stebbings	0
Manager	Nicola Barr	0
Shareholder	Betfred International Holdings, Ltd.	100%
	Total	100%

Betfred International Holdings, LTD

Title	Name	% Ownership
Director	Fred Done	0
Director	Mark Stebbings	0
Director	Nicola Barr	0
Shareholder	Lightcatch, Ltd.	100%
	Total	100%

Lightcatch, LTD

Title	Name	% Ownership
Director	Fred Done	0
Director	Joanne Whittaker	0
Director	Mark Stebbings	0
Director	Nicola Barr	0
Shareholder	Betfred Group, Ltd.	100%
	Total	100%

Betfred Group, LTD

Title	Name	% Ownership
Chairman of the Board	Fred Done	0%
CEO and Director	Joanne Whittaker	0%
COO and Director	Mark Stebbings	0%
CFO and Director	Nicola Barr	0%
Shareholder	Fred Done 1991 No. 1 Life Interest Settlement (LIS)(Fred Done; Peter Eric Done)	22.7328%

Shareholder	Fred Done 1991 No. 3 LIS (Fred Done; Peter Eric Done)	23.4273%
Shareholder	Fred Done 2007 Family Discretionary Trust (Fred Done; Peter Eric Done)	15.437%
Shareholder	Peter Eric Done 1991 No. 1 LIS (Fred Done; Peter Eric Done)	11.0246%
Shareholder	Peter Eric Done 1991 No. 4 LIS (Fred Done; Peter Eric Done)	11.7136%
Shareholders	Various minority, non-substantial interest shareholders*	15.6647%
	Total	100%

*Based upon the remaining shares after totaling the shares/percentages held by the trustees.

Fred Done 1991 No. 1 Life Interest Settlement

Title	Name	% Ownership
Trustee	Fred Done	50%
Trustee	Peter Eric Done	0%
Beneficiary	Jacqueline Anne Siddons	12.5%
Beneficiary	Nicola Anne Done Orrell	12.5%
Beneficiary	Peter Daniel Done	12.5%
Beneficiary	Lea Anne Done Jackson	12.5%
	Total	100%

Fred Done 1991 No. 3 Life Interest Settlement

Title	Name	% Ownership
Trustee	Fred Done	0%
Trustee	Peter Eric Done	0%
Beneficiary	Jacqueline Anne Siddons	25%
Beneficiary	Nicola Anne Done Orrell	25%
Beneficiary	Peter Daniel Done	25%
Beneficiary	Lea Anne Done Jackson	25%
	Total	100%

Fred Done 2007 Family Discretionary Trust

Title	Name	% Ownership
Trustee	Fred Done	0%
Trustee	Peter Eric Done	0%
Beneficiary	Jacqueline Anne Siddons	25%
Beneficiary	Nicola Anne Done Orrell	25%
Beneficiary	Peter Daniel Done	25%
Beneficiary	Lea Anne Done Jackson	25%
	Total	100%

Peter Eric Done 1991 No. 1 Life Interest Settlement

Title	Name	% Ownership
Trustee	Fred Done	0

Trustee	Peter Eric Done	0
Beneficiary	Peter Eric Done	100%
	Total	100%

Peter Eric Done 1991 No. 4 Life Interest Settlement

Title	Name	% Ownership
Trustee	Fred Done	0
Trustee	Peter Eric Done	0
Beneficiary	Deborah Anne Lyon	50%
Beneficiary	Daniel Peter Done	50%
	Total	100%

Other Jurisdictions Licensed:

Betfred Group subsidiaries are licensed in several jurisdictions, including Colorado, Iowa, and Pennsylvania. It has applications in process in Louisiana and Nevada. Internationally, Betfred is licensed in the UK, Gibraltar, Ireland, and Spain.

**Part II
Licensing Investigations Summary**

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

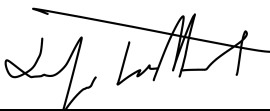
- No unreported people or businesses involved (i.e. substantial interest holders);
- No undisclosed ownership or undisclosed involvement in other activities/businesses;
- No disqualifying administrative history;
- All funding sources were disclosed; and
- All substantial interest holders qualify to hold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

Source of Funds:

The company’s source of funds for the pre-licensing process came from loans from its parent company.

**Part III
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing Betfred Sports (Washington), LLC, doing business as Betfred Sports, with a Major Sports Wagering Vendor license.

Prepared By Jennifer LaMont, Agent in Charge Licensing Unit	Signature 	Date January 26, 2022
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**Washington State Gambling Commission
Pre-Licensing Report
Major Sports Wagering Vendor**

**Part I
Licensing/Organization Information**

Type of Approval Major Sports Wagering Vendor License	Trade Name/ Premises Address FanDuel Sportsbook 6701 Center Drive West, Suite 1000 Los Angeles, CA 90045
Date of Application October 21, 2021	

APPLICANT INFORMATION

Name FanDuel Sportsbook	License Application # 10-00075	Business Phone # (917) 604-4172
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Mailing Address
6701 Center Drive West, Suite 1000
Los Angeles, CA 90045

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Major Sports Wagering Vendor License	Exp. Date 12/31/2022	License Number(s) 81-00009
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COMMISSION STAFF

Licensing Specialist Elizabeth O'Hara	Special Agents Lisa Saila Donna Khanhasa Julie Sullivan
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Background/Structure

General Information:

Betfair Interactive US, LLC, doing business as FanDuel Sportsbook, applied for a Major Sports Wagering Vendor license to provide the following services in Washington:

- Managing a Tribe's or Tribes' sports wagering operations and
- Providing bookmaking services.

Ownership/corporate structure:**Betfair Interactive US, LLC**

Title	Name	% Ownership
CEO	Amy Howe	0%
Manager	Paul Rushton	0%
Shareholder	FanDuel Group, Inc.	100%
	Total	100%

FanDuel Group, Inc.

Title	Name	% Ownership
CEO, Director	Amy Howe	0%
CFO	Paul Rushton	0%
COO, Director	Andrew Giancamilli	0%
Shareholder	FanDuel Group Parent, LLC	100%

FanDuel Group Parent, LLC

Title	Name	% Ownership
President and CEO	Amy Howe	0%
CFO	Paul Rushton	0%
Director	Jeremy Peter Jackson	0%
Director	Jonathan Hill	0%
Director	David Nathanson	0%
Shareholder	TSE Holdings, Ltd.	95.5%
Shareholder	Boyd Interactive Gaming Holdings, LLC	4.5%
Total		100%

TSE Holdings, Ltd.

Title	Name	% Ownership
Director	Jeremy Peter Jackson	0%
Director	Edward Traynor	0%
Shareholder	The Sporting Exchange, Ltd.	100%

The Sporting Exchange, Ltd.

Title	Name	% Ownership
Director	Jeremy Peter Jackson	0%
Director	Edward Traynor	0%
Shareholder	Betfair Group, Ltd.	100%

Betfair Group, Ltd.

Title	Name	% Ownership
Director	Jeremy Peter Jackson	0%
Director	Edward Traynor	0%
Shareholder	Flutter Entertainment, PLC	100%

Flutter Entertainment, plc* as of November 29, 2021

Title	Name	% Ownership
CEO and Director	Jeremy Peter Jackson	0%
CFO and Director	Jonathan Hill	0%
Chairman of the Board	Gary McGann	0%
Director	Zillah Byng-Thorne	0%
Director	Michael Cawley	0%
Director	Nancy Cruickshank	0%
Director	Nancy Dubuc-Kizilbash	0%
Director	Richard Flint	0%
Director	Andrew Higginson	0%
Director	Alfred Hurley Jr	0%
Director	Holly Koeppel	0%
Director	David Lazzarato	0%
Director	Mary Turner	0%
Secretary	Edward Traynor	0%
Institutional Investor	BlackRock, Inc.	7.38%
Institutional Investor	Caledonia (Private) Investments Pty Ltd.	10.26%
Institutional Investor	The Capital Group Companies, Inc.	14.87%
Non-substantial interest holders	Other shareholders of less than 5%	67.49%
Total		100%

* Flutter Entertainment, plc is a publicly traded company on the London Stock Exchange.

Other Jurisdictions Licensed:

Betfair Interactive US, LLC is licensed in multiple jurisdictions including Colorado, Pennsylvania, New Jersey, Illinois, Michigan, Mississippi, and New York.

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


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

Source of Funds:

The company's source of funds for the licensing process came from cash on hand from operations.

**Part III
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing Betfair Interactive US, LLC, doing business as FanDuel Sportsbook, with a Major Sports Wagering Vendor license.

Prepared By Jennifer LaMont, Agent in Charge Licensing Unit	Signature 	Date January 21, 2022
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Washington State Gambling Commission
Pre-Licensing Report
Ancillary Sports Wagering Vendor

Part I
Licensing/Organization Information

Type of Approval Ancillary Sports Wagering Vendor License	Premises/Trade Name/Address United Tote Company 600 N. Hurstbourne Pkwy, Ste. 400 Louisville, KY 40222
Date of Application November 17, 2021	

APPLICANT INFORMATION

Name United Tote Company	License Application # 10-00040	Business Phone # (502) 636-4432
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Address
600 N Hurstbourne Pkwy, Ste. 400
Louisville, KY 40222

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Ancillary Sports Wagering Vendor License	Exp. Date 12/31/2022	License Number(s) 83-00009
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COMMISSION STAFF

Licensing Specialist Michael Moore	Special Agents Kevin Maxwell Edward Ward
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Background/Structure

General Information:

United Tote was formed in Montana in 1959 and merged with Cabin Creek Corporation and United Totalisator Corporation in July 1984.

The company applied for an Ancillary Sports Wagering Vendor license to provide sports wagering kiosks (hardware only, no software) in Washington State.

Organizational/Ownership Structure:**United Tote Company**

Title	Name	% Ownership
Chairman, Director	Benjamin Murr	0%
President, Director	Nathaniel Simon	0%
Treasurer, Director	Michael Anderson	0%
Secretary	Andrew Archibald	0%
Shareholder	Youbet.com, LLC	100%

Youbet.com, LLC

Title	Name	% Ownership
Shareholder	Churchill Downs, Inc.	100%
Total		100%

Churchill Downs, Inc.

Title	Name	Shares	% Ownership
Shareholder	BlackRock, Inc. and Affiliates	4,949,949	12.85%
Shareholder	The Vanguard Group, Inc. and Affiliates	3,289,869	8.54%
Shareholder	FMR LLC and Affiliates	3,509,049	9.11%
Shareholder	CDI Holdings LLC	2,617,773	6.8%
Director	Ulysses L. Bridgeman, Jr.	21,840	+
Director	Robert L. Fealy	56,695	0.15%
Director	Douglas C. Grissom	8,198	+
Director	Daniel P. Harrington	628,297	1.63%
Director	Karole F. Lloyd	14,011	+
Director	R. Alex Rankin	43,288	0.11%
Director	Paul C. Varga	9,781	+
Director	William C. Carstanjen	544,807	1.14%
Director	William E. Mudd	254,403	0.66%
Director	Marcia A. Dall	41,146	0.11%
Director	Austin W. Miller	27,341	+
Shareholder	Various non substantial-interest holders	22,505,170	58.42%
Total		38,521,617	100%

+ Less than 0.1% ownership

Other Jurisdictions Licensed:

United Tote Company is licensed in several U.S. states and Canadian provinces to include but not limited to: Alabama, Arizona, California, Colorado, Delaware, Florida, Idaho, Illinois, Indiana, Iowa, Kentucky, Ontario, Prince Edward Island, and Saskatchewan.

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

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

Source of Funds:

The company's source of funds for the pre-licensing process came from cash on hand.

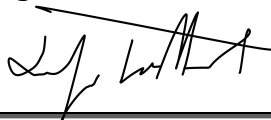
**Part III
Staff Recommendations**

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

Prepared By

Jennifer LaMont, Agent in Charge
Licensing Unit

Signature



Date

January 24, 2022



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

**Part I
Licensing/Organization Information**

Type of Approval Ancillary Sports Wagering Vendor License	Trade Name/ Premises Address Sightline Payments 6750 Via Austi Pkwy, Suite 130 Las Vegas, NV 89119
Date of Application August 17, 2021	

APPLICANT INFORMATION

Name Sightline Payments, LLC	License Application # 10-00137	Business Phone # (702) 851-4747
Mailing Address 6750 Via Austi Pkwy, Suite 130 Las Vegas, NV 89119		

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Ancillary Sports Wagering Vendor License	Exp. Date 12/31/2022	License Number(s) 83-00002
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COMMISSION STAFF

Licensing Specialist Rose Guzman	Special Agents Julie Sullivan
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Background/Structure

General Information:

Sightline Payments, LLC, applied for an Ancillary Sports Wagering Vendor license to provide cashless digital payment services for on-premises mobile gaming for sports wagering.

Ownership/corporate structure: Sightline Payments, LLC

Title	Name	% Ownership
Co-CEO	Joseph Pappano	0%
Co-CEO	Omer Sattar	0%
Secretary, CFO	John Gronen	0%
COO	Thomas Sears	0%
Manager	Sightline Payments Holdings, LLC	0%
Member	Sightline Payments Holdings Sub, LLC	100%
	TOTAL	100%

Ownership/corporate structure: Sightline Payments Holding Sub, LLC *

Title	Name	% Ownership
Member/Manager	Sightline Payments Holdings, LLC	100%
	TOTAL	100%

Ownership/corporate structure of Sightline Payments Holdings, LLC **

Title	Name	% Ownership
Director	Joseph Pappano	0%
Director	Omer Sattar	0%
Director	Elizabeth Chambers	0%
Director	Christopher Cruz	0%
Director	David Ducommun	0%
Director	William Foley II	0%
Director	Walter Kortschak	0%
Member	Sightline Investor Holdings, LLC	30.8%
Member	Sightline Management Holdings, LLC	10.7%
Member	Sightline PU Holdings, LLC	10.8%
Member	Searchlight III FEY, L.P ***	20.9%
Member	Other < 10% each	26.8%
	TOTAL	100%

Ownership/corporate structure of Sightline Investor Holdings, LLC

Title	Name	% Ownership
Member	Cannae Holdings, LLC ****	29.5%
Member	Other < 5% each	70.5%
	TOTAL	100%

Ownership reflects diluted shares of the applicant

Ownership/corporate structure of Sightline Management Holdings, LLC

Title	Name	% Ownership
Member	Various Members < 10% each	100%
	TOTAL	100%

Ownership reflects diluted shares of the applicant

Ownership/corporate structure of Sightline PU Holdings, LLC

Title	Name	% Ownership
Member	Various Members < 10% each	100%
	TOTAL	100%

Ownership reflects diluted shares of the applicant

Ownership/corporate structure of Searchlight III FEY, L.P.

Title	Name	% Ownership
Member	Various Members < 10% each	100%
	TOTAL	100%

Ownership reflects diluted shares of the applicant

* Sightline Payments Holdings Sub, LLC, does not have Officers or Directors. Their sole manager is Sightline Payments Holding LLC.

** Sightline Payments Holdings, LLC, does not have Officers, they have a Board of Directors. The Board of Directors are the Manager of the applicant.

*** Searchlight III FEY, L.P., is ultimately owned by Searchlight Capital Partners, a private equity fund firm in North America and Europe.

*** Cannae Holdings, LLC, is a wholly owned subsidiary of Cannae Holdings, Inc., a publicly traded company on the New York Stock Exchange.

Other Jurisdictions Licensed:

Sightline Payments, LLC, is licensed in over a dozen jurisdictions including Colorado, Pennsylvania, New Jersey, and Michigan.

**Part II
Licensing Investigations Summary**

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

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

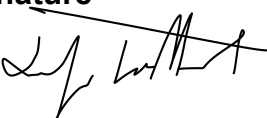
Source of Funds:

The company's source of funds for the licensing process came from cash on hand.

**Part III
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing Sightline Payments, LLC, with an ancillary Sports Wagering Vendor license.

Prepared By
Jennifer LaMont, Agent in Charge
Licensing Unit

Signature


Date
January 5, 2022



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

**Part I
Licensing/Organization Information**

Type of Approval Mid-Level Sports Wagering Vendor License	Trade Name/ Premises Address SportsContentCo 518 S. Oxford Valley Road Fairless Hills, PA 19030
Date of Application November 12, 2021	

APPLICANT INFORMATION

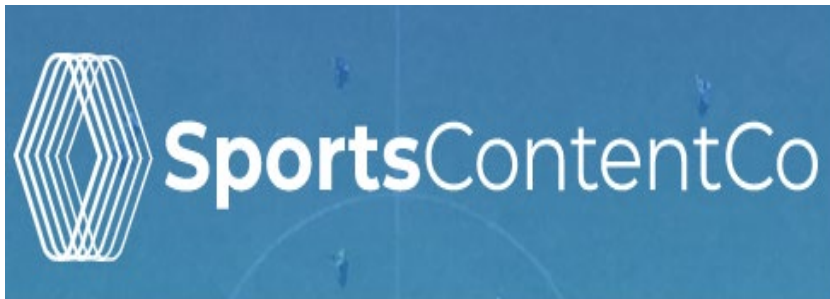
Name SportsContentCo, LLC	License Application # 10-00202	Business Phone # (267) 804-5017
Mailing Address 1555 Zion Road, Suite 202 Northfield, NJ 08228		

ACTIVE LICENSES ISSUED BY GAMBLING COMMISSION

Description/Class Mid-Level Sports Wagering Vendor License	Exp. Date 12/31/2022	License Number(s) 82-00015
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COMMISSION STAFF

Licensing Specialist Jeanette Warner	Special Agents Julie Sullivan Edward Ward
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Background/Structure

General Information:

SportsContentCo, LLC, applied for a Mid-Level Sports Wagering Vendor license to provide data and streaming services for sports wagering.

Ownership/corporate structure: SportsContentCo

Title	Name	% Ownership
General Manger	Sean Schafer	0%
Member	US DataCo Holdings, LLC	100%
	Total	100%

Ownership/corporate structure: US DataCo Holdings, LLC

Title	Name	% Ownership
Member	Pasquale Deon	33.3%
Member	William Gormley	33.3%
Member	David Mountcastle	33.3%

Other Jurisdictions Licensed:

SportsContentCo is licensed in over a dozen jurisdictions including Colorado, Pennsylvania, New Jersey, and Michigan.

**Part II
Licensing Investigations Summary**

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


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

Source of Funds:

The company’s source of funds for the licensing process came from cash on hand.

**Part III
Staff Recommendations**

Based upon the criminal history and financial background investigations, staff recommends licensing SportsContentCo, LLC, with a Mid-Level Sports Wagering Vendor license.

<p>Prepared By Jennifer LaMont, Agent in Charge Licensing Unit</p>	<p>Signature </p>	<p>Date January 10, 2022</p>
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STATE OF WASHINGTON
GAMBLING COMMISSION

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

February 7, 2022

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

EX OFFICIO MEMBERS
Senator Steve Conway
Senator Jeff Holy
Representative Shelley Kloba
Representative Brandon Vick

FROM: Tina Griffin, Interim Director

SUBJECT: Interim Director’s Report for February 2022

Staffing Update

At the November meeting, I provided a report on the agency’s staffing levels and was asked to provide an update in February.

The chart below indicates the vacancy rates and number of vacant positions as of November 1, 2021, and February 1, 2022:

	As of November 1, 2021		As of February 1, 2022	
	Vacancy Rate	Vacant Positions	Vacancy Rate	Vacant Positions
Agency	26%	31	27%	32
Special Agents	25%	16	26%	17

The changes that have occurred since November 2021 are as follows:

- Filled a position in the Information Technology Unit on January 3, 2022.
- Special Agent from the Criminal Enforcement Unit resigned January 21, 2022; and
- Fiscal Analyst in the Business Operations Unit resigned February 1, 2022.

We are currently recruiting for 15 positions, 12 are for Special Agents amongst the four operational units. We are currently conducting background investigations on candidates for 4 of the positions.

Correspondence from Western Hockey League

On January 25, 2022, we received a letter from Mr. Ron Robison, Commissioner of the Western Hockey League (WHL), requesting sports wagering not be permitted on WHL games.

Staff let Mr. Robison know that sports wagering on minor league sports is prohibited.

Attachment



January 25, 2022

Mr. Gary Drumheller
Interim Assistant Director
Washington State Gambling Commission
P.O. Box 42400
Olympia, WA 98504

Sent via Email

Dear Mr. Drumheller,

As you are aware, the Western Hockey League (WHL) teams in Washington – Everett Silvertips, Seattle Thunderbirds, Spokane Chiefs and Tri-City Americans - are proud members of their respective communities. Each of our WHL teams not only provide the highest level of entertainment in the amateur hockey system but also are major contributors to the economic and social well being of their communities. Our players, staff and team ownerships are also very committed to supporting local charities and minor hockey in their communities making major contributions each year.

We are writing in regard to the recent legalization of sports betting in U.S.A. We understand Washington State Gambling Commission continues to review this matter and consult on how sports betting will be regulated in your state.

We would like to clarify with you that the Western Hockey League does not support betting on our WHL games. Unlike other Leagues that have been approved for sports betting, our players are amateur athletes between the ages of 16-19. Should there currently be any betting on WHL games or consideration for this in the future, we would request that betting not be permitted for WHL games.

We are in the process of taking the same position in sports betting with other state gaming authorities. The WHL is also a member league of the Canadian Hockey League (CHL) along with the Ontario Hockey League and Quebec Junior Minor Hockey League. The CHL has also requested that betting on games not be permitted in any other Canadian or U.S. jurisdiction where teams are located.

WESTERN HOCKEY LEAGUE

Father David Bauer Arena – 2424 University Drive NW, Calgary AB T2N 3Y9
T. 403-693-3030 F. 403-693-3031
www.whl.ca

Thank you for taking our concerns into consideration. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Robison". The signature is fluid and cursive, with a horizontal line extending from the end.

Ron Robison
Commissioner
Western Hockey League

Cc: Bill Yuill, Governor, Everett Silvertips
Dan Leckelt, Governor, Seattle Thunderbirds
Mark Miles, Governor, Spokane Chiefs
Bob Tory, Governor, Tri-City Americans



STRATEGIC PLAN PROGRESS REPORT 2018-2022



Washington State
GAMBLING
COMMISSION

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

P.O. Box 42400 Olympia, WA 98504 | www.wsgc.wa.gov

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Goal 2: Strengthen legislative relationships	9
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Goal 3: Staff continuity and succession planning	10
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Goal 4: Strengthen stakeholder relationships	12
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Notable Accomplishments from May 2020 through December 2021

<p>Covid 19 Pandemic Response to Assist Licensees</p>	<p>COVID-19 presented one of the greatest obstacle’s staff and administration faced through 2020 and 2021. Despite that, the WSGC remained dedicated to our mission while working to keep employees and customers safe.</p> <p>Allowed licensees to renew up to 30 days after licensees could re-open to the public for onsite consumption of food and/or beverages, which was beyond their expiration date.</p> <p>Allowed licensees to delay and change dates for raffles, fundraising events and recreational gaming activities without penalty of fees due to limits on public gatherings.</p> <p>Waived late fees for quarterly license reports submitted and fees paid after the due dates between March 2020 and September 2021.</p> <p>Accepted and processed licensing applications even if applicants were prevented from sending in fingerprints due to fingerprinting locations being closed.</p> <p>Communicated changing operational conditions and restrictions to our licensees via our website:</p> <ul style="list-style-type: none"> • There were approximately one dozen revisions of the WSGC website to update information regarding the proclamation information that affected our licensees and applicants, and, • Developed FAQ to answer questions posed by licensees. <p>Allowed house-banked cardrooms and nonprofit licensees an additional 60 days to submit financial statements.</p> <p>Allowed nonprofit licensees to have a negative cash flow for the fiscal year that included the state of emergency.</p> <p>Extended reporting requirements for licensees until 30 days after licensees could reopen to the public for onsite consumption of food and/or beverages.</p> <p>Reprogrammed licensee database and MyAccount multiple times to facilitate licensee accommodations for payment of license fees and renewals.</p>
<p>COVID-19 Pandemic Response as an Employer</p>	<p>Reassigned over 100 staff to work from home with little notice. We had to find a new way of doing business remotely and provide staff with equipment to do their jobs from home or in the field.</p> <p>Changed several processes to make it possible to continue operating in the new work environment.</p> <p>Closed three offices to the public in March 2020 with no reopen date determined yet.</p>

	<p>Obtained and distributed PPE supplies to all staff for their protection.</p> <p>Developed and updated an agency Safe Start Guide for employees working in the office or in the field.</p> <p>Worked with fewer staff due to the 12 weeks of Families First Coronavirus Response Act, which allowed staff to be off work for up to 12 weeks if certain criteria were met.</p> <p>Implemented eight furlough days in five months. Human Resources worked directly with Employment Security and staff to ensure unemployment benefits were paid correctly.</p> <p>Implemented the Governor’s vaccine mandate. Human Resources monitored the vaccination status of staff and worked on religious and medical exemption and accommodation requests.</p> <p>Monitored, managed, and communicated new federal and state leave laws for staff due to COVID.</p> <p>Tracked and managed COVID positive tests by employees and communicated to other staff who may have been exposed at the workplace.</p> <p>Ensured compliance with health and safety standards for the workplace.</p> <p>Changed recruitment, interviewing, and on-boarding of new employees to an on-line format.</p>
<p>Tribal Relations</p>	<p>Agreement was reached with 18 tribes to amend their Class III gaming authorizing sports wagering.</p> <p>Developed rules and licensing process to allow sports wagering vendors to apply for a pre-licensing investigation to reduce the time to process applications for licensure once the tribal-state compacts were published to authorize sports wagering.</p> <p>Worked with the Tribal Gaming Agencies to open four sportsbooks.</p> <p>Agreement was reached with five tribes on increased wager limits, extension of credit, high-limit areas and increased contributions to problem and responsible gambling and communities.</p> <p>Negotiated as part of an amendment to Appendix X2 a pilot program to explore an alternative fee method.</p> <p>Agreed to 17 clarifications of compact appendices, which required extensive staff time complete.</p>

	<p>Conducted six Government to Government consultation meetings with tribal leaders to exchange information and solicit input on gambling related topics.</p> <p>Tracked costs into annual regulatory billing and sports wagering start-up categories.</p> <p>Conducted 742 onsite tribal gaming facility visits and concurred with 319 internal control submissions and 171 game rule submissions.</p>
<p>Licensure and Regulation of Licensees</p>	<p>Processed 28 sports wagering vendor applications, which required the development of new on-line applications and processes for acceptance of pre-licensing investigation and licensure of sports wagering vendors.</p> <p>Temporarily transferred and trained three staff into the Licensing Unit to assist in conducting investigations required for sports wagering vendor applicants.</p> <p>Responded to 1,869 inquiries and complaints received from our public website regarding topics such as illegal sweepstakes, raffles, bingo and pull-tabs being conducted over the internet, and operational violations at licensees</p> <p>Conducted over 35 on-site pre-operational inspections based on a new program developed to authorize house-banked card rooms to open in temporary structures in their parking lots.</p> <p>Completed 4,108 compliance and spot inspections at cardrooms, bingo halls, pull tab, and raffle licensees.</p> <p>Investigated 155 criminal complaints and 362 administrative violations.</p> <p>Issued:</p> <ul style="list-style-type: none"> • 43 Notice of Administrative Charges and/or Amended Notice of Administrative Charges - 29 of the charges were forwarded to the Office of Administrative Hearings, 20 resulted in defaults and six resulted in stipulated settlement agreements. • 3 Summary Suspensions • 2 Notices of Denial and • 26 Cease and Desist Letters.
<p>Rules and Legislation</p>	<p>Received a budget proviso to extend the \$6 million loan we received from the 2020 Engrossed Substitute House Bill 2638 to launch sports wagering from June 30, 2021 to June 30, 2023.</p> <p>Supported the Problem Gambling Taskforce in extending the completion date and expenditure authority for the problem gambling prevalence study to June 30, 2022 and the submission of the task force is final report to the legislature until November 30, 2022.</p>

	<p>Revised seven agency policies provided training to staff and purchased equipment needed to implement ten new law enforcement reform laws.</p> <p>Sought a legislative change to enhance the effectiveness and efficiency of staff by authorizing nonprofit senior housing centers and community centers to operate unlicensed bingo up to 12 times per year not to exceed \$5,000 per calendar year in gross gambling receipts.</p> <p>Revised approximately 120 WAC rules. Staff spent a significant amount of time working with stakeholders and tribal partners on rule language, evaluating gambling equipment, and researching the regulatory approach taken by other state regulatory agencies on rules regarding a statewide self-exclusion program, electronic raffles, pre-licensing investigations and licensing of sports wagering vendors, card game requirements, pull-tab price limit increases, and changes to how raffles are operated.</p>
Problem Gambling	<p>Began developing a state-wide self-exclusion program to begin May 1, 2022, based on the programs and rules in other states and the Lottery Commission’s new program.</p> <p>Developed rules based on feedback from the Problem Gambling Task Force, Certified Gambling Counselors, Commissioners and Ex-Officios.</p> <p>Engaged tribal and non-tribal gaming sectors as rules were developed.</p>
Administrative	<p>Conducted and published a feasibility study under the Office of Chief Information Officer oversight to validate the agency's request to modernize our legacy IT systems. All work was accomplished remotely within the given timeframe and under budget.</p> <p>Recruited to fill an unprecedented number of vacancies. At the peak, currently, 31 positions or 26% of overall staff positions are vacant.</p>
Criminal Investigations	<p>Criminal investigations were not slowed by the pandemic conditions and Special Agents successfully investigated several cases, such as:</p> <p>Received 37 complaints in 2021 through the agency website.</p> <p>Investigated over 17 bookmaking cases in 2021. Some of those cases are still on- going. Below are a few examples of cases closed with an arrest:</p> <ul style="list-style-type: none"> • The suspect operated a bookmaking operation where he provided access to an online gambling platform that allowed his clients to place bets on sporting events. The suspect was arrested and booked for professional gambling, collection of an unlawful debt and money laundering.

	<ul style="list-style-type: none">• Based on information received from the Vancouver Police Department, we investigated a suspect who operated his bookmaking operation via a third-party website. The Suspect was arrested and booked for professional gambling, transmitting or receiving gambling information, and collection of an unlawful debt. <p>Investigated 10 cases in which the elderly were taken advantage of by a caretaker or family member, such as:</p> <ul style="list-style-type: none">• Adult Protective Services referred a case to WSGC regarding the financial exploitation of a vulnerable adult. The suspect, the victim's daughter, used her position as a durable power of attorney with control over the victim's bank accounts to steal approximately \$161,000 from the victim's account, most of that she used for gambling. The suspect was arrested and booked for Theft from a Vulnerable Adult in the First Degree. <p>Investigated nine complaints involving loan sharking, money laundering and fraud.</p> <p>Worked with the Washington State Lottery who reported their representatives had observed what appeared to be slot machines being operated in several convenience stores in the Tri-Cities area. Agents located ten illegal gambling devices on the premise of several convenience stores. The machines were seized and forfeited.</p> <p>Provided intelligence information to agents to assist in their investigations by processing 256 agent requests and sent out 13 intelligence bulletins.</p>
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Commission Goals for 2018-2022		
Goal 1: Increase the Commission's role in helping people who are suffering from gambling disorders		
Objectives	Completed Tactics	Tactics in Progress/Not Started
1. Complete and present problem gambling study to Legislature in February 2019 that looks at ensuring those who need treatment receive treatment in Washington	<ul style="list-style-type: none"> • Secured funding for the study • Present study to Legislature for the 2019 session 	
2. Increase public awareness around problem gambling	<ul style="list-style-type: none"> • Posted agency problem gambling literature prominently on our website • Brought awareness to problem gambling activities during Problem Gambling Awareness month, and as needed • <i>Updated agency problem gambling literature in partnership with the Health Care Authority, Horse Racing Commission and Lottery Commission.**</i> 	<ul style="list-style-type: none"> • <i>Increase education through social media and the agency website upon implementation of the self-exclusion program in 2022.**</i>
3. Seek additional funding for problem gambling awareness and focus prevention of problem gambling on minors and youths	<ul style="list-style-type: none"> • Obtained funding through legislative action in 2019 for: (1) Problem Gambling Task Force (PGTF); (2) prevalence study in 2021 • Worked with the appropriate state agency to account for current problem gambling revenue stream received from the state's Business and Occupation tax • Assigned to PGTF: Conduct awareness study and develop problem gambling literature targeted towards youth • <i>Additional funding for problem gambling, from 0.13% to 0.2% of net win, was negotiated in Tribal-State Compact Amendments for Tribes seeking to add higher limits to their Class III gaming facilities**</i> • <i>A commitment to responsible gaming and offering self-</i> 	

	<i>imposed limits on wagering was negotiated in Tribal-State Compact Amendments for Tribes seeking to operate sports wagering**</i>	
4. Explore the option of revising RCW 9.46 to increase agency problem gambling responsibility	<ul style="list-style-type: none"> Determine it was not necessary to request legislation to clarify Commission's problem gambling role 	
5. Involve all stakeholders in problem gambling processes, e.g. Tribes, licensees, health care professionals etc.	<ul style="list-style-type: none"> Create statewide problem gambling taskforce <i>Developed rules for the self-exclusion program which become effective on May 1, 2022 **</i> 	<ul style="list-style-type: none"> <i>Develop the self-exclusion program, train licensees and staff on new program, and prepare education materials for when the program goes live on May 1, 2022**</i>
		<ul style="list-style-type: none"> <i>Provide opportunities for tribes to participate in the statewide self-exclusion program**</i>

*Denotes tactics that have been completed and are scheduled to recur in future years

** Denotes tactics completed and new tactics identified for this period

Goal 2: Strengthen legislative relationships		
Objectives	Completed Tactics	Tactics in Progress/Not Started
1. Prepare an annual report to the Legislature about Commission activities	<ul style="list-style-type: none"> Assembled staff/stakeholder workgroup with cross representation to prepare legislative report* Publish fiscal year annual report on the Commission website* Updated annual legislative media brochure with Commission activity highlights* 	
2. Share emerging issues and solutions through white paper process	<ul style="list-style-type: none"> Staff assigned to work on sports betting Formed internal team to keep abreast of emerging issues, determine what issues to focus on, and forecast topics for lawmakers Sought legislative input on topics* 	<ul style="list-style-type: none"> Assign staff to work on loot boxes and skins gambling
3. Build coalitions and involve stakeholders in presenting information to the Legislature	<ul style="list-style-type: none"> Held periodic meetings that facilitate communications between the public, Legislature, tribes, licensees, and other stakeholders* 	

4. Encourage Legislative committees to hold educational work sessions	<ul style="list-style-type: none"> • Commission legislative team monitored gambling related bills, and determined how best to educate lawmakers on the subject* • Better utilize Commissioner Ex Officios as a resource • <i>Published WSU's Study on Sports Betting in Washington State **</i> 	
5. Develop position for general fund appropriations for criminal enforcement work	<ul style="list-style-type: none"> • Engaged tribes and licensees in support of general fund appropriations for criminal enforcement work 	<ul style="list-style-type: none"> • Engage law enforcement in support of general fund appropriations for criminal enforcement work

*Denotes tactics that have been completed and are scheduled to recur in future years

** Denotes tactics completed and new tactics identified for this period

Goal 3: Staff continuity and succession planning		
Objectives	Completed Tactics	Tactics in Progress/Not Started
1. Establish agency leadership pathways	<ul style="list-style-type: none"> • Reevaluated prior Leadership Development Program; decided not to reinstate as written • Provide opportunities for staff to get a feel for leadership by participating on agency teams, and being involved with external organizations • Develop individual training plans that support opportunities for leadership development • <i>Cross trained staff where appropriate **</i> • <i>Provided opportunities for staff to determine if they want to pursue leadership**</i> • <i>Provided opportunities for staff to get a feel for leadership as subject matter experts and taking a higher level of duties and responsibilities**</i> • <i>Developed individual training plans that support opportunities for leadership development**</i> 	<ul style="list-style-type: none"> • Fill vacant agency leadership positions

	<ul style="list-style-type: none"> • <i>Managers and Supervisors checked in with staff during PDP's and interim reviews to determine goals and training plans to achieve those goals**</i> 	
2. Evaluate each division for potential leadership transitions identify staff that can take over and plan for “back-up” on key positions	<ul style="list-style-type: none"> • Identified staff who may be leaving for retirement or other opportunities and determined the future vacancies to be filled • Ongoing conversations with staff regarding their goals • Updated competencies for key positions • <i>Updated job requirements for key positions**</i> • <i>Provided cross training**</i> 	
3. Understand that not all great employees want to be leaders	<ul style="list-style-type: none"> • Talked to staff about their goals and what motivates them* • Retained people where they are successful as subject matter experts • <i>Provided training opportunities for staff that want to be subject matter experts and do not have the desire to be supervisors**</i> • <i>Managers and Supervisors checked in with staff to determine goals and training plans to achieve those goals**</i> 	
4. Be the employer of choice	<ul style="list-style-type: none"> • Highlighted state and agency benefits during recruitment and stressed what this agency offers, such as flexible scheduled, telework opportunities, etc.* • Where feasible, provided for a flexible and modern work environment* • Provided meaningful recognition to staff* • Developed methods to reach diverse candidate pool* 	

*Denotes tactics that have been completed and are scheduled to recur in future years

** Denotes tactics completed and new tactics identified for this period

Goal 4: Strengthen stakeholder relationships		
Objectives	Completed Tactics	Tactics in Progress/Not Started
1. Improve Tribal billing system and Tribal Relations policy	<ul style="list-style-type: none"> • Conducted formal and informal tribal consultation meetings* • Shared information with Tribal leaders, designees, and Washington Indian Gaming Association (WIGA) who helped identify workgroup members* • Built relationships with tribal gaming commissions, tribal gaming agencies, casino operations, and others* 	<ul style="list-style-type: none"> • Did not result in improved billing system; new tactics needed • <i>Work with Tribes to explore an alternative fee method as negotiated and documented agreement in an MOU**</i>
2. Utilize stakeholders & other experts when presenting information		<ul style="list-style-type: none"> • Send staff to, or request to have a representative at, licensee trade organization meetings • Increase visits to state non-profit conventions • Provide the ability for stakeholders to add Commission meeting agenda topics on emerging gambling issues
3. Obtain feedback on fee simplification from stakeholders	<ul style="list-style-type: none"> • Talked to individual licensees to gauge effectiveness of fee simplification on stakeholders 	<ul style="list-style-type: none"> • Conduct online surveys and town hall meetings to gauge effectiveness of fee simplification on stakeholders • Follow tribal consultation process to obtain feedback from Tribal partners
4. Work on raffle rules and build better relationships with non-profits	<ul style="list-style-type: none"> • Identified changes the agency is willing to accept/consider • Determine scope of any potential rule changes • Identified staff who are subject matter experts to work on raffle rule project 	
5. Coordinate a gambling summit to discuss various gambling related topics		<ul style="list-style-type: none"> • Follow a process similar to Tribal consultation to prepare a summit that includes entire gaming industry • Engage stakeholders and tribal partners and ask them to contribute ideas for the summit

*Denotes tactics that have been completed and are scheduled to recur in future years

** Denotes tactics completed and new tactics identified for this period

Washington State Gambling Commission

4565 7th Avenue SE
PO Box 42400
Olympia, WA 98504-2400
360-486-3440

800-345-2529

www.wsgc.wa.gov

February 2022



Rule Petition to Adopt
Sports wagering and iGaming.

February 2022 – Commission Review
January 2022 – Rule-Making Petition Received

Tab 2: FEBRUARY 2022 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Todd Schuerman	
Background	
<p>Todd Schuerman is proposing a rule change to allow for online sports betting and iGaming in Washington State.</p> <p>The petitioner feels this change is needed because people want to participate in sports wagering and iGaming from the comfort of their own homes. The petitioner would also like to have access to the NFT marketplace, which currently no tribal casino is offering.</p> <p>The petitioner feels the effect of this rule change would increase competition and the ability to participate in sports wagering, iGaming, and access to NFT marketplace from home.</p> <p>Attachments:</p> <ul style="list-style-type: none">• Petition	
Policy Considerations	
RCW 9.46.0364 authorizes sports wagering through class III tribal gaming compacts to be conducted and operated on Indian lands.	
Staff Recommendation	
<p>Under the requirements of the Administrative Procedure Act, the Commission must take action on a petition within 60 days of receiving it. Your options are:</p> <ol style="list-style-type: none">1) Initiate rule-making proceedings by filing the rule as proposed for further discussion; or2) Deny the petition in writing, a) stating the reasons for denial and specifically address the concerns stated in the petition, or b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. <p>Staff recommends denial as the change being requested can only be done by the legislature.</p>	

Laydon, Ashlie (GMB)

From: AgencyWebsite (GMB)
Sent: Monday, January 10, 2022 9:37 AM
To: Laydon, Ashlie (GMB)
Cc: Teal, Adam (GMB)
Subject: FW: Contact Us Submission from wsgc.wa.gov

See below

Nicole Frazer
Administrative Assistant 3, CEU/Regulations Agency Evidence Officer & Agency ACCESS TAC
Phone: 509-325-7905 Cell – 509-530-0743
Nicole.Frazer@wsgc.wa.gov

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

From: no-reply@wsgc.wa.gov <no-reply@wsgc.wa.gov> On Behalf Of WSGC Web
Sent: Friday, January 7, 2022 4:06 PM
To: AgencyWebsite (GMB) <agency.website@wsgc.wa.gov>
Subject: Contact Us Submission from wsgc.wa.gov

External Email

Submitted on Friday, January 7, 2022 - 4:06pm Submitted by anonymous user: 98.247.169.154 Submitted values are:

Your Name: Todd Schuerman
Email Address: tmsherrm@yahoo.com
Phone: 425-531-0553

Description of request: Please seriously consider changing the rules to allow online sports betting and igaming in Washington State. Tribal casinos have created a monopoly and narrowed competition on gaming in Washington state. Time to allow operators like Draftkings, Caesar's, Rush Street interactive to be allowed to compete. many years ago it was disappointing that Tribal casinos were able to pay off legislature rep to ban online poker in Washington state too. It would be one thing if those Tribal casinos invested in technology to bring sports betting and gaming (poker) online but they have chosen to protect their monopoly and keep out competition. People like me just want to stay home and watch sports with friends, family and not have to drive out of the way. Personally, I would like to see Draftkings approved for online initially so that we can have access to their NFT marketplace, which no Tribal casino is offering in Washington state. Thanks, Todd Schuerman

The results of this submission may be viewed at:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wsgc.wa.gov%2Fnode%2F7720%2Fsubmission%2F3139&data=04%7C01%7CASHLIE.LAYDON%40WSGC.WA.GOV%7CB05D80668AA3499C030E08D9D45FD354%7C11D0E217264E400A8BA057DCC127D72D%7C0%7C0%7C637774330296871555%7CUNKNOWN%7CTWFPBGZSB3D8EYJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000&sd=KEm4eu5v%2B7jlAjzD%2BT4D0ueTBbGy96aK6tIr4u38JL8%3D&reserved=0>