

# WASHINGTON STATE GAMBLING COMMISSION PUBLIC MEETING - July 14 & 15, 2022

Washington State Liquor & Cannabis Board 1025 Union Avenue SE Olympia , WA 98501

# **COMMISSIONERS**



Alicia Levy Chair



Julia Patterson Vice Chair



**Bud Slzemore** 



**Kristine Reeves** 



Sarah Lawson

# **EX OFFICIOS**



Senator **Steve Conway** 



Senator Jeff Holy



Representative Shelley Kloba



Representative Brandon Vick



**Washington State Gambling Commission P.O. Box 42400 | Olympia, WA 98504-2400** (360) 486-3469 | (800) 345-2529 | www.wsgc.wa.gov

**WAGamblingCommission** 

**WAG**ambling

**o** wagambling



**STATE OF WASHINGTON** 

## GAMBLING COMMISSION

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

**Gambling Commission Meeting Agenda** 

Thursday, July 14 and Friday, July 15, 2022

Meeting will be held virtually through Teams and in person at the

Washington State Liquor and Cannabis Board

1025 Union Avenue SE Olympia, WA 98501

To join the meeting virtually through TEAMS Click here

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 (\*)

|                  | Thursday, July 14, 20                         | 22   |
|------------------|---|--|
|                  | Thursday, July 14, 202<br>PUBLIC MEETING      |  |
| 9:30 AM<br>Tab 1 | Call to Order                                 | Alicia Levy, Chair   |
|                  | *Consent agenda                               | (Action)   |
|                  | • May 12 & 13, 2022, Commission Meetin        | g Minutes  |
|                  | New Licenses and Class III Employees L        | icense   |
|                  | Sports Wagering Vendor Report                 |  |
|                  | September Commission Meeting location         | l.   |
|                  | Public Comment                                |  |
| Tab 2            | *Special Olympics Washington                  | (Action)   |
|                  |   | Mary Do, Chief Operating Officer                                 |
|                  | M   | Tark Sinay, VP Accounting & Administration                       |
|                  |   | Neal Zeavy, Manager of NZ Consulting                             |
|                  |   | Tony Czar, Special Agent Regulation Unit                         |
|                  | Public Comment                                |  |
| Tab 3            | <b>*PETITION FOR RULE CHANGE</b>              | (Action)   |
|                  | Rule Petition to Amend                        |  |
|                  | • WAC 230-06-045                              | Long Labor Acting Dulas Coordinator                              |
|                  |   | Jess Lohse, Acting Rules Coordinator<br>Corey Lowell, Petitioner |
|                  | Public Comment                                | Corey Lowell, 1 elilloner  |
| Tab 4            | Presentation – State Problem Gambling Progr   | ram Undate   |
| 140 1            | 8 8   | Manager, State Problem Gambling Program                          |
|                  | Public Comment                                |  |
| Tab 5            | Presentation - Agency Request Legislation 202 | 23   |
|                  |   | Tommy Oakes, Interim Legislative Liaison                         |
|                  | Public Comment                                |  |
| Tab 6            | Presentation – FY 23 Budget Proposal          | (Action)   |
|                  |   | Kriscinda Hansen, Chief Financial Officer                        |
|                  | Public Comment                                |  |

| 12:00-12:30 | Lunch Break  |
|-------------|--|
| Tab 7       | Defaults (Action   |
|             | • Jeffrey Juangco – CR 2021-01639                                    |
|             | Public Cardroom Employee License, Number 68-35811                    |
|             | • Thomas Luong – CR 2022-00183                                       |
|             | Public Cardroom Employee License, Number 68-05623                    |
|             | • Buntho C. Chau – CR 2022-00304                                     |
|             | Public Cardroom Employee License, Number 68-35918                    |
|             | Adam Teal, Interim Legal Manage                                      |
|             | Public Comment   |
|             | Public Comment can be provided via:                                  |
|             | • Email, before or during the meeting to Julie.anderson@wsgc.wa.gov. |
|             | Microsoft Office Teams Chat Box.                                     |
|             | • By phone; or   |
|             | • In person.   |
|             | Adjourn  |

he agenda, rule changes and requests for special accommodations should be directed to Julie Anderson, Executive Assistant at (360) 486-3453 or TDD (360) 486-363.

Please silence your cell phones and mute your mics for the public meeting



## GAMBLING COMMISSION

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

Gambling Commission Meeting Agenda

Friday, July 15, 2022

Meeting will be held virtually through Teams and in person at the

Washington State Liquor and Cannabis Board

1025 Union Avenue SE Olympia, WA 98501

### To join the meeting virtually through TEAMS Click here

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 (\*)

| 0.20 ANT | W. Learner and D. Construction  |
|----------|---|
| 9:30 AM  | Welcome and Reconvene         Call to Order       Alicia Levy, C                        |
|          | Call to Order Alicia Levy, C  |
|          | Executive Session – Closed to the Public  |
|          | To discuss current and potential agency litigation with legal counsel, including tribal |
|          | negotiations.   |
|          | Public Comment can be provided via:   |
|          | • Email, before or during the meeting to Julie.anderson@wsgc.wa.gov.                    |
|          | Microsoft Office Teams Chat Box.  |
|          | • By phone; or  |
|          | • In person.  |
|          | Adjourn   |

pon advance request, the Commission will pursue reasonable accommodations to enable persons with disabilities to attend Commission meetings Questions or comments pertaining to the agenda, rule changes and requests for special accommodations should be directed to Julie Anderson, Executive Assistant at (360) 486-3453 or TDD (360) 486-363.

Please silence your cell phones and mute your mics for the public meeting



## STATE OF WASHINGTON GAMBLING COMMISSION

"Protect the Public by Ensuring that Gambling is Legal and Honest" May Gambling Commission Meeting Minutes Hybrid Meeting \*May 12 & 13, 2022

<u>Commissioners Present:</u> Bud Sizemore Julia Patterson Alicia Levy Kristine Reeves Sarah Lawson (Via Teams) <u>Ex Officio Members Present:</u> Senator Steve Conway (Via Teams) Representative Shelley Kloba (Via Teams)

## **Staff Present :**

Tina Griffin, Director; Dan Wegenast, Agent in Charge (AIC); Gary Drumheller, Interim Assistant Director; Tommy Oakes, Interim Legislative Liaison (ILL); Julie Anderson, Executive Assistant; Suzanne Becker, Assistant Attorney General (AAG)

### Staff Present Virtual:

Julie Lies, Tribal Liaison; Ashlie Laydon, Rules Coordinator (RC); Jeanine Sugimoto, Special Agent (SA); Nicole Frazer, Administrative Assistant; Rashida Robbins, Administrative Assistant

**Chair Sizemore** called the virtual meeting to order at 9:34AM and mentioned that TVW would be livestreaming the meeting. Director Griffin called the roll to confirm a quorum. **Chair Sizemore** asked for a moment of silence to acknowledge any law enforcement officers that lost their lives since the commission last met.

There were 51 people in attendance.

#### Tab 1

### **Confederated Tribes of Chehalis Reservation**

The Honorable Harry Pickernell Sr., Chairman Confederated Tribes of the Chehalis Reservation and Harry Chesnin, Lead Counsel to the Confederated Tribes of the Chehalis Reservation, Tina Griffin; Director and Jeanine Sugimoto, Special Agent (SA) presented the materials for this tab. Director Griffin began the presentation by explaining the process. The Honorable Harry Pickernell Sr. thanked the Commissioners and staff for their work and gave a brief history about the Chehalis Tribe. SA Sugimoto provided a summary and a detailed account of the compact changes to the Tribe's Amendment.

### **Public Comment**

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

\* Governor Inslee issued <u>Proclamation 20-28.4</u> et al that suspended certain Open Public Meeting requirements, including in-person public meetings requirements for this Commission Meeting.

Commissioner Levy moved to forward the proposed compact amendment to the governor for review and final execution. Commissioner Reeves seconded the motion. The motion passed 7:0

Next steps include forwarding the agreement to Governor Jay Inslee for his signature and final execution.

## Tab 2

## **Presentation – Tribal Contribution**

**Agent in Charge (AIC), Dan Wegenast**; of the Tribal Gaming Unit (TGU) presented the materials for this tab. He started his presentation by explaining that TGU is tasked with ensuring Compact Compliance including the portions of the compact that require Tribal contributions for Community Impacts, Charitable contributions, Problem Gambling, and Smoking Cessation. **Senator Conway** asked for clarification on 2% contributions. **Commissioner Patterson** inquired if all Tribes participate in the contributions themselves. **AIC Wegenast** stated that it depends on the compact. **Senator Conway** asked Director Griffin to consider submitting a formal written report of this information to the legislature. (50.05)

### **Public Comment**

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

## **Presentation - Washington Tribes Build Community**

**Rebecca George**, **Executive Director**; of Washington Indian Gaming Association (WIGA) presented to the commission. She provided the Commissioners an overall look at the contributions that Tribes in Washington contribute to such as communities and nonprofits, local fire, police and local governments that benefit all Washingtonians.

**Representative Kloba** asked if Director George knew of other types of culturally appropriate treatment programs for cultures such as the Asian cultures. She did not.

Commissioners appreciated the information and thanked Director George for her time. To view these materials, go to <u>wsgc.wa.gov</u>.

**Commissioner Levy** commented on a Washington Tribe newsletter that she receives from WIGA saying it is very informational. Director George will send out the link to the Commissioners.

For more WIGA information contact Director George at info@washingtonindiangaming.org.

The public meeting adjourned at 10:59 AM. The Commissioner adjourned to Executive Session where they will discuss current and potential future litigation with legal counsel, including tribal negotiations.

Executive Session adjourned at 3:01 PM on May 12, 2022.

## May Gambling Commission Meeting Minutes Hybrid Meeting \*May 13, 2022

## **Commissioners Present:**

Bud Sizemore (Present) Julia Patterson (Via Teams) Alicia Levy (Present) Kristine Reeves (Via Teams) Sarah Lawson (Via Teams)

## **Ex Officios Present:**

Senator Steve Conway (Via Teams) Representative Kloba (Via Teams)

## **Staff Present :**

Tina Griffin, Director; Tommy Oakes, Interim Legislative Liaison (ILL); and Suzanne Becker, Assistant Attorney General (AAG)

### Staff Present Virtual:

Ashlie Laydon, Rules Coordinator (RC); Julie Anderson, Executive Assistant; Nicole Frazer, Administrative Assistant; Rashida Robbins, Administrative Assistant

Chair Sizemore reconvened day two of the May Commission meeting at 9:33AM and Director Griffin called the roll to confirm a quorum.

### Tab 2

<u>Consent Agenda</u> Commissioner Levy moved to approve the consent agenda as presented by staff. Commissioner Lawson seconded the motion. The motion passed. 5:0

### Tab 5

## Presentation – Hybrid Commission Meeting

**Tina Griffin, Director;** and representatives from World Wide Technologies Client Manager, Jeremy Daniels and Principal Systems Engineer, Christian Mair presented the materials for this tab. World Wide Technologies provided their recommendations to implement a hybrid meeting solution. They provided a complete data analysis of the situation. Their recommendation was a custom-built mobile hybrid solution. They provided costs and answered Commissioners questions. **Commissioner Patterson** was not in favor of spending a lot of money on a new system. She also asked staff to provide her with the costs of traveling to remote places for commission meetings across the state. **Chair Sizemore** suggested because there wasn't any interest in a motion for one of the solutions presented, that the commission table this discussion until August. That would allow staff more time to gather additional information. **Senator Conway** said he would reach out to TVW and talk to them about solutions as well. He asked Representative Kloba to help with talking to legislators regarding this topic.

## **Public Comment:**

Chair Sizemore asked for public comment. There was none.

Commissioner Levy moved that the July (and August) Commission meetings be held at the Liquor and Cannabis Board in their Olympia office.

### Commissioner Patterson seconded the motion. The motion passed 4:0 Commissioner Reeves was not present for the vote.

## **Director's Report**

**Director Griffin** reported that the house banked card room financial report was in the packet and if Commissioners had any questions to let her know. She also mentioned the launch of the Statewide Self-Exclusion Program and thanked Roxane Waldron and the Healthcare Authority for their help with providing 6,000 resource cards in eight different languages. The agency has distributed 5,000 cards to licensees and are in the process of getting the resource cards translated into two more additional languages, Cambodian and Taiwanese. **Director Griffin** also mentioned that the agency was receiving the self-exclusion forms in all capacities.

## **Election of Officers**

Chair Sizemore opened the nominations for Chair and Vice Chair.

Chair Sizemore nominates Commissioner Levy as Commission Chair for the term to begin at the conclusion of today's meeting and end at the election of the new officers in 2023. Commissioner Patterson seconded the nomination. The nomination passed 4:0 One abstention.

Commissioner Levy nominates Commissioner Patterson as Vice Chair for the term to begin at the conclusion of today's meeting and end at the election of new officers in 2023. Commissioner Reeves seconded the nomination. The nomination passed 5:0

## Tab 4

## Agency Request Legislation for 2023

**Tommy Oakes, Interim Legislative Liaison (ILL)** presented the materials for this tab. **ILL Oakes** asked Commissioners for their recommendations for agency request legislation. Once a direction is given, the staff will further research and draft bill language for any agency request legislation for the Commissioners review at the August meeting, and then final approval at the September meeting.

Commissioner Reeves had two specific asks; 1) Statutory framework for hiring a director of a state agency compared to our recent hiring process. And, if any changes would require legislative authorization or executive authorization to change and if so, what that process would look like.2) Legislative strategies around limited law enforcement with certification and training.

**Senator Conway** mentioned that there might be several recommendations coming from the Problem Gambling Task Force Prevalence study. **Commissioner Patterson** said that the Gambling Commission will have a summary overview of the potential recommendations in September, so that the Gambling Commission can fully vet the recommendations and ask questions. But she also said that those recommendations should come from the Healthcare Authority.

Staff is requesting changes to RCW 9.46.0356 concerning promotional contests of chance.

In addition, staff will hold a stakeholder and tribal partners meeting to get feedback from them.

**Director Griffin** announced that the date of the public stakeholder meeting will be on the website soon.

## **Public Comment:**

Chair Sizemore asked for public comment. There was none.

## Tab 6

## Rule Petition to amend - WAC 230-15-150

**Ashlie Laydon, Rules Coordinator** presented the materials for this tab. Jan Espejo, Product Compliance Manager for Light and Wonder, of Las Vegas, Nevada, addressed the commission. He is proposing to amend WAC 230-15-150, selling, and redeeming chips, to allow chips to be sold using debit cards.

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

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

Michael Sackrison with Light and Wonder stated, "we do have the ability to put in some type of velocity controls, whereas there would be delays between using the ATM device. So, for instance, if a patron would use the transaction, they might be prohibited from using it again for another hour or so. All those things can be implemented either by a request of the jurisdiction, or request of the property".

Staff recommends initiating rule-making implementing WAC 230-17-192, Submission of electronic or mechanical gambling equipment during rule making, to ensure the equipment used to accept debit transactions for the purchase of chips meets all requirements of Chapter 9.46 RCW and that any rule changes address staff concerns.

**Commissioner Reeves** asked if this system provide cash advances at a high interest rate, it will only apply to debit card transactions. The petitioner answered yes. Commissioner Reeves also wanted to make sure that staff's perspective that in negotiated compact agreements for what the table limits would be, that there's no way in which this particular tool could create a scenario in which a player could get around the cap table limits that have been set. Director Griffin answered yes. SAS Bill McGregor addressed the commission by stating the withdraw on the debit card has nothing to do with the wager at the table, it only allows the player to purchase chips.

## **Public Comment:**

Chair Sizemore asked for public comment. There was none.

### Commissioner Reeves moved to initiate rule making proceedings by filing the rule as proposed for further discussion. Commissioner Levy seconded the motion. The motion passed 5:0

<u>Default</u> Adam Teal, Interim Legal Manager presented the material for this tab.

Chair Sizemore asked if Michelle T. Ye, CR 2022-00185 was present or online. She was not.

Commissioner Levy moved to revoke Michelle T. Ye's public card room employee license, Number 68-35323 as presented by staff. Commissioner Patterson seconded the motion. The motion passed. 5:0

#### **Public Comment:**

Chair Sizemore asked for public comment. There was none.

**Chair Sizemore** adjourned the public meeting at 11:36PM and announced that the commissioners would be taking a short break then going into Executive Session to discuss current and potential litigation with legal counsel, including tribal negotiations and to review the performance of a public employee.

Executive Session adjourned at 2:04PM and the public meeting adjourned at 2:05PM.



## COMMISSION APPROVAL LIST (New Licenses & Class III Gaming Employees) July 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 37

## ORGANIZATION NAME

LICENSE NUMBER

#### PREMISES LOCATION

**NEW APPLICATIONS** 

## BINGO

AMERICAN LEGION 00017 00-00447 01-02818

FOE 01722 00-00052 01-02814 111 1/2 W MAIN ST CENTRALIA WA 98531

220 WELLS AVE S RENTON WA 98057-2130

## RAFFLE

AMERICAN LEGION 00072 00-01388 02-20953

CENTRALIA ROTARY PROJECT FOUNDATION 00-24953 02-21261

F.H. COE ELEMENTARY SCHOOL PTA 00-24620 02-21113

FALL CITY ELEMENTARY SCHOOL PTSA 2.18.15 00-20710 02-08681

FOE 00013 00-00093 02-00806

HOPESPARKS 00-24798 02-21189

KIWANIS CLUB OF GIG HARBOR 00-20449 02-08616

LC CLOSERS 00-24809 02-21199

LIONS CLUB OF WINLOCK 00-08881 02-09018

MORTON LOGGERS JUBILEE 00-23984 02-20763

MOTO FOR MIRACLES 00-24906 02-21242

PETER KIRK ELEMENTARY PTSA 00-22374 02-21017

PLUMBERS AND STEAMFITTERS LOCAL 598 BIKES FOR TIK 00-24942 02-21255 116 COLLEGE AVE CHENEY WA 99004

701 ALLEN AVE CENTRALIA WA 98531

2424 7TH AVE W SEATTLE WA 98119

33314 SE 42ND ST FALL CITY WA 98024

2822 HOYT AVE EVERETT WA 98201

6424 N 9TH ST TACOMA WA 98406

3711 48TH ST CT GIG HARBOR WA 98332

1001 INTERSTATE AVE CHEHALIS WA 98532

408 SE 2ND ST WINLOCK NA 98596

KNITTLE WAY MORTON WA 98356

4426 N SULLIVAN RD M118 SPOKANE VALLEY WA 99216

1312 6TH ST KIRKLAND WA 98033

3305 W 19TH AVE KENNEWICK WA 99338

## ORGANIZATION NAME

### LICENSE NUMBER

#### **NEW APPLICATIONS**

## RAFFLE

SPOKANE HOOPFEST ASSOCIATION 00-24683 02-21138

THE 5TH AVENUE THEATRE ASSOCIATION 00-22393 02-09283

THE MEMORIAL FOUNDATION 00-24911 02-21243

WHIDBEY ISLAND DANCE THEATRE 00-24849 02-21223

421 WEST RIVERSIDE SUITE 115 SPOKANE WA 99201

1326 5TH AVENUE STE 735 SEATTLE WA 98101

PREMISES LOCATION

3111 TIETON DR YAKIMA WA 98942

714 CAMANO AVE LANGLEY WA 98260

## AMUSEMENT GAMES NONPROFIT

PETER KIRK ELEMENTARY PTSA 00-22374 03-20749

1312 6TH ST KIRKLAND WA 98033

## **PUNCHBOARD/PULL-TAB NONPROFIT**

AMERICAN LEGION 00072 00-01388 05-02413

FOE 00013 00-00093 05-00115 116 COLLEGE AVE CHENEY WA 99004

2822 HOYT AVE EVERETT WA 98201

## PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

ACORN SALOON 00-24887 05-21756

BLIND BUCK 00-24929 05-21770

CHARACTERS CORNER 00-24914 05-21766

HIGH DIVE BAR & GRILL 00-24915 05-21767

JOE'S LOG CABIN 00-24872 05-21752 262 S MAIN ST COLVILLE WA 99114

204 N DIVISION ST STE B SPOKANE WA 99202

6620 SEXTON DR NW OLYMPIA WA 98502

2621 NE SUNSET BLVD RENTON WA 98056

633 N WENATCHEE AVE WENATCHEE WA 98801 ORGANIZATION NAME

LICENSE NUMBER

**NEW APPLICATIONS** 

## PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

SWING LOUNGE 00-24888 05-21757

UNCLE SAM'S SALOON 00-24892 05-21759

3808 N SULLIVAN RD SPOKANE VALLEY WA 99216

8378 W GAGE BLVD KENNEWICK WA 99336

PREMISES LOCATION

## NON HOUSE-BANKED CARD GAME

FOE 00013 00-00093 65-07517 2822 HOYT AVE EVERETT WA 98201

## **HOUSE BANKED CARD GAMES**

FORTUNE CASINO - LACEY 00-24868 67-00347

8318 OUINAULT DR NE LACEY WA 98516

## ANCILLARY SPORTS WAGERING VENDOR

PAYSAFE MERCHANT SERVICES CORP 10-00240 83-00016

SKRILL USA INC. 10-00242 83-00017

SOCURE INC. 10-00241 83-00018 3500 DE MAISONNEUVE BLVD WEST MONTREAL QC H3Z 3C1

2 S BISCAYNE BLVD SUITE 2630 MIAMI FL 33131

885 TAHOE BLVD INCLINE VILLAGE NV 89451

Page 3 of 37

LICENSE NUMBER

EMPLOYER'S NAME PREMISES LOCATION

### **NEW APPLICATIONS**

## **DISTRIBUTOR REPRESENTATIVE**

ALI, SYED S 22-01314

CHERNIVETSKY, SERGEI 22-01308

DERHOUSOFF, DUSTIN D 22-01294

GOODRIDGE, MICHAEL A 22-01306

LUCENA, JESUS M 22-01305

PRIMIANO, CHARLES J 22-01297

NRT TECHNOLOGIES INC LAS VEGAS NV 89118

## MANUFACTURER REPRESENTATIVE

ABUSHHIWA, SALAHEDDIN E 23-03439

AGYEMANG, EVANS G 23-03442

ARUNACHALAM, SHALINI 23-03426

BALLARD, FINLEY P III 23-03452

BANE, THOMAS A 23-01143

BHAWAL, SUSHMITA 23-03455

BRAND, BARRY K 23-03437

BROWN, CHRISTINA M 23-03420

DAVID, JOHN O 23-03394

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

IGT

LAS VEGAS NV 89113

SCIENTIFIC GAMES LAS VEGAS NV 89119

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

SCIENTIFIC GAMES LAS VEGAS NV 89119

SCIENTIFIC GAMES LAS VEGAS NV 89119

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

EVERI PAYMENTS INC LAS VEGAS NV 89113-2175

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

#### Page 4 of 37

LICENSE NUMBER

## EMPLOYER'S NAME PREMISES LOCATION

#### **NEW APPLICATIONS**

## MANUFACTURER REPRESENTATIVE

DAVIS, BRYAN L 23-03432

DIEBOLD, JOHN W 23-03419

DUNAVANT, DANIEL A JR 23-03421

ELANGO MANIVANNAN, PADMANABHAN 23-03427

FOWLER, ERIC R 23-03451

FRITZ, JUSTIN A 23-03405

FULTON, RAEANNE M 23-03416

GEOBLE, DUANE W 23-03440

GREEN, SAMMY D 23-03424

HANKE, PRESTON J 23-03415

HERNANDEZ, RAUL R 23-03448

HOWTON, JAMES E JR 23-01271

HUBINGER, KYLE D 23-03422

HUDSON, CANDACE M 23-03453

JOHANN, NATHANIEL S 23-03435

JONES, KRISTEN L 23-02356 IGT LAS VEGAS NV 89113

ACRES MANUFACTURING COMPANY LAS VEGAS NV 89113

EVERI GAMES INC. AUSTIN TX 78746

SCIENTIFIC GAMES LAS VEGAS NV 89119

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

AGS LLC LAS VEGAS NV 89118

EVERI PAYMENTS INC LAS VEGAS NV 89113-2175

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

TCS JOHN HUXLEY AMERICA INC LAS VEGAS NV 89120

EVERI PAYMENTS INC LAS VEGAS NV 89113-2175

IGT LAS VEGAS NV 89113

IGT LAS VEGAS NV 89113

EVERI PAYMENTS INC LAS VEGAS NV 89113-2175

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

LICENSE NUMBER

## EMPLOYER'S NAME PREMISES LOCATION

#### **NEW APPLICATIONS**

## MANUFACTURER REPRESENTATIVE

JONES, KYLE J 23-03443

KARATUR GOVINDASAMY, BALASUBRAMANIAN 23-03457

KARIMI, NIEKOU A 23-03444

KELLOGG, TRACY R JR 23-03404

KOILRAJ, JEYAPRABU 23-03410

KOTHAPALLI, SRIDHAR 23-01956

LANE, JEFFREY H 23-03438

LUCAS, MICHAEL D 23-03441

MCKINNELL, FAITH 23-03221

MEMMO, CHANCE A 23-03407

MENDEZ, SAUL 23-03446

MUNOZ GUARNIZO, GONZALO 23-03339

NOWLIN, ERIC N 23-03450

PACKRISAMY, ARAVINDH RAJ 23-03428

PHILLIPS, RONALD S III 23-03418

PINKNEY, CHRISTOPHER S 23-03413

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

SCIENTIFIC GAMES LAS VEGAS NV 89119

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

AGS LLC LAS VEGAS NV 89118

SCIENTIFIC GAMES LAS VEGAS NV 89119

SCIENTIFIC GAMES LAS VEGAS NV 89119

AINSWORTH GAME TECHNOLOGY INC LAS VEGAS NV 89118

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

IGT LAS VEGAS NV 89113

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

EVERI GAMES INC. AUSTIN TX 78746

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

SCIENTIFIC GAMES LAS VEGAS NV 89119

ACRES MANUFACTURING COMPANY LAS VEGAS NV 89113

TCS JOHN HUXLEY AMERICA INC LAS VEGAS NV 89120

LICENSE NUMBER

## EMPLOYER'S NAME PREMISES LOCATION

#### **NEW APPLICATIONS**

## MANUFACTURER REPRESENTATIVE

RACANSKY, ADAM J 23-03412

RADHAKRISHNAN, TRISHA 23-02242

RAJENDRAN, PREMKUMAR 23-03429

REISNER, SAMUEL J 23-02334

SAREPALLA, HEMA LATHA 23-03423

SERRAG, HAITHEM N 23-03434

SEVERANCE, DAVID A 23-02236

SHANMUGAM, SELVA KUMAR 23-03411

SHARMA, VIVEK 23-02049

SHOEMAKER, JEFFERY L JR 23-03425

SIGMAN, JANSEN A 23-03414

SMITH, ALLEN C 23-02361

TAYLOR, LOGAN C 23-03417

TRILLANES, RODEL P JR 23-03454

VAN BODEGOM, JOHN S 23-03436

VANG, HOUA W 23-03449

IGT LAS VEGAS NV 89113

SCIENTIFIC GAMES LAS VEGAS NV 89119

SCIENTIFIC GAMES LAS VEGAS NV 89119

IGT LAS VEGAS NV 89113

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

IGT LAS VEGAS NV 89113

SCIENTIFIC GAMES LAS VEGAS NV 89119

NRT TECHNOLOGY CANADA NA M1S5R3

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

TCS JOHN HUXLEY AMERICA INC LAS VEGAS NV 89120

SCIENTIFIC GAMES LAS VEGAS NV 89119

EVERI PAYMENTS INC LAS VEGAS NV 89113-2175

SCIENTIFIC GAMES LAS VEGAS NV 89119

PASSPORT TECHNOLOGY USA INC GLENDALE CA 91203

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

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## EMPLOYER'S NAME PREMISES LOCATION

#### **NEW APPLICATIONS**

## MANUFACTURER REPRESENTATIVE

VENKATESAN, DHANA PRABHA 23-03430

VENKATRAMAN, KAMAKSHI 23-03431

VILLALUZ, ARNEL G 23-02654

VINA, JOSEPH B 23-03409

WALKER, MICHAEL B 23-03456

WARSAW, WHITNEY S 23-03445

WILK, MARK A 23-03447

WILSON, MARCUS W 23-03433

SCIENTIFIC GAMES LAS VEGAS NV 89119

SCIENTIFIC GAMES LAS VEGAS NV 89119

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

SCIENTIFIC GAMES LAS VEGAS NV 89119

SCIENTIFIC GAMES LAS VEGAS NV 89119

ARISTOCRAT TECHNOLOGIES INC LAS VEGAS NV 89135

EVERI PAYMENTS INC LAS VEGAS NV 89113-2175

IGT LAS VEGAS NV 89113

## MAJOR SPORTS WAGERING REPRESENTATIVE

AHN, MICHAEL YOUNG-BIN 33-00301

BHARDWAJ, NEETIKA 33-00302

CIRIC, ZELJKO 33-00309

CLEMENTS, JASON A 33-00282

CRUZ, AMANDA M 33-00300

DOLAN, JOHN C 33-00292

ERICKSON, CHRISTOPHER K 33-00283

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

IGT

LAS VEGAS NV 89113

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

BETFRED SPORTS LAS VEGAS NV 89103

SPORTS INFORMATION SERVICES LIMI TA'XBIEX NA XBX1120

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

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### **NEW APPLICATIONS**

## MAJOR SPORTS WAGERING REPRESENTATIVE

FULLARD, LESLIE J 33-00281

GALIE, DAVID M 33-00287

GIORDANO, LINDSEY M 33-00303

GRILLO, CHRISTOPHER J 33-00285

GUMABON, DAVIN J 33-00272

HE, YUANSHENG 33-00271

KIRAN, PRATYUISH 33-00270

KONCAR, VALERIJA 33-00297

KONSTANTOULAS, EVANGELOS 33-00284

PESIC, DANIJEL 33-00311

RANKOVIC, DEJAN R 33-00310

SIMIC, PREDRAG 33-00296

SLANI, ANA 33-00298

WU, YU 33-00316 NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

IGT LAS VEGAS NV 89113

IGT LAS VEGAS NV 89113

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

IGT LAS VEGAS NV 89113

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

IGT LAS VEGAS NV 89113

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

IGT LAS VEGAS NV 89113

NYX DIGITAL GAMING (USA), LLC LAS VEGAS NV 89119

## MID-LEVEL SPORTS WAGERING REPRESENTATIVE

ZIAMA, KOLU B 34-00013 DRUVSTAR LAS VEGAS NV 89119

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**NEW APPLICATIONS** 

## ANCILLARY SPORTS WAGERING REPRESENTATIVE

WOLLERT, DANIEL A 35-00002

UNITED TOTE COMPANY LOUISVILLE KY 40222

## NON-PROFIT GAMBLING MANAGER

ALDER, APRIL C 61-04792

DIBB, DEBBIE J 61-04793

FRENCH, JAMES L 61-03029

MOORE, WESLIE A 61-04746

SLOAN, LENEILE A 61-04791

FOE 02218 CHELAN WA 98816

FOE 00649 CLE ELUM WA 98922-0000

FOE 00556 CASTLE ROCK WA 98611

FOE 00696 ROSLYN WA 98941

FOE 02622 MOSES LAKE WA 98837

## SERVICE SUPPLIER REPRESENTATIVE

BAILEY, STEPHEN P 63-00702

BAKEN, ANDREW J 63-01033

FELT, WADE G 63-01036

HARRIS, MIKE 63-01040

HUFF, TYRONE P 63-01035

JOHNSTONE, MELISSA M 63-01037

MELLOR, MATTHEW A 63-01032

RUDD, VICTOR D 63-00791

SALISHAN-MOHEGAN LLC VANCOUVER WA 98660

MAVERICK WASHINGTON KIRKLAND WA 98034

TECHNICAL SECURITY INTEGRATION LAKE STEVENS WA 98258

MAVERICK WASHINGTON KIRKLAND WA 98034

MAVERICK WASHINGTON KIRKLAND WA 98034

MAVERICK WASHINGTON KIRKLAND WA 98034

WG-AIRWAY HEIGHTS LLC LAS VEGAS NV 89119

NORTH AMERICAN VIDEO BRICK NJ 08723

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## EMPLOYER'S NAME PREMISES LOCATION

**NEW APPLICATIONS** 

## SERVICE SUPPLIER REPRESENTATIVE

TAKATA, TYLER L 63-01031

ZIAMA, KOLU B 63-01034

TNT DEADPULLS FEDERAL WAY WA 98023

DRUVSTAR LAS VEGAS NV 89119

## **CARD ROOM EMPLOYEE**

| AH YEN, JESSE J<br>68-36764          | В | SILVER DOLLAR CASINO/RENTON<br>RENTON WA 98057                  |
|--------------------------------------|---|---|
| ALI, SALMA M<br>68-36698             | В | ROMAN CASINO<br>SEATTLE WA 98178                                |
| ARELLANO, NOE<br>68-36715            | В | CRAZY MOOSE CASINO/PASCO<br>PASCO WA 99301                      |
| BJORG, GORDON E III<br>68-36710      | В | ZEPPOZ<br>PULLMAN WA 99163                                      |
| BOUNKHOUN, AENOI<br>68-36744         | В | RIVERSIDE CASINO<br>TUKWILA WA 98168                            |
| BRUNO, ANDREW L III<br>68-36775      | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034                         |
| CABALLERO, CRISTO A<br>68-36770      | В | CRAZY MOOSE CASINO/PASCO<br>PASCO WA 99301                      |
| CARDENAS, GUADALUPE J II<br>68-36740 | В | RC'S AT VALLEY LANES<br>SUNNYSIDE WA 98944                      |
| CASTRO, RODNEY C<br>68-32931         | В | RIVERSIDE CASINO<br>TUKWILA WA 98168                            |
| CHAN, THAN<br>68-05599               | В | GREAT AMERICAN CASINO/LAKEWOO<br>LAKEWOOD WA 98499              |
| CHEA, KHUNYE<br>68-36719             | В | SILVER DOLLAR CASINO/RENTON<br>RENTON WA 98057                  |
| CHEN, YAN Y<br>68-31055              | В | RIVERSIDE CASINO<br>TUKWILA WA 98168                            |
| CHICK, CHANNA S<br>68-36695          | В | BLACK PEARL RESTAURANT & CARD I<br>SPOKANE VALLEY WA 99206-4719 |
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## EMPLOYER'S NAME PREMISES LOCATION

## **NEW APPLICATIONS**

| CHUAB, JOHNNY W<br>68-32554     | В | FORTUNE CASINO - RENTON<br>RENTON WA 98055              |
|---------------------------------|---|---|
| COLTHART, PATRICK R<br>68-36772 | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034                 |
| CORNELIUS, CODY J<br>68-34081   | В | THE PALACE<br>LA CENTER WA 98629                        |
| CRAFT, MATT F<br>68-10502       | В | FORTUNE POKER<br>RENTON WA 98057                        |
| DALY, JONATHAN W<br>68-26515    | В | LANCER LANES/REST AND CASINO<br>CLARKSTON WA 99403-2219 |
| DANIEL, IM'UNIQUE J<br>68-36736 | В | SILVER DOLLAR CASINO/RENTON<br>RENTON WA 98057          |
| DAVIS, RAZHANE L<br>68-36702    | В | GREAT AMERICAN CASINO/LAKEWOO<br>LAKEWOOD WA 98499      |
| DE ARMOND, KEVIN M<br>68-36771  | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034                 |
| DOOLITTLE, JUSTIN D<br>68-25559 | В | LAST FRONTIER<br>LA CENTER WA 98629-0000                |
| DUFFER, RUSSELL H<br>68-36701   | В | ALL STAR CASINO<br>SILVERDALE WA 98383                  |
| EDWARDS, PATRICIA E<br>68-34979 | В | GOLDIES SHORELINE CASINO<br>SHORELINE WA 98133          |
| ELLIS, DAVID A<br>68-36757      | В | MACAU CASINO<br>TUKWILA WA 98188                        |
| ELVIRA, ALEJANDRO A<br>68-36761 | В | COYOTE BOB'S CASINO<br>KENNEWICK WA 99336               |
| EMERY, JOSEPH L<br>68-36765     | В | RIVERSIDE CASINO<br>TUKWILA WA 98168                    |
| FAGA, POUTOA I<br>68-36721      | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499              |
| FAILAUGA, SAVOEUN S<br>68-36717 | В | MACAU CASINO<br>LAKEWOOD WA 98499-4457                  |
|                                 |   |   |

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## EMPLOYER'S NAME PREMISES LOCATION

## **NEW APPLICATIONS**

| FETZER, ELIJAH L<br>68-36780      | В | FORTUNE CASINO - TUKWILA<br>TUKWILA WA 98168                    |
|-----------------------------------|---|---|
| FRASER, SEAN N<br>68-36749        | В | FORTUNE CASINO - LACEY<br>LACEY WA 98516                        |
| GRAHAM, JADEYN A<br>68-36712      | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034                         |
| GREEN, PADRIC J<br>68-36687       | В | FORTUNE CASINO - LACEY<br>LACEY WA 98516                        |
| GRUBBS, DARREN C<br>68-36693      | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034                         |
| HACKERSON, DONTAY S<br>68-36751   | В | GREAT AMERICAN CASINO/LAKEWOO<br>LAKEWOOD WA 98499              |
| HARRINGTON, WESTLEE O<br>68-36711 | В | LANCER LANES/REST AND CASINO<br>CLARKSTON WA 99403-2219         |
| HARRIS, SKYLER A<br>68-36742      | В | IRON HORSE CASINO<br>AUBURN WA 98002                            |
| HAYDEN, SAMANTHA P<br>68-36781    | В | BLACK PEARL RESTAURANT & CARD I<br>SPOKANE VALLEY WA 99206-4719 |
| HIN, ROEN<br>68-18923             | В | LUCKY DRAGONZ CASINO<br>SEATTLE WA 98178                        |
| HODAPP, JOHN B<br>68-34646        | В | GREAT AMERICAN CASINO/EVERETT<br>EVERETT WA 98204               |
| HOWLE, BRANDON T<br>68-36725      | В | SILVER DOLLAR CASINO/RENTON<br>RENTON WA 98057                  |
| HUANG, MIAOLING<br>68-34846       | В | FORTUNE CASINO - TUKWILA<br>TUKWILA WA 98168                    |
| HUNTER, DAVID B<br>68-36696       | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499                      |
| HUYNH, LIEN M<br>68-36754         | В | MACAU CASINO<br>TUKWILA WA 98188                                |
| ILANO, JED ADRIEL D<br>68-36778   | В | FORTUNE CASINO - TUKWILA<br>TUKWILA WA 98168                    |

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## **NEW APPLICATIONS**

| IM, SEREY<br>68-36758                | В | GREAT AMERICAN CASINO/TUKWILA<br>TUKWILA WA 98168         |
|--------------------------------------|---|---|
| JACKSON, JEREMY J<br>68-35204        | В | GREAT AMERICAN CASINO/TUKWILA<br>TUKWILA WA 98168         |
| KEO, SREYCHAN<br>68-32790            | В | RIVERSIDE CASINO<br>TUKWILA WA 98168                      |
| KIM, KIEN<br>68-17260                | В | LUCKY DRAGONZ CASINO<br>SEATTLE WA 98178                  |
| LI, JIAXIAN<br>68-36762              | В | ROMAN CASINO<br>SEATTLE WA 98178                          |
| LIMA, ASANDRA M<br>68-36731          | В | GREAT AMERICAN CASINO/TUKWILA<br>TUKWILA WA 98168         |
| LONG, CHANDARA<br>68-30465           | В | MACAU CASINO<br>LAKEWOOD WA 98499-4457                    |
| LUU, HONG D<br>68-09343              | В | LAST FRONTIER<br>LA CENTER WA 98629-0000                  |
| LYNGSTAD, CASSANDRA A<br>68-36727    | В | LILAC LANES & CASINO<br>SPOKANE WA 99208-7393             |
| MC CANN, KEVIN M<br>68-36774         | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034                   |
| MEYER, NORIKO<br>68-36752            | В | FORTUNE CASINO - LACEY<br>LACEY WA 98516                  |
| MINTON, JAYCE D<br>68-36700          | В | BUZZ INN STEAKHOUSE/EAST WENAT<br>EAST WENATCHEE WA 98802 |
| MOCTEZUMA, MIGUEL L<br>68-36723      | В | RC'S AT VALLEY LANES<br>SUNNYSIDE WA 98944                |
| MOHAN, ASHWINI R<br>68-36745         | В | MACAU CASINO<br>LAKEWOOD WA 98499-4457                    |
| MUSSELWHITE, KYLIE D<br>68-31885     | В | NOB HILL CASINO<br>YAKIMA WA 98902                        |
| MYERS-JAUREGUI, JOSHUA R<br>68-36718 | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034                   |
|                                      |   |   |

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## EMPLOYER'S NAME PREMISES LOCATION

## **NEW APPLICATIONS**

| NGUYEN, QUINN T<br>68-05583      | В | RIVERSIDE CASINO<br>TUKWILA WA 98168                            |
|----------------------------------|---|---|
| NOINALA, THANYARAT<br>68-36756   | В | ROXY'S BAR & GRILL<br>SEATTLE WA 98126                          |
| OROZCO, HEATHER L<br>68-36716    | В | CASINO CARIBBEAN<br>YAKIMA WA 98901                             |
| OZUNA, VANESSA B<br>68-33114     | В | RC'S AT VALLEY LANES<br>SUNNYSIDE WA 98944                      |
| PARO, DEREK J<br>68-36714        | В | LAST FRONTIER<br>LA CENTER WA 98629-0000                        |
| PEDERSEN, BRANDELL S<br>68-36737 | В | LOGGERS INN<br>SULTAN WA 98294                                  |
| PERMIN, TYLER A<br>68-36729      | В | WILD GOOSE CASINO<br>ELLENSBURG WA 98926                        |
| PHAN, CHHEA<br>68-23867          | В | MACAU CASINO<br>LAKEWOOD WA 98499-4457                          |
| PICKERING, STEVEN R<br>68-36728  | В | BLACK PEARL RESTAURANT & CARD I<br>SPOKANE VALLEY WA 99206-4719 |
| POM, HEIDI<br>68-35942           | В | LUCKY DRAGONZ CASINO<br>SEATTLE WA 98178                        |
| PROEUNG, SOPHEA<br>68-10890      | В | GREAT AMERICAN CASINO/TUKWILA<br>TUKWILA WA 98168               |
| PROM, CHAN L<br>68-34127         | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499                      |
| RA, BRITTANY S<br>68-33171       | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499                      |
| REISWIG, MICHAEL I<br>68-36741   | В | MACAU CASINO<br>TUKWILA WA 98188                                |
| REITAN, CHRISTINE R<br>68-36739  | В | CRAZY MOOSE CASINO/PASCO<br>PASCO WA 99301                      |
| RICH, KALEE S<br>68-36784        | В | BUZZ INN STEAKHOUSE/EAST WENAT<br>EAST WENATCHEE WA 98802       |
|                                  |   |   |

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## EMPLOYER'S NAME PREMISES LOCATION

## **NEW APPLICATIONS**

| ROBERTSON, CATHLEEN A<br>68-36748 | В | MACAU CASINO<br>LAKEWOOD WA 98499-4457                          |
|-----------------------------------|---|---|
| SALGADO-NAVA, STEVEN<br>68-36704  | В | RC'S AT VALLEY LANES<br>SUNNYSIDE WA 98944                      |
| SAM, MELINDA A<br>68-36776        | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499                      |
| SATHER, MAVERICK B<br>68-36779    | В | CRAZY MOOSE CASINO/PASCO<br>PASCO WA 99301                      |
| SENG, SOPHORN<br>68-26058         | В | RIVERSIDE CASINO<br>TUKWILA WA 98168                            |
| SHARP, BRANDON D<br>68-36722      | В | LILAC LANES & CASINO<br>SPOKANE WA 99208-7393                   |
| SHIN, EVELYN S<br>68-36734        | В | MACAU CASINO<br>LAKEWOOD WA 98499-4457                          |
| SIAGATONU, MOSE JR<br>68-36746    | В | MACAU CASINO<br>TUKWILA WA 98188                                |
| SMITH, BRANDI A<br>68-36703       | В | GREAT AMERICAN CASINO/LAKEWOO<br>LAKEWOOD WA 98499              |
| SOEUM, SOPHEAP<br>68-29861        | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499                      |
| SOK, PRAKSOVANNDANY S<br>68-36705 | В | BLACK PEARL RESTAURANT & CARD I<br>SPOKANE VALLEY WA 99206-4719 |
| SON, VICKY<br>68-21971            | В | FORTUNE CASINO - RENTON<br>RENTON WA 98055                      |
| SPRINGS, MADGE L<br>68-36743      | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499                      |
| STIERS, KRISTEN L<br>68-36726     | В | CASINO CARIBBEAN<br>YAKIMA WA 98901                             |
| STYRON, MORGAN K<br>68-36750      | В | COYOTE BOB'S CASINO<br>KENNEWICK WA 99336                       |
| SYAHPHAY, MA LEE VANH<br>68-36777 | В | CRAZY MOOSE CASINO/PASCO<br>PASCO WA 99301                      |
|                                   |   |   |

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## EMPLOYER'S NAME PREMISES LOCATION

## **NEW APPLICATIONS**

| SZRAMA, ANTHONY L<br>68-13182   | В | FORTUNE CASINO - LACEY<br>LACEY WA 98516          |
|---------------------------------|---|---|
| TANG, VICTOR<br>68-36747        | В | SILVER DOLLAR CASINO/RENTON<br>RENTON WA 98057    |
| THOMAS, ERIC C<br>68-36699      | В | ROMAN CASINO<br>SEATTLE WA 98178                  |
| THOMPSON, MARCELLUS<br>68-36760 | В | ROMAN CASINO<br>SEATTLE WA 98178                  |
| TILLMAN, TARA L<br>68-35079     | В | CASINO CARIBBEAN<br>YAKIMA WA 98901               |
| TOUCHINE, ELAINE<br>68-30170    | В | CHIPS CASINO/LAKEWOOD<br>LAKEWOOD WA 98499        |
| TRAN, ANDREW S<br>68-36766      | В | FORTUNE CASINO - TUKWILA<br>TUKWILA WA 98168      |
| WALKER, NATASHA M<br>68-36755   | В | GREAT AMERICAN CASINO/TUKWILA<br>TUKWILA WA 98168 |
| WIDGER, MONIQUE T<br>68-36673   | В | FORTUNE CASINO - LACEY<br>LACEY WA 98516          |
| WILLIAMS, DEANNA L<br>68-36713  | В | CASINO CARIBBEAN<br>YAKIMA WA 98901               |
| WU, PENG Y<br>68-16094          | В | RIVERSIDE CASINO<br>TUKWILA WA 98168              |
| WU, QI H<br>68-19696            | В | ROMAN CASINO<br>SEATTLE WA 98178                  |
| WU, XINGXIAN<br>68-36763        | В | ROMAN CASINO<br>SEATTLE WA 98178                  |
| XIAO, ZHIYI<br>68-36773         | В | CARIBBEAN CARDROOM<br>KIRKLAND WA 98034           |
| XIE, KATIE<br>68-16929          | В | RIVERSIDE CASINO<br>TUKWILA WA 98168              |
|                                 |   |   |

#### PERSON'S NAME

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#### **NEW APPLICATIONS**

## CLASS III GAMING EMPLOYEE

### CHEHALIS CONFEDERATED TRIBES

BARELA, BRIDGET L 69-52237

BLANKENSHIP, SARAH J 69-52355

DOWNING, DANIEL D 69-52356

GLENN, HOLLY A 69-08200

HORRACE, BENJAMIN L 69-52485

MATTOX-HANSON, DANIEL K 69-52682

MILLER, ROBERT J 69-33443

OLSEN, NICHOLAS T 69-41770

RANDT, ANNE M 69-52426

SPAKE, JENNIFER A 69-52559

BARTLETT, JAMES E 69-52317

BURNETT, ARICK L 69-52557

EDGIN, KEVEN T 69-52338

GRACE, SHANTINA R 69-52395

KINSWA, CHEYANNE M 69-52680

MILLER, ERIK T 69-52503

MULLER, SAMUEL E 69-42733

RAFAYETULLAH, AMBER S 69-32998

SERRANO, GILBERT 69-35292

THOMAS, CARISSA L 69-52560

### COLVILLE CONFEDERATED TRIBES

BUCSKO, ROBERT III 69-52500

CLARK, ARIEL L 69-31738 CARDONA, JO ANN 69-52414

COBLE, KASSIDY S 69-52586

#### PERSON'S NAME

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## **NEW APPLICATIONS**

## CLASS III GAMING EMPLOYEE

### COLVILLE CONFEDERATED TRIBES

DIDDOCK, CHRISTINA J 69-52428

FLORES-GUZMAN, MARIA E 69-52331

HERNANDEZ, PEDRO S 69-24908

ISENHART, THOMAS B 69-45584

JONES, BARTOLOME F 69-52494

NUNEZ, ADRIAN I 69-52497

PIO, CARMEN A 69-52608

YOUNG, MICHAEL D 69-52501

ERICKSON, CARL J 69-52693

FULTON, SHYLEEN E 69-52493

HILDRETH, TIANNA H 69-45669

JACK, MONICA S 69-48639

KENCK, EUAN V 69-52587

PARKS, MATTHEW R 69-52498

WESTBROOK, KIRK D 69-52499

### COWLITZ INDIAN TRIBE

ALCORAN, NOEL P 69-52590

ARELLANO, SELENA 69-52509

BEAN, JESSICA N 69-52464

BLUNCK, DANA L 69-52639 ANDERSON, SHIELA ANN G 69-52513

BATE, THOMAS G 69-52284

BIERSCHBACH, GRANT B 69-52288

BOBBETT, MAXWELL T 69-52613

#### PERSON'S NAME

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## **NEW APPLICATIONS**

## **CLASS III GAMING EMPLOYEE**

### COWLITZ INDIAN TRIBE

BOTTA, MIA L 69-52466

BRIGGS, LANNI S 69-52456

COOKE, LESTER D 69-41373

EDGE, ERNEST R 69-52547

FLORES, JORDAN A 69-50045

GULLIFORD, ANDREW L 69-52326

HAIR, THOMAS E 69-52435

HOLLINGSWORTH, MICHAEL E 69-52411

HOWARD, GRACE H 69-52408

KAMMERER, JUSTIN A 69-46231

KELLEY, RYAN J 69-52279

KINSWA-GAISER, PATRICIA M 69-52386

BRENTANO, ELISSA A 69-52593

CASWELL, EKRAM 69-45911

DOLATA, DUSTIN D 69-52564

FIFE, BRIA L 69-42120

GRAVES, JAMES T 69-52576

GULTIANO, CARMEN V 69-52514

HAMMERS, CHASE H 69-52341

HOOK, PAMELA K 69-52592

HUSEMOEN, ERIC O 69-52462

KASINGER, TERI L 69-52287

KERR, BRITTNEY M 69-52596

KNUTSON, JACOUELINE J 69-52295

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## **NEW APPLICATIONS**

## **CLASS III GAMING EMPLOYEE**

### COWLITZ INDIAN TRIBE

LACASSE, JOEL D 69-52612

MACIAS, ANNALYSIA J 69-52510

MAYCHROWITZ, MATTHEW R 69-52469

MCNABB. HONIE M 69-52565

MURRAY, STEVEN A 69-52470

OAKES, MATTHEW B 69-52580

RAMON, CHLOE M 69-52591

SHATAVA, MILDRED A 69-52548

TORRES, CAMMY P 69-52615

WASHBURN, JEFFREY G 69-52463

WILCOX, MATTHEW A 69-52642

WISNER, SASHA G 69-48127 LAVALLEY, WILLIAM D 69-52286

MARTIN, SHAWNA R 69-42630

MCCANN, AALIYAH M 69-52417

MINOR, TRACY A 69-52641

MYER, ALEXANDER M 69-52640

PERVISKI, RAYMOND J 69-52324

ROTH, CHRISTOPHER 69-52410

TANGCHITKORSAKUN, PIMPITCHA 69-52546

WARD, JEREMIAH I 69-52611

WHITE, CONNIE A 69-52278

WILLIAMS, ANTHONY H 69-52296

YOUNG, JAYDON N 69-52409

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## **NEW APPLICATIONS**

## **CLASS III GAMING EMPLOYEE**

### COWLITZ INDIAN TRIBE

ZHANG, LI 69-52594

#### KALISPEL TRIBE

BABINSKI, CORTNIE M 69-52400

CHRISTENSEN, TUCKER W 69-52430

COLLINS, BRIAN M 69-52604

DALYAN, HAKAN 69-47628

ELLIS, OLIVIA 69-52621

HENDERSHOTT, ROSS A 69-52572

MCCORD, NICOLE S 69-52655

MIGLIARESE, FRANCESCO 69-37240

PAVLIC, JENNIFER J 69-52573

ROACH, DEVIN M 69-52656

VANNORMAN, RICHARD L II 69-52574

BEBOUT, BRITNEY L 69-52603

COCHRANE, ASHLEY M 69-52363

CONNACHER, JENNA M 69-52457

DIERKS, AUSTIN M 69-52575

FOZZARD, JANIS M 69-16060

JACKSON, ANDREW J 69-52399

MCNEILLY, JOSEPH I 69-52620

MURPHY, TAYLOR R 69-52429

REED, KEEGAN T 69-52362

TOMAR, RIYA 69-52455

WALLACE, PATRICK M 69-52325

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## **NEW APPLICATIONS**

## CLASS III GAMING EMPLOYEE

### KALISPEL TRIBE

WETZLER, LUKE F 69-52605

WILSON, DEREK J 69-52431 WIESE, AVERY J 69-52467

WOHALI, CASIE L 69-52619

#### LUMMI NATION

AGERUP, DANIEL W 69-52437

CULTEE, CLIFFORD A 69-52654

GARCIA, PRISCILLA 69-52549

JAMES, DENISE M 69-25528

KAMKOFF, HENRY F 69-52554

NEAL, JAKIB J 69-52645

PARROTT, SASHA R 69-52614

SALDIVAR, MANUEL S 69-52528

SIMPSON, MITCHELL E 69-52529

WILLIAMS, CARLENE D 69-52637

ALLEN, GEORGIA A 69-52550

FINKBONNER, BRIDGETT R 69-36624

GEPNER, AARON M 69-52556

JAMES, DORIAN A 69-52551

LARSON, LILLIAN L 69-52555

NOLAND, TAMERA C 69-52348

PERRIN, JOHN S 69-45028

SEUEN, NEUM 69-30996

VILLAVER, MICHAEL J 69-46457

WORKMAN SMITH, BENJAMIN A 69-49536

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## **NEW APPLICATIONS**

## CLASS III GAMING EMPLOYEE

## MUCKLESHOOT INDIAN TRIBE

ADAMS, CODY A 69-52563

AVILA, EVAN J 69-52305

BROWN, RUSSELL L 69-52345

CHON, MIKE H 69-52471

FINAU, DAVID A 69-52340

HARDING, AARON C 69-52472

HUTSON, JYSANI K 69-52381

MALABANAN, SHENNA C 69-52618

MILLER, TRYSTEN N 69-52307

MORGAN, KADY L 69-52473

PULOKA, MADELINE L 69-52524

REMPEL, JESSE J 69-52433 ANDERSON, JOSEPH W 69-30347

BROWN, KATIE J 69-52666

CHAVEZ, JESSICA R 69-52306

DUARTE, LAOUINA M 69-39254

GOURDINE, TAMMY L 69-08521

HEYDLAUFF, WESLEY A 69-52665

KOCH, CAMERON T 69-49540

MAXEY, LANCE R 69-52304

MOLIGA, AUMAGATAU T 69-52636

OLIVER, LORI A 69-25048

RAIFORD, MICHAEL A 69-52562

SAMII, CAMERON J 69-52664

#### PERSON'S NAME

**CERTIFICATION / ELIGIBILITY NUMBER** 

## **NEW APPLICATIONS**

## **CLASS III GAMING EMPLOYEE**

### MUCKLESHOOT INDIAN TRIBE

SOLO, KALOB E 69-52392

SUMERLIN, NATHAN T 69-52308

69-52617

STRONG, MAURICE A

THOMPSON, ANTHONY L 69-52523

VARGAS VALLES, AARON L 69-52385

WARD, CEDRICK M 69-52634

#### NISQUALLY INDIAN TRIBE

CLARKE, LEVI S 69-52517 ELLIS, ROBIN J 69-15460

VILAI, STAR M

69-52522

EVERYBODYTALKSABOUT, DISHANE E 69-47582

GIFFIN, RYAN W 69-52516

ISENBERG, RICHARD J 69-52553

MONELO, JAY L 69-52412

PERRINE, CANDICE L 69-43218

WHITTINGTON, THEODORE A 69-45956

FONTANOS, ANGELICA B

69-52432

HERNANDEZ, MELANIE M 69-52364

MEYER, COURTNEY A 69-33496

PEREIRA, GISELLE F 69-50269

ROBERTO, BERNADETTE F 69-52552

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#### PERSON'S NAME

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## **NEW APPLICATIONS**

## **CLASS III GAMING EMPLOYEE**

### NOOKSACK INDIAN TRIBE

ALVAREZ, DEANNA D 69-52289

HETRICK, BRADEN T 69-52318

WALL, RALONDA R 69-38249 FLEMING, TESSA C 69-52446

THOMPSON, PARKER A 69-52515

YODER, MARY D 69-52488

#### PORT GAMBLE S'KLALLAM TRIBE

BELGARDE, RILEY C 69-52366

ELLINGSEN, ROBERT I 69-52402

GOLDEN, KALEB A 69-44406

JAUREGUI, JACOB M 69-52599

MOWRY, ALEXANDER L 69-52448

OXFORD, KEVIN J 69-52368

RAVINE, STEVEN 69-52370

SAMONTE, MAY ANNE M 69-52371

COX, JAXON I 69-52274

EVANS, TREVOR D 69-52447

HALD, KARSTEN W 69-52403

MILLER, RONDA D 69-52600

O'CONNOR, SEAN M 69-52367

PIAZZA, JULIE M 69-52369

REILLY, JOHN A 69-52449

SWINNEY, BRIONNA D 69-52372

#### PERSON'S NAME

**CERTIFICATION / ELIGIBILITY NUMBER** 

## **NEW APPLICATIONS**

## **CLASS III GAMING EMPLOYEE**

### PUYALLUP TRIBE OF INDIANS

AHPING, LELESIO JR 69-52653

ARCHER, EVAN Y 69-52461

BANNON, ERIC L 69-52589

BUTLER, ROBERT W 69-52354

CALDERON, JOSEPH E 69-52588

CLARK, JOSEPH T 69-52650

DAVIS, STEPHEN A JR 69-52520

EAGLE, KEEGAN T 69-52610

FAAATUATU, AIGA 69-52651

FALEALII, MIKA T 69-40667

GAISOA, RICK P 69-52583

GANITANO, YVAN J 69-52406 ALAIMALO, VANESSA R 69-52216

AUPAAU, MAASIASI 69-52623

BRISCOE, CAMRON R 69-52585

CAGAMPAN, LAWRENCE S 69-52704

CALES, BRIAN R 69-52584

CRAFT, MATT F 69-37148

DELE, SHENAYA M 69-38614

ESPINOSA, DAVID A 69-52330

FAILAUTUSI, FREDA V 69-52526

FISHER, KATHLEEN L 69-52578

GALICIA, AMI 69-52702

GEORGE, SYLVIA S 69-52519

#### PERSON'S NAME

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## **CLASS III GAMING EMPLOYEE**

### PUYALLUP TRIBE OF INDIANS

GOBRIGHT, MARITA O 69-52688

HALL, DARRYL S 69-52442

JOHNSON, SARAH M 69-52652

JORDAN, PIERRE R 69-52351

KIRKMAN, NIKEE L 69-52609

LA FOUNTAINE, ALEX G 69-32934

LANDRIE, CARMEL 69-52458

LOK, PRISCILLA M 69-15128

MAGNUSON, MARK C 69-52439

MATURI, FRANK D 69-52581

MEJIA BARCENAS, EDUARDO 69-52339

MITCHELL, DWAYNE D 69-48728

GOTTFRIEDSON, SPAP-ULL K JR 69-52527

HANDLEY, NICO G 69-52539

JONES, DENITA A 69-52582

KEN, TYLER T 69-52518

KNAACK, DAWN D 69-52459

LACROIX, JOHN S 69-12796

LILLY, CRYSTAL M 69-45963

LY, VOUCH L 69-52353

MANE, ROCKY P 69-43940

MAYES, JOHN G II 69-52393

MERIDA DE BORJAS, MAURIS H 69-52329

MONTIJO, MICHELLE F 69-52415

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## **NEW APPLICATIONS**

## CLASS III GAMING EMPLOYEE

### PUYALLUP TRIBE OF INDIANS

NATAC, HAGEN B 69-52625

OFAGALILO, LARRY F 69-52460

PAINE, ADRIEL B 69-52407

RAMOS VARELA, LUIS A 69-52352

RODRIGUEZ-SAMPSON, ALEJANDRO R 69-52434

SHIFLET, EDWARD J 69-52715

SHORT, ILZE I 69-52703

SWANSON, ALAN W 69-52622

TORRES, MELISSA R 69-52416

VELAZOUEZ-CARABALLO, MELBA E 69-52496

WARD, JAYMES A 69-44385

WINCHELL, LANCE R 69-52384

NAVARRO, MYKHEL J 69-52440

OLA, JOSHUA O 69-52487

PARKER-COLEMAN, DAVID D 69-52350

RIVERA, DARNELL T 69-47314

SAVUSA, ROBERT S 69-52383

SHIRTS, KURTIS J 69-52441

SIN, SARAB 69-52495

TOM, JOSEPH A JR 69-52382

UMAGAT JARATA, MIKHAEL A 69-52689

WARD, CARLEENA M 69-52538

WEISENBACH, TERRIKA M 69-20731

WOMACK, AUDRE A 69-52714

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### **NEW APPLICATIONS**

## **CLASS III GAMING EMPLOYEE**

### PUYALLUP TRIBE OF INDIANS

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YOUNG, CASSANDRA D

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HOWARD, JONATHAN N 69-52413

LONG, ECHO L 69-15586

MONTGOMERY, EVANGELINE P 69-52313

MUSCAT, MELISIA R 69-15771

YOUNG, SEAN P 69-52443 LEESON, CHRISTOPHER R 69-52486

MACDONALD, JESSICA L 69-52490

MURPHY, RONAN C 69-52312

PORTULANO, ANDREW M 69-52357

#### SKOKOMISH TRIBE

ASHWORTH, SANDRA K 69-52320

BECK, WYATT J 69-35687

CARNAHAN, JAMES C 69-52404

#### SNOQUALMIE TRIBE

AGUILERA MONTERO, KEIVA C 69-52476

BINDER, JOSEPH D 69-52668

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## CLASS III GAMING EMPLOYEE

### SNOQUALMIE TRIBE

CHEN, MIAODAN 69-52478

DAHL, THOMAS H 69-52389

ELDRIDGE, BRADYN J 69-52667

HSU, LICHI 69-52477

LUO, SIHUA 69-52482

MALDONADO, RICARDO N 69-52568

PHILLIPS, DEMETRIUS J 69-49882

RUTHROFF, KATIE J 69-52335

TANCRETO, NICHOLAS P 69-52480

WALCOTT, VINCENT E 69-52425

WYATT, CHRISTOPHER C 69-52673

AKINS, CARMI JOY B 69-52451

CHENG, SHUMIN 69-52481

DURFEY, TIMOTHY T 69-52672

FOSTER, SARAH N 69-52424

KOEUTH, SODARA 69-52483

MAKHELLA, MEKHDI-KONSTANTIN K 69-52423

MCLAGLEN, ERIC P JR 69-52566

RONDEAU, WILLIAM T 69-52484

SIN, NAIHEANG 69-52479

TRAN, HAU 69-52475

WHITE, PATRICK J 69-52671

YU, PING 69-52507

#### SPOKANE TRIBE

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BARR-CLENDENNEN, JENNIFER M 69-52281

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SIJOHN, ISAAC K 69-52358

WILSON, GRANT A 69-52303

## BIENHOFF, JAMIE L 69-52508

MANN, VICTORIA L 69-52359

VERCRUYSSE, DEAN J 69-52321

#### SQUAXIN ISLAND TRIBE

ALEXANDER, LUCIA G 69-18319

BROWER, SEAN A 69-48221

COOK, BRIAN R 69-52607

COYLE, CRYSTAL L 69-52492

DION, MADISON K 69-52606

FLINT, JAMES L 69-52631

GONZALES-PAIZ, ANTONIO 69-52438

HAWLEY, RONALD T 69-52316

BAKER, MICHAELA L 69-52319

CANNON, WILLIAM B 69-48087

COUNTY OSTENSON, HUNTER Z 69-52628

DAHIR, NADIFA A 69-52540

ELLISON, JOHN M 69-52391

FRIZZELL, REBEKAH N 69-52542

GONZALEZ ORTIZ, ORLANDO 69-52541

HILL, TJADA K 69-52343

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### SQUAXIN ISLAND TRIBE

MACHOVSKY, JENNIFER 69-52465

NOGLE, DAVID A 69-09891

RADLEY, CHRISTIAN N 69-31975

SPIKER, COREY M 69-52450

WARMAN, AJAY E 69-52401

MCEACHERN, JOANNE E 69-52577

PHIWTHONG, VERONICA L 69-52344

SMITH, CHEYENNE C 69-52365

STRICKLAND, SHANNON D 69-52489

### SUQUAMISH TRIBE

BREUER, KEVIN L 69-52663

DALTON, TRAVIS J 69-52646

DEAN, MICHAEL A 69-52360

FITZPATRICK, TONYA K 69-52534

MALONE, CHARLES J 69-52531

OROZCO BECERRA, PRESCILLA 69-52648

SCHELL, ROY C 69-52649 CALDWELL, CORI J 69-52535

DAWSON, KOLE A 69-52474

DUMAS, JAYON M 69-52533

GARRETT, AARON M 69-20281

MCKAY, ALLISON C 69-52543

POS, DAKOTA R 69-52521

SCHROEMER, KATARINA C 69-52530

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### SUQUAMISH TRIBE

SCHWITZER, CODY L 69-39861

WILD, JAMIE L 69-52647

ZHU, YUNPENG 69-52701

## SWINOMISH INDIAN TRIBAL COMMUNITY

CABATAY, RODRIGO B 69-52525

CRISCUOLA, MARIANNE M 69-52427

GOMEZ, KRICELLA A 69-52601

LYDEN, JOHN A 69-34081

CARRILLO-MCNINCH, AMANDA K 69-52602

DAN, DARRYL D 69-52322

HUNTER-MEEDEN, EVAN L 69-52679

RUSHIN, TEASA L 69-45688

### THE TULALIP TRIBES

BAKER, JEROME 69-52571

BAZAN, STACEY L 69-11417

BENDER, BRANDY L 69-46998

BUSTOS, ASHLEY D 69-52569

COBB, SHANNON A 69-52627

BARBOSA MANRIOUEZ, HUGO 69-52454

BEGAY, JOANN P 69-00421

BLACKFORD, TRAVIS E 69-28303

CLARK, CHERYL M 69-35731

COLTON, SCOTT W 69-52597

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## **CLASS III GAMING EMPLOYEE**

### THE TULALIP TRIBES

FAULKNER, MORIAH A 69-52436

GOOCH, AMANDA J 69-52598

HARRIS, JEREMY A 69-52332

HENDERSON, MISTY A 69-16140

HUFF, HOLLY K 69-52333

LINDELL, KAYLA M 69-52419

MOSS, CHARLES R 69-52337

RUTLEDGE, ROBERT E 69-52570

SIRIWATANARONGROJ, VACHARA 69-28424

STONE, JASON P 69-27382

WALTON, WILLIAM J II 69-20175

GOERS, NATHANEAL D 69-48152

GOVENDER, NALAN 69-52595

HART, MICHAEL J III 69-52265

HINTON, MARK W 69-52630

LARKIN, JESSICA J 69-52418

MANGLONA, JESSE S 69-36472

O'BANNON, MARJORIE K 69-52626

SCHULTZ, JENNIFER E 69-52504

SMITH, BROOKE M 69-38136

TATARAN, ANDREW E 69-52420

WILDE, AMBER L 69-52505

### UPPER SKAGIT INDIAN TRIBE

CHARTIER, RUTH N 69-52397

COGGINS, DAVID R 69-52691

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## **CLASS III GAMING EMPLOYEE**

### UPPER SKAGIT INDIAN TRIBE

DSIO, SYANNA E 69-52692

MARANDOLA, WILLIAM J 69-52658

PRICE, ZACHARY S 69-52558

JOHNSTON, THOMAS S 69-52686

PETERSON, DEREK C 69-52468

WILLIAMS, EDWINA R 69-19642

#### YAKAMA NATION

AROUETTE, LINDA D 69-52698

DAVIS, DOMINIC R 69-26888

GLEASON, ALFRED H JR 69-22206

GUTIERREZ, ELIZABETH 69-52544

JOHNS-WINISHUT, CHRISTA K 69-49153

LAVALLIE, JEFFREY R 69-36149

NEGRETE, JASMIN 69-48570

SOLIS, ROMARIO L 69-52700

TAKESGUN, ANNIE M 69-42352

69-40415

BILL, SHAYLA E

GALEANA, CLAUDIA K 69-36492

GUDINO-RODRIGUEZ, VALERIA I 69-44509

HERNANDEZ-LOPEZ, EDUARDO 69-52616

KOERNER, LLOYD H JR 69-52405

MEDINA, MARISSA L 69-52545

ORNELAS, ASHLEY M 69-52699

STWYER, ANGELA M 69-32216

TAKESGUN, CHRISTINA L 69-09727

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## **CLASS III GAMING EMPLOYEE**

## YAKAMA NATION

TYSON, DANIEL L 69-24818 YALLUP, URSULA N 69-14940

ZICK, IRENE M 69-08497



# Washington State Gambling Commission Pre-Licensing Report House-Banked Public Card Rooms

|   |  | Part I   |  |
|---|--|--|--|
| Lic   | ensing/Orga  | anization Info   | ormation   |
| <b>Type of Approval</b><br>House-Banked Card Room   | Fortu  | nises/Trade Na<br>Ine Casino – Lace  | ey .   |
| Date of Application<br>January 20, 2022   |  | Quinault Drive N<br>y, WA 98516  | E  |
|   | APPLICAN   |  | N  |
| <b>Name</b><br>Hawks Prairie Casino, LLC  | License 00-24868   | Application #  | Business Phone #<br>(360) 528-8888   |
| <b>Address</b><br>8318 Quinault Drive NE<br>Lacey, WA 98516   |  |  | Liquor License:<br>Ves 🗌 No  |
| ACTIVE LIC  | ENSES ISSUE  | ED BY GAMBLI   | NG COMMISSION  |
| <b>Description/Class</b><br>House-banked Card Room  |  |  | License Number(s)<br>67-00347  |
|   | COMM   | SSION STAFF  |  |
|   | 0  |  |  |
| Rose Guzman, Licensing  | Julie  | <b>cial Agents</b><br>Sullivan, Licensir<br>Saila, Regulation  | ng   |
| Rose Guzman, Licensing<br>Background/Structure<br>General Information:<br>On January 20, 2022, the WSGC<br>Prairie Casino, LLC, doing busine<br>the operating entity remained the<br>Ownership Information:   | Julie<br>Lisa<br>received a 100 <sup>c</sup><br>ess as (DBA) Ha<br>same but the D  | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin   | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing<br>Background/Structure<br>General Information:<br>On January 20, 2022, the WSGC<br>Prairie Casino, LLC, doing busine<br>the operating entity remained the<br>Ownership Information:<br>• <u>Hawks Prairie Casino LI</u>   | Julie<br>Lisa<br>received a 100 <sup>0</sup><br>ess as (DBA) Ha<br>same but the D  | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo   | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing<br>Background/Structure<br>General Information:<br>On January 20, 2022, the WSGC<br>Prairie Casino, LLC, doing busine<br>the operating entity remained the<br>Ownership Information:<br>• Hawks Prairie Casino LI<br>Name  | Julie<br>Lisa<br>received a 100<br>ess as (DBA) Ha<br>same but the D   | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo   | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing<br>Background/Structure<br>General Information:<br>On January 20, 2022, the WSGC<br>Prairie Casino, LLC, doing busine<br>the operating entity remained the<br>Ownership Information:<br>• <u>Hawks Prairie Casino LI</u>   | Julie<br>Lisa<br>received a 100 <sup>0</sup><br>ess as (DBA) Ha<br>same but the D  | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo   | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing Background/Structure General Information: On January 20, 2022, the WSGC Prairie Casino, LLC, doing busine the operating entity remained the Ownership Information: • Hawks Prairie Casino LI Name Fortune Lacey LLC Total  | Julie<br>Lisa<br>received a 100<br>ess as (DBA) Ha<br>same but the D   | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo<br>backs of the second<br>backs of the seco | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing Background/Structure General Information: On January 20, 2022, the WSGC Prairie Casino, LLC, doing busine the operating entity remained the Ownership Information: • Hawks Prairie Casino LI Name Fortune Lacey LLC Total  | Julie<br>Lisa<br>received a 100<br>ess as (DBA) Ha<br>same but the D   | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo<br>backs of the second<br>backs of the seco | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing Background/Structure General Information: On January 20, 2022, the WSGC Prairie Casino, LLC, doing busine the operating entity remained the Ownership Information: • Hawks Prairie Casino LI Name Fortune Lacey LLC Total • Fortune Lacey LLC:   | Julie<br>Lisa<br>received a 100 <sup>c</sup><br>ess as (DBA) Ha<br>same but the D<br>LC:<br>Owner  | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo<br>0%<br>100%<br>100%   | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing Background/Structure General Information: On January 20, 2022, the WSGC Prairie Casino, LLC, doing busine the operating entity remained the Ownership Information: Hawks Prairie Casino LI Name Fortune Lacey LLC Total Fortune Lacey LLC: Name  | Julie<br>Lisa<br>Freceived a 100<br>ess as (DBA) Ha<br>same but the D<br>LC:<br>Title<br>Owner   | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo<br>100%<br>100%<br>% Ownership  | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing Background/Structure General Information: On January 20, 2022, the WSGC Prairie Casino, LLC, doing busine the operating entity remained the Ownership Information: • Hawks Prairie Casino LI Name Fortune Lacey LLC Total • Fortune Lacey LLC: Name TIL Gaming LLC                         | Julie<br>Lisa<br>Freceived a 100<br>ess as (DBA) Ha<br>same but the D<br>LC:<br>Title<br>Owner   | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo<br>100%<br>100%<br>% Ownership<br>100%  | nge and a new application from Hawks<br>no. As part of the ownership change, |
| On January 20, 2022, the WSGC<br>Prairie Casino, LLC, doing busine<br>the operating entity remained the<br>Ownership Information:<br>• Hawks Prairie Casino LI<br>Name<br>Fortune Lacey LLC<br>Total<br>• Fortune Lacey LLC:<br>Name<br>TIL Gaming LLC<br>Total   | Julie<br>Lisa<br>Freceived a 100<br>ess as (DBA) Ha<br>same but the D<br>LC:<br>Title<br>Owner   | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo<br>100%<br>100%<br>% Ownership<br>100%  | nge and a new application from Hawks<br>no. As part of the ownership change, |
| Rose Guzman, Licensing Background/Structure General Information: On January 20, 2022, the WSGC Prairie Casino, LLC, doing busine the operating entity remained the Ownership Information: • Hawks Prairie Casino LI Name Fortune Lacey LLC Total • Fortune Lacey LLC: Name TIL Gaming LLC Total • TIL Gaming LLC: | LC:<br>Title<br>Owner<br>Creceived a 100 <sup>c</sup><br>Same but the D<br>Creceived a 100 <sup>c</sup><br>Creceived a 10 <sup>c</sup> | Sullivan, Licensir<br>Saila, Regulation<br>% ownership char<br>wks Prairie Casin<br>BA changed to Fo<br>100%<br>100%<br>100%<br>100%   | nge and a new application from Hawks<br>no. As part of the ownership change, |

## • Other Affiliations:

TIL Gaming LLC is licensed as a service supplier and a distributor. They also have ownership in two other House-Banked Card Rooms and one Nonhouse-Banked Card Room.

## Part II Licensing Investigations Summary

A Special Agent from the Commission's Licensing Unit conducted criminal records investigations and financial investigations focusing on funding sources and beneficiaries for suitability in accordance with RCW 9.46 and WAC 230. The investigations found:

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

An inspection and review were conducted of the accounting records, bank statements, contracts, and agreements. The Agent verified the funding sources, reviewed the financial records, and discussed licensing requirements.

Source of Funds:

This purchase was funded by TIL Gaming LLC.

## Part III Pre-Operational Review and Evaluation Summary

A Special Agent from the Commission's Regulation Unit completed an investigation to determine that the gambling operation complies with the requirements of RCW 9.46 and WAC 230. The review found that the following comply:

- Nature, size, and scope of gambling operations
- Regulations for the operation and management of gambling
- Forms and recordkeeping
- Surveillance and security; and Internal controls for surveillance, security, accounting, and gambling

The applicant proposes to operate the following games:

- Baccarat
- Player's Edge
- Lucky Ladies Blackjack
- Emperor's Challenge
- Head's Up Hold 'Em
- High Card Flush
- Poker

## Part IV Staff Recommendations

Based upon the licensing and regulation investigations, staff recommends licensing Hawks Prairie Casino LLC, DBA Fortune Casino – Lacey, as a house-banked card room to operate in accordance with the wagering limits of WAC 230-15-140.

**Prepared By** Jennifer LaMont, Agent in Charge Licensing

Signature

**Date** May 13, 2022



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

| 1073 · V   |                                       |   |
|--|---------------------------------------|---|
| Licen  | Part I<br>sing/Organization Ir        | oformation  |
| <b>Type of Approval</b><br>Ancillary Sports Wagering Vendor Licer<br><b>Date of Application</b><br>February 10, 2022 | ise Paysafe                           | <b>emises Address</b><br>neuve Blvd. West<br>3Z 3C1 |
| A  | PPLICANT INFORM                       | ATION   |
| <b>Name</b><br>Paysafe Merchant Services Corp.   | License Application<br>10-00240       | # Business Phone #<br>(305) 413-0282                |
| <b>Mailing Address</b><br>3500 De Maisonneuve Blvd. West<br>Montreal, QC H3Z 3C1<br>Canada                           |                                       |   |
| ACTIVE LICENS  | ES ISSUED BY GAM                      | BLING COMMISSION                                    |
| <b>Description/Class</b><br>Ancillary Sports Wagering Vendor Licer   | Exp. Date<br>03/31/2023               | License Number(s)<br>83-00016                       |
|  | COMMISSION STA                        | \FF   |
| Licensing Specialist<br>Elizabeth O'Hara   | <b>Special Agent</b><br>Donna Khanhas | а   |
| <b>Pay</b><br>Background/Structure   |                                       | afe:  |
| General Information:   |                                       |   |
| Paysafe Merchant Services Corp., o<br>Delaware in November 2010.   | loing business as Pay                 | ysafe, was incorporated in the state of             |
| Paysafe has applied for an Ancillary processing for use in mobile sports   |                                       | ndor license to provide mobile payment              |
| Organizational/Ownership Struct  | ure:                                  |   |

| Paysafe Merchant Services | Corp.                 |           |
|---------------------------|-----------------------|-----------|
| Title                     | Name                  | Ownership |
| CEO and Director          | Zakary (Zak) Cutler   | 0%        |
| CFO, COO, and Director    | Paul Jardon           | 0%        |
| Chief Compliance Officer, | Phyllis Skene-Stimac  | 0%        |
| Director                  |                       |           |
| Secretary                 | Lana Rabinovitch      | 0%        |
| Shareholder               | Paysafe Holdings (US) | 100%      |
|                           | Corp.*                |           |
|                           | Total                 | 100%      |

\*Paysafe Holdings (US) Corp. is a wholly owned subsidiary of Paysafe US Holdco Limited, which is a wholly owned subsidiary of Paysafe Holdings UK Limited, which is a wholly owned subsidiary of Paysafe Group Limited, which is a wholly owned subsidiary of Paysafe Group III Limited, which is a wholly owned subsidiary of Paysafe Group III Limited, which is a wholly owned subsidiary of Paysafe Group Holdings II Limited, which is wholly owned by PI Jersey Holdco 1.5 Limited, which is wholly owned by Paysafe Bermuda Holding, LLC, which is wholly owned by Paysafe Limited, which is publicly traded on the New York Stock Exchange with ticker PFSE.

Because Paysafe Merchant Services Corp. operates autonomously from its parent companies, the only substantial interest holders are the officers and directors of Paysafe Merchant Services Corp.

## **Affiliated Companies:**

Paysafe's sister company, Skrill USA, Inc., doing business as Skrill (organization number 10-00242), has also applied for an Ancillary Sports Wagering Vendor license to provide mobile payment processing for use in mobile sports wagering.

## **Other Jurisdictions Licensed:**

Paysafe is licensed in several jurisdictions, including Michigan, Virginia, Arizona, Tennessee, Pennsylvania, and Wyoming.

## 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 from |
|---|
| operations.   |

## Part III Staff Recommendations

Based upon the criminal history and financial background investigations, staff recommends licensing Paysafe Merchant Services Corp., doing business as Paysafe with an Ancillary Sports Wagering Vendor license.

| Prepared By  | Signature | Date          |
|--|-----------|---------------|
| Jennifer LaMont, Agent in Charge<br>Licensing Unit |           | June 28, 2022 |



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

| 101 + 1073 · V  |       |  |                                    |
|---|-------|--|------------------------------------|
| Licen   | nsing | Part I<br>J/Organization Infor   | mation                             |
| <b>Type of Approval</b><br>Ancillary Sports Wagering Vendor License<br><b>Date of Application</b><br>February 4, 2022         |       | <b>Trade Name/ Prem</b><br>Skrill<br>2 S. Biscayne Blvd.,<br>Miami, FL 33131 |                                    |
|   | PPL   | ICANT INFORMATI  | ON                                 |
| Name<br>Skrill USA, Inc.  |       | ense Application #<br>0242   | Business Phone #<br>(786) 753-7275 |
| <b>Mailing Address</b><br>2 S. Biscayne Blvd., Suite 2630<br>Miami, FL 33131  | 1     |  |                                    |
| ACTIVE LICENS   | ES I  | SSUED BY GAMBL   | ING COMMISSION                     |
| <b>Description/Class</b><br>Ancillary Sports Wagering Vendor Licer  | nse   | Exp. Date<br>03/31/2023  | License Number(s)<br>83-00017      |
|   | CC    | OMMISSION STAFF  |                                    |
| Licensing Specialist<br>Elizabeth O'Hara  |       | <b>Special Agent</b><br>Donna Khanhasa                                       |                                    |
| Background/Structure  |       |  |                                    |
| General Information:  |       |  |                                    |
| Skrill USA, Inc., doing business as<br>2008.<br>Skrill has applied for an Ancillary Sp<br>processing for use in mobile sports | ports | Wagering Vendor lid  |                                    |
|   |       |  |                                    |

## Organizational/Ownership Structure:

## Skrill USA, Inc.

| Title                     | Name                      | %         |
|---------------------------|---------------------------|-----------|
|                           |                           | Ownership |
| CEO and Director          | Zakary (Zak) Cutler       | 0%        |
| CFO, COO, and Director    | Paul Jardon               | 0%        |
| Chief Compliance Officer, | Phyllis Skene-Stimac      | 0%        |
| Director                  | -                         |           |
| Director                  | David Schlapbach          | 0%        |
| Secretary                 | Lana Rabinovitch          | 0%        |
| Shareholder               | Paysafe Group Holdings II | 100%      |
|                           | Limited*                  |           |
|                           | Total                     | 100%      |

\* Paysafe Group Holdings II Limited is wholly owned by PI Jersey Holdco 1.5 Limited, which is wholly owned by Paysafe Bermuda Holding, LLC, which is wholly owned by Paysafe Limited, which is publicly traded on the New York Stock Exchange with ticker PFSE.

Because Skrill USA, Inc. operates autonomously from its parent companies, the only substantial interest holders are the officers and directors of Skrill USA, Inc.

## **Affiliated Companies:**

Skrill's sister company, Paysafe Merchant Services Corp. (organization number 10-00240), has also applied for an Ancillary Sports Wagering Vendor license to provide mobile payment processing for use in mobile sports wagering.

## **Other Jurisdictions Licensed:**

Skrill is licensed in several jurisdictions, including New Jersey, Colorado, Michigan, Virginia, West Virginia, Arizona, Tennessee, Pennsylvania, and Wyoming.

## 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.

## Part III Staff Recommendations

Based upon the criminal history and financial background investigations, staff recommends licensing Skrill USA, Inc., doing business as Skrill, with an Ancillary Sports Wagering Vendor license.

| Prepared By  | Signature | Date          |
|--|-----------|---------------|
| Jennifer LaMont, Agent in Charge<br>Licensing Unit | I with    | June 29, 2022 |



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

| 10173 *  |   |                                    |
|--|---|------------------------------------|
| Licensin   | Part I<br>ng/Organization Infor   | mation                             |
| <b>Type of Approval</b><br>Ancillary Sports Wagering Vendor License<br><b>Date of Application</b><br>January 28, 2022                | Premises/Trade Na<br>Socure, Inc.<br>885 Tahoe Bouleva<br>Incline Village, NV 8 | rd, Suite 11                       |
|  |   | ON                                 |
|  |   |                                    |
|  | cense Application #<br>-00241   | Business Phone #<br>(866) 932-9013 |
| Address<br>885 Tahoe Boulevard, Suite 11<br>Incline Village, NV 89451  |   |                                    |
| ACTIVE LICENSES  | ISSUED BY GAMBLI  | NG COMMISSION                      |
| <b>Description/Class</b><br>Ancillary Sports Wagering Vendor License   | Exp. Date<br>03/31/2023   | License Number(s)<br>83-00018      |
| C  | OMMISSION STAFF   |                                    |
| Licensing Specialist<br>Jeanette Warner  | <b>Special Agents</b><br>Julie Sullivan   |                                    |
| S  | Socure  |                                    |
| Background/Structure   |   |                                    |
| <b>General Information:</b><br>Source, Inc. applied for a new Ancillary<br>providing Know Your Customer (KYC) s<br>Washington State. |   |                                    |
|  |   |                                    |

## Organizational/Ownership Structure:

| CEO, Director       John Ayers IV       7.423%         CFO       Shrikrishna Venkataraman       0%         Secretatry       Avrohom Aronvitz       0.575%         Director       Daniel Rosen       < 2%         Director       Bergy Gribov       0%         Director       Sergy Gribov       0%         Director       John Locke       0%         Director       John Locke       0%         Shareholders       Individually owning < 10% of the shares       88.002%         Total       100%       100%         Other Jurisdictions Licensed:         Socure, Inc. is currently licensed several jurisdictions in the U.S. including, New Jumichigan, and Pennsylvania.         Part II         Licensing Investigations Summary         A Special Agent from the Commission's Licensing Unit conducted a criminal his financial investigation focusing on funding sources and beneficiaries for suitabil accordance with RCW 9.46 and WAC 230. The investigation included verifying ownership structure, reviewing financial and business records, and conducting The investigation found:         No unreported people or businesses involved (i.e., substantial interest holders         No undisclosed ownership or undisclosed involvement in other activities/busing No disqualifying administrative history.         All funding sources were disclosed; and      | CFO Shi<br>Secretatry Avi<br>Director Da   | rikrishna Venkataraman  |   |
|--|--|---|---|
| Secretatry       Avrohom Aronvitz       0.575%         Director       Daniel Rosen       < 2%         Director       Rory O'Driscoll       < 2%         Director       Sergy Gribov       0%         Director       John Locke       0%         Director       John Locke       0%         Director       John Locke       0%         Shareholders       Individually owning < 10% of the shares       88.002%         Total       100%       100%         Other Jurisdictions Licensed:         Socure, Inc. is currently licensed several jurisdictions in the U.S. including, New John Locke         Part II         Licensing Investigations Summary         A Special Agent from the Commission's Licensing Unit conducted a criminal hit financial investigation focusing on funding sources and beneficiaries for suitabil accordance with RCW 9.46 and WAC 230. The investigation included verifying ownership structure, reviewing financial and business records, and conducting The investigation found:         • No unreported people or businesses involved (i.e., substantial interest holder         • No undisclosed ownership or undisclosed involvement in other activities/busi         • No disqualifying administrative history.         • All funding sources were disclosed; and         • All substantial interest holders qualify to hold a license. | Secretatry Avi<br>Director Da  |   | 0%  |
| Director         Daniel Rosen         < 2%           Director         Rory O'Driscoll         < 2%   | Director Da  | rohom Aronvitz  |   |
| Director         Rory O'Driscoll         < 2%           Director         Sergy Gribov         0%           Director         John Locke         0%           Shareholders         Individually owning < 10% of the shares   |  |   | 0.575%  |
| Director         Sergy Gribov         0%           Director         John Locke         0%           Shareholders         Individually owning < 10% of the shares   |  | niel Rosen  | < 2%  |
| Director         John Locke         0%           Shareholders         Individually owning < 10% of the shares  | Director   Ro  | ry O'Driscoll   | < 2%  |
| Shareholders         Individually owning < 10% of the shares         88.002%           Total         100%           Other Jurisdictions Licensed:         100%           Socure, Inc. is currently licensed several jurisdictions in the U.S. including, New John Michigan, and Pennsylvania.         Part II           Licensing Investigations Summary         A Special Agent from the Commission's Licensing Unit conducted a criminal his financial investigation focusing on funding sources and beneficiaries for suitabil accordance with RCW 9.46 and WAC 230. The investigation included verifying ownership structure, reviewing financial and business records, and conducting The investigation found:           No unreported people or businesses involved (i.e., substantial interest holder           No undisclosed ownership or undisclosed involvement in other activities/busite           No disqualifying administrative history.           All funding sources were disclosed; and           All substantial interest holders qualify to hold a license.   | Director Sei   | rgy Gribov  | 0%  |
| Total       100%         Other Jurisdictions Licensed:       Socure, Inc. is currently licensed several jurisdictions in the U.S. including, New Jurisdiction, and Pennsylvania.         Part II Licensing Investigations Summary         A Special Agent from the Commission's Licensing Unit conducted a criminal his financial investigation focusing on funding sources and beneficiaries for suitabil accordance with RCW 9.46 and WAC 230. The investigation included verifying ownership structure, reviewing financial and business records, and conducting The investigation found:         • No unreported people or businesses involved (i.e., substantial interest holders)         • No disqualifying administrative history.         • All funding sources were disclosed; and         • All substantial interest holders qualify to hold a license.   | )irector Joł   | n Locke   | 0%  |
| Total       100%         Other Jurisdictions Licensed:       Socure, Inc. is currently licensed several jurisdictions in the U.S. including, New Jurisdiction, and Pennsylvania.         Part II Licensing Investigations Summary         A Special Agent from the Commission's Licensing Unit conducted a criminal his financial investigation focusing on funding sources and beneficiaries for suitabil accordance with RCW 9.46 and WAC 230. The investigation included verifying ownership structure, reviewing financial and business records, and conducting The investigation found:         • No unreported people or businesses involved (i.e., substantial interest holders)         • No disqualifying administrative history.         • All funding sources were disclosed; and         • All substantial interest holders qualify to hold a license.   | hareholders Ind  | ividually owning < 10% of the shares  | 88.002%   |
| Socure, Inc. is currently licensed several jurisdictions in the U.S. including, New Jerrer<br>Michigan, and Pennsylvania.<br>Part II<br>Licensing Investigations Summary<br>A Special Agent from the Commission's Licensing Unit conducted a criminal his<br>financial investigation focusing on funding sources and beneficiaries for suitabil<br>accordance with RCW 9.46 and WAC 230. The investigation included verifying<br>ownership structure, reviewing financial and business records, and conducting<br>The investigation found:<br>• No unreported people or businesses involved (i.e., substantial interest holde<br>• No undisclosed ownership or undisclosed involvement in other activities/bus<br>• No disqualifying administrative history.<br>• All funding sources were disclosed; and<br>• All substantial interest holders qualify to hold a license.   |  |   | 100%  |
| <ul> <li>financial investigation focusing on funding sources and beneficiaries for suitabil accordance with RCW 9.46 and WAC 230. The investigation included verifying ownership structure, reviewing financial and business records, and conducting The investigation found:</li> <li>No unreported people or businesses involved (i.e., substantial interest holde</li> <li>No undisclosed ownership or undisclosed involvement in other activities/business</li> <li>No disqualifying administrative history.</li> <li>All funding sources were disclosed; and</li> <li>All substantial interest holders qualify to hold a license.</li> </ul>  |  |   | imary   |
| Source of Funds:   | financial investigation<br>accordance with RC<br>ownership structure<br>The investigation for<br>No unreported p<br>No undisclosed<br>No disqualifying<br>All funding source | on focusing on funding sources and ben<br>CW 9.46 and WAC 230. The investigation<br>e, reviewing financial and business recom-<br>bund:<br>beople or businesses involved (i.e., subs<br>ownership or undisclosed involvement in<br>administrative history.<br>ces were disclosed; and | eficiaries for suitability in<br>on included verifying the<br>rds, and conducting interviews.<br>tantial interest holders). |

| Part III                     |
|------------------------------|
| <b>Staff Recommendations</b> |

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

| Prepared By  | Signature | Date         |
|--|-----------|--------------|
| Jennifer LaMont, Agent in Charge<br>Licensing Unit | I, With t | May 13, 2022 |
|  |           |              |



## HOUSE-BANKED PUBLIC CARD ROOM REPORT

| Licensed and Operating                   |                      |                             | 39                            |          |              |
|--|----------------------|-----------------------------|-------------------------------|----------|--------------|
|  | City                 | Commission<br>Approval Date | License<br>Expiration<br>Date | Org #    | License<br># |
| ALL STAR CASINO                          | SILVERDALE           | Jan 14, 1999                | Jun 30, 2023                  | 00-18357 | 67-00058     |
| BLACK PEARL RESTAURANT & CARD ROOM       | SPOKANE<br>VALLEY    | Jan 10, 2013                | Sep 30, 2022                  | 00-22440 | 67-00321     |
| BUZZ INN STEAKHOUSE/EAST WENATCHEE       | EAST<br>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<br>WENATCHEE    | Feb 14, 2019                | Dec 31, 2022                  | 00-24296 | 67-00339     |
| COYOTE BOB'S CASINO                      | KENNEWICK            | Jul 10, 2009                | Mar 31, 2023                  | 00-21848 | 67-00282     |
| CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE  | MOUNTLAKE<br>TERRACE | Jul 10, 2009                | Mar 31, 2023                  | 00-21849 | 67-00283     |
| CRAZY MOOSE CASINO/PASCO                 | PASCO                | Jul 10, 2009                | Mar 31, 2023                  | 00-21847 | 67-00281     |
| FORTUNE CASINO - LACEY                   | LACEY                | Jul 14, 2022                | Mar 31, 2023                  | 00-24868 | 67-00347     |
| FORTUNE CASINO - RENTON                  | RENTON               | Jan 8, 2015                 | Sep 30, 2022                  | 00-23339 | 67-00327     |
| FORTUNE CASINO - TUKWILA                 | TUKWILA              | Oct 8, 2015                 | Jun 30, 2023                  | 00-23465 | 67-00329     |
| GOLDIES SHORELINE CASINO                 | SHORELINE            | May 13, 1999                | Dec 31, 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, 2023                  | 00-19258 | 67-00184     |
| GREAT AMERICAN CASINO/TUKWILA            | TUKWILA              | Jan 15, 1998                | Sep 30, 2022                  | 00-12554 | 67-00012     |
| 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     |

Compiled by WSGC Revised 7/1/2022

Page 1 of 3

| Licensed and Operating           | 39         |                             |                               |          |              |
|----------------------------------|------------|-----------------------------|-------------------------------|----------|--------------|
|                                  | City       | Commission<br>Approval Date | License<br>Expiration<br>Date | Org #    | License<br># |
| LILAC LANES & CASINO             | SPOKANE    | Jul 12, 2007                | Jun 30, 2023                  | 00-21305 | 67-00267     |
| LUCKY DRAGONZ CASINO             | SEATTLE    | Mar 10, 2022                | Jun 30, 2023                  | 00-23001 | 67-00323     |
| 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     |
| PAPAS CASINO RESTAURANT & LOUNGE | MOSES LAKE | Aug 13, 1998                | Jun 30, 2023                  | 00-02788 | 67-00004     |
| RC'S AT VALLEY LANES             | SUNNYSIDE  | Nov 16, 2017                | Mar 31, 2023                  | 00-16220 | 67-00336     |
| RIVERSIDE CASINO                 | TUKWILA    | Aug 14, 2003                | Jun 30, 2023                  | 00-19369 | 67-00187     |
| ROMAN CASINO                     | SEATTLE    | Feb 10, 2000                | Mar 31, 2023                  | 00-17613 | 67-00057     |
| ROXY'S BAR & GRILL               | SEATTLE    | Nov 18, 2004                | Jun 30, 2023                  | 00-20113 | 67-00231     |
| SILVER DOLLAR CASINO/MILL CREEK  | BOTHELL    | Sep 9, 2010                 | Jun 30, 2023                  | 00-22131 | 67-00302     |
| SILVER DOLLAR CASINO/RENTON      | RENTON     | Sep 9, 2010                 | Jun 30, 2023                  | 00-22134 | 67-00305     |
| SILVER DOLLAR CASINO/SEATAC      | SEATAC     | Sep 9, 2010                 | Jun 30, 2023                  | 00-22128 | 67-00299     |
| SLO PITCH PUB & EATERY           | BELLINGHAM | Aug 12, 1999                | Jun 30, 2023                  | 00-16759 | 67-00038     |
| THE PALACE                       | LA CENTER  | Apr 9, 1998                 | Jun 30, 2023                  | 00-16903 | 67-00010     |
| WILD GOOSE CASINO                | ELLENSBURG | Apr 8, 2004                 | Dec 31, 2022                  | 00-20009 | 67-00212     |
| ZEPPOZ                           | PULLMAN    | Nov 13, 2008                | Mar 31, 2023                  | 00-18777 | 67-00209     |

| Licensed but Not Currently Operating | 3       |                             |                               |          |              |
|--------------------------------------|---------|-----------------------------|-------------------------------|----------|--------------|
|                                      | City    | Commission<br>Approval Date | License<br>Expiration<br>Date | Org #    | License<br># |
| EMERALD DOWNS                        | AUBURN  | May 11, 2017                | Mar 31, 2023                  | 00-23814 | 67-00335     |
| ROYAL CASINO                         | EVERETT | Sep 9, 2010                 | Jun 30, 2023                  | 00-22130 | 67-00301     |
| WIZARDS CASINO                       | BURIEN  | Feb 11, 2010                | Dec 31, 2022                  | 00-21998 | 67-00287     |

| Applications Pending   | 1       |                             |                               |          |              |
|------------------------|---------|-----------------------------|-------------------------------|----------|--------------|
|                        | City    | Commission<br>Approval Date | License<br>Expiration<br>Date | Org #    | License<br># |
| IMPERIAL PALACE CASINO | TUKWILA |                             |                               | 00-24893 | 67-00348     |

# WASHINGTON STATE GAMBLING COMMISSION **Revised 2022 Commission Meeting Schedule**

January 13th & 14th **Thursday & Friday** 

February 7th Monday

March 10<sup>th</sup> & 11<sup>th</sup> **Thursday & Friday** 

April 14th & 15th **Thursday & Friday** 

May 12th & 13th Thursday & Friday

June 9th & 10th Canceled

July 14<sup>th</sup> and 15<sup>th</sup> **Thursday & Friday** 

August 11th & 12th **Thursday & Friday** 

September 8<sup>th</sup> & 9<sup>th</sup> Thursday & Friday

October 6th & 7th **Thursday & Friday** 

November 9th & 10th Wednesday & Thursday

December

**Gambling Commission** (Virtual) Lacey, WA

**Special Gambling Commission** (Virtual) Lacey, WA

**Gambling Commission** Lacey, WA (Virtual)

**Gambling Commission** Lacey, WA (Virtual)

**Gambling Commission** Lacey, WA (Hybrid)

**Gambling Commission** 

**Liquor Cannabis Board** The Union Tower Building **1025 Union Avenue SE** Olympia, WA (Hybrid)

**Liquor Cannabis Board** The Union Tower Building **1025 Union Avenue SE** Olympia, WA (Hybrid)

**Liquor Cannabis Board** The Union Tower Building **1025 Union Avenue SE** Olympia, WA (Hybrid)

**Gambling Commission** Lacey, WA (Hybrid)

**Gambling Commission** Lacey, WA (Hybrid)

**NO MEETING** 

Beginning with the May 2022 commission meeting, all future commission meetings will be a hybrid model whereby the public will be able to attend the meetings virtually or in person at the address provided.



#### STATE OF WASHINGTON GAMBLING COMMISSION "Protect the Public by Ensuring that Gambling is Legal and Honest"

July 14, 2022

## TO: COMMISSIONERS

Alicia Levy, Chair Julia Patterson, Vice Chair Bud Sizemore Kristine Reeves Sarah Lawson

## **EX-OFFICIO MEMBERS**

Senator Steve Conway Senator Jeff Holy Representative Shelley Kloba Representative Brandon Vick

- FROM: Tony Czar, Special Agent Regulation Unit
- SUBJECT: Special Olympics of Washington Fall 2022 Western Washington Enhanced Raffle Plan Request

Special Olympics of Washington (SOWA) is requesting your approval to conduct a "Dream Adventure Raffle," an enhanced raffle in Western Washington.

In the 2013 Legislative session, the Legislature passed Engrossed Substitute Senate Bill 5723 authorizing enhanced raffles. Washington Administrative Code (WAC) 230-03-152 states the commissioners may vote to approve a bona fide charitable or nonprofit organization whose primary purpose is serving individuals with intellectual disabilities to conduct enhanced raffles when they meet the requirements of the law and submit a plan as set out in the rule.

## Mission:

SOWA's mission is to provide year-around sports training and athletic competition in a variety of Olympic type sports for children and adults with intellectual disabilities, giving them continuing opportunities to develop physical fitness, demonstrate courage, experience joy and participate in the sharing of gifts, skills and friendship with their families, other Special Olympics athletes and the community

## **Programs and Clients Served:**

SOWA currently serves more than 7,400 athletes and has a support system of nearly 1,800 volunteers.

P.O. Box 42400, Olympia, WA 98504 | (360) 486-3440 901 N. Monroe St., Suite 240, Spokane, WA 99201 | (509) 325-7900 wsgc.wa.gov Commissioners and Ex Officios June 14, 2022 Page 2 of 3

## Purpose for Conducting the Enhanced Raffle:

To provide the necessary resources for the organization to enhance its programming and to grow its athlete base.

## **Enhanced Raffle Details:**

Ticket costs: \$50 each, 3-pack for \$125, or 6-pack for \$200. Add-on tickets are \$20 each, 3-pack for \$50, or 6-pack for \$75.

| Drawing      | Date              | Location                  | Prizes Available                          |
|--------------|-------------------|---------------------------|---|
| Appreciation | September 9, 2022 | 2815 2 <sup>nd</sup> Ave, | \$1,000.                                  |
|              |                   | Suite 370,                |   |
|              |                   | Seattle, WA,              |   |
|              |                   | 98121                     |   |
| Early Bird   | November 4, 2022  | 2815 2 <sup>nd</sup> Ave, | Winner's choice: Tesla Model 3, BMW       |
|              |                   | Suite 370,                | X5, or \$50,000 cash.                     |
|              |                   | Seattle, WA,              |   |
|              |                   | 98121                     |   |
| Grand Prize  | December 2, 2022  | 2815 2 <sup>nd</sup> Ave, | 2022 Winnebago Hike H120S (valued at      |
|              |                   | Suite 370,                | \$41,000), plus choice between Ford F-150 |
|              |                   | Seattle, WA,              | (valued at \$40,000) or \$40,000 cash.    |
|              |                   | 98121                     | Prizes 2-335 include cash or merchandise. |
| Add-on       | December 2, 2022  | 2815 2 <sup>nd</sup> Ave, | \$50,000                                  |
| Drawing      |                   | Suite 370,                |   |
|              |                   | Seattle, WA,              |   |
|              |                   | 98121                     |   |

## Security and Purchase of Prizes:

All prizes will be purchased with the raffle revenue and awarded after each applicable drawing. The donated grand prize Winnebago will be stored and secured at the Broadmoor RV facility located at 9145 St. Thomas Dr., Pasco, WA 99301 until the grand prize winner has been announced and can coordinate with SOWA for pick-up or delivery.

## **Protection of the integrity of the raffle:**

SOWA will conduct an audit of ticket stubs prior to each drawing. The audit will be performed by a member of SOWA staff who will use an Excel generated random list of tickets to audit. The tickets will be made up of the entire population of tickets sold, both active and voided. The sample size will be no less than 90 tickets. An employee of SOWA will draw all winning raffle tickets. Commissioners and Ex Officios June 14, 2022 Page 3 of 3

All ticket purchase proceeds of the raffle, whether the tickets are sold in the SOWA office by designated staff or through the call center, will be deposited into a SOWA raffle account which is separate from the Organization's general operating funds.

An employee of Special Olympics Washington will draw all winning raffle tickets.

## **Use of Proceeds:**

The proceeds will be used to further drive the vision of SOWA.

## Protection in the Event of Low Ticket Sales:

The law requires that in the event SOWA determines the ticket sales are insufficient to qualify for a complete enhanced raffle to move forward, the enhanced raffle winner must receive fifty percent of the net proceeds in excess of expenses as the grand prize, through an annuity paid over 20 years or a lump sum payment of 70% of the annuity value. For this raffle, there is no minimum ticket threshold that must be met in order for the grand prize and other prizes available to be awarded. All prizes, including the grand prize, will be awarded regardless of the number of ticket sales.

## **Projected Budget:**

SOWA estimates the breakeven number of ticket sales to be 6,400 plus 4,408 add-on tickets. SOWA estimates net proceeds to be between \$0 and \$582,239, provided 25,000 grand prize tickets and 17,217 add-on tickets are sold.

## Dedicated Employee Responsible for Oversight of the Enhanced Raffle Operation:

Mary Do, Chief Operating Officer of SOWA, will be overseeing the enhanced raffle operation.

## Licensed Service Supplier Managing the Enhanced Raffle:

NZ Consulting, Inc., owned 100% by Neal Zeavy, is managing the enhanced raffle for SOWA.

## Licensed Call Center Contracted to Receive Enhanced Raffle Ticket Sales:

Incept Corporation, owned 100% by Salvatore Falletta, will be the call center contracted to receive enhanced raffle tickets sales for SOWA.

Attachments (2)



### Special Olympics Washington Enhanced Raffle Plan 2022 "Special Olympics Washington Dream Adventure Raffle"

## <u>Purpose</u>

Special Olympics Washington serves more than 7,400 participants across the state which is just a fraction of the nearly 120,000 individuals with intellectual disabilities in Washington who are eligible for its programs.

As the organization navigates through the COVID-19 pandemic and begins the important work of returning to a "better normal" for its constituents, one thing remains clear: Special Olympics Washington is a constant in the lives of its athletes. For individuals with intellectual disabilities in Washington, Special Olympics is often the only place where they can participate in physical activity, health education, and sports in their communities, as well as at a regional and state level. The need to continue these programs is more vital than ever.

Since the inception of the Special Olympics Washington Dream House Raffle in 2013, proceeds have enabled the organization to unlock old financial constraints and open the door to new programs and serving more athletes across the state. The Dream House Raffle allowed us to react and pivot quickly to provide athletes with critical resources and support during this unprecedented time of the pandemic. It has helped us continue to provide critical sports, health/wellness and leadership programming throughout the pandemic, and bring our participants safely back onto the fields with their friends as the world began to reopen.

For 2022, Special Olympics Washington is proposing to add a second raffle, the "Dream Adventure Raffle." With the funds earned from the Dream Adventure Raffle, Special Olympics Washington can continue the journey of reaching into every corner of the state to make sure EVERYONE has the opportunity to be tested like champions!

### About Special Olympics Washington

Special Olympics Washington was incorporated in 1975 and is a 501(c)(3) organization in Washington State. The mission of Special Olympics is to provide year-round sports training and athletic competition in a variety of Olympic-type sports for children and adults with intellectual disabilities, giving them continuing opportunities to develop physical fitness, demonstrate courage, experience joy and participate in the sharing of gifts, skills and friendship with their families, other Special Olympics athletes and the community. Special Olympics Washington currently serves more than 7,400 participants and has a support system of more than 1,800 volunteers. The organization is part of Special Olympics International, which serves more than 3.8 million athletes and Unified Sports partners in more than 200 countries and jurisdictions.

### About Our Athletes

Special Olympics serves individuals with intellectual disabilities (or ID). The term is used when a person has certain limitations in cognitive functioning and skills, including communication, social and self-care skills. The goal of Special Olympics Washington is to reach the nearly 120,000 people in Washington State with ID. Special Olympics Washington athletes range in age from 8 years old to the oldest of our athletes who compete into their 70's. We also have a Young Athletes program for children ages 2 to 7.

Special Olympics Washington celebrates people's abilities rather than focus on their disabilities. No matter the person's age or skill level, Special Olympics Washington has something for anyone with intellectual disabilities. We deliver high-quality, year-round competition and training opportunities in an inclusive culture that stresses athletic excellence, rewards determination, emphasizes health, brings together communities and celebrates personal achievement.

### Empowering Leaders Beyond the Field of Play

In addition to 23 Olympic-type sports offerings and 180+ local and state competitions, Special Olympics Washington also puts an emphasis on empowering our athletes off the playing field by providing opportunities through our Athlete Leadership Program, Unified Champions Schools, and Inclusive Health initiatives.

<u>Athlete Leadership</u>: Athletes are empowered to use their voices to assume meaningful leadership roles, influence change in the Special Olympics movement, and help create more accepting and inclusive communities. In 2022, Special Olympics Washington inducted its first athlete as the chairperson of its board of directors.

<u>Unified Champion Schools</u>: Special Olympics Unified Champion Schools® builds on Special Olympics' values, principles, practices, experiences, and impacts to shape a generation that welcomes everyone.

The Special Olympics Unified Champion Schools program is aimed at promoting social inclusion through intentionally planned and implemented activities affecting systems-wide change. With sports as the foundation, the three-component model offers a unique combination of effective activities that equip young people with tools and training to create sports, classroom, and school climates of acceptance. These are school climates where students with disabilities feel welcome and are routinely included in, and feel a part of, all activities, opportunities, and functions.

<u>Inclusive Health</u>: Despite severe need and higher health risks, people with intellectual disabilities (ID) are often denied health services and die on average 16 years sooner than the general population. Special Olympics Health is creating a world where people with intellectual disabilities have every opportunity to be healthy.

Inclusive health means people with ID can take full advantage of the same health programs and services available to people who do not have ID. Currently, people with ID face significant challenges in accessing quality health care and obtaining opportunities that promote fitness and wellness, resulting in pronounced health disparities and reduced life expectancy. Special Olympics' health programming focuses on improving the physical and social-emotional well-being of people with ID by increasing inclusion in health care, wellness and health systems for Special Olympics athletes and others with ID.

All our programs and services are provided at no cost to our athletes, Unified partners and/or their families, and will continue to be made possible through the Dream Adventure Raffle, individual giving, special events, grants, and corporate partnerships.

#### SPECIAL OLYMPICS WASHINGTON Enhanced Raffle Rules 2022

Special Olympics Washington, a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code, is conducting this raffle pursuant to SB 5723, Washington Administrative Code 230-03-152, to raise funds for ongoing charitable purposes. The Rules and Regulations of the Special Olympics Washington raffle are set forth below. By purchasing a raffle ticket, the purchaser agrees to be bound by these rules and regulations. Special Olympics Washington's interpretation and application of the rules and regulations shall be final.

The Grand Prize Drawing for Special Olympics Washington Dream Adventure Raffle will be held on Friday, December 2, 2022, at 2815 2nd Ave, Suite 370, Seattle, WA, 98121. All drawings will be held at 2815 2<sup>nd</sup> Ave, Suite 370, Seattle, WA, 98121. Tickets will not be sold after November 18, 2022. Tickets may sell out before that time. An independent raffle auditor will supervise the drawing. The drawing for prizes may be open to the public, but the winner does not need to be present to win.

Only 100,000 tickets will be sold. The chances of winning are based on that number. If fewer tickets are sold, the chances of winning the Grand Prize and other prizes improve. The IRS has taken the position that amounts paid for chances in raffles, lotteries or similar drawings for valuable prizes are not gifts, and consequently do not qualify as deductible charitable contributions.

Prize winners assume all fees, local, state and federal taxes (including but not limited to income taxes based on the value of the prize). Likewise, there may be federal taxes and state and/or local tax consequences if winners select alternate cash prizes (See Prizes section below). Special Olympics Washington takes no responsibility for any tax liabilities. Consult your tax advisor. This offer is void where prohibited by law, and all federal, state and local laws and regulations apply.

By entering this raffle, entrants accept and agree (1) to be bound by all the rules, limitations and restrictions set forth here and (2) that their names and/or likenesses may be disclosed to and used by the news media and may otherwise be used by Special Olympics Washington for publicity purposes and in lists of prize winners to be published in area newspapers and announced on the Special Olympics Washington raffle website. Special Olympics Washington will provide purchasers all raffle information as required by WAC 230-11-015. Other rules and regulations may apply. Please contact Special Olympics Washington if you have questions. Special Olympics Washington's interpretation and application of the rules and regulations shall be final.

By entering this raffle, each participant releases Special Olympics Washington, its directors, officers, employees and agents from any and all liability for injuries, losses or damages of any kind caused by participating in the raffle or winning any prize or resulting from acceptance, possession, use or misuse of any prize, and each winner agrees to indemnify and hold Special Olympics Washington harmless from any and all losses, damages, rights, claims and actions of any kind rising in connection with or as a result of participating in the raffle or the winner's acceptance or use of any prize.

Special Olympics Washington will provide a "Q&A" document that will be given to potential ticket purchasers and be prominently displayed on the Dream Adventure Raffle website: <a href="http://www.PugetSoundRaffle.com">www.PugetSoundRaffle.com</a>.

### Tickets:

Tickets are \$50 each, 3-pack for \$125, or 6-pack for \$200. Only one method of payment, one name, and one mailing address are permitted per ticket pack. Only one eligible person may be entered in the raffle per ticket sold. If the name of more than one person is submitted with a ticket purchase, and that ticket is selected as a winning ticket, then the person named first will be deemed the holder of record of that ticket and declared the winner regardless of who paid for the ticket. Division of prize by a group purchasing a ticket in common shall be to the sole responsibility of the person named as the holder of record of that ticket, should that ticket be selected as a winner.

Early ticket purchases will be included in up to two drawings. Tickets purchased by August 26, 2022, will be eligible for the Appreciation Drawing - \$1,000(drawing date: September 9, 2022). Tickets purchased by October 21, 2022, will be eligible for the Early Bird Drawing - Tesla Model 3, BMW X5, or \$50,000 cash (drawing date: November 4, 2022). All such tickets, including all winning tickets from the Appreciation Drawing and the Early Bird Drawing, will be included in applicable subsequent drawings as well as the Grand Prize drawing. Tickets purchased by November 18, 2022, will be eligible for the Grand Prize drawing (drawing date: December 2, 2022).

Raffle participants who purchase at least one raffle ticket are eligible to purchase an Add-On ticket in the Add-On drawing. Add-On tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75. Rules for purchasing Add-On tickets are as follows:

The prize for the Add-On drawing is \$50,000 cash. Add-On tickets must be ordered in conjunction with a raffle ticket. Add-On orders will not be accepted after the original raffle ticket order date. Only one method of payment and only one mailing address are permitted. An individual can purchase as many Add-On tickets as he or she may wish. There is no limit on the maximum number of Add-On tickets that may be sold.

Special Olympics Washington reserves the right to reject any entry form that is submitted with payment that does not constitute "good funds." All defective or physically altered entry forms will be immediately disqualified by Special Olympics Washington. Prior to the Grand Prize drawing, Special Olympics Washington will make a reasonable effort to notify the individual and/or entity that submits such an entry form or one which has been rejected because the credit card or check did not clear that the entry has been rejected by attempting to make contact through the information provided at the time of submitting the purchase request. All orders for tickets for the Early Bird drawings must be received and/or purchased by the indicated deadline. Any orders received after these deadlines will be held for the subsequent drawings, if applicable and Grand Prize drawing. Special Olympics Washington assumes no responsibility for lost, late, misdirected or non-delivered mail or fax messages, or any other failure to receive orders or deliver receipts prior to the drawing deadlines.

A raffle participant's sole and exclusive remedy for Special Olympics Washington's breach shall be limited to the return of the purchase price paid for his or her raffle ticket(s). In no event shall Special Olympics Washington, its directors, officers, employees, agents or representatives be liable to any party for any loss or injuries to earnings, profits or goodwill, or for any incidental, special, punitive or consequential damages of any person or entity whether arising in contract, tort or otherwise, even if advised of the possibility of such damages.

#### How to Purchase:

To purchase tickets: use the order form provided and fax the order form to (206) 361-8158, or you may mail it to Special Olympics Washington Dream Adventure Raffle, 2815 2<sup>nd</sup> Avenue, Suite 370 Seattle, WA, 98121 or call 877-740-9633, providing your name, address, phone number, email

address for confirmation along with your credit card number, credit card security code and expiration date. Tickets cannot be purchased on the raffle website or by email. *Any entry form submitted by email will be rejected*. You may also purchase tickets in person at Special Olympics Washington 2815 2<sup>nd</sup> Avenue, Suite 370, Seattle, Washington 98121. All entries must include payment by cash, check, money order or credit card in US dollars. Special Olympics Washington reserves the right to reject any entry form that is submitted with payment that does not constitute "good funds." No refunds will be made except under the following circumstances: any ticket order with payment received after 100,000 tickets have been sold or after November 18, 2022, will be returned. No other refunds are available except in the exclusive discretion of Special Olympics Washington. Special Olympics Washington assumes no responsibility for lost, late, misdirected, or non-delivered mail or fax messages, or any other failure to receive orders or deliver receipts prior to the drawing deadlines.

### Selection of Winners:

The Special Olympics Washington Dream Adventure Raffle Grand Prize drawing will be held on December 2, 2022, from all eligible raffle tickets. Winners need not be present to win. Special Olympics Washington will conduct the following additional drawings:

- Appreciation Drawing on September 9, 2022,
- Early Bird Drawing on November 4 and,
- Add-On drawing on Friday, December 2, 2022.

All drawings will take place at 2815 2<sup>nd</sup> Avenue, Suite 370, Seattle, WA, 98121.

Winners will be notified according to the contact information provided to Special Olympics Washington at the time of ticket purchase. In addition to the list of winners posted on the Special Olympics Washington raffle web site (PugetSoundRaffle.com), a list of winners may be obtained from Special Olympics Washington or by sending a self-addressed, stamped envelope to Special Olympics Washington Dream Adventure Raffle, 2815 2<sup>nd</sup> Avenue, Suite 370, Seattle, WA, 98121 within one week of the drawing.

In order to collect prizes valued \$5,000 or more, a ticket winner must sign and deliver to Special Olympics Washington: (a) a sworn affidavit of eligibility in accordance with these Rules and applicable law, including without limitation that he or she is at least 18 years old; (b) such written information as is required by any applicable tax and/or real estate laws, including without limitation his or her Social Security Number; (c) proof of identity in forms satisfactory to the Special Olympics Washington showing that the person claiming the prize is the same person who is named on the winning raffle ticket.; and (d) the winning ticket stub. Winners of prizes of \$5,000 or more may be required to submit a W-2G, Form 5754 or similar tax form (provided by Special Olympics Washington) for tax withholding purposes. There are a total of 335 prizes for the Grand Prize drawing. Odds of winning a prize is approximately 1 in 300.

### **Eligibility:**

Anyone 18 years of age or older may enter. Special Olympics Washington employees, members of the Board of Directors, authorized agents and employees thereof, consultants, attorneys, independent accountant firm, and their spouses and children living in the same household are excluded from participating and are not eligible to win a prize. All federal, state, and local laws and regulations apply. The raffle is void where prohibited or restricted by law. An affidavit of eligibility may be required from prize winners.

### Prizes:

The Grand Prize is a 2022 Winnebago Hike H120S (donated/value \$41,000), plus a choice between a Ford F-150 (value \$40,000) or \$40,000 cash. A detailed description will be referred to in all raffle materials. Complete prize list below:

All vehicles come base model factory equipped unless otherwise noted on the raffle website. Winner(s) may be responsible for any and all state or local license, title, registration, taxes, or fees associated with the vehicle, as well as insurance (proof of which must be shown prior to delivery) and pickup or delivery costs at the dealership as well as any non-standard options chosen by the winner and negotiated with the dealership. All contracted vehicles are subject to availability at the automobile dealer selected by Special Olympics Washington and may be substituted with a comparable vehicle by Special Olympics Washington or with the cash alternate prize.

Vacation travel is as noted on the raffle website. Please note that vacation travel is for land only and does not include airfare unless otherwise noted on the raffle website. All vacation and travel prizes are subject to space and availability. All gratuities, taxes and fees are the responsibility of the winner. Winners of travel related prizes must comply with all applicable requirements and restrictions related to said prizes including without limitation applicable travel dates, age restrictions, liability waivers, travel documentation and reservation and confirmation procedures. All contracted vacations are subject to availability and may be substituted with a comparable vacation prize or with a cash alternate prize.

All unclaimed prizes will be returned to Special Olympics Washington 60 days after the Grand Prize drawing date.

### Appreciation Drawing:

\$1,000 cash (Value: \$1,000)

### Early Bird Drawing:

Winner's choice between a Tesla Model 3, BMW X5, or \$50,000 cash. (Value: \$50,000)

#### Grand Prize Drawing:

| Grand Prize:   | The Grand Prize is a 2022 Winnebago Hike H120S (donated/value: \$41,000), plus a choice between a Ford F-150 (value: \$40,000) or \$40,000 cash. (Total value: \$81,000) |
|----------------|--|
| 2nd Prize:     | Vacation to Bordeaux, France or \$3,500 cash (Value: \$3,500)  |
| 3rd Prize:     | Vacation to Alaska or \$3,500 cash (Value: \$3,500)  |
| 4th Prize:     | Vacation to Amsterdam, Netherlands or \$3,000 cash (Value: \$3,000)  |
| 5th Prize:     | Vacation to Barcelona, Spain or \$2,500 cash (Value: \$2,500)  |
| 6th Prize:     | Vacation to Sydney, Australia or \$2,500 cash (Value: \$2,500)   |
| 7th Prize:     | Caribbean Cruise or \$1,500 cash (Value: \$1,500)  |
| 8th Prize:     | 12 - \$100 gas cards or \$1,200 cash (Value: \$1,200)  |
| 9th Prize:     | DK Metcalf Signed Helmet or \$1,000 cash (Value: \$1,000)  |
| 10th Prize:    | \$1,000 cash (Value: \$1,000)  |
| Prizes 11-60:  | 50 - \$100 gift cards (Value: \$100 each/\$5,000)  |
| Prizes 61-90:  | 30 - \$75 gift cards (Value: \$2,250)  |
| Prizes 91-335: | 245 - \$50 gift cards (Value: \$12,250)  |
|                |  |

Gift card winners (11-335) will be notified via email and will have a choice between receiving a gift card from one of the following brands: REI Landry's Hulu Sephora Sunbasket Panera Bread Adidas HomeGoods Chipotle GrubHub Darden Visa Gift Card

### Add-On Drawing:

Prize: \$50,000 cash. (Value: \$50,000)

Raffle participants who purchase at least one raffle ticket are eligible to purchase an Add-On ticket in the Add-On drawing. Add-On tickets are one for \$20, 3-pack for \$50 or 6-pack for \$75. Rules for purchasing Add-On tickets are as follows:

The prize for the Add-On drawing is \$50,000 cash. Add-On tickets must be ordered in conjunction with a raffle ticket. Add-On orders will not be accepted after the original raffle ticket order date. Only one method of payment and only one mailing address are permitted. An individual can purchase as many Add-On tickets as he or she may wish. There is no limit on the maximum number of Add-On tickets that may be sold.

### **General Terms and Conditions:**

No express warranties are given and no affirmation of Special Olympics Washington by words and/or actions will constitute a warranty. The vehicles will be transferred to the prize winners "as is, where is, and with all faults." Special Olympics Washington does not provide any guarantee or warranty, expressed or implied, in connection with the vehicles and accepts no liability or responsibility regarding the construction or condition of the vehicles. Special Olympics Washington does not warrant that the vehicles are of mercantile quality or that it can be used for any particular purpose.

All federal and state income taxes based on the value of the 2022 Winnebago Hike H120S and Ford F-150, if selected will be due from the Grand Prize winner. If the Grand Prize winner selects the one-time cash payment with the recreation vehicle, as well as winners of other prizes of \$5,000 or more, all appropriate and required federal and state taxes will be withheld by Special Olympics Washington in accordance with federal and state law and Special Olympics Washington will remit the balance of the cash prizes to the winners. Special Olympics Washington makes no guarantee that the Grand Prize Winner will be able to sell the recreation vehicle for the value of \$41,000 nor is there any guarantee that the Internal Revenue Service (IRS) will accept that value of the winner. Special Olympics Washington takes no responsibility for any tax liabilities. Consult your tax advisor.

Any controversy or claim arising out of or relating to the contract, or the breach thereof, shall be settled by binding arbitration administered by the American Arbitration Association (pursuant to its expedited procedures) under its Commercial Arbitration Rules, and judgment on the award rendered by the arbitrator may be entered in any court having jurisdiction thereof.

#### c(i) Dates of raffle and drawing:

Start Date - August 15

Appreciation Deadline – August 26 Appreciation Drawing – September 9 Early Bird Deadline – October 21 Early Bird Drawing – November 4 Grand Prize and Add-On Deadline – November 18 Grand Prize Drawing and Add-On Drawing – December 2

#### c(ii) Cost of raffle ticket:

Tickets are \$50 each, or 3-tickets for \$125, or 6-pack for \$200 Add-On Tickets are 1 for \$20, 3-pack for \$50 or 6-pack for \$75

### c(iii) Prizes available:

#### Appreciation Drawing:

\$1,000 cash (Value: \$1,000)

### **Early Bird Drawing:**

Winner's choice between a Tesla Model 3, BMW X5, or \$50,000 cash. (Value: \$50,000)

#### Grand Prize Drawing:

| Grand Prize:   | The Grand Prize is a 2022 Winnebago Hike H120S (donated/value \$41,000), plus a choice between a Ford F-150 (value \$40,000) or \$40,000 cash. (Value: \$81,000) |
|----------------|--|
| 2nd Prize:     | Vacation to Bordeaux, France or \$3,500 cash (Value: \$3,500)  |
| 3rd Prize:     | Vacation to Alaska or \$3,500 cash (Value: \$3,500)  |
| 4th Prize:     | Vacation to Amsterdam, Netherlands or \$3,000 cash (Value: \$3,000)  |
| 5th Prize:     | Vacation to Barcelona, Spain or \$2,500 cash (Value: \$2,500)  |
| 6th Prize:     | Vacation to Sydney, Australia or \$2,500 cash (Value: \$2,500)   |
| 7th Prize:     | Caribbean Cruise or \$1,500 cash (Value: \$1,500)  |
| 8th Prize:     | 12 - \$100 gas cards or \$1,200 cash (Value: \$1,200)  |
| 9th Prize:     | DK Metcalf Signed Helmet or \$1,000 cash (Value: \$1,000)  |
| 10th Prize:    | \$1,000 cash (Value: \$1,000)  |
| Prizes 11-60:  | 50 - \$100 gift cards (Value: \$5,000)   |
| Prizes 61-90:  | 30 - \$75 gift cards (Value: \$2,250)  |
| Prizes 91-335: | 245 - \$50 gift cards (Value: \$12,250)  |

Gift card winners (11-335) will be notified via email and will have a choice between receiving a gift card from one of the following brands:

REI Landry's Hulu Sephora Sunbasket Panera Bread Adidas HomeGoods Chipotle GrubHub Darden Visa Gift Card

### Add-On Drawing:

Prize: \$50,000 cash. (Value: \$50,000)

#### c(iv) Security of prizes:

Prizes including cash, vacations, and cars, which will be purchased and awarded after each applicable drawing with raffle revenue, thus prizes don't need to be protected since they are not being purchased prior to the raffle drawing.

The RV has been donated to Special Olympics Washington by Broadmoor RV and will be stored and secured at the Broadmoor RV facility located at 9145 St Thomas Dr, Pasco, WA 99301 until the raffle has been complete. The winner will coordinate with Special Olympics Washington for pick-up or delivery of the RV from Broadmoor RV.

#### c(v) Plans for selling raffle tickets:

Raffle tickets will be sold via phone, fax, mail, and in person. Please refer to the Raffle Ticket Process document attachment (Attachment A)

### c(vi) Description of how the integrity of the raffle will be protected:

Special Olympics Washington will conduct an audit of ticket stubs prior to each drawing. The audit will be performed by a member of the Special Olympics Washington staff who will use an Excel generated random list of tickets to audit. The tickets will be made up of the entire population of tickets sold, both active and voided. The sample size will be no less than 90 tickets.

All ticket purchase proceeds of the raffle, whether the tickets are sold in the Special Olympics Washington office by designated staff or through the call center, will be deposited into a Special Olympics Washington raffle account which is separate from the Organization's general operating funds.

An employee of Special Olympics Washington will draw all winning raffle tickets.

#### d) Explanation of how the proceeds from the raffle will be used: Funds will be used to further drive the vision of Special Olympics Washington as described on page 1 of this document.

- e) Plan to protect the licensee in the event of low ticket sales and other risks: There is no minimum ticket threshold that must be met in order for the grand prize and other prizes available to be awarded. All prizes, including the grand prize, will be awarded regardless of the number of ticket sales.
- f) Explanation of how the prize(s) will be purchased for the raffle: Cash prizes are offered from the sale of raffle tickets. Non-cash prizes, such as vacations and cars will be purchased if the winner chooses such prize in lieu of cash.

### g) Projected budget includes the following – (Attachment B):

- i. Estimated gross gambling receipts, expenses, and net income for the raffle.
- ii. Corresponding sales and prize levels with projected revenues and expenses for each level.
- iii. Minimum and maximum prizes available.
- h) Special Olympics Washington's dedicated employee is Mary Do.
- i) NZ Consulting Inc. will be the licensed service supplier.
- j) Incept will be our licensed call center.
- **k)** Raffle Ticket Process Document (Attachment A)

SPECIAL OLYMPICS WA WSGC Ticket Sales

2022

|                           | % of |          |         |                 | % of total |
|---------------------------|------|----------|---------|-----------------|------------|
|                           | В    | reakeven | revenue | Budget          | revenue    |
| Total # of Raffle Tickets |      | 6,400    |         | 25,000          |            |
| Average Price/ticket      |      | 38.00    |         | \$<br>38.00     |            |
| GROSS RAFFLE TICKET SALES |      | 243,200  | 82.8%   | \$<br>950,000   | 82.8%      |
| Total # of Add On Tickets |      | 4,408    |         | 17,217          |            |
| Average Price/ticket      | \$   | 11.50    |         | \$<br>11.50     |            |
| GROSS ADD ON TICKET SALES | \$   | 50,692   | 17.2%   | \$<br>197,996   | 17.2%      |
| TOTAL SALES               |      | 293,892  |         | \$<br>1,147,996 |            |
| Expenses:                 |      |          |         |                 |            |
| Advertising               |      | 15,000   | 5.1%    | 15,000          | 1.3%       |
| Professional Fees         |      | 44,084   | 15.0%   | 172,199         | 15.0%      |
| Personnel                 |      | 29,389   | 10.0%   | 114,800         | 10.0%      |
| Sales Expense             |      | 8,317    | 2.8%    | 32,488          | 2.8%       |
| Prize Expense             |      | 181,350  | 61.7%   | 181,350         | 15.8%      |
| Regulatory Expense        |      | 15,756   | 5.4%    | 49,920          | 4.3%       |
| TOTAL EXPENSE             |      | 293,896  | 100.0%  | 565,757         | 49.3%      |
|                           |      | (4)      |         | 582,239         | 50.7%      |



Rule Petition to Amend WAC 230-06-045- Conduct gambling activities on licensed business premises only

## JULY 2022 – Commission Review MAY 2022 – Rule-Making Petition Received

# Tab 3: JULY 2022 Commission Meeting Agenda.

### **Statutory Authority 9.46.070**

### Who Proposed the Rule Change?

Corey Lowell, Northshore Senior Center, Bothell, Washington

### Background

Corey Lowell of Northshore Senior Center in Bothell, Washington is proposing to amend WAC 230-06-045 to allow an organization with multiple physical locations having the same tax identification, same board members, and same bylaws, to operate bingo games under one license. Northshore Senior Center is a nonprofit organization with three physical locations where they offer services: Bothell, Kenmore, and Mill Creek. The Bothell and Kenmore locations are in King County and the Mill Creek location is in Snohomish County. Northshore Senior Center currently has a bingo license associated with the Bothell location. They want to operate bingo at the Kenmore and Mill Creek locations under the same bingo license issued to the Bothell location.

The petitioner feels this change is needed because WAC 230-06-045 (1) currently restricts bingo licensees to conducting bingo activities on the licensed business premises only. The petitioner feels that since the Kenmore and Mill Creek locations fall under the same organizational umbrella as the Bothell location, they should be able to operate bingo at the other two locations.

The petitioner feels that amending the rule in question will allow organizations with multiple locations that have the same organizational structure (i.e. same tax identification, board members, bylaws, etc.) to hold bingo games at each location with only one bingo license.

The petitioner noted that they are most interested in operating bingo at the Mill Creek location in addition to the Bothell location.

Attachments:

- Petition
- WAC 230-06-045

## **Policy Considerations**

Staff has the following policy concerns:

• RCW 9.46.0205 defines bingo in part as "a game conducted only in the county within which the organization is principally located..." The same RCW defines "principally located" as "For the purposes of this section, the organization shall be deemed to be principally located in the county within which it has its primary business office." Northshore Senior Center's primary business office is at the Bothell location in King County. The Mill Creek location is in Snohomish County. Since the Mill Creek location is not in the county within which the organization is principally located, a license cannot be issued to the Mill Creek location to conduct bingo.

### Staff Recommendation

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:

1) Initiate rule-making proceedings by filing the rule as proposed for further discussion; or

2) 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.

Staff recommends denying the petition due to the restrictions in RCW 9.46.0205. The licensee should seek legislative support to change the law to allow what they are proposing.

### Laydon, Ashlie (GMB)

From:no-reply@wsgc.wa.gov on behalf of WSGC Web <no.reply@wsgc.wa.gov>Sent:Tuesday, May 10, 2022 11:23 AMTo:Rules Coordinator (GMB)Subject:Request a Rule Change Submission from wsgc.wa.gov

External Email

Submitted on Tuesday, May 10, 2022 - 11:21am Submitted by anonymous user: 50.239.174.90 Submitted values are:

Petitioner's Name: Corey Lowell Mailing Address: 10201 East Riverside Dr City: Bothell State: WA Zip Code: 98011 Phone: 4252861048 Email: CoreyL@mynorthshore.org Rule Petition Type: Amend Rule - I am requesting WSGC to change an existing rule. ==Amend Rule - I am requesting WSGC to change an existing rule.== List rule number (WAC) if known: WAC 230-06-045 I am requesting the following change: Allow an organization with multiple sites (under the same tax id, having the same board, and bylaws, etc.) to be able to hold bingo at more than just the address that is on the currently license. This change is needed because: Currently (based on WAC 230-06-045), it is required for licensees to conduct bingo only at the business address where the license was originally issued. Our non-profit organization has multiple sites that fall under the same tax ID, same board members, same bylaws, etc. We would like to request that we be able to hold bingo at any site that falls under our organization umbrella. The effect of this rule change will be: To allow organizations (with the same tax id, having the same board, and bylaws, etc.), with multiple locations/sites to hold bingo games at all sites.

The results of this submission may be viewed at:

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwsgc.wa.gov%2Fnode%2F18%2Fsubmission%2F3 343&data=05%7C01%7Crules.coordinator%40wsgc.wa.gov%7Cc66c3ac6995741d70b5e08da32b21efc%7C11d0e21 7264e400a8ba057dcc127d72d%7C0%7C637878037872801698%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjA wMDAiLCJQIjoiV2IuMzIiLCJBTil6lk1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=pinvnXyHVDjirmV5leaTU PZmemqHSJWe2U2iZQve%2BLA%3D&reserved=0 WAC 230-06-045 Conduct gambling activities on licensed business premises only. (1) Except for raffle and enhanced raffle licensees, all other licensees, including electronic raffle licensees, must conduct all gambling activities on the licensed business premises.

(2) Charitable or nonprofit organizations licensed to conduct bingo and punch board and pull-tab games may sell punch boards and pull-tabs to customers of a licensed card room if the charitable or nonprofit organization:

(a) Shares a common wall with the card room; and

(b) Controls all doors, counters, or windows allowing customer access through the common wall between the two premises and the charitable or nonprofit organization can securely close and lock the doors, counters, or windows; and

(c) Keeps and sells the punch board and pull-tab games and redeems prizes only on their licensed business premises. Punch board and pull-tab players may take already purchased punch boards and pull-tabs into the card room area; and

(d) Allows only its employees to sell the punch board and pulltabs; and

(e) Posts signs at the door, window, or counter common to the two business premises that clearly notify customers of the organization's identity.

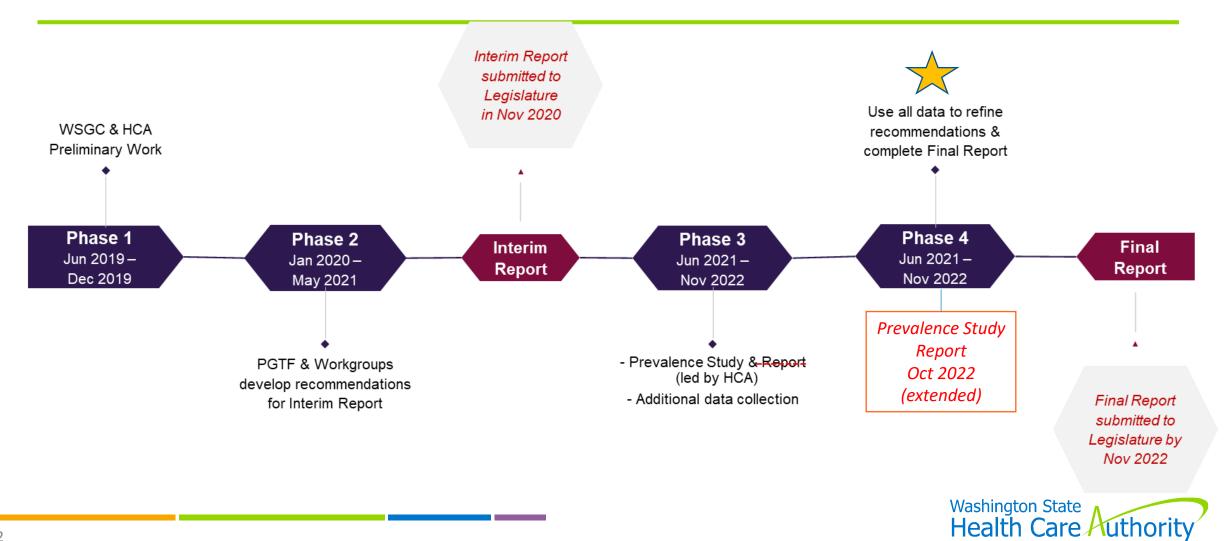
[Statutory Authority: RCW 9.46.070. WSR 21-21-079, § 230-06-045, filed 10/18/21, effective 11/18/21. Statutory Authority: RCW 9.46.070, 9.46.0277. WSR 14-21-079 (Order 707), § 230-06-045, filed 10/13/14, effective 1/1/15. Statutory Authority: RCW 9.46.070. WSR 06-17-132 (Order 601), § 230-06-045, filed 8/22/06, effective 1/1/08.]

# State Problem Gambling Program Update

# WA State Gambling Commission Public Meeting July 2022 Roxane Waldron, Manager State Problem Gambling Program



# PG Task Force – Timeline – Revised



2

# Adult PG Prevalence Survey

# AREAS OF FOCUS

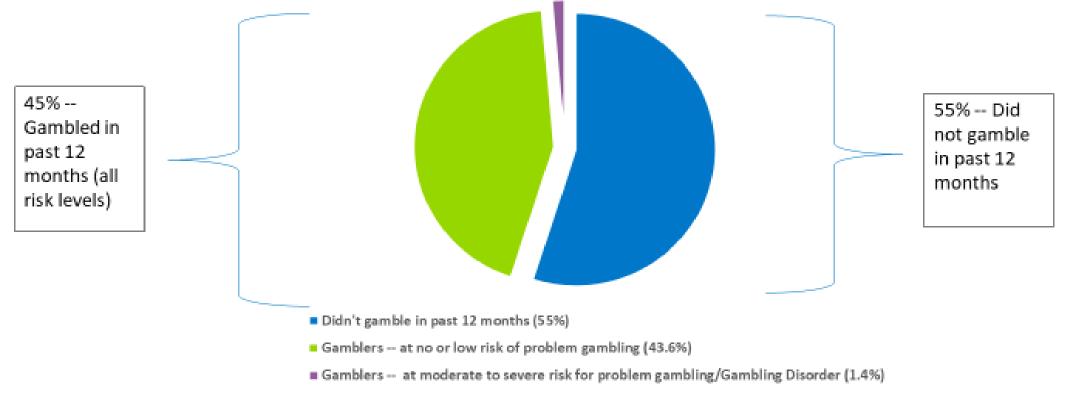


- 1) Beliefs and attitudes towards gambling
- 2) Gambling behavior & preferences
- 3) Awareness of problem gambling treatment services
- 4) Level of risk for problem gambling (prevalence for WA State residents)
- 5) Overlap with prevalence of mental health & substance use issues
- 6) Online gambling: Prevalence, methods and modes\*\*

\*\*added by Problem Gambling Task Force

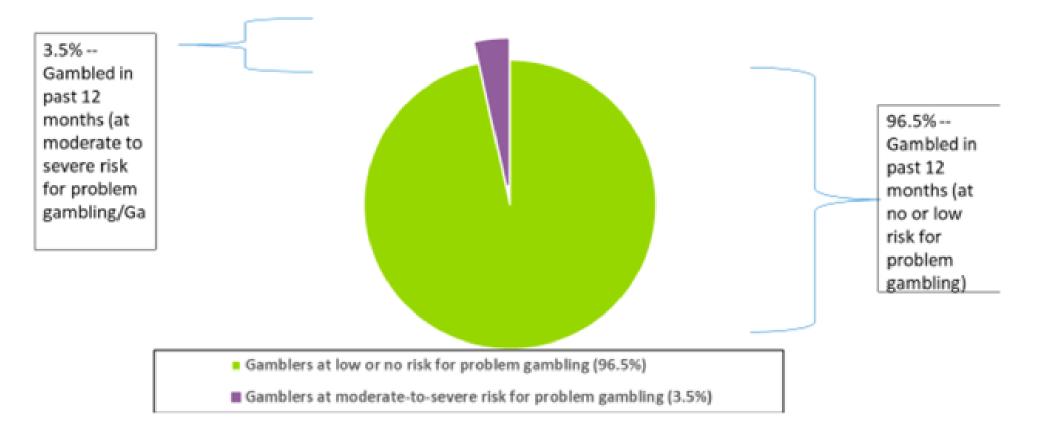


# All Adults, Gambling & Problem Gambling



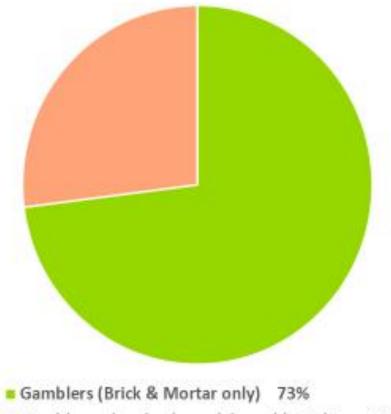


# Gambling & Problem Gambling





# Gambling & Online Gambling



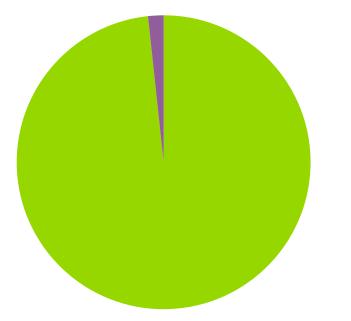
Gamblers who also (or only) gamble Online 27%



\* based on response to Q21

# Type of Gambling and Problem Gambling

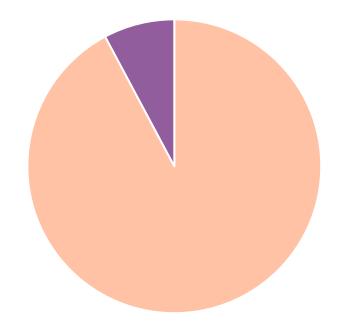
# Gamble in brick & mortar only



Gamble in brick & mortar (no or low risk of problem gambling) (98.3%)

At risk for moderate to severe problem gambling (1.7%)

Gamble online (may also gamble in brick & mortar)



Gamble online (no or low risk of problem gambling) (92.2%)

At risk for moderate to severe problem gambling (7.8%)



# Who gambles? (more likely)

# Men

- Aged 35-64
- People with education of high school (or less) or some college
- Military personnel (active, retired, in transition)



# Who gambles in brick & mortar venues?\*

More likely --

- Women
- Advanced degree
- Military (active, retired, in transition) service
- Retired persons

<u>Note: No significant differences</u> seen in race, ethnicity, martial status, or physical disability



<sup>9 \*</sup> Includes purchasing lottery tickets

# Who gambles online?

- Men
- Ages 18-34, followed by ages 35-64
- Never married
- High school degree
- No military service
- Employed



# Who is at greater risk for moderate-to-severe **problem gambling**? (PGSI score 5+)

- Black, Indigenous & People of Color (BIPOC) are at double the risk than 'White' (6% vs. 2.8%)
- People having some college (but not having graduated)

Note: Physical disability, gender, age, marital status, military status, employment status, region <u>were not</u> <u>detectable</u> as a significant factor



# Policy brief – possible WSGC items

 Address Illegal Online Gambling & Implications for Problem Gambling

Encourage the State legislature and relevant state agencies to study the impacts from illegal online gambling on WA State residents, including any policy recommendations relating to future legislation and related consumer protections, and regulation.



# Policy brief – possible WSGC items

- Tackle emergent commercial sports wagering
  - Recommend to the Legislature to create a workgroup to develop a 'Sports Bettors' Bill of Rights' (example: Virginia's recently enacted law) Strategy
  - Require that the sports wagering revenue be taxed for problem gambling services at no less than the current rate for other commercial gambling (rather than as a fixed payment or other model). This will allow funding for problem gambling services to match increases in gambling overall. (WSGC with Legislature)



# Legal Sports wagering -- recommendations

# Specific consumer protections (examples)

- Time limits
- Deposit limits (daily, weekly, monthly)
- Win/Loss limits
- Give real time updates on how time & money is being spent/lost
- Clock always prominently displayed on screen
- Ability to self-exclude online
- 'Cool off' options
- Ability to unsubscribe to marketing (while still holding account)
- Operators should not be allowed to offer 'credit lines'



# Legal Sports wagering (continued)

- Ensure sports wagering is directly taxed based on a percentage of net revenue (no less than the current rate)
- Enact a Sports Bettor's Bill of Rights (similar to Virginia's)
- Include the 'gold standard' for statute language:
  - Funding for problem gambling services, to include research, prevention, education/outreach/awareness, clinical training, treatment, and recovery
- Advertising guidelines to minimize/ban around Youth & colleges
- Not use the term, 'risk-free'
- Require that national Helpline # be included (for ads)





# WA State Problem Gambling Program (DBHR/HCA)

# Washington State Health Care Authority

# Roxane Waldron, Manager roxane.waldron@hca.wa.gov

1-360-867-8486

https://www.hca.wa.gov/health-careservices-supports/behavioral-healthrecovery/problem-gambling



# PROBLEM GAMBLING TASK FORCE -- POLICY BRIEF MAY 2022

# Introduction

The Washington State Legislature in the 2019-2021 biennium budget directed the formation of the joint legislative Problem Gambling Task Force (PGTF). Two mandatory reports are required:

- An Interim Report (submitted November 2020)
- A Final Report due November 2022

The PGTF launched in January 2020 and will complete its work by November 2022. Since 2020, members have been attending quarterly PGTF meetings and most have participated in at least one topical workgroup. The scope of the PGTF's work is as follows:

- How to proceed with a state prevalence study measuring adult participation in gambling and adult problem gambling and gaming?
- Whether Washington state should expand state funding for prevention, treatment and recovery?
- What steps should the state take to improve current licensing and certification of problem gambling health care providers to meet the current and projected demand for services?
- Identifying additional problem gambling areas for consideration and associated actions needed.

Based on data from the 2021 Problem Gambling Prevalence Study and preliminary results from the gap analysis of available problem gambling-related services compared to current and anticipated need, the PGTF is issuing this policy brief that summarizes the anticipated PGTF recommendations that are most relevant for state agencies. Note that these recommendations have not been fully approved for inclusion in the final report. However, given the time frame that state agencies work with to assess and potentially submit policy and budget recommendations to the Governor's Office for the 2023 state legislative session, PGTF leadership felt it critical to develop this policy brief at this time.

# Policy & Funding Objectives, Rationale and Strategies

# Objective 1: Integrate problem gambling awareness, prevention, treatment, and recovery into behavioral health planning, policy, and treatment settings.

Clinical treatment for problem gambling/Gambling Disorder (DSM-5) and other related services receive NO federal block grant, SAMHSA grant, or other federal funding. At the state level, problem gambling services are 'siloed' and screening for problem gambling is not currently required when screening for mental health and substance use (co-occurring) disorders. If the current proposed amendment to the State Medicaid plan is approved by CMS allowing coverage of problem gambling clinical treatment under Medicaid and the Legislature approves state matching funding, that will expand problem gambling treatment to Apple Health clients.

**Strategy 1.1** Fund state match for Medicaid coverage of problem gambling treatment. Initial state funds were appropriated SFY 2023; additional state match needed for subsequent state biennium budgets. Awaiting CMS approval under the state Medicaid plan. (continuing HCA agency request legislation)

**Strategy 1.2** Fund technical assistance to selected behavioral health agencies to integrate a validated problem gambling screening tool along with other mental health and substance use screenings. **(HCA agency decision package request)** 

# Objective 2: Improve availability and access to problem gambling treatment and recovery services through public and private behavioral health care delivery channels

Based on the initial results of the 2021 Problem Gambling Prevalence Study, many more individuals would benefit from problem gambling clinical treatment than the State Problem Gambling Program serves annually, especially in more rural areas of the state. To meet current and future anticipated needs, the certified gambling counselor workforce needs to be expanded. At the same time, a complementary robust year-round outreach campaign to inform the state population about this specialized treatment will need to be undertaken. To ensure that certified gambling counselors and agencies continue to be able to afford providing statereimbursed treatment, increasing the fee-for-service treatment encounter rates to match rates for other state-provided behavioral health treatment is urgent.

**Strategy 2.1** For the State funded problem gambling treatment, increase reimbursement rates for problem gambling assessment and treatment (fee-for-service) rates that match or exceed provider rates in parity with state-funded behavioral health (HCA/DBHR)

**Strategy 2.2** Achieve insurance coverage parity. Direct the Legislature and the insurance Commissioner to assess how comprehensively private insurers operating in Washington State are covering and complying with all aspects of problem gambling treatment akin to insurance coverage for mental health and substance use disorder treatment.

(Legislature and Insurance Commissioner)

### Objective 3: Increase funding for the dedicated state problem gambling fund to meet current and future clinical treatment needs and to enhance problem gambling-related services to better serve WA State residents

Both increased and sustainable funding sources are needed to support a comprehensive statewide problem gambling program.

**Strategy 3.1** Increase funding via the current business and occupation tax for problem gambling to a level that will meet the anticipated need for expanded state problem gambling services and/or other funding methods to raise the necessary revenue **(HCA/DBHR)** 

Service components include:

- Treatment reimbursement (outpatient and residential) services
- Workforce development to train additional Certified Gambling Counselors in geographic and demographic areas not currently served or underserved
- Continuous and robust Prevention campaigns for Youth, Adults and other demographic groups that are currently underserved
- On-going research (periodic prevalence studies, behavioral health provider survey, cost-benefit analysis on impacts of gambling, etc.)
- Technological enhancement to allow the state problem gambling program to improve program accountability through strengthening monitoring and evaluation

### **Objective 4: Tackle emergent commercial sports wagering**

Sports wagering has been legalized in over 30 states across the nation and is generating a huge amount of new revenue, including through taxes. When the State of Virginia legalized sports wagering, it enacted a 'Sports Bettors' Bill of Rights.' If Washington State legalizes sports wagering for commercial operators, the legislature should consider enacting consumer protections at the same time. And as with other gambling revenue, commercial sports wagering operators should be required to designate a percentage to the state problem gambling account so that as gambling increases, state-wide problem gambling services can meet the need.

In the event that WA State legalizes commercial sports wagering:

Strategy 4.1Recommend to the Legislature to create a workgroup to develop a'Sports Bettors' Bill of Rights' (example: Virginia's recently enacted law)Strategy 4.2Require that the sports wagering revenue be taxed for problem game

**Strategy 4.2** Require that the sports wagering revenue be taxed for problem gambling services at no less than the current rate for other commercial gambling (rather than as a fixed payment or other model). This will allow funding for problem gambling services to match increases in gambling overall. (WSGC with Legislature)

## **Objective 5: Address Online Gambling and Implications for Problem Gambling**

The 2021 problem gambling prevalence study showed that, of those that gamble, 27% gamble online, despite that this activity was not legal at the time the survey was conducted (legal

sports wagering at Tribal casinos had not yet opened). The prevalence study also showed that, as compared to gamblers overall, those individuals who gamble online are at <u>double the risk</u> of moderate-to-severe problem gambling/Gambling Disorder (3.5% compared to 7.8%). Except for legal sports wagering at Tribal casinos which opened in Sept. 2021, online gambling is illegal in Washington State. Because illegal online gambling is neither regulated nor taxed in WA State, the state problem gambling fund receives no funding from it to mitigate the negative impacts, including additional problem gambling treatment and other services needed because of illegal online gambling.

**Strategy 5.1:** Encourage the state Legislature and relevant state agencies to study the impacts from online gambling on WA State and residents, including any policy recommendations for relating to future legalization and related consumer protections, and regulation. **(Legislature/WSGC/Attorney General's Office – Consumer Protection Office)** 

# CONTACT

# Victor Colman, Consultant Staff viccolman@uncommonsolutionsinc.com

**JUNE 2022** 



# Washington State Gambling Commission

# AGENCY REQUEST LEGISLATION AND AGENCY PRIORITIES FOR THE 2023 LEGISLATIVE SESSION

Tommy Oakes, Interim Legislative Liaison

Protect the public by ensuring that gambling is legal and honest

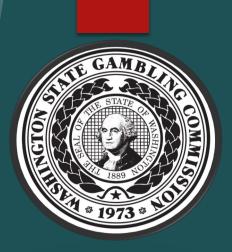
# What is needed Today:

- Today, I will be asking for your direction for the 2023 Agency Request Legislation and Agency Request Priorities. The following requests are based on commissioners, staff, stakeholders, and tribal requests.
- Once a direction is given, the staff will further research and draft bill language for any agency request legislation for your review at the August meeting, with final approval at the September meeting.
- With any legislative priorities that are directed by the commission, there may be letters of support drafted for your approval.
- Commissioners can also ask for any legislative priorities to be turned into Agency Request Legislation.



# **Commissioner Request:**

• Commissioner Reeves requested that staff look at why the director is appointed by the commission and not appointed by the Governor. Also, to research if there are other agencies that have this same process.



# RCW <u>9.46.080</u>

# Gambling commission—Administrator—Staff—Rules and regulations—Service contracts.

The commission shall employ a full-time director, who shall be the administrator for the commission in carrying out its powers and duties and who shall issue rules and regulations adopted by the commission governing the activities authorized hereunder and shall supervise commission employees in carrying out the purposes and provisions of this chapter. In addition, the director shall employ a deputy director, not more than three assistant directors, together with such investigators and enforcement officers and such staff as the commission determines is necessary to carry out the purposes and provisions of this chapter. The director, the deputy director, the assistant directors, and personnel occupying positions requiring the performing of undercover investigative work shall be exempt from the provisions of chapter <u>41.06</u> RCW, as now law or hereafter amended. Neither the director nor any commission employee working therefor shall be an officer or manager of any bona fide charitable or bona fide nonprofit organization, or of any organization which conducts gambling activity in this state.

The director, subject to the approval of the commission, is authorized to enter into agreements on behalf of the commission for mutual assistance and services, based upon actual costs, with any state or federal agency or with any city, town, or county, and such state or local agency is authorized to enter into such an agreement with the commission. If a needed service is not available from another agency of state government within a reasonable time, the director may obtain that service from private industry.



# **History:**

In researching the history of this, it appears this RCW along with most of the early gambling-related RCWs were crafted with corruption in mind. As you know, our agency was created in 1973 out of a need to regulate and stop the corruption of gambling in this state.

In 1971, King County grand jury indicts public officials in a police payoff scandal:

28 police officers/political leaders, including King County sheriff, prosecutor, and Seattle councilmember. The Seattle Police Chief resigned, and the "Seattle Crime Family" leader was convicted of racketeering (illegal bingo cards).



This is an article that appeared in the Seattle Times Opinion & Comment on December 4, 1972:

# "Rigid Rules on Gambling"

"The key element in King County Prosecutor Christopher T. Bayley's recommended legislation is the creation of a state gambling commission, adequately insulated from conflict-of-interest pressures, which would have broad powers to issue licenses and to write the ground rules for legalized gaming."

"Law-enforcement experts are under no illusions that the state commission approach can be achieved without a fight."

- By having the process of the director appointed by the commission in RCW, the intent was to ensure one person did not have the ultimate power to appoint the director.
- All agents are exempt employees to help eliminate corruption.
- The RCW <u>9.46.080</u> would need to be changed to make this a Governor appointed position.
- According to the OFM 2021 Organization Chart of Washington State Government, there are over 30 agencies in this state in which the director is chosen by their commissioners.



# **Staff Request:**

• Staff is requesting changes to RCW 9.46.0356 concerning Promotional Contests Of Chance (PCOC)



### RCW <u>9.46.0356</u>

### Promotional contests of chance authorized.

(1) The legislature authorizes:

(a) A business to conduct a promotional contest of chance as defined in this section, in this state, or partially in this state, whereby the elements of prize and chance are present but in which the element of consideration is not present;

(b) A financial institution, as defined in \*RCW <u>30.22.040</u>, to conduct a promotional contest of chance under this section in which: (i) A drawing for an annual prize is held that includes as eligible prize recipients only those persons who deposited funds at the financial institution in a savings account, certificate of deposit, or any other savings program and retained those funds for at least twelve months in the savings account, certificate of deposit, or other savings program; and (ii) drawings for other prizes are held from time to time that include as eligible prize recipients only those persons who deposited funds at the financial institution in a savings account, certificate of deposit, or other prizes are held from time to time that include as eligible prize recipients only those persons who deposited funds at the financial institution in a savings account, certificate of deposit, or other savings program. No such contest may be conducted, either wholly or partially, by means of the internet.

(2) Promotional contests of chance under this section are not gambling as defined in



### RCW <u>9.46.0237</u>.

(3) Promotional contests of chance shall be conducted as advertising and promotional undertakings solely for the purpose of advertising or promoting the services, goods, wares, and merchandise of a business.

(4) No person eligible to receive a prize in a promotional contest of chance under subsection (1)(a) of this section may be required to:

(a) Pay any consideration to the promoter or operator of the business in order to participate in the contest; or

(b) Purchase any service, goods, wares, merchandise, or anything of value from the business, however, for other than contests entered through a direct mail solicitation, the promoter or sponsor may give additional entries or chances upon purchase of service, goods, wares, or merchandise if the promoter or sponsor provides an alternate method of entry requiring no consideration.

(5) No person eligible to receive a prize in a promotional contest of chance under subsection (1)(b) of this section may be required to pay any consideration other than the deposit of funds, or purchase any service, goods, wares, merchandise, or anything of value from the financial institution.

(6)(a) As used in this section, "consideration" means anything of pecuniary value required to be paid to the promoter or sponsor in order to participate in a promotional contest. Such things as visiting a business location, placing or answering a telephone call, completing an entry form or customer survey, or furnishing a stamped, self-addressed envelope do not constitute consideration.

(b) Coupons or entry blanks obtained by purchase of a bona fide newspaper or magazine or in a program sold in conjunction with a regularly scheduled sporting event are not consideration.

(7) Unless authorized by the commission, equipment or devices made for use in a gambling activity are prohibited from use in a promotional contest.

(8) This section shall not be construed to permit noncompliance with chapter <u>19.170</u> RCW, promotional advertising of prizes, and chapter <u>19.86</u> RCW, unfair business practices.



# Why?

- Since 2021, we have seen a significant increase in the number of complaints/inquiries regarding entities offering an unlicensed activity not considered to be gambling because it lacks consideration (which can include a person's time) and the complaint/inquiries are taking a significant amount of staff time to address:
- Over 20 complaints in the last 17 months
- Staff time has taken up to 50 hours and AAG costs to learn more about the offering in WA and how it may or may not comply with the statute



WSGC staff believe that organizations are trying to offer promotional contests beyond what was intended by the legislature:

- Statute states only a "business" can offer a PCOC, which is not defined in statute we have interpreted "business" to mean commercial businesses
- Prohibit contests using the internet or a mobile device. The intent has always been to promote the goods or services of a business not to promote business as a service, such as an online marketplace or online social gaming platforms.
- Clarify method of entry to ensure the promotional contest of chance does not become a gambling activity by adding consideration. This is not gambling because it lacks consideration.
- Businesses should not be making any money on these promotional contests of chance other than the increased sales of their goods or services. Nonprofits have the ability to get money for their stated purpose through licensed/unlicensed activities.



# These changes align with the Governor's **Priorities of:**

- Promoting Healthy and Safe Communities
  - $\circ$  Consumer protection concerns
  - Like a PCOC, but really an unlicensed, unregulated activity run by a charity or business requesting money for entry into the contest for the purposes of fundraising not to promote their goods or services.
- Efficient, Effective, and Accountable Government
  - Goes to our mandate of promoting the social welfare of the people through strict regulation and control (RCW 9.46.010)
  - Ensure that these contests do not include consideration and therefore are not a gambling activity



## **Stakeholder and Tribal Partner's Requests:**

- Hybrid Table Games
- Online Social Gaming (Play to Pay)



# **Legislative Priorities:**

- Law Enforcement Certification and Training
- Problem Gambling Task Force Recommendations



### Law Enforcement Certification and Training:

As we have discussed in prior meetings, the passage of Engrossed Second Substitute Senate Bill 5051 addressed a public policy concern by requiring all peace officers and corrections officers to obtain and maintain certification that could be denied, suspended, or revoked by the Washington State Criminal Justice Training Commission (WSCJTC) and adhere to set standards for hiring and training.

Unfortunately, this bill left out limited authority of law enforcement agencies like ours. This has created issues in training and certification for us.

To address this inconsistency in certification and training, it appears to require a legislative fix for, "Limited authority Washington Peace Officer", as defined in RCW 10.93.020, to:

- Obtain and maintain certification that could be denied, suspended, or revoked by WSCJTC and
- Be mandated to be trained by the WSCJTC.

We have been working with the four other state-limited law enforcement agencies (State Parks, Liquor and Cannabis, Department of Natural Resources, and Office of Insurance Commissioner) affected by this. We have also been talking with legislators and the Washington State Criminal Justice Training Commission (CJTC) to address a technical fix to allow us to be certified and trained to state standards.



# Legislative Recap:

**Action Needed Today:** 

### **Determine 2023 Agency Request Legislation**

- Governor Appointed Director
- Changes to Promotional Contests of Chance
- Other Suggestions

### **2023 Legislative Priorities**

- Law Enforcement Certification and Training
- Problem Gambling Task Force Recommendations





# Questions?



# FY23 Budget Review

July 2023

Kriscinda Hansen Chief Financial Officer

Protect the public by ensuring that gambling is legal and honest

# FY22 summary and FY23 proposed changes

| Expenditure<br>Category | FY22 budgeted<br>to date | FY22 spent to<br>date | difference    | FY23 already<br>adopted | FY23<br>proposed | difference    |
|-------------------------|--------------------------|-----------------------|---------------|-------------------------|------------------|---------------|
| FTEs                    | 124                      | 95                    | (29)          | 124                     | 114              | (10)          |
| Personnel               | \$11,937,154             | \$9,127,551           | (\$2,809,603) | \$13,382,433            | \$12,800,177     | (\$582,256)   |
| Contracts               | \$1,782,022              | \$69,272              | (\$1,712,750) | \$1,944,012             | \$349,200        | (\$1,594,812) |
| Goods & Services        | \$3,573,988              | \$2,963,490           | (\$610,498)   | \$140,500               | \$1,353,802      | \$1,213,302   |
| Travel                  | \$311,366                | \$108,196             | (\$203,170)   | \$339,660               | \$352,380        | \$12,720      |
| Equipment               | \$545,413                | \$244,665             | (\$300,748)   | \$594,984               | \$670,000        | \$75,016      |
| Grants and benefits     | \$2,321                  | \$4,000               | \$1,679       | \$2,532                 | \$21,700         | \$19,168      |
| Agency total            | \$18,152,264             | \$12,517,174          | (\$5,635,090) | \$16,404,121            | \$15,547,259     | (\$856,862)   |



# Washington State Gambling Commission

# Questions?

Protect the public by ensuring that gambling is legal and honest



### STATE OF WASHINGTON GAMBLING COMMISSION

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

July 14, 2022

TO: COMMISSIONERS: Alicia Levy, Chair Julia Patterson, Vice Chair Sarah Lawson

Bud Sizemore Kristine Reeves

**FROM:** Adam Teal, Acting Legal Manager Legal and Records Division

### SUBJECT: Jeffrey G. Juangco, CR 2021-01639 Final Order – July 14, 2022 Commission Meeting

Jeffrey Juangco has a gambling license authorizing Public Card Room Employee activity; Juangco's license is not currently linked to an employer. His license expires on September 7, 2022.

On November 9, 2021, a WSGC Special Agent was informed by the Regional General Manager of Fortune Poker that one of his employees, Jeffrey Juangco, had been found stealing money out of rakes being collecting from poker game pots. Fortune staff had detected a pattern in which Juangco would collect chips intended to go in either Fortune's rake and/or the Player Supported Jackpot, and place the chips into his chip tray. When he would rotate to a new table, instead of depositing the chips into the proper drop box, Juangco would instead steal the chips by placing them into his own toke box. Over the course of eleven separate days, Fortune calculated the entire amount stolen by Juangco was over \$2,200.

Director Tina Griffin issued Juangco a Notice of Administrative Charges on May 4, 2022, by regular and certified mail to his last known address on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by May 30, 2022. To date, the Commission has received no communication from Juangco.

Jeffrey Juangco's failure to respond to the charges or timely request a hearing is a waiver of Juangco's right to a hearing in Case No. CR 2021-01639. You may take final action against his gambling license. Juangco obtained unauthorized control of his employer's property, chips, with the intent of depriving Fortune of the chips while in the course of his employment. In doing so, Juangco is in violation of RCW 9A.56.050, 9.46.1961, and 9.46.075(2), (4), (8), (9) and (10) and WAC 230-03-085(1), (3), and (8). Based on his conduct, Juangco cannot show by clear and convincing evidence that he is qualified to keep his gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Jeffrey Juangco's Public Card Room Employee license, Number 68-35811.

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| 5  | STATE OF W   | ASHINGTON                                   |  |
| 6  | GAMBLING C   |   |  |
| 7  | In the Matter of:  | NO. CR 2021-01639                           |  |
| 8  | JEFFREY G. JUANGCO,  | FINAL ORDER OF THE                          |  |
| 9  | License No. 68-35811,  | GAMBLING COMMISSION                         |  |
| 10 |  |   |  |
| 11 | Licensee.  |   |  |
| 12 | This matter having come before the Washington State Gambling Commission                      |   |  |
| 13 | (Commission) on July 14, 2022, the Commission makes the following Findings of Fact,          |   |  |
| 14 | Conclusions of Law, and issues its Final Order:  |   |  |
| 15 | I. FINDINGS OF FACT  |   |  |
| 16 | 1. The Washington State Gamblin  | g Commission issued Jeffrey Juangco License |  |
| 17 | No. 68-35811 authorizing Public Card Room Employee activity; Juangco's license is not        |   |  |
| 18 | currently linked to a House-Banked Card Room.  |   |  |
| 19 | 2. This license, which expires on September 7, 2022, was issued subject to                   |   |  |
| 20 | Juangco's compliance with state gambling laws and Commission rules.                          |   |  |
| 21 | 3. Juangco has been licensed since 2020.   |   |  |
| 22 | 4. On November 9, 2021, a WSGC Special Agent received a call from Pat Hosier,                |   |  |
| 23 | the Region General Manager of Fortune Properties, the parent company of Fortune Poker in     |   |  |
| 24 | Renton. Hosier was calling to inform the agent that Fortune had discovered that one of their |   |  |
| 25 | employees had been stealing from them.   |   |  |
| 26 |  |   |  |
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FINAL ORDER OF THE GAMBLING COMMISSION

IN RE: JEFFREY G. JUANGCO NO. 2021-01639

5. According to Hosier, the discovery was made during a routine review of
 surveillance footage. Fortune believed that the employee that was caught stealing, Jeffrey
 Juangco, had been doing so for a while. Accordingly, Fortune Poker's General Manager Jeff
 Hirai was in the process of reviewing all of the footage taken while Juangco was working, dating
 back to October 13, 2021.

6 6. On September 16, 2021, the Agent called Hirai to discuss the matter. Hirai told
7 the Agent that the issue was discovered when Hirai was reviewing footage from November 8,
8 2021. Hirai noticed that Juangco exhibited abnormal behavior.

9 7. Upon closer review of the footage, Hirai noticed that Juangco was collecting
10 money from the rake of the pot<sup>1</sup>, and keeping it for himself. Upon reporting this to Hosier, Hirai
11 was ordered to review all of Fortune's footage from when Juangco was working.

8. Hirai told the Agent that in his review of the footage, there was a pattern to
Juangco's behavior. He would collect money from the rake of the pot at the appropriate time,
which was intended to go to both the card room fees and the Player Supported Jackpot<sup>2</sup> (PSJ).

9. Juangco would collect the chips in the pot, and place the chips into his chip tray<sup>3</sup>
as opposed to depositing them into the proper drop box. According to Hirai, Juangco was
attempting to disguise his actions as though he was exchanging chips. Juangco never properly

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If a player's tray is short money at the end of their shift, they are required to pay the difference to the house. FINAL ORDER OF THE 2 GAMBLING COMMISSION

 <sup>&</sup>lt;sup>1</sup> A rake is the portion of a poker hand pot that a dealer collects as participation fee from players. Once the maximum fee for the hand has accumulated, a dealer is to take the rake, spread the chips or money on the table so that surveillance may view the rake, and then deposit the rake into a drop box for collection. The rake collected into the drop box represents the gross receipts/revenue that the card room collects on that hand.

 <sup>&</sup>lt;sup>2</sup> A Player Supported Jackpot (PSJ) is collected from a poker hand pot in the same manner as the card room fees are taken from a pot. Unlike the card room fee portion, the PSJ funds are deposited into a separate drop box that funds a contest of chance separate from the poker game itself. All funds collected as part of the PSJ go directly back to players as prizes.

<sup>&</sup>lt;sup>3</sup> Dealers are required to sign out an Imprest Dealer Bank Chip Tray at the beginning of their shift. The tray is used so that a player may either buy chips from the dealer by handing them cash, or by exchanging chips between the dealer and player (for example: a player may "color up" by exchanging twenty-five \$1 chips for one \$25 chip, or "color down" by exchanging one \$100 chip for four \$25 chips). All dealers have a tray of their own, and all trays must maintain a \$600 balance on it, regardless of whether there is cash or chips given to the dealer.

1 deposited the collected rake into the proper box, but rather deposited the chips that he placed in
2 his tray into his toke box<sup>4</sup> whenever he rotated to a new table.

10. Hirai told the Agent that Fortune had called Juangco to come into their facility on
November 9, 2021 upon the initial theft discovery. Hirai said that he could not make it in. Hirai
then told Juangco that his employment depended on him coming in that day, and Juangco again
said he couldn't make it.

7 11. When Juangco refused to appear in person Hirai, with Hosier and other members
8 of Fortune's management on the call, informed Juangco of what they had seen in the surveillance
9 video. Juangco claimed he didn't realize what he was doing. Juangco was fired then from his
10 employment over the phone.

11 12. On December 2, 2021 the Agent went to Fortune Poker to retrieve a portable hard
12 drive containing the video surveillance. While there, the Agent also received a copy of a
13 spreadsheet compiled by surveillance employee Sung Purnell. Purnell's spreadsheet detailed the
14 amounts that he observed Juangco steal, broken down by date and time.

15 13. The Agent began a review of the video surveillance footage by comparing
photographs that he had obtained of Juangco from the Department of Licensing and Fortune's
employment records, to ensure that it was Juangco that was on the received footage. Upon
confirming that, the Agent reviewed footage from October 13, 14, 15, and 16 of 2021.

19 14. In his review of the October 13, 2021 footage, the Agent was able to make the20 following observations:

a. The Agent observed fifteen separate incidents of Juangco stealing chips from the pot in the same manner that Hirai had detailed. On all fifteen occasions, Juangco took chips from the pot, and placed them into his tray.

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<sup>26 4</sup> A toke box is a drop box that is assigned to a dealer when they begin their shift. The toke box is where dealers are to deposit any tips, or tokes, that they receive from players while dealing. FINAL ORDER OF THE GAMBLING COMMISSION 4565 7th August S.E. Learn WA 08502

| 1  | b.                 | On four occasions, Juangco took a total of \$6 worth of chips from the pot,    |
|----|--------------------|--|
| 2  |                    | placed those chips into his tray, and then began the next hand without         |
| 3  |                    | depositing the rake chips into a drop box. Each incident resulted in a \$3     |
| 4  |                    | loss to the card room, and a \$3 loss to the PSJ; a total of \$24 stolen by    |
| 5  |                    | Juangco.   |
| 6  | с.                 | On five occasions, Juangco took a total of \$8 worth of chips from the pot,    |
| 7  |                    | and placed those chips into his tray. Juangco then placed a \$1 chip back      |
| 8  |                    | into the pot, kept the remaining \$7 in his tray, and then began the next      |
| 9  |                    | hand without depositing the rake chips into a drop box. Each incident          |
| 10 |                    | resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of |
| 11 |                    | \$35 stolen by Juangco.  |
| 12 | d.                 | On three occasions, Juangco took \$5 worth of chips from the pot, and          |
| 13 |                    | placed those chips in his tray, and began the next hand without depositing     |
| 14 |                    | the rake chips into a drop box. Each incident resulted in a \$3 loss to the    |
| 15 |                    | card room, and a \$2 loss to the PSJ; a total of \$15 stolen by Juangco.       |
| 16 | e.                 | On two occasions, Juangco took a total of \$5 worth of chips from the pot,     |
| 17 |                    | and placed those chips into his tray. Juangco then placed \$2 worth of         |
| 18 |                    | chips into the pot, kept the remaining \$3 in his tray, and then began the     |
| 19 |                    | next hand without depositing the rake chips into a drop box. Each incident     |
| 20 |                    | resulted in a \$2 loss to the card room, and a \$1 loss to the PSJ; a total of |
| 21 |                    | \$6 stolen by Juangco.   |
| 22 | f.                 | On one occasion, Juangco took a total of \$10 worth of chips from the pot,     |
| 23 |                    | and placed those chips into his tray. Juangco then placed \$3 worth of         |
| 24 |                    | chips back into the pot, kept the remaining \$7 in his tray, and then began    |
| 25 |                    | the next hand without depositing the rake chips into a drop box. This          |
| 26 |                    | resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ.            |
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FINAL ORDER OF THE GAMBLING COMMISSION

| 1  | g.                    | At approximately 0228, a player purchased \$40 worth of chips from          |
|----|-----------------------|---|
| 2  |                       | Juangco. Juangco then placed two \$20 bills onto the center of his chip     |
| 3  |                       | tray.   |
| 4  | h.                    | At 0230, a player gave Juangco a toke of three \$1 chips. Juangco           |
| 5  |                       | motioned as if he was exchanging the chips for a larger denomination, but   |
| 6  |                       | instead placed the three chips into his toke box, and then took a \$2 chip  |
| 7  |                       | from his tray and placed it into his toke box.                              |
| 8  | i.                    | At 0231, while rotating tables, Juangco is observed taking chips from his   |
| 9  |                       | tray and placing them into his toke box. He also took the two \$20 bills    |
| 10 |                       | and placed them into his front pocket.                                      |
| 11 | j.                    | When Juangco ended his shift, his tray was short \$8. Juangco was           |
| 12 |                       | required to pay the difference to the cage.                                 |
| 13 | 15. In his r          | review of the October 14, 2021 footage, the Agent was able to make the      |
| 14 | following observation | s:  |
| 15 | a.                    | The Agent observed twenty separate incidents of Juangco stealing chips      |
| 16 |                       | from the pot in the same manner that Hirai had detailed. On all twenty      |
| 17 |                       | occasions, Juangco took chips from the pot, and placed them into his tray.  |
| 18 | b.                    | On nine occasions, Juangco took a total of \$7 worth of chips from the pot, |
| 19 |                       | placed those chips into his tray, and then began the next hand without      |
| 20 |                       | depositing the rake chips into a drop box. Each incident resulted in a \$4  |
| 21 |                       | loss to the card room, and a $3$ loss to the PSJ; a total of $63$ stolen by |
| 22 |                       | Juangco.  |
| 23 | с.                    | On seven occasions, Juangco took a total of \$8 worth of chips from the     |
| 24 |                       | pot, and placed those chips into his tray. Juangco then placed \$1 worth of |
| 25 |                       | chips into the pot, kept the remaining \$7 in his tray, and then began the  |
| 26 |                       | next hand without depositing the rake chips into a drop box. Each incident  |
| 1  | FINAL ORDER OF THE    | 5   |

FINAL ORDER OF THE GAMBLING COMMISSION resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$49 stolen by Juangco.

- d. On two occasions, Juangco took a total of \$6 worth of chips from the pot, placed those chips into his tray, and then began the next hand without depositing the rake chips into a drop box. Each incident resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by Juangco.
- e. On one occasion, Juangco took a total of \$6 worth of chips from the pot, and placed those chips into his tray. Juangco then placed \$2 worth of chips into the pot, kept the remaining \$3 in his tray, and then began the next hand without depositing the rake chips into a drop box. This resulted in a \$3 loss to the card room, and a \$3 loss to the PSJ.
- f. On one occasion, Juangco took a total of \$4 worth of chips from the pot, placed those chips into his tray, and then began the next hand without depositing the rake chips into a drop box. This resulted in a \$4 loss to the card room.
- g. At 2300, a player purchased \$20 in chips from Juangco. Juangco placed the \$20 bill in the center of his tray.
- h. At 0130, after rotating to a different table, the \$20 was no longer in Juangco's tray.
- At 0203, Juangco rotated tables again. Juangco can be seen taking chips from his tray and placing them into his toke box.
  - j. When Juangco ended his shift, his tray was short \$8 short. Juangco was required to pay the difference to the cage.

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16. In his review of the October 15, 2021 footage, the Agent was able to make the

26 following observations:

FINAL ORDER OF THE GAMBLING COMMISSION

| 1  | I                  | The Area to have a transfer and a second to be the former of the               |
|----|--------------------|--|
| 1  | a.                 | The Agent observed twenty-nine separate incidents of Juangco stealing          |
| 2  |                    | chips from the pot in the same manner that Hirai had detailed. On all          |
| 3  |                    | twenty-nine occasions, Juangco took chips from the pot, and placed them        |
| 4  |                    | into his tray.   |
| 5  | b.                 | On eighteen occasions, Juangco took a total of \$7 worth of chips from the     |
| 6  |                    | pot, and then began the next hand without depositing the rake chips into       |
| 7  |                    | a drop box. Each incident resulted in a \$4 loss to the card room, and a \$3   |
| 8  |                    | loss to the PSJ; a total of \$126 stolen by Juangco.                           |
| 9  | с.                 | On seven occasions, Juangco took a total of \$8 worth of chips from the        |
| 10 |                    | pot, and placed those chips into his tray. Juangco then placed \$1 worth of    |
| 11 |                    | chips into the pot, kept the remaining \$7 in his tray, and then began the     |
| 12 |                    | next hand without depositing the rake chips into a drop box. Each incident     |
| 13 |                    | resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of |
| 14 |                    | \$42 stolen by Juangco.  |
| 15 | d.                 | On two occasions, Juangco took a total of \$10 worth of chips from the         |
| 16 |                    | pot, and placed those chips into his tray. Juangco then placed \$3 worth of    |
| 17 |                    | chips into the pot, kept the remaining \$7 in his tray, and then began the     |
| 18 |                    | next hand without depositing the rake chips into a drop box. Each incident     |
| 19 |                    | resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of |
| 20 |                    | \$14 stolen by Juangco.  |
| 21 | e.                 | On one occasion, Juangco took a total of \$3 worth of chips from the pot,      |
| 22 |                    | placed those chips into his tray, and began the next hand without              |
| 23 |                    | depositing the rake chips into a drop box. This resulted in a \$2 loss to the  |
| 24 |                    | card room, and a \$1 loss to the PSJ.  |
| 25 | f.                 | On one occasion, Juangco took a total of \$7 worth of chips from the pot,      |
| 26 |                    | and placed those chips into his tray. Juangco then placed \$3 worth of chips   |
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FINAL ORDER OF THE GAMBLING COMMISSION

| 1  |                    | into the rake drop box and \$1 worth of chips into the PSJ drop box. He       |
|----|--------------------|---|
| 2  |                    | then began the next hand without depositing the rake chips into a drop        |
| 3  |                    | box. This resulted in a \$2 loss to the card room, and a \$2 loss to the PSJ. |
| 4  | g.                 | At 2256, Juangco received a \$4 toke from a player, in form of two \$2        |
| 5  |                    | chips. Juangco placed the chips into his tray, removed a \$5 chip from his    |
| 6  |                    | tray, and placed it into his toke box.  |
| 7  | h.                 | At 2257, Juangco received a \$4 toke from a player, in form of two \$2        |
| 8  |                    | chips. Juangco placed the chips into his tray, removed a \$5 chip from his    |
| 9  |                    | tray, and placed it into his toke box.  |
| 10 | i.                 | At 0032, while rotating tables, Juangco appeared to take chips from his       |
| 11 |                    | tray and placed them into his toke box. When this occurred, Juangco had       |
| 12 |                    | his back facing the surveillance camera, thus the view is partially           |
| 13 |                    | obstructed.   |
| 14 | j.                 | At 0034, Juangco took at least five \$5 chips from his tray, and placed it    |
| 15 |                    | into his toke box.  |
| 16 | k.                 | At 0034, Juangco took at least three \$5 chips from his tray, and placed it   |
| 17 |                    | into his toke box.  |
| 18 | 1.                 | At 0046, Juangco took at least six \$5 chips from his tray, and placed it     |
| 19 |                    | into his toke box.  |
| 20 | m.                 | At 0100, Juangco took at least four \$5 chips from his tray, and placed it    |
| 21 |                    | into his toke box.  |
| 22 | n.                 | At 0154, Juangco received a \$3 tip from a player in the form of three \$1    |
| 23 |                    | chips. Juangco placed the chips in his tray, then took a \$5 chip from the    |
| 24 |                    | tray and placed it into his toke box.   |
| 25 | 0.                 | At 0156, Juangco took at least two \$5 chips and two \$1 chips from his       |
| 26 |                    | tray, and placed them into his toke box.                                      |
| 1  | FINAL ORDER OF THE | 8<br>Washington State Campling Commission                                     |

FINAL ORDER OF THE GAMBLING COMMISSION

| 1  | p.                    | At 0332, when rotating to a different table, Juangco took at least four chips  |
|----|-----------------------|--|
| 2  |                       | from his tray and placed them into his toke box.                               |
| 3  | q.                    | At 0334, Juangco took at least two \$5 chips from his tray and placed them     |
| 4  |                       | into his toke box.   |
| 5  | r.                    | When Juangco ended his shift, his tray had a balance of \$600.                 |
| 6  | 17. In his            | review of the October 16, 2021 footage, the Agent was able to make the         |
| 7  | following observation | s:   |
| 8  | a.                    | The Agent observed thirty-four separate incidents of Juangco stealing          |
| 9  |                       | chips from the pot in the same manner that Hirai had detailed. On all          |
| 10 |                       | thirty-four occasions, Juangco took chips from the pot, and placed them        |
| 11 |                       | into his tray.   |
| 12 | b.                    | On twelve occasions, Juangco took a total of \$8 worth of chips from the       |
| 13 |                       | pot, and placed those chips into his tray. Juangco then placed \$1 worth of    |
| 14 |                       | chips into the pot, kept the remaining \$7 in his tray, and then began the     |
| 15 |                       | next hand without depositing the rake chips into a drop box. Each incident     |
| 16 |                       | resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of |
| 17 |                       | \$84 stolen by Juangco.  |
| 18 | с.                    | On nine occasions, Juangco took a total of \$7 worth of chips from the pot,    |
| 19 |                       | placed those chips into his tray, and then began the next hand without         |
| 20 |                       | depositing the rake chips into a drop box. Each incident resulted in a \$4     |
| 21 |                       | loss to the card room, and a \$3 loss to the PSJ; a total of \$63 stolen by    |
| 22 |                       | Juangco.   |
| 23 | d.                    | On seven occasions, Juangco took a total of \$6 worth of chips from the        |
| 24 |                       | pot, placed those chips into his tray, and then began the next hand without    |
| 25 |                       | depositing the rake chips into a drop box. Each incident resulted in a \$3     |
| 26 |                       |  |
|    | FINAL ORDER OF THE    | 9  |

FINAL ORDER OF THE GAMBLING COMMISSION

loss to the card room, and a \$3 loss to the PSJ; a total of \$42 stolen by Juangco.

e. On three occasions, Juangco took a total of \$10 worth of chips from the pot, and placed those chips into his tray. Juangco then placed \$3 worth of chips back onto the pot. He then began the next hand without depositing the rake chips into a drop box. Each incident resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$21 stolen by Juangco.

f. On two occasions, Juangco took a total of \$10 worth of chips from the pot, and placed those chips into his tray. Juangco then placed \$4 worth of chips back onto the pot. He then began the next hand without depositing the rake chips into a drop box. Each incident resulted in a \$3 loss to the card room, and a \$3 loss to the PSJ; a total of \$12 stolen by Juangco.

g. On one occasion, Juangco took a total of \$2 worth of chips from the pot, and placed those chips into his tray. He then began the next hand without depositing the rake chips into a drop box. Each incident resulted in a \$2 loss to the card room.

 h. At 2132, when rotating to a different table, Juangco appeared to take chips from his tray and place them into his toke box. Juangco positioned himself so that his back was facing the surveillance camera.

## i. At 2146, Juangco took at least four \$5 chips from his tray and placed them into his toke box.

j. At 2200, Juangco took at least four \$4 chips from his tray and placed them into his toke box.

## k. At 2331, while rotating to different table, Juangco took at least seventeen chips from his tray.

FINAL ORDER OF THE GAMBLING COMMISSION

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IN RE: JEFFREY G. JUANGCO NO. 2021-01639

| 1  | 1. At 2345, a player purchased \$100 worth of chips from Juangco. Juangco  |  |  |
|----|--|--|--|
| 2  | placed the \$100 bill on to his chip tray.   |  |  |
| 3  | m. At 0031, after Juangco rotated to a different table, the \$100 bill was no  |  |  |
| 4  | longer in his chip tray.   |  |  |
| 5  | n. At 0303, while rotating to a different table, Juangco took at least five chips                                    |  |  |
| 6  | from his tray and placed them into his toke box.   |  |  |
| 7  | o. At 0431, while rotating to a different table, Juangco took at least seven   |  |  |
| 8  | chips from his tray and placed them into his toke box.   |  |  |
| 9  | p. At 0436, a player purchased \$20 worth of chips from Juangco. Juangco   |  |  |
| 10 | placed the \$20 bill into his tray.  |  |  |
| 11 | q. At 0444, Juangco ended his shift and went to the toke window. At that   |  |  |
| 12 | time, Juangco placed the \$20 bill from his tray into his pocket.  |  |  |
| 13 | r. When Juangco ended his shift, his tray had a balance of \$600.  |  |  |
| 14 | 18. In total, for the video surveillance footage reviewed, Juangco stole at least \$600                              |  |  |
| 15 | worth of chips in total: at least \$350 from Fortune Poker, and at least \$250 from the Player                       |  |  |
| 16 | Supported Jackpot.   |  |  |
| 17 | 19. The spreadsheet that Purnell provided the Agent included an accounting of all                                    |  |  |
| 18 | days that Fortune Poker had surveillance footage of Juangco working. This included: October                          |  |  |
| 19 | 20, 21, 22, 23, 27, 28, 29 and November 3, 4, 5, and 6. According to Purnell's accounting,                           |  |  |
| 20 | Juangco stole an additional \$1,699 over that time frame.  |  |  |
| 21 | 20. On March 14, 2022, the Agent left a voicemail on the phone that Juangco had                                      |  |  |
| 22 | listed with the WSGC in order to discuss the incidents. To date, the Agent has never received                        |  |  |
| 23 | a response from Juangco.   |  |  |
| 24 | 21. Director Tina Griffin issued Administrative Charges on April 28, 2022 alleging                                   |  |  |
| 25 | that Juangco's actions constituted a violation of RCW 9A.56.050, 9.46.1961, and 9.46.075(2),                         |  |  |
| 26 | (4), (8), (9) and (10) and WAC 230-03-085(1), (3), and (8). Further, that Juangco could not show                     |  |  |
|    | FINAL ORDER OF THE11GAMBLING COMMISSIONWashington State Gambling Commission<br>4565 7th Avenue S.E., Lacey, WA 98503 |  |  |
|    | P.O. Box 42400<br>Olympia WA 98504   |  |  |

IN RE: JEFFREY G. JUANGCO NO. 2021-01639

1 by clear and convincing evidence that he was qualified for licensure as required by RCW
2 9.46.153(1), and that his actions warranted revocation of his license pursuant to RCW
3 9.46.075(2), (4), (8), (9) and (10) and WAC 230-03-085(1), (3), and (8).

4 22. Juangco was sent the charges by regular and certified mail on May 4, 2022 to the
5 last address the Gambling Commission had on file.

Bursuant to WAC 230-17-010, a response was required to be received by the
Commission by May 30, 2022. To date, the Commission has received no communication from
Juangco.

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#### **II. CONCLUSIONS OF LAW**

Jeffrey Juangco received proper notice of the charges within three days of May
 4, 2022 via regular and certified mail, pursuant to RCW 34.05.413, RCW 34.05.434, WAC 230 17-005, WAC 230-17-010, and WAC 10-08-130.

The Commission can take final action against Jeffrey Juangco's gambling license
 under Case Number CR 2021-01639 pursuant to RCW 9.46.075, RCW 34.05.440(1), RCW
 34.05.461, and WAC 230-03-085.

3. Jeffrey Juangco's license should be revoked under Case Number CR 2021-01639
pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC
230-03-085.

**III. ORDER** 

This matter having come before the Commission at its July 14, 2022, Commission meeting, the Commissioners having heard arguments, been given the chance to review the administrative record, and being fully advised in this matter, now therefore:

It is hereby **ORDERED** that Jeffrey Juangco's gambling license, Number 68-35811, is

#### **REVOKED**.

DATED this 14<sup>th</sup> day of July, 2022.

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ALICIA LEVY, Chair

FINAL ORDER OF THE GAMBLING COMMISSION

### JULIA PATTERSON, Vice Chair

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Washington State Gambling Commission 4565 7<sup>th</sup> Avenue S.E., Lacey, WA 98503 P.O. Box 42400 Olympia, WA 98504

IN RE: JEFFREY G. JUANGCO NO. 2021-01639

| 1  |   |            |                                      |
|----|---|------------|--------------------------------------|
| 2  |   |            |                                      |
| 3  | BUD SIZEMORE                              | KRISTINE R | REEVES                               |
| 4  |   |            |                                      |
| 5  |   |            |                                      |
| 6  | SARAH LAWSON                              |            |                                      |
| 7  |   |            |                                      |
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| 25 |   |            |                                      |
| 26 |   |            |                                      |
| I  | FINAL ORDER OF THE<br>GAMBLING COMMISSION | 13         | Washington State Gambling Commission |

| 1  | NOTICE   |  |  |
|----|--|--|--|
| 2  |  |  |  |
| 3  | Reconsideration: RCW 34.05.470 and WAC 230-17-140 provide that a party may file a                        |  |  |
| 4  | petition for reconsideration of a final order. A petition for reconsideration must be received no        |  |  |
| 5  | later than thirteen (13) days after the date this final order is mailed. Any motion for                  |  |  |
| 6  | reconsideration must state the specific grounds supporting the party's request for                       |  |  |
| 7  | reconsideration.   |  |  |
| 8  | Stay of Final Order: Filing for reconsideration does not stay the effectiveness of this                  |  |  |
| 9  | Order. WAC 230-17-145 provides that a party may petition the Commission for a stay of a final            |  |  |
| 10 | order. Any petition for a stay should be received by the Commission within thirteen (13) days            |  |  |
| 11 | after the date this final order is mailed.   |  |  |
| 12 | Judicial Review: RCW 34.05.542 provides that a party may appeal this final order by                      |  |  |
| 13 | filing a petition for judicial review within thirty (30) days after service of this order. A petition    |  |  |
| 14 | for judicial review must be filed with the appropriate superior court and served upon both the           |  |  |
| 15 | Commission and the Office of the Attorney General.   |  |  |
| 16 | Service: This Order was served on you three days after it was deposited in the United                    |  |  |
| 17 | States Postal Service regular mail, excluding the date of mailing. WAC 230-17-035.                       |  |  |
| 18 | Any motions or petitions for judicial review should be served on or mailed to:                           |  |  |
| 19 | Washington State Gambling Commission Doug Van de Brake   |  |  |
| 20 | Legal and Records DivisionAttorney General's Office4565 7th Avenue S.E., Lacey, WA1135 Washington St. SE |  |  |
| 21 | P.O. Box 42400 P.O. Box 40100  |  |  |
| 22 | Olympia, WA 98504-2400 Olympia, WA 98504-0100  |  |  |
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| I  | FINAL ORDER OF THE     14       GAMBLING COMMISSION     4565 7 <sup>th</sup> Avenue S.F. Lacey, WA 98503 |  |  |

| 1  | CERTIFICATE OF SERVICE   |
|----|--|
| 2  | I certify that on the date below I served a copy of the foregoing document on all parties                |
| 3  | and/or their counsel by United States Postal Service regular mail to the following:                      |
| 4  | JEFFREY G JUANGCO  |
| 5  | 2026 J ST NE<br>AUBURN WA 98002-2814   |
| 6  |  |
| 7  | EXECUTED this day of July, 2022, at Lacey, Washington.   |
| 8  |  |
| 9  | Rashida Robbins  |
| 10 | Administrative Assistant   |
| 11 |  |
| 12 |  |
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| I  | FINAL ORDER OF THE     15       GAMBLING COMMISSION     4565 7 <sup>th</sup> Avenue S.F. Lacey, WA 98503 |

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| 5  | STATE OF W.<br>GAMBLING C  |  |  |
| 6  | In the Matter of:  |  |  |
| 7  | in the Watter of.  | NO. CR 2021-01639                              |  |
| 8  | JEFFREY G JUANGCO<br>License No. 68-35811  | NOTICE OF ADMINISTRATIVE<br>CHARGES            |  |
| 9  | License INO. 08-55811  | CHARGES  |  |
| 10 | Licensee.  |  |  |
| 11 | Electisee.   |  |  |
| 12 | These administrative charges are broug   | th under and in accordance with Chapter 9.46   |  |
| 13 | RCW, the Washington State Gambling Act, Chapter 34.05 RCW, the Administrative                |  |  |
| 14 | Procedure Act, and Title 230 WAC, Rules adopted by the Gambling Commission.                  |  |  |
| 15 | I. LICENSE   |  |  |
| 16 |  |  |  |
| 17 | Juangco a gambling license, License No. 68-35811, authorizing Public Card Room Employee      |  |  |
| 18 | activity at Fortune Poker in Renton, Washington.   |  |  |
| 19 | 2. This license, which expires on September 7, 2022 was issued subject to                    |  |  |
| 20 | Juangco's compliance with state gambling laws and Commission rules.                          |  |  |
| 21 | II. FACTUAL BACKGROUND   |  |  |
| 22 | 1. On November 9, 2021, a WSGC   | Special Agent received a call from Pat Hosier, |  |
| 23 | the Region General Manager of Fortune Properties, the parent company of Fortune Poker in     |  |  |
| 24 | Renton. Hosier was calling to inform the agent that Fortune had discovered that one of their |  |  |
| 25 | employees had been stealing from them.   |  |  |
| 26 |  |  |  |
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2. According to Hosier, the discovery was made during a routine review of 1 2 surveillance footage. Fortune believed that the employee that was caught stealing, Jeffrey 3 Juangco, had been doing so for a while. Accordingly, Fortune Poker's General Manager Jeff Hirai was in the process of reviewing all of the footage taken while Juangco was working, 4 5 dating back to October 13, 2021.

3. On September 16, 2021, the Agent called Hirai to discuss the matter. Hirai told 6 7 the Agent that the issue was discovered when Hirai was reviewing footage from November 8, 8 2021. Hirai noticed that Juangco exhibited abnormal behavior.

9 4. Upon closer review of the footage, Hirai noticed that Juangco was collecting money from the rake of the pot<sup>1</sup>, and keeping it for himself. Upon reporting this to Hosier, 10 11 Hirai was ordered to review all of Fortune's footage from when Juangco was working.

12 5. Hirai told the Agent that in his review of the footage, there was a pattern to Juangco's behavior. He would collect money from the rake of the pot at the appropriate time, 13 which was intended to go to both the card room fees and the Player Supported Jackpot<sup>2</sup> (PSJ). 14

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6. Juangco would collect the chips in the pot, and place the chips into his chip tray<sup>3</sup> as opposed to depositing them into the proper drop box. According to Hirai, Juangco was attempting to disguise his actions as though he was exchanging chips. Juangco never

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<sup>3</sup> Dealers are required to sign out an Imprest Dealer Bank Chip Tray at the beginning of their shift. The tray is used so that a player may either buy chips from the dealer by handing them cash, or by exchanging 24 chips between the dealer and player (for example: a player may "color up" by exchanging twenty-five \$1 chips for one \$25 chip, or "color down" by exchanging one \$100 chip for four \$25 chips). All dealers have a tray of 25 their own, and all trays must maintain a \$600 balance on it, regardless of whether there is cash or chips given to the dealer. If a player's tray is short money at the end of their shift, they are required to pay the difference to 26 the house.

NO. CR 2021-01639

<sup>&</sup>lt;sup>1</sup> A rake is the portion of a poker hand pot that a dealer collects as participation fee from players. Once the maximum fee for the hand has accumulated, a dealer is to take the rake, spread the chips or money on the table so that surveillance may view the rake, and then deposit the rake into a drop box for collection. The rake collected into the drop box represents the gross receipts/revenue that the card room collects on that hand.

<sup>&</sup>lt;sup>2</sup> A Player Supported Jackpot (PSJ) is collected from a poker hand pot in the same manner as the card 22 room fees are taken from a pot. Unlike the card room fee portion, the PSJ funds are deposited into a separate drop box that funds a contest of chance separate from the poker game itself. All funds collected as part of the 23 PSJ go directly back to players as prizes.

properly deposited the collected rake into the proper box, but rather deposited the chips that he
 placed in his tray into his toke box<sup>4</sup> whenever he rotated to a new table.

7. Hirai told the Agent that Fortune had called Juangco to come into their facility
on November 9, 2021 upon the initial theft discovery. Hirai said that he could not make it in.
Hirai then told Juangco that his employment depended on him coming in that day, and Juangco
again said he couldn't make it.

8. When Juangco refused to appear in person Hirai, with Hosier and other
members of Fortune's management on the call, informed Juangco of what they had seen in the
surveillance video. Juangco claimed he didn't realize what he was doing. Juangco was fired
then from his employment over the phone.

9. On December 2, 2021 the Agent went to Fortune Poker to retrieve a portable
 hard drive containing the video surveillance. While there, the Agent also received a copy of a
 spreadsheet compiled by surveillance employee Sung Purnell. Purnell's spreadsheet detailed
 the amounts that he observed Juangco steal, broken down by date and time.

15 10. The Agent began a review of the video surveillance footage by comparing
photographs that he had obtained of Juangco from the Department of Licensing and Fortune's
employment records, to ensure that it was Juangco that was on the received footage. Upon
confirming that, the Agent reviewed footage from October 13, 14, 15, and 16 of 2021.

19 11. In his review of the October 13, 2021 footage, the Agent was able to make the20 following observations:

a. The Agent observed fifteen separate incidents of Juangco stealing chips from the pot in the same manner that Hirai had detailed. On all fifteen occasions, Juangco took chips from the pot, and placed them into his tray.

<sup>4</sup> A toke box is a drop box that is assigned to a dealer when they begin their shift. The toke box is where dealers are to deposit any tips, or tokes, that they receive from players while dealing.

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| 1  | b. | On four occasions, Juangco took a total of \$6 worth of chips from the pot,       |
|----|----|---|
| 2  |    | placed those chips into his tray, and then began the next hand without            |
| 3  |    | depositing the rake chips into a drop box. Each incident resulted in a \$3        |
| 4  |    | loss to the card room, and a \$3 loss to the PSJ; a total of \$24 stolen by       |
| 5  |    | Juangco.  |
| 6  | c. | On five occasions, Juangco took a total of \$8 worth of chips from the pot,       |
| 7  |    | and placed those chips into his tray. Juangco then placed a \$1 chip back         |
| 8  |    | into the pot, kept the remaining \$7 in his tray, and then began the next hand    |
| 9  |    | without depositing the rake chips into a drop box. Each incident resulted in      |
| 10 |    | a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$35 stolen by |
| 11 |    | Juangco.  |
| 12 | d. | On three occasions, Juangco took \$5 worth of chips from the pot, and placed      |
| 13 |    | those chips in his tray, and began the next hand without depositing the rake      |
| 14 |    | chips into a drop box. Each incident resulted in a \$3 loss to the card room,     |
| 15 |    | and a \$2 loss to the PSJ; a total of \$15 stolen by Juangco.                     |
| 16 | e. | On two occasions, Juangco took a total of \$5 worth of chips from the pot,        |
| 17 |    | and placed those chips into his tray. Juangco then placed \$2 worth of chips      |
| 18 |    | into the pot, kept the remaining \$3 in his tray, and then began the next hand    |
| 19 |    | without depositing the rake chips into a drop box. Each incident resulted in      |
| 20 |    | a \$2 loss to the card room, and a \$1 loss to the PSJ; a total of \$6 stolen by  |
| 21 |    | Juangco.  |
| 22 | f. | On one occasion, Juangco took a total of \$10 worth of chips from the pot,        |
| 23 |    | and placed those chips into his tray. Juangco then placed \$3 worth of chips      |
| 24 |    | back into the pot, kept the remaining \$7 in his tray, and then began the next    |
| 25 |    | hand without depositing the rake chips into a drop box. This resulted in a        |
| 26 |    | \$4 loss to the card room, and a \$3 loss to the PSJ.                             |

NOTICE OF ADMINISTRATIVE CHARGES

| 1  | g. At approximately 0228, a player purchased \$40 worth of chips from             |  |  |
|----|---|--|--|
| 2  | Juangco. Juangco then placed two \$20 bills onto the center of his chip tray.     |  |  |
| 3  | h. At 0230, a player gave Juangco a toke of three \$1 chips. Juangco motioned     |  |  |
| 4  | as if he was exchanging the chips for a larger denomination, but instead          |  |  |
| 5  | placed the three chips into his toke box, and then took a \$2 chip from his       |  |  |
| 6  | tray and placed it into his toke box.   |  |  |
| 7  | i. At 0231, while rotating tables, Juangco is observed taking chips from his      |  |  |
| 8  | tray and placing them into his toke box. He also took the two \$20 bills and      |  |  |
| 9  | placed them into his front pocket.  |  |  |
| 10 | j. When Juangco ended his shift, his tray was short \$8. Juangco was required     |  |  |
| 11 | to pay the difference to the cage.  |  |  |
| 12 | 12. In his review of the October 14, 2021 footage, the Agent was able to make the |  |  |
| 13 | following observations:   |  |  |
| 14 | a. The Agent observed twenty separate incidents of Juangco stealing chips         |  |  |
| 15 | from the pot in the same manner that Hirai had detailed. On all twenty            |  |  |
| 16 | occasions, Juangco took chips from the pot, and placed them into his tray.        |  |  |
| 17 | b. On nine occasions, Juangco took a total of \$7 worth of chips from the pot,    |  |  |
| 18 | placed those chips into his tray, and then began the next hand without            |  |  |
| 19 | depositing the rake chips into a drop box. Each incident resulted in a \$4        |  |  |
| 20 | loss to the card room, and a \$3 loss to the PSJ; a total of \$63 stolen by       |  |  |
| 21 | Juangco.  |  |  |
| 22 | c. On seven occasions, Juangco took a total of \$8 worth of chips from the pot,   |  |  |
| 23 | and placed those chips into his tray. Juangco then placed \$1 worth of chips      |  |  |
| 24 | into the pot, kept the remaining \$7 in his tray, and then began the next hand    |  |  |
| 25 | without depositing the rake chips into a drop box. Each incident resulted in      |  |  |
| 26 |   |  |  |
|    |   |  |  |

NOTICE OF ADMINISTRATIVE CHARGES

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| a \$4 loss to the card room, and a \$3 loss to th | e PSJ; a total of \$49 stolen by |
|---|----------------------------------|
| Juangco.  |                                  |

- d. On two occasions, Juangco took a total of \$6 worth of chips from the pot, placed those chips into his tray, and then began the next hand without depositing the rake chips into a drop box. Each incident resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by Juangco.
- e. On one occasion, Juangco took a total of \$6 worth of chips from the pot, and placed those chips into his tray. Juangco then placed \$2 worth of chips into the pot, kept the remaining \$3 in his tray, and then began the next hand without depositing the rake chips into a drop box. This resulted in a \$3 loss to the card room, and a \$3 loss to the PSJ.
- f. On one occasion, Juangco took a total of \$4 worth of chips from the pot,
  placed those chips into his tray, and then began the next hand without
  depositing the rake chips into a drop box. This resulted in a \$4 loss to the
  card room.
  - g. At 2300, a player purchased \$20 in chips from Juangco. Juangco placed the\$20 bill in the center of his tray.
  - h. At 0130, after rotating to a different table, the \$20 was no longer in Juangco's tray.
  - At 0203, Juangco rotated tables again. Juangco can be seen taking chips from his tray and placing them into his toke box.
    - j. When Juangco ended his shift, his tray was short \$8 short. Juangco was required to pay the difference to the cage.
- In his review of the October 15, 2021 footage, the Agent was able to make thefollowing observations:

| 1  | a.       | The Agent observed twenty-nine separate incidents of Juangco stealing  |
|--|----------|--|
| 2  |          | chips from the pot in the same manner that Hirai had detailed. On all  |
| 3  |          | twenty-nine occasions, Juangco took chips from the pot, and placed them  |
| 4  |          | into his tray.   |
| 5  | b.       | On eighteen occasions, Juangco took a total of \$7 worth of chips from the   |
| 6  |          | pot, and then began the next hand without depositing the rake chips into a   |
| 7  |          | drop box. Each incident resulted in a \$4 loss to the card room, and a \$3 loss  |
| 8  |          | to the PSJ; a total of \$126 stolen by Juangco.  |
| 9  | c.       | On seven occasions, Juangco took a total of \$8 worth of chips from the pot,   |
| 10   |          | and placed those chips into his tray. Juangco then placed \$1 worth of chips   |
| 11   |          | into the pot, kept the remaining \$7 in his tray, and then began the next hand   |
| 12   |          | without depositing the rake chips into a drop box. Each incident resulted in   |
| 13   |          | a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$42 stolen by  |
| 14   |          | Juangco.   |
| 15   | d.       | On two occasions, Juangco took a total of \$10 worth of chips from the pot,  |
| 16   |          | and placed those chips into his tray. Juangco then placed \$3 worth of chips   |
| 10   |          |  |
| 17   |          | into the pot, kept the remaining \$7 in his tray, and then began the next hand   |
|  |          | into the pot, kept the remaining \$7 in his tray, and then began the next hand without depositing the rake chips into a drop box. Each incident resulted in  |
| 17   |          |  |
| 17<br>18   |          | without depositing the rake chips into a drop box. Each incident resulted in   |
| 17<br>18<br>19   | e.       | without depositing the rake chips into a drop box. Each incident resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by   |
| 17<br>18<br>19<br>20   | e.       | without depositing the rake chips into a drop box. Each incident resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by Juangco.  |
| 17<br>18<br>19<br>20<br>21   | e.       | without depositing the rake chips into a drop box. Each incident resulted in<br>a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by<br>Juangco.<br>On one occasion, Juangco took a total of \$3 worth of chips from the pot,   |
| 17<br>18<br>19<br>20<br>21<br>22   | e.       | without depositing the rake chips into a drop box. Each incident resulted in<br>a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by<br>Juangco.<br>On one occasion, Juangco took a total of \$3 worth of chips from the pot,<br>placed those chips into his tray, and began the next hand without depositing   |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>             | e.<br>f. | <ul><li>without depositing the rake chips into a drop box. Each incident resulted in</li><li>a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by</li><li>Juangco.</li><li>On one occasion, Juangco took a total of \$3 worth of chips from the pot,</li><li>placed those chips into his tray, and began the next hand without depositing</li><li>the rake chips into a drop box. This resulted in a \$2 loss to the card room,</li></ul> |
| <ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol> |          | without depositing the rake chips into a drop box. Each incident resulted in<br>a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$14 stolen by<br>Juangco.<br>On one occasion, Juangco took a total of \$3 worth of chips from the pot,<br>placed those chips into his tray, and began the next hand without depositing<br>the rake chips into a drop box. This resulted in a \$2 loss to the card room,<br>and a \$1 loss to the PSJ.              |

| 1  |    | into the rake drop box and \$1 worth of chips into the PSJ drop box. He then    |
|----|----|---|
| 2  |    | began the next hand without depositing the rake chips into a drop box. This     |
| 3  |    | resulted in a \$2 loss to the card room, and a \$2 loss to the PSJ.             |
| 4  | g. | At 2256, Juangco received a \$4 toke from a player, in form of two \$2 chips.   |
| 5  |    | Juangco placed the chips into his tray, removed a \$5 chip from his tray, and   |
| 6  |    | placed it into his toke box.  |
| 7  | h. | At 2257, Juangco received a \$4 toke from a player, in form of two \$2 chips.   |
| 8  |    | Juangco placed the chips into his tray, removed a \$5 chip from his tray, and   |
| 9  |    | placed it into his toke box.  |
| 10 | i. | At 0032, while rotating tables, Juangco appeared to take chips from his tray    |
| 11 |    | and placed them into his toke box. When this occurred, Juangco had his          |
| 12 |    | back facing the surveillance camera, thus the view is partially obstructed.     |
| 13 | ј. | At 0034, Juangco took at least five \$5 chips from his tray, and placed it into |
| 14 |    | his toke box.   |
| 15 | k. | At 0034, Juangco took at least three \$5 chips from his tray, and placed it     |
| 16 |    | into his toke box.  |
| 17 | 1. | At 0046, Juangco took at least six \$5 chips from his tray, and placed it into  |
| 18 |    | his toke box.   |
| 19 | m. | At 0100, Juangco took at least four \$5 chips from his tray, and placed it into |
| 20 |    | his toke box.   |
| 21 | n. | At 0154, Juangco received a \$3 tip from a player in the form of three \$1      |
| 22 |    | chips. Juangco placed the chips in his tray, then took a \$5 chip from the tray |
| 23 |    | and placed it into his toke box.  |
| 24 | 0. | At 0156, Juangco took at least two \$5 chips and two \$1 chips from his tray,   |
| 25 |    | and placed them into his toke box.  |
| 26 |    |   |
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NOTICE OF ADMINISTRATIVE CHARGES

| 11 | T             |      |   |
|----|---------------|------|---|
| 1  |               | p.   |   |
| 2  |               |      | from his tray and placed them into his toke box.                                    |
| 3  |               | q.   | At 0334, Juangco took at least two \$5 chips from his tray and placed them          |
| 4  |               |      | into his toke box.  |
| 5  |               | r.   | When Juangco ended his shift, his tray had a balance of \$600.                      |
| 6  | 14.           | In   | his review of the October 16, 2021 footage, the Agent was able to make the          |
| 7  | following obs | erva | ations:   |
| 8  |               | a.   | The Agent observed thirty-four separate incidents of Juangco stealing chips         |
| 9  |               |      | from the pot in the same manner that Hirai had detailed. On all thirty-four         |
| 10 |               |      | occasions, Juangco took chips from the pot, and placed them into his tray.          |
| 11 |               | b.   | On twelve occasions, Juangco took a total of \$8 worth of chips from the            |
| 12 |               |      | pot, and placed those chips into his tray. Juangco then placed \$1 worth of         |
| 13 |               |      | chips into the pot, kept the remaining \$7 in his tray, and then began the next     |
| 14 |               |      | hand without depositing the rake chips into a drop box. Each incident               |
| 15 |               |      | resulted in a \$4 loss to the card room, and a \$3 loss to the PSJ; a total of \$84 |
| 16 |               |      | stolen by Juangco.  |
| 17 |               | c.   | On nine occasions, Juangco took a total of \$7 worth of chips from the pot,         |
| 18 |               |      | placed those chips into his tray, and then began the next hand without              |
| 19 |               |      | depositing the rake chips into a drop box. Each incident resulted in a \$4          |
| 20 |               |      | loss to the card room, and a \$3 loss to the PSJ; a total of \$63 stolen by         |
| 21 |               |      | Juangco.  |
| 22 |               | d.   | On seven occasions, Juangco took a total of \$6 worth of chips from the pot,        |
| 23 |               |      | placed those chips into his tray, and then began the next hand without              |
| 24 |               |      | depositing the rake chips into a drop box. Each incident resulted in a \$3          |
| 25 |               |      | loss to the card room, and a \$3 loss to the PSJ; a total of \$42 stolen by         |
| 26 |               |      | Juangco.  |
| 1  | I             |      |   |

NOTICE OF ADMINISTRATIVE CHARGES

| 1  | e. | On three occasions, Juangco took a total of \$10 worth of chips from the pot, |
|----|----|---|
| 2  |    | and placed those chips into his tray. Juangco then placed \$3 worth of chips  |
| 3  |    | back onto the pot. He then began the next hand without depositing the rake    |
| 4  |    | chips into a drop box. Each incident resulted in a \$4 loss to the card room, |
| 5  |    | and a \$3 loss to the PSJ; a total of \$21 stolen by Juangco.                 |
| 6  | f. | On two occasions, Juangco took a total of \$10 worth of chips from the pot,   |
| 7  |    | and placed those chips into his tray. Juangco then placed \$4 worth of chips  |
| 8  |    | back onto the pot. He then began the next hand without depositing the rake    |
| 9  |    | chips into a drop box. Each incident resulted in a \$3 loss to the card room, |
| 10 |    | and a \$3 loss to the PSJ; a total of \$12 stolen by Juangco.                 |
| 11 | g. | On one occasion, Juangco took a total of \$2 worth of chips from the pot,     |
| 12 |    | and placed those chips into his tray. He then began the next hand without     |
| 13 |    | depositing the rake chips into a drop box. Each incident resulted in a \$2    |
| 14 |    | loss to the card room.  |
| 15 | h. | At 2132, when rotating to a different table, Juangco appeared to take chips   |
| 16 |    | from his tray and place them into his toke box. Juangco positioned himself    |
| 17 |    | so that his back was facing the surveillance camera.                          |
| 18 | i. | At 2146, Juangco took at least four \$5 chips from his tray and placed them   |
| 19 |    | into his toke box.  |
| 20 | j. | At 2200, Juangco took at least four \$4 chips from his tray and placed them   |
| 21 |    | into his toke box.  |
| 22 | k. | At 2331, while rotating to different table, Juangco took at least seventeen   |
| 23 |    | chips from his tray.  |
| 24 | 1. | At 2345, a player purchased \$100 worth of chips from Juangco. Juangco        |
| 25 |    | placed the \$100 bill on to his chip tray.                                    |
| 26 |    |   |
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NOTICE OF ADMINISTRATIVE CHARGES

| 1              | m. At 0031, after Juangco rotated to a different table, the \$100 bill was no   |
|----------------|---|
| 2              | longer in his chip tray.  |
| 3              | n. At 0303, while rotating to a different table, Juangco took at least five chips   |
| 4              | from his tray and placed them into his toke box.  |
| 5              | o. At 0431, while rotating to a different table, Juangco took at least seven chips  |
| 6              | from his tray and placed them into his toke box.  |
| 7              | p. At 0436, a player purchased \$20 worth of chips from Juangco. Juangco  |
| 8              | placed the \$20 bill into his tray.   |
| 9              | q. At 0444, Juangco ended his shift and went to the toke window. At that time,  |
| 10             | Juangco placed the \$20 bill from his tray into his pocket.   |
| 11             | r. When Juangco ended his shift, his tray had a balance of \$600.   |
| 12             | 15. In total, for the video surveillance footage reviewed, Juangco stole at least \$600   |
| 13             | worth of chips in total: at least \$350 from Fortune Poker, and at least \$250 from the Player  |
| 14             | Supported Jackpot.  |
| 15             | 16. The spreadsheet that Purnell provided the Agent included an accounting of all   |
| 16             | days that Fortune Poker had surveillance footage of Juangco working. This included: October   |
| 17             | 20, 21, 22, 23, 27, 28, 29 and November 3, 4, 5, and 6. According to Purnell's accounting,  |
| 18             | Juangco stole an additional \$1,699 over that time frame.   |
| 19             | 17. On March 14, 2022, the Agent left a voicemail on the phone that Juangco had   |
|                |   |
| 20             | listed with the WSGC in order to discuss the incidents. To date, the Agent has never received   |
| 20<br>21       |   |
|                | listed with the WSGC in order to discuss the incidents. To date, the Agent has never received   |
| 21             | listed with the WSGC in order to discuss the incidents. To date, the Agent has never received a response from Juangco.  |
| 21<br>22       | listed with the WSGC in order to discuss the incidents. To date, the Agent has never received a response from Juangco. III. BASIS FOR REVOCATION  |
| 21<br>22<br>23 | <ul> <li>listed with the WSGC in order to discuss the incidents. To date, the Agent has never received a response from Juangco.</li> <li>III. BASIS FOR REVOCATION</li> <li>1. Between October 13 and October 16, 2021, Jeffrey Juangco wrongfully</li> </ul> |

IN RE: JEFFREY G JUANGCO

NO. CR 2021-01639

October 20 through November 6, 2021. In each instance, Juangco was in violation of RCW
 9A.56.050, Theft in the Third Degree.

By taking chips from the pot, placing them into his chip tray, and then failing
 to deposit those chips into their appropriate drop box, Jeffrey Juangco employed a scheme to
 defraud both participants and the operator, Fortune Poker. In doing so while acting as an
 employee in an authorized gambling activity, Juangco repeatedly violated RCW 9.46.1961,
 Cheating in the First Degree.

8 3. Jeffrey Juangco has failed to prove by clear and convincing evidence that he is
9 qualified for licensure, as required by RCW 9.46.153(1).

4. The Commission is authorized to revoke Jeffrey Juangco's Public Card Room
Employee license pursuant to RCW 9.46.075(2), (4), (8), (9) and (10), RCW 9.46.153(1), and
WAC 230-03-085(1), (3), and (8).

13

## IV. REVOCATION

The above-referenced findings are a sufficient basis for revocation of Jeffrey
 Juangco's Public Card Room Employee License.

2. Based on the facts and violations referenced above, the penalty for Jeffrey
Juangco's actions is **REVOCATION** of his Public Card Room Employee License.

18 I have read this Notice of Administrative Charges, know the contents of it, believe it to
19 be true, and have executed this Notice in my capacity as Director of the Washington State
20 Gambling Commission.

21 22

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#### NOTICE OF ADMINISTRATIVE CHARGES

DocuSigned by

4CFDDC8C0E1345F

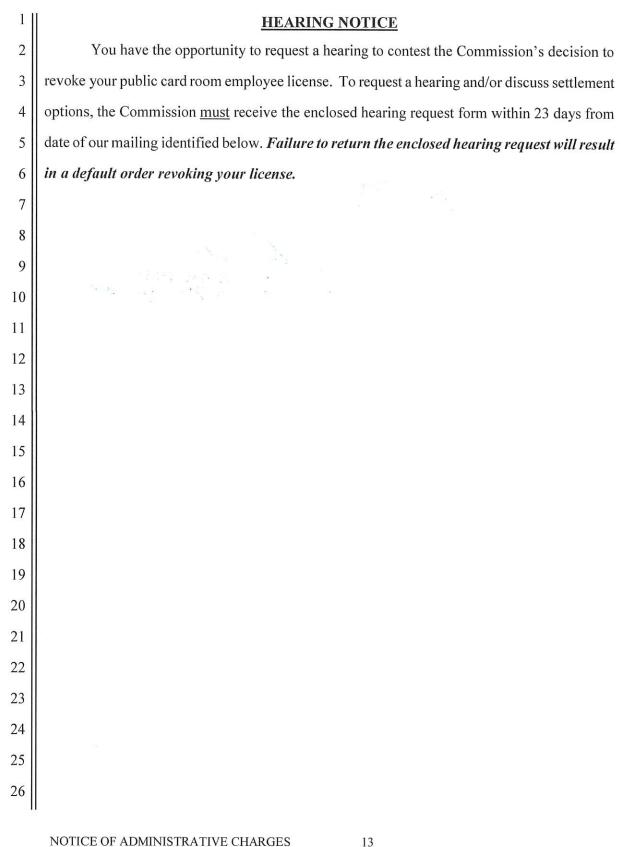
TINA GRIFFIN, DIRECTOR

Washington State Gambling Commission

IN RE: JEFFREY G JUANGCO NO. CR 2021-01639 12

Date

4/28/2022



NO. CR 2021-01639

| 1  | CERTIFICATE OF SERVICE  |
|----|---|
| 2  | I certify that on the date below I served a copy of the foregoing document on all parties     |
| 3  | or their counsel by United States Postal Service regular and certified mail to the following: |
| 4  |   |
| 5  | JEFFREY G JUANGCO<br>2026 J ST NE   |
| 6  | AUBURN WA 98002-2814  |
| 7  | EXECUTED this <u>1</u> day of April, 2022, at Lacey, Washington,                              |
| 8  | The The   |
| 9  | Ashlie Laydon ADAM TEAC   |
| 10 | Rules Coordinator STASP ASTOENEY  |
| 11 |   |
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| 5  | STATE OF W                                       | ASHINGTON  |  |
| 6  | GAMBLING C                                       |  |  |
| 7  | In the Matter of:                                | NO. CR 2022-00183                                |  |
| 8  | THOMAS T. LUONG,                                 | FINAL ORDER OF THE                               |  |
| 9  | License No. 68-05623,                            | GAMBLING COMMISSION                              |  |
| 10 |  |  |  |
| 11 | Licensee.  |  |  |
| 12 | This matter having come before the               | e Washington State Gambling Commission           |  |
| 13 | (Commission) on July 14, 2022, the Commis        | ssion makes the following Findings of Fact,      |  |
| 14 | Conclusions of Law, and issues its Final Order:  |  |  |
| 15 | I. FINDINGS OF FACT                              |  |  |
| 16 | 1. The Washington State Gambling                 | Commission issued Thomas Luong License No.       |  |
| 17 | 68-05623 authorizing Public Card Room Empl       | oyee activity; Luong's license is not currently  |  |
| 18 | linked to a House-Banked Card Room.              |  |  |
| 19 | 2. This license, which expires on A              | ugust 24, 2022, was issued subject to Luong's    |  |
| 20 | compliance with state gambling laws and Comm     | nission rules.                                   |  |
| 21 | 3. Luong has been licensed since 19              | 999.   |  |
| 22 | 4. On December 18, 2021, a WSG                   | C Special Agent received an email from Rick      |  |
| 23 | Ngeth, the Assistant General Manager at Maca     | u Casino in Tukwila. Ngeth was emailing to       |  |
| 24 | inform the Agent that one of his licensed employ | ees had been alleged to have stolen a customer's |  |
| 25 | iPhone.  |  |  |
| 26 |  |  |  |
| I  | FINAL ORDER OF THE                               | 1  |  |

GAMBLING COMMISSION

5. 1 | According to Ngeth, a customer of Macau, Long Pham, had requested that 2 surveillance look into who entered into the bathroom after him. Pham claimed that he had left 3 the phone in the bathroom, and that when he returned to find it 10 minutes later, it was no longer 4 where he left it.

6. Ngeth provided the Agent with a copy of the surveillance report that he had drafted on the incident. The report outlined that two of Macau's employees had entered the bathroom after Long: security guard Ricky Bynum and dealer Thomas Luong.

7. According to Ngeth, at the time the phone was reported lost, Bynum had told two other Macau employees that he had seen the phone in the bathroom, but was "too lazy to get it."

8. Bynum escorted Pham into the bathroom with another employee, at which point, 12 he pointed to the paper towel dispenser that he had seen the phone on top off. Long confirmed 13 that is where he left it.

> 9. When asked, Luong denied taking the phone.

15 10. On the same day, December 18, 2021, the Agent was forwarded an email by 16 Luyen Le, Macau's Regional General Manager. Le reiterated that both Bynum and Luong had 17 denied taking the phone. However, Pham had tried tracking the phone, and when he called it, he received a return call from Luong. 18

19 11. Le told the Agent that because Luong had denied taking the phone, but in fact 20 had it in his possession, that Macau was going to terminate Luong's employment.

12. 21 On December 20, 2021, the Agent emailed Le to request copies of the video 22 surveillance from the date in question, and to ask whether Luong was still employed with 23 Macau.

13. The same day, the Agent received a response from Ngeth. Ngeth informed the 24 25 Agent that Luong was still employed, pending management's decision. He also told the Agent 26 that Luong had returned the phone to Pham.

FINAL ORDER OF THE GAMBLING COMMISSION

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IN RE: THOMAS T. LUONG NO. 2022-00183

1 | 14. Ngeth added that Luong had claimed that he had found the phone, but it was dead 2 when he found it. Luong acknowledged he shouldn't have taken the phone regardless of it 3 being charged or not. 4 15. According to Ngeth, Pham had informed him that because he was an Uber driver, 5 his phone was always fully charged. Pham also told Ngeth that when he initially tried calling 6 his phone, it rang, but then was turned off. 7 16. Later that day, Le responded to the email by informing the Agent that Luong 8 would be fired when he returns to work. 9 17. On February 8, 2022, the Agent retrieved a copy of the surveillance footage from Macau. The Agent's review of the footage revealed the following: 10 11 a. At 0821, Pham exited the bathroom. 12 b. At 0822, Bynum entered the bathroom. c. At 0826, Luong entered the bathroom. 13 d. At 0828, Luong exited the bathroom and walked directly to the 14 15 breakroom. 16 e. At 0829, Luong took a white cell phone out of his back pocket and placed 17 it in a locker. f. At 0830, Bynum exited the bathroom. 18 19 g. At 0831, Pham returned to the bathroom to look for his phone. 20 18. On February 17, 2022, the Agent left a voicemail for Luong asking that he return his call on the phone number that Le had provided him. The voicemail greeting identified 21 22 Luong as the phone's owner. To date, Luong has not returned the Agent's call. 23 19. Director Tina Griffin issued Administrative Charges on April 28, 2022 alleging that Luong's actions constituted a violation of RCW 9A.56.050(1) and 9.46.075(1) and (8) and 24 25 WAC 230-03-085(1), (3), and 9(d). Further, that Luong could not show by clear and convincing evidence that he was qualified for licensure as required by RCW 9.46.153(1), and that his actions 26 FINAL ORDER OF THE 3 Washington State Gambling Commission GAMBLING COMMISSION 4565 7th Avenue S.E., Lacey, WA 98503

IN RE: THOMAS T. LUONG NO. 2022-00183

warranted revocation of his license pursuant to RCW 9.46.075(1) and (8) and WAC 230-03 085(1), (3), and (9)(c).

20. Luong was sent the charges by regular and certified mail on May 4, 2022 to the
4 last address the Gambling Commission had on file.

5 21. Pursuant to WAC 230-17-010, a response was required to be received by the
6 Commission by May 30, 2022. To date, the Commission has received no communication from
7 Luong.

8

## **II. CONCLUSIONS OF LAW**

9 1. Thomas Luong received proper notice of the charges within three days of May 4,
10 2022 via regular and certified mail, pursuant to RCW 34.05.413, RCW 34.05.434, WAC 23011 17-005, WAC 230-17-010, and WAC 10-08-130.

12 2. The Commission can take final action against Thomas Luong's gambling license
13 under Case Number CR 2022-00183 pursuant to RCW 9.46.075, RCW 34.05.440(1), RCW
14 34.05.461, and WAC 230-03-085.

15 3. Thomas Luong's license should be revoked under Case Number CR 2022-00183
16 pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC
17 230-03-085.

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### **III. ORDER**

This matter having come before the Commission at its July 14, 2022, Commission meeting, the Commissioners having heard arguments, been given the chance to review the administrative record, and being fully advised in this matter, now therefore:

It is hereby **ORDERED** that Thomas Luong's gambling license, Number 68-05623, is **REVOKED**.

DATED this 14<sup>th</sup> day of July, 2022.

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ALICIA LEVY, Chair

FINAL ORDER OF THE GAMBLING COMMISSION

JULIA PATTERSON, Vice Chair

4

Washington State Gambling Commission 4565 7<sup>th</sup> Avenue S.E., Lacey, WA 98503 P.O. Box 42400 Olympia, WA 98504

IN RE: THOMAS T. LUONG NO. 2022-00183

| 1  |   |   |
|----|---|---|
| 2  |   |   |
| 3  | BUD SIZEMORE                              | KRISTINE REEVES   |
| 4  |   |   |
| 5  |   |   |
| 6  | SARAH LAWSON                              | -   |
| 7  |   |   |
| 8  |   |   |
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| I  | FINAL ORDER OF THE<br>GAMBLING COMMISSION | 5<br>Washington State Gambling Commission<br>4565.7 <sup>th</sup> Avenue S.F. Lacey, WA 98503 |

## NOTICE

3 Reconsideration: RCW 34.05.470 and WAC 230-17-140 provide that a party may file a 4 petition for reconsideration of a final order. A petition for reconsideration must be received no 5 later than thirteen (13) days after the date this final order is mailed. Any motion for 6 reconsideration must state the specific grounds supporting the party's request for 7 reconsideration. 8 Stay of Final Order: Filing for reconsideration does not stay the effectiveness of this 9 Order. WAC 230-17-145 provides that a party may petition the Commission for a stay of a final 10 order. Any petition for a stay should be received by the Commission within thirteen (13) days 11 after the date this final order is mailed. 12 Judicial Review: RCW 34.05.542 provides that a party may appeal this final order by 13 filing a petition for judicial review within thirty (30) days after service of this order. A petition 14 for judicial review must be filed with the appropriate superior court and served upon both the 15 Commission and the Office of the Attorney General. 16 Service: This Order was served on you three days after it was deposited in the United 17 States Postal Service regular mail, excluding the date of mailing. WAC 230-17-035. 18 Any motions or petitions for judicial review should be served on or mailed to: 19 Washington State Gambling Commission 20 Legal and Records Division 4565 7<sup>th</sup> Avenue S.E., Lacey, WA 21 P.O. Box 42400 22 Olympia, WA 98504-2400 23 24 25 26 FINAL ORDER OF THE 6 GAMBLING COMMISSION

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

| 1  |  |
|----|--|
| 2  | CERTIFICATE OF SERVICE   |
| 3  | I certify that on the date below I served a copy of the foregoing document on all parties  |
| 4  | and/or their counsel by United States Postal Service regular mail to the following:  |
| 5  |  |
| 6  | THOMAS T. LUONG<br>8601 S 133 <sup>RD</sup> PL<br>SEATTLE WA 08178   |
| 7  | SEATTLE WA 98178   |
| 8  | EXECUTED this day of July, 2022, at Lacey, Washington.   |
| 9  | aug of burg, 2022, at Eucey, (tubinington.   |
| 10 |  |
| 11 | Rashida Robbins<br>Administrative Assistant  |
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|    | FINAL ORDER OF THE       7         GAMBLING COMMISSION       7         Washington State Gambling Commission         4565.7th Avenue S.F. Lacey, WA 98503 |

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| 4  |   |   |
| 5  |   | VASHINGTON<br>COMMISSION                      |
| 6  | In the Matter of:                           | NO. CR 2022-00183                             |
| 7  |   | NO. CK 2022-00185                             |
| 8  | THOMAS T LUONG<br>License No. 68-05623      | NOTICE OF ADMINISTRATIVE                      |
| 9  | License 110. 08-03025                       | CHARGES                                       |
| 10 | Licensee.                                   |   |
| 11 | Licensee.                                   |   |
| 12 | These administrative charges are brou       | ght under and in accordance with Chapter 9.46 |
| 13 | RCW, the Washington State Gambling A        | ct, Chapter 34.05 RCW, the Administrative     |
| 14 | Procedure Act, and Title 230 WAC, Rules add | opted by the Gambling Commission.             |
| 15 | I. LICENSE                                  |   |
| 16 | 1. The Washington State Gam                 | bling Commission (WSGC) issued Licensee       |
| 17 | Thomas Luong a gambling license, License    | No. 68-05623, authorizing Public Card Room    |
| 18 | Employee activity at Macau Casino in Tukwil | a, Washington.                                |
| 19 | 2. This license, which expires on           | August 24, 2022 was issued subject to Luong's |
| 20 | compliance with state gambling laws and Con | nmission rules.                               |
| 21 | II. FACTUAI                                 | L BACKGROUND                                  |
| 22 | 1. On December 18, 2021, a WS               | GC Special Agent received an email from Rick  |
| 23 | Ngeth, the Assistant General Manager at Ma  | cau Casino in Tukwila. Ngeth was emailing to  |
| 24 | inform the Agent that one of his licensed   | employees had been alleged to have stolen a   |
| 25 | customer's iPhone.                          |   |
| 26 |   |   |
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According to Ngeth, a customer of Macau, Long Pham, had requested that
 surveillance look into who entered into the bathroom after him. Pham claimed that he had
 left the phone in the bathroom, and that when he returned to find it 10 minutes later, it was no
 longer where he left it.

3. Ngeth provided the Agent with a copy of the surveillance report that he had
drafted on the incident. The report outlined that two of Macau's employees had entered the
bathroom after Long: security guard Ricky Bynum and dealer Thomas Luong.

8 4. According to Ngeth, at the time the phone was reported lost, Bynum had told
9 two other Macau employees that he had seen the phone in the bathroom, but was "too lazy to
10 get it."

5. Bynum escorted Pham into the bathroom with another employee, at which point, he pointed to the paper towel dispenser that he had seen the phone on top off. Long confirmed that is where he left it.

14

6. When asked, Luong denied taking the phone.

7. On the same day, December 18, 2021, the Agent was forwarded an email by
Luyen Le, Macau's Regional General Manager. Le reiterated that both Bynum and Luong
had denied taking the phone. However, Pham had tried tracking the phone, and when he
called it, he received a return call from Luong.

8. Le told the Agent that because Luong had denied taking the phone, but in fact
had it in his possession, that Macau was going to terminate Luong's employment.

9. On December 20, 2021, the Agent emailed Le to request copies of the video
surveillance from the date in question, and to ask whether Luong was still employed with
Macau.

24 10. The same day, the Agent received a response from Ngeth. Ngeth informed the
25 Agent that Luong was still employed, pending management's decision. He also told the Agent
26 that Luong had returned the phone to Pham.

| <ul> <li>2 dead when he found it. Luong acknowledged he shouldn't have taken the phone it</li> <li>3 of it being charged or not.</li> </ul>  | regardless  |
|--|-------------|
| 3 of it being charged or not.  |             |
|  |             |
| 4 12. According to Ngeth, Pham had informed him that because he was  | an Uber     |
| 5 driver, his phone was always fully charged. Pham also told Ngeth that when he init   | ially tried |
| 6 calling his phone, it rang, but then was turned off.   |             |
| 7 13. Later that day, Le responded to the email by informing the Agent the A | nat Luong   |
| 8 would be fired when he returns to work.  |             |
| 9 14. On February 8, 2022, the Agent retrieved a copy of the surveilland   | e footage   |
| 10 from Macau. The Agent's review of the footage revealed the following:   |             |
| a. At 0821, Pham exited the bathroom.  |             |
| 12 b. At 0822, Bynum entered the bathroom.   |             |
| 13 c. At 0826, Luong entered the bathroom.   |             |
| 14 d. At 0828, Luong exited the bathroom and walked directly to the b  | reakroom.   |
| 15 e. At 0829, Luong took a white cell phone out of his back pocket a  | nd placed   |
| 16 it in a locker.   |             |
| 17 f. At 0830, Bynum exited the bathroom.  |             |
| 18 g. At 0831, Pham returned to the bathroom to look for his phone.  |             |
| 19 15. On February 17, 2022, the Agent left a voicemail for Luong askin  | ng that he  |
| 20 return his call on the phone number that Le had provided him. The voicemai  | l greeting  |
| 21 identified Luong as the phone's owner. To date, Luong has not returned the Agent  | 's call     |
| 22 III. BASIS FOR REVOCATION   |             |
| 23 1. Thomas Luong took a customer's iPhone into his possession, and la  | ter lied to |
| 24 Macau's management about doing so. Luong thus obtained unauthorized contro  | l over the  |
| 25 phone with the intent of depriving the phone from its rightful owner. In doing  | so, Luong   |
| 26 violated RCW 9A.56.050(1), Theft in the Third Degree.   |             |

| 1  | 2. Thomas Luong has failed to prove by clear and convincing evidence that he is           |  |  |
|----|---|--|--|
| 2  | qualified for licensure, as required by RCW 9.46.153(1).                                  |  |  |
| 3  | 3. The Commission is authorized to revoke Thomas Luong's Public Card Room                 |  |  |
| 4  | Employee license pursuant to RCW 9.46.075(1) and (8), RCW 9.46.153(1), and WAC 230-       |  |  |
| 5  | 03-085(1), (3), and (9)(d).   |  |  |
| 6  | IV. REVOCATION  |  |  |
| 7  | 1. The above-referenced findings are a sufficient basis for revocation of Thomas          |  |  |
| 8  | Luong's Public Card Room Employee License.  |  |  |
| 9  | 2. Based on the facts and violations referenced above, the penalty for Thomas             |  |  |
| 10 | Luong's actions is <b>REVOCATION</b> of his Public Card Room Employee License.            |  |  |
| 11 | I have read this Notice of Administrative Charges, know the contents of it, believe it to |  |  |
| 12 | be true, and have executed this Notice in my capacity as Director of the Washington State |  |  |
| 13 | Gambling Commission.  |  |  |
| 14 | Ina Muffyn 4/28/2022  |  |  |
| 15 | TINA GRIFFIN, DIRECTOR Date   |  |  |
| 16 | Washington State Gambling Commission  |  |  |
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| 1        | HEARING NOTICE   |
|----------|--|
| 2        | You have the opportunity to request a hearing to contest the Commission's decision to            |
| 3        | revoke your public card room employee license. To request a hearing and/or discuss settlement    |
| 4        | options, the Commission must receive the enclosed hearing request form within 23 days from       |
| 5        | date of our mailing identified below. Failure to return the enclosed hearing request will result |
| 6        | in a default order revoking your license.  |
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IN RE: THOMAS T LUONG NO. CR 2022-00183

Washington State Gambling Commission 4565 7<sup>th</sup> Avcnue S.E., Lacey, WA 98503 P.O. Box 42400 Olympia, WA 98504

| 1  | CERTIFICATE OF SERVICE  |
|----|---|
| 2  | I certify that on the date below I served a copy of the foregoing document on all parties     |
| 3  | or their counsel by United States Postal Service regular and certified mail to the following: |
| 4  |   |
| 5  | THOMAS T LUONG<br>8601 S 133 <sup>RD</sup> PL   |
| 6  | SEATTLE WA 98178  |
| 7  | EXECUTED this 4 day of April, 2022, at Lacey, Washington.                                     |
| 8  |   |
| 9  | Astille Laydon Agan TEAR  |
| 10 | Rules Coordinator STAFF ATTORNEY  |
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# STATE OF WASHINGTON GAMBLING COMMISSION

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

July 14, 2022

- TO:COMMISSIONERS:<br/>Alicia Levy, ChairBud Sizemore<br/>Bud Sizemore<br/>Kristine Reeves<br/>Sarah Lawson
- **FROM:** Adam Teal, Acting Legal Manager Legal and Records Division

# SUBJECT: Bunthon C. Chau, CR 2022-00304 Final Order – July 14, 2022 Commission Meeting

Bunthon Chau has a gambling license authorizing Public Card Room Employee activity; Chau's license is not currently linked to an employer. His license expires on January 12, 2023.

On February 2, 2022, a WSGC Special Agent was contacted by the Assistant General Manager of Macau Casino, Lakewood, regarding one of his employees printing out and issuing unearned Free Play Coupons. The Agent was provided three separate Incident Reports that Macau's Surveillance department has furnished outlining Chau's violations. All three reports outline the same pattern: Chau printed Free Play Coupons off Macau's Sonoma player tracking system from the account of a player that was not present, handed the coupons to a player at a gambling table, and that player then used the Coupon to gamble with. The Agent went to Macau and observed surveillance footage from the dates in question; the Agent was able to track the Coupons being issued by comparing the footage to Sonoma player account activity summaries provided by Macau. The Agent spoke with Chau, who only acknowledged printing out the unearned Coupons once, but in doing so stated that he was just, "hooking the players up."

Director Tina Griffin issued Chau a Notice of Administrative Charges on May 25, 2022, by regular and certified mail to his last known address on file. Pursuant to WAC 230-17-010, a response was required to be received by the Commission by June 20, 2022. To date, the Commission has received no communication from Chau.

Bunthon Chau's failure to respond to the charges or timely request a hearing is a waiver of Chau's right to a hearing in Case No. CR 2022-00304. You may take final action against his gambling license. Chau employed a scheme to wrongfully obtain control over property (Free Play Coupons), depriving his employer of that property and defrauding Macau Casino of value of those coupons. In doing so, Chau is in violation of RCW 9A.56.050, 9.46.1961, 9.46.190, and 9.46.075(1) and (8) and WAC 230-03-085(1), (3), 9(c) and (d). Based on his conduct, Chau cannot show by clear and convincing evidence that he is qualified to keep his gambling license. Therefore, staff recommends that the Commission sign the proposed final order and revoke Bunthon Chau's Public Card Room Employee license, Number 68-35918.

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| 5  | STATE OF W  | ASHINGTON   |
| 6  | GAMBLING (  |   |
| 7  | In the Matter of:   | NO. CR 2022-00304   |
| 8  | BUNTHON C. CHAU,  | FINAL ORDER OF THE  |
| 9  | License No. 68-35918,   | GAMBLING COMMISSION                                       |
| 10 |   |   |
| 11 | Licensee.   |   |
| 12 | This matter having come before th   | e Washington State Gambling Commission                    |
| 13 | (Commission) on July 14, 2022, the Commi  | ssion makes the following Findings of Fact,               |
| 14 | Conclusions of Law, and issues its Final Order:   |   |
| 15 | I. FINDINGS   | OF FACT   |
| 16 | 1. The Washington State Gambling  | Commission issued Bunthon Chau License No.                |
| 17 | 68-35918 authorizing Public Card Room Employee activity; Chau's license is not currently  |   |
| 18 | linked to a House-Banked Card Room.   |   |
| 19 | 2. This license, which expires on J   | anuary 12, 2023, was issued subject to Chau's             |
| 20 | compliance with state gambling laws and Comm  | nission rules.  |
| 21 | 3. Chau has been licensed since 202   | 21.   |
| 22 | 4. On February 2, 2022, a WSGC S  | Special Agent received an email from Van                  |
| 23 | Long, the Assistant General Manager of Macau  | Casino in Lakewood. Long was notifying the                |
| 24 | Agent that Bunthon Chau, a floor supervisor, ha   | ad been found printing out Free Play Coupons <sup>1</sup> |
| 25 | <sup>1</sup> Supervisors may print out Coupons of a certain   | n denomination from the Sonoma Player Tracking            |
| 26 | software, based on a player's gambling history, as a "con<br>amount of the coupon without additional cost. The amou<br>FINAL ORDER OF THE | p" which allows the player to place a wager in the        |
|    |   | ±   |

off of their Sonoma Player Tracking Software in random customer's names and giving them to
 other guests to use.

5. Included in the email were three Incident Reports that were submitted by
Macau's Surveillance department outlining Chau's alleged violations. In response to two
questions emailed by the Agent, Long responded by stating that none of the recipients of the
Free Play Coupons were licensed Card Room Employees.

6. The first Incident Report outlined that on January 23, 2022, at 1736, Chau
printed two separate \$300 Free Play Coupons in the name of player Mark Saniatan, folded
them lengthwise, and then placed them into a pit podium drawer. A few minutes later, Chau
removed the Coupons and handed them to player Tuan Le. Le proceeded to wager with the
two Coupons.

7. The second Incident Report detailed multiple suspicious activities that
surveillance observed Chau commit on January 28, 2022. The reporting party was unable to
confirm the amounts of the Free Play Coupons printed out, nor the names on the tickets,
because the dealers that allowed the Coupons to be used failed to unfold the Coupons to show
them to the camera, as they were supposed to.

17 8. The third Incident Report outlined seven additional instances of Chau printing
18 out Free Play Coupons between January 26 and January 28, 2022. In each incident, Chau
19 printed out the Coupons in the name of a player who was either not on the property or hadn't
20 had any rated activity on that day.

9. On February 8, 2022, the Agent visited Macau to review the surveillance
 footage in question. The Agent was able to confirm Chau printed the Free Play Coupons. The
 Agent then compared that footage to the Sonoma Player History of player Mark Saniatan.

<sup>26</sup> earned are based on factors such as: how frequently a player gambles, the amount that they wager per hand, and their wins and losses. The data on these factors is manually entered into the Sonoma software at a terminal located on the gambling floor by the organization's supervisors. FINAL ORDER OF THE 2

1 10. The player history showed that on January 23, 2022, Saniatan had activity
 2 entered into the Sonoma system at 1736. Surveillance showed that Saniatan was not on the
 3 property at the time the data was entered. While the rating was entered by user Derek
 4 Niumatalo, the Agent was able to place Niumatalo at the other end of the pit away from a
 5 terminal at the time the entries were logged. Chau can be seen at the podium printing out the
 6 Free Play Coupons as the Incident Report outlined.

11. Later, the Agent met with Long and Macau's Regional General Manager, Luyen
Le to discuss Chau's employment at Macau. They reported that they terminated Chau on
February 4, 2022; Chau refused to meet the two in person when they requested he come in.

10 12. Le provided the Agent with an email detailing the phone call that he and Long
11 had with Chau. That email stated that on the call, Chau had acknowledged issuing the
12 unearned Free Play Coupons, and said that he was "hooking the players up."

13 13. On February 25, 2022, the Agent spoke with Chau over the phone. Chau told
14 the Agent that the player that he issued Saniatan's Coupons to, Tuan Le, had been losing a lot
15 of money. Chau reiterated that he was trying to "hook him up", and admitted to only doing it
16 one time.

17 14. Director Tina Griffin issued Administrative Charges on May 20, 2022 alleging 18 that Chau's actions constituted a violation of RCW 9A.56.050, 9.46.1961, 9.46.190, and 19 9.46.075(1) and (8) and WAC 230-03-085(1), (3), 9(c) and (d). Further, that Chau could not 20 show by clear and convincing evidence that he was qualified for licensure as required by RCW 21 9.46.153(1), and that his actions warranted revocation of his license pursuant to RCW 22 9.46.075(1) and (8) and WAC 230-03-085(1), (3), (9)(c) and (d).

23 15. Chau was sent the charges by regular and certified mail on May 25, 2022 to the
24 last address the Gambling Commission had on file.

25

26

FINAL ORDER OF THE GAMBLING COMMISSION

IN RE: BUNTHON C. CHAU NO. 2022-00304

| 1  | 16. Pursuant to WAC 230-17-010, a response was required to be received by the                                   |  |
|----|---|--|
| 2  | Commission by June 20, 2022. To date, the Commission has received no communication from                         |  |
| 3  | Chau.   |  |
| 4  | II. CONCLUSIONS OF LAW  |  |
| 5  | 1. Bunthon Chau received proper notice of the charges within three days of May 25,                              |  |
| 6  | 2022 via regular and certified mail, pursuant to RCW 34.05.413, RCW 34.05.434, WAC 230-                         |  |
| 7  | 17-005, WAC 230-17-010, and WAC 10-08-130.  |  |
| 8  | 2. The Commission can take final action against Bunthon Chau's gambling license                                 |  |
| 9  | under Case Number CR 2022-00304 pursuant to RCW 9.46.075, RCW 34.05.440(1), RCW                                 |  |
| 10 | 34.05.461, and WAC 230-03-085.  |  |
| 11 | 3. Bunthon Chau's license should be revoked under Case Number CR 2022-00304                                     |  |
| 12 | pursuant to RCW 9.46.075, RCW 9.46.153(1), RCW 34.05.440(1), RCW 34.05.461, and WAC                             |  |
| 13 | 230-03-085.   |  |
| 14 | III. ORDER  |  |
| 15 | This matter having come before the Commission at its July 14, 2022, Commission                                  |  |
| 16 | meeting, the Commissioners having heard arguments, been given the chance to review the                          |  |
| 17 | administrative record, and being fully advised in this matter, now therefore:                                   |  |
| 18 | It is hereby <b>ORDERED</b> that Bunthon Chau's gambling license, Number 68-35918, is                           |  |
| 19 | REVOKED.  |  |
| 20 |   |  |
| 21 | DATED this 14 <sup>th</sup> day of July, 2022.  |  |
| 22 |   |  |
| 23 | ALICIA LEVY, Chair     JULIA PATTERSON, Vice Chair  |  |
| 24 |   |  |
| 25 | BUD SIZEMORE KRISTINE REEVES  |  |
| 26 | BUD SIZEMORE KRISTINE REEVES  |  |
|    | FINAL ORDER OF THE 4<br>GAMBLING COMMISSION 4565 7 <sup>th</sup> Avenue S.E., Lacey, WA 98503<br>P.O. Box 42400 |  |
|    | IN RE: BUNTHON C. CHAU Olympia, WA 98504<br>NO. 2022-00304  |  |

| 1  |   |
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| 3  | SARAH LAWSON                              |
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| I  | FINAL ORDER OF THE<br>GAMBLING COMMISSION |

| 1        | NOTICE   |   |
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| 2        | Reconsideration: RCW 34.05.470 and WAC 230                   | )-17-140 provide that a party may file a                                      |
| 3        |  | 1 1 0 0   |
| 4        |  |   |
| 5        |  | -   |
| 6        | reconsideration.   |   |
| 7        | Stay of Final Order: Filing for reconsideration              | does not stay the effectiveness of this                                       |
| 8        | Order. WAC 230-17-145 provides that a party may petit        | tion the Commission for a stay of a final                                     |
| 9        | order. Any petition for a stay should be received by the     | e Commission within thirteen (13) days  |
| 10       | after the date this final order is mailed.                   |   |
| 11       | Judicial Review: RCW 34.05.542 provides that a               | a party may appeal this final order by  |
| 12       | filing a petition for judicial review within thirty (30) day | ys after service of this order. A petition                                    |
| 13       | for judicial review must be filed with the appropriate su    | perior court and served upon both the   |
| 14       | Commission and the Office of the Attorney General.           |   |
| 15       | Service: This Order was served on you three day              | s after it was deposited in the United  |
| 16       | States Postal Service regular mail, excluding the date of    | mailing. WAC 230-17-035.  |
| 17       | Any motions or petitions for judicial review show            | uld be served on or mailed to:  |
| 18       | Washington State Gambling Commission                         | Doug Van de Brake   |
| 19<br>20 | 4565 7 <sup>th</sup> Avenue S.E. Lecov. WA                   | Attorney General's Office<br>1135 Washington St. SE                           |
| 20       | P.O. Box 42400<br>Olympia, WA 98504-2400                     | P.O. Box 40100<br>Olympia, WA 98504-0100                                      |
| 21<br>22 |  | Orympia, WA 98904-0100  |
| 22       |  |   |
|          |  |   |
| 24<br>25 |  |   |
| 25<br>26 |  |   |
| 20       | <br>FINAL ORDER OF THE 6<br>GAMBLING COMMISSION              | Washington State Gambling Commission<br>4565 7th Avenue S.E., Lacey, WA 98503 |

| 1  | <b>CERTIFICATE OF SERVICE</b>   |         |
|----|---|---------|
| 2  | I certify that on the date below I served a copy of the foregoing document on all   | parties |
| 3  | and/or their counsel by United States Postal Service regular mail to the following: |         |
| 4  |   |         |
| 5  | BUNTHON C. CHAU<br>5209 S TRAFTON   |         |
| 6  | 6 TACOMA WA 98409   |         |
| 7  |   |         |
| 8  | EXECUTED this day of July, 2022, at Lacey, Washington.                              |         |
| 9  |   |         |
| 10 | Rashida Robbins   | -       |
| 11 | Administrative Assistant  |         |
| 12 |   |         |
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| I  | FINAL ORDER OF THE 7<br>GAMBLING COMMISSION 7<br>Washington State Gambling Comm     |         |

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| 5  | STATE OF V  | VASHINGTON                                    |
| 6  |   | COMMISSION                                    |
| 7  | In the Matter of:   | NO. CR 2022-00304                             |
| 8  | BUNTHON C CHAU<br>License No. 68-35918,                                     | NOTICE OF ADMINISTRATIVE                      |
| 9  | License 140. 08-55918,  | CHARGES                                       |
| 10 | Τ   |   |
| 11 | Licensee.   |   |
| 12 | These administrative charges are brou                                       | ght under and in accordance with Chapter 9.46 |
| 13 |   | ct, Chapter 34.05 RCW, the Administrative     |
| 14 | Procedure Act, and Title 230 WAC, Rules adopted by the Gambling Commission. |   |
| 15 | I. I  | ICENSE  |
| 16 | 1. The Washington State Gamb  | oling Commission (WSGC) issued Licensee       |
| 17 | Bunthon Chau a gambling license, License                                    | No. 68-35918, authorizing Public Card Room    |
| 18 | Employee activity; the license is not currently                             | linked to a House-Banked Card Room.           |
| 19 | 2. This license, which expires on   | January 12, 2023 was issued subject to Chau's |
| 20 | compliance with state gambling laws and Con                                 | mission rules.                                |
| 21 | II. FACTUAI   | BACKGROUND                                    |
| 22 | 1. On February 2, 2022, a WSGC  | Special Agent received an email from Van      |
| 23 | Long, the Assistant General Manager of Maca                                 | u Casino in Lakewood. Long was notifying      |
| 24 | the Agent that Bunthon Chau, a floor supervise                              | or, had been found printing out Free Play     |
| 25 |   |   |
| 26 |   |   |
|    |   |   |

IN RE: BUNTHON C CHAU NO. CR 2022-00304 Coupons<sup>1</sup> off of their Sonoma Player Tracking Software in random customer's names and
 giving them to other guests to use.

Included in the email were three Incident Reports that were submitted by
 Macau's Surveillance department outlining Chau's alleged violations. In response to two
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two Coupons.

4. The second Incident Report detailed multiple suspicious activities that
surveillance observed Chau commit on January 28, 2022. The reporting party was unable to
confirm the amounts of the Free Play Coupons printed out, nor the names on the tickets,
because the dealers that allowed the Coupons to be used failed to unfold the Coupons to
show them to the camera, as they were supposed to.

5. The third Incident Report outlined seven additional instances of Chau printing
out Free Play Coupons between January 26 and January 28, 2022. In each incident, Chau
printed out the Coupons in the name of a player who was either not on the property or hadn't
had any rated activity on that day.

6. On February 8, 2022, the Agent visited Macau to review the surveillance
footage in question. The Agent was able to confirm Chau printed the Free Play Coupons.

23

24 Solution of the coupon without additional cost. The amount of the frequency in which Free Play Coupons are earned are based on factors such as: how frequently a player gambles, the amount that they wager per hand, and their wins and losses. The data on these factors is manually entered into the Sonoma software at a terminal located on the gambling floor by the organization's supervisors.

The Agent then compared that footage to the Sonoma Player History of player Mark
 Saniatan.

7. The player history showed that on January 23, 2022, Saniatan had activity
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terminal at the time the entries were logged. Chau can be seen at the podium printing out the
Free Play Coupons as the Incident Report outlined.

8. Later, the Agent met with Long and Macau's Regional General Manager,
Luyen Le to discuss Chau's employment at Macau. They reported that they terminated Chau
on February 4, 2022; Chau refused to meet the two in person when they requested he come
in.

9. Le provided the Agent with an email detailing the phone call that he and Long
had with Chau. That email stated that on the call, Chau had acknowledged issuing the
unearned Free Play Coupons, and said that he was "hooking the players up."

16 10. On February 25, 2022, the Agent spoke with Chau over the phone. Chau told
17 the Agent that the player that he issued Saniatan's Coupons to, Tuan Le, had been losing a lot
18 of money. Chau reiterated that he was trying to "hook him up", and admitted to only doing it
19 one time.

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# **III. BASIS FOR REVOCATION**

Bunthon Chau wrongfully obtained controlled of the property of another, with
 the intent to deprive them of that property by providing two unearned \$300 Free Play Coupons
 to a player to wager with. In doing so, Chau violated RCW 9A.56.050, Theft in the Third
 Degree.

25 2. Bunthon Chau employed a scheme to defraud the operator Macau Casino –
26 Lakewood when he printed out two \$300 Free Play Coupons from the account of a player that

was not present at the time and handed them to another play to use to wager with. By engaging
 in such a scheme while working as a licensed Card Room Employee, Chau violated RCW
 9.46.1961, Cheating in the First Degree.

3. Bunthon Chau both employed a scheme to defraud and engaged in an act that
operated as fraud or deceit by giving a player two separate \$300 Free Play Coupons that the
player then used to wager with. By taking these steps while directly engaged in the operation
of licensed gambling activity, Chau in in violation of RCW 9.46.190, Violations Relating to
Fraud, Deceit, Altering or Misrepresenting Betting or Gambling.

9 4. Bunthon Chau has failed to prove by clear and convincing evidence that he is
10 qualified for licensure, as required by RCW 9.46.153(1).

5. The Commission is authorized to revoke Bunthon Chau's Public Card Room
Employee license pursuant to RCW 9.46.075(1) and (8), RCW 9.46.153(1), and WAC 23003-085(1), (3), and (9)(c) and (d).

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# IV. REVOCATION

The above-referenced findings are a sufficient basis for revocation of Bunthon
 Chau's Public Card Room Employee License.

Based on the facts and violations referenced above, the penalty for Bunthon
 Chau's actions is **REVOCATION** of his Public Card Room Employee License.

I have read this Notice of Administrative Charges, know the contents of it, believe it to
be true, and have executed this Notice in my capacity as Director of the Washington State
Gambling Commission.

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# TINA GRIFFIN, DIRECTOR Washington State Gambling Commission

5/20/2022

Date

NOTICE OF ADMINISTRATIVE CHARGES

DocuSigned by

Washington State Gambling Commission 4565 7th Avenue S.E., Lacey, WA 98503 P.O. Box 42400 Olympia, WA 98504

| 1  |  |
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| 2  | HEARING NOTICE   |
| 3  | You have the opportunity to request a hearing to contest the Commission's decision to            |
| 4  | revoke your public card room employee license. To request a hearing and/or discuss settlement    |
| 5  | options, the Commission must receive the enclosed hearing request form within 23 days from       |
| 6  | date of our mailing identified below. Failure to return the enclosed hearing request will result |
| 7  | in a default order revoking your license.  |
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| 2  | CERTIFICATE OF SERVICE  |
| 3  | I certify that on the date below I served a copy of the foregoing document on all parties     |
| 4  | or their counsel by United States Postal Service regular and certified mail to the following: |
| 5  |   |
| 6  | BUNTHON C CHAU<br>5209 S TRAFTON  |
| 7  | TACOMA WA 98409   |
| 8  | EXECUTED this 25 day of May, 2022, at Lacey, Washington.                                      |
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| 10 | Adam Teal   |
| 11 | Acting Legal Manager  |
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IN RE: BUNTHON C CHAU NO. CR 2022-00304