



**WASHINGTON STATE GAMBLING  
COMMISSION MEETING**

**February 8, 2024**

Olympia, Washington

## COMMISSIONERS



Alicia Levy  
Chair



Julia Patterson  
Vice Chair



Bud Sizemore

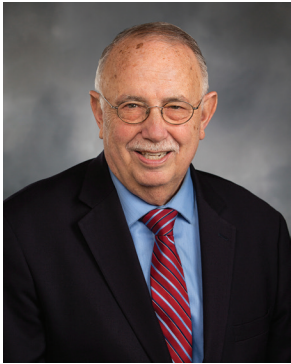


Sarah Lawson



Anders Ibsen

## EX OFFICIOS



Senator  
Steve Conway



Senator  
Jeff Holy



Representative  
Shelley Kloba




Representative  
Eric Robertson



### Washington State Gambling Commission

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

(360) 486-3469 | (800) 345-2529 | [www.wsgc.wa.gov](http://www.wsgc.wa.gov)

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# Washington State Gambling Commission

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

## Special Gambling Commission Meeting Agenda

Thursday, February 8, 2024

You can attend the meeting virtually: [TEAMS meeting link](#)

By phone: 360-726-3322, ID# 506 250 750#

In-Person: Liquor Cannabis Board, 1025 Union Ave SE, Olympia, WA

### Public Comment can be provided by:

- Written comment by email no later than close of business the day before the commission meeting to [askus@wsgc.wa.gov](mailto:askus@wsgc.wa.gov)
- Virtually via Teams or
- In person
- Public comments will be limited to no more than 3 minutes.

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

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9:00 am Call to Order Alicia Levy, Chair

**\*Tab 1 Consent agenda (Action)**  
January 11 & 12, 2024 Commission Meeting Minutes **Pg. 5**  
January 22, 2024 Commission Meeting Minutes **Pg. 11**  
New Licenses & Class III Gaming Employees **Pg. 12**  
HBCR List **Pg. 27**  
2024 Meeting Locations **Pg. 30**

*Public Comment*

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**Tab 2 Rocky Mountain Elk Foundation Pg. 31 (Action)**  
• Requests to exceed 300k limit in raffle prizes in license year.  
Jim Melville, Special Agent  
Alex Baier, Regional Director, Western Washington

*Public Comment*

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**Tab 3 Budget Update**  
Kriscinda Hansen, Chief Financial Officer

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**Tab 4 Legislative Update Pg. 38**  
Tina Griffin, Director

**Tab 5 IT Modernization Update**

Gary Drumheller, Deputy Director

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**Tab 6 Discussion-Firearm as a raffle prize Pg. 41 (Possible Action)**  
Sarah Lawson, Commissioner

*Public Comment*

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**RULE MAKING  
ADMINISTRATIVE PROCEDURE ACT PROCEEDINGS**

**\*Tab 7 Petition to Initiate Rulemaking (Action)**

- *Authorize Centralized Surveillance Pg. 56*

Bill McGregor, Special Agent Supervisor

*Public Comment*

**\*Tab 8 Staff Rule Amendment for Discussion and Possible Filing (Action)**

- *Adjacent Card rooms Pg. 105*

Adam Amorine, Staff Attorney and Rules Coordinator

*Public Comment*

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**Tab 9 Discussion – Director Salary Review (Action)**

Alicia Levy, Chair

*Public Comment*

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**Public Comment**

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**Executive Session – Closed to the Public**

To discuss current and potential agency litigation with legal counsel, including tribal negotiations.

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**Adjourn**

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*Updated: February 5, 2024*

*Next Meeting: March 14<sup>th</sup> and 15<sup>th</sup>, 2024, LCB*

*Public Meeting Accommodations:*

Questions or comments pertaining to the agenda and requests for special accommodation should be directed to [askus@wsgc.wa.gov](mailto:askus@wsgc.wa.gov)



# Washington State Gambling Commission

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

January 11, 2024

## Gambling Commission Meeting Minutes

The meeting was held at the Gambling Commission Headquarters, Lacey, WA.

### Commissioners:

Chair Alicia Levy – In person  
Vice Chair Julia Patterson – In person  
Sarah Lawson – In person  
Anders Ibsen – Via Teams  
Bud Sizemore – In person

### Ex Officio Members Present:

Senator Steve Conway – Via Teams  
Senator Jeff Holy – Excused  
Representative Shelley Kloba – Excused  
Representative Skyler Rud – Excused

### Staff Present:

Tina Griffin, Director; Lisa McLean, Legislative and Policy Manager; Troy Kirby, PIO; George Schultz, IT; Damon Mentzer, Administrative Assistant; Suzanne Becker, Assistant Attorney General (AAG)

### Staff Present Virtually:

Gary Drumheller, Deputy Director; Bill McGregor, Special Agent Supervisor; Nicole Frazer, Administrative Assistant

There were 7 people in the audience and 45 people attended virtually.

Chair Levy welcomed everyone to the Gambling Commission Headquarters and called the January meeting to order at 9:33 AM. She announced that executive session would occur at 11:30 for about 30 minutes. She called the roll to ensure a quorum.

### Tab 1 Consent Agenda

Chair Levy asked the Commissioners if they had any changes to the consent agenda. She asked commissioners if they had any questions. There were none. She asked for public comment. There was none.

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

*Commissioner Lawson seconded the motion.*

*The motion passed unanimously. 4:0*

*Commissioner Ibsen had not arrived yet.*

Director Griffin Director Griffin announced staffing changes. On December 11, 2023, we launched our new agency website. IT Modernization continues to move forward.

### Tab 2 Problem Gambling Update

Lisa C. McLean, Legislative and Policy Manager (LPM), introduced Cole Wogoman, Senior Government Relations Manager for National Council on Problem Gambling. Mr.

Wogoman presented a PowerPoint regarding Gambling Addiction Recovery, Investment,

and Treatment (GRIT) Act and answered questions. **Mr. Wogoman** explained that funding would be based on population in the states.

**Chair Levy** asked for a motion.

*Vice Chair Patterson moved that the Washington State Gambling Commission express its support for the successful adoption of the GRIT Act and that we notify our legislative delegation of that support.*

*Chair Levy seconded the motion.*

*Motion passed 4:0.*

*Commissioner Ibsen was not present for this vote.*

**Maureen Greely, Executive Director, Evergreen Counsel on Problem Gambling**, thanked the Commission for inviting Mr. Wogoman to speak at the meeting. This has been years of advocacy work, and this is the first time we've seen federal support.

The National Counsel will be holding its advocacy day on May 23<sup>rd</sup>, which is the same month we will be holding our Focus on the Future conference. To support this advocacy day.

**Vice Chair Patterson** asked about taking a step to find a sponsor in session. **Maureen Greely** agreed it was a fantastic idea. Vice Chair offered her help on this endeavor.

### **Tab 3 Discussion – Firearm as a raffle prize**

**Vice Chair Patterson** sought to have a broad conversation on the legislation that was passed relating to the ban on assault weapons and if there are any implications for those that we regulate here at the gambling commission.

This discussion was for information gathering and discussion.

**Director Griffin** went over the memo she prepared with the information requested by the commissioners at the November 2023 meeting. She shared that WAC 230-06-025. currently requires the awarding of a prize to be in compliance with any rules or laws in the state of Washington.

**Kirk Struggle, with Ducks Unlimited**, stated raffle and firearms are critical means on how we raise funds. We are always in compliance with state and federal laws when it comes to the firearms we offer and how they are transferred. If an individual wins they are required to get the firearm from a licensed dealer, pass background checks, and meet every aspect of the laws in the state of Washington.

**Commissioner Lawson** thanked staff for their work and asked for more time to understand the RCW and Rules. She would like to reserve the right for a future discussion.

**Commissioner Sizemore** stated that he wanted to make sure that the commission didn't get ahead of the legislature on this topic. He thinks the commission's rule works.

**Commissioner Ibsen** was able to join the meeting virtually.

### **Tab 4 – Special Olympics of Washington (SOWA)**

4565 7th Avenue SE  
Lacey, WA 98503  
wsgc.wa.gov

PO Box 42400  
Olympia, WA 98504  
360-486-3440

901 N Monroe St Suite 240  
Spokane, WA 99201  
509-325-7900

**Tony Czar, Special Agent**, reviewed the 2023 Western Washington enhanced raffle results, program review, and the 2024 Western Washington enhanced raffle plan.

**Mary Do**, Chief Operating Officer thanked the commission for their continued support. She invited the commission to SOWA's 50<sup>th</sup> anniversary that will be held this year. She said Tony was great.

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

*Commissioner Sizemore moved to approve the 2024 Enhanced Raffle Request for the Special Olympics of Washington to conduct a "Dreamhouse Raffle" in Western Washington.*

*Commissioner Ibsen seconded the motion.*

*Motion passed 5:0.*

**Chair Levy** called for a 10-minute break.

#### **Tab 6 – Staff – Proposed Rule Repeal for Final Action – Bingo**

**Lisa McLean, Legislative and Policy Manager**, presented the materials for this tab. She explained that the Commissioners would be taking final action on a repeal of Rule 230-03-155. This repeal would take effect 31 days from filing with the code revisor.

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

*Vice Chair Patterson moved to take final action on the staff proposed rule repeal of WAC 230-03-155 with an effective date of 31 days after filing with the Office of the Code Reviser.*

*Commissioner Lawson seconded.*

*Motion passed 5:0.*

#### **Tab 7 – Petition for Discussion and Possible Filing – Non-profit raffle rules**

**Lisa McLean, Legislative and Policy Manager**, presented the materials for this tab. She explained this petition was brought to us by a coalition of non-profits regarding their raffles. Some of the concerns are keeping up with inflation, conditions of members-only raffles, and modifying records retention requirements.

**Special Agent Bill McGregor** confirmed the prize limits prior to seeking commissioner approval have been in place since the 1980's. Director Griffin confirmed that in 2010 the agency changed the rule to \$40K for a single prize and \$80k in cumulative prizes for a license year. She also confirmed that in 2012 we raised the cumulative amount was raised to \$300k.

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

*Commissioner Sizemore made a motion to amend only a single rule in the packet, WAC 230-11-067 increasing the threshold to \$60k for a single prize and \$400k for cumulative prizes.*

*Commissioner Ibsen seconded the motion.*

*Motion passed 5:0.*

**Tab 8 – Staff Rule Amendment for Discussion and Possible Filing – Adjacent Card rooms**

**Lisa McLean, Legislative and Policy Manager**, presented the materials for this tab. She explained staff has developed clarifying language to ensure that adjacent card rooms operate as separate businesses premises. In developing the language, the WAC is better to belong in the licensing chapter. We are suggesting to take a couple of actions:

1. File for a new rule 230-03-182 which will amend the current rule in chapter WAC 230-06 and
2. Authorize us to file for a repeal of WAC 230-06-046 on an expedited basis because it would exist in chapter WAC 230-03 and 230-06.

**Chair Levy** asked for public comments.

**Eric Pearson, Owner of Maverick Gaming**, stated they are building two new card rooms in Kent and two card rooms in Kirkland which are adjacent to each other, and this would be devastating because they would have to be closed.

*Commissioner Lawson moved to file the proposed language with one change in subsection 2, taking out “licensed on the effective date” and adding “licensed as of July 1, 2018.” Create a new rule in 230-03 and move to repeal 230-06-046 given that the new rule will make the existing rule redundant upon enactment of the new rule.  
Motion passes 5:0.*

**Break for Executive Session**

**Tab 5 – Update on Centralized Surveillance**

**Tina Griffin, Director and Bill McGregor, Special Agent Supervisor (SAS)** presented a PowerPoint to update Commissioners on the research and discussions on this topic. There are currently two states that offer centralized surveillance systems: Colorado and Nevada. SAS McGregor shared the topics for future discussions.

**Phyllis Ermey and Kim McCabe from Maverick Gaming** presented a PowerPoint presentation that addressed the advantages of and how they currently operate centralized surveillance in other states and network topology.  
**Eric Pearson** explained what surveillance agents do.

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

**Tab 9 – Budget Update**

**Kriscinda Hansen, Chief Financial Officer (CFO)** presented the materials for this tab. CFO Hansen gave a brief overview of the 2023 license fee increase, revenue received to date for fiscal year 2024, and estimated expenditures for FY 24 and 25.

**Tab 10 – Staff Proposal to Initiate Rulemaking – Fee Increase**

**Lisa C. McLean, Legislative and Policy Manager (LPM), Kriscinda Hansen, Chief Financial Officer (CFO)** presented the materials for this tab. LPM McLean explained that staff is seeking to initiate rulemaking for a possible fee increase to cover the cost of licensing, regulation, and enforcement needs.



**Vice Chair Patterson is concerned about the full impact this action might have on licensees.**

**Commissioner Sizemore** said he was not in favor of a fee increase across the board. We need to look at activities individually and evaluate them for 6 months. He suggested a discussion on this topic in March.

**Chair Levy** asked for public comments.

**Vicki Christopherson, representing Maverick Gaming**, thanked Commissioners Patterson and Sizemore for their comments. We have never opposed a fee increase and do not want to. We are all feeling economic pressure. We would like to work with you and hopefully this initiation of rules if it incurs includes licensees and a conversation on how we can ensure stable funding for you and keep our business stable as well.

**Fred Riviera, Executive VP of the Mariners**, thanked Commissioners and commented on the 50/50 raffles and the impact, and the cost of licensure for them.

**Chair Levy** called for a motion.

*Vice Chair Patterson moved to initiate rule making proceedings for further discussion.  
Commissioner Lawson seconded the motion.  
Motion passed 5:0.*

10-minute break

**Tab 11 – Petition to Initiate Rulemaking – HBCR Financial Statements**

**Lisa C. McLean, Legislative and Policy Manager (LPM)**, presented the materials for tab. **Tim Gorrell** from Black Pearl Casino in Spokane Valley, WA, is seeking to amend WAC 230-15-740 to raise the gross gambling receipt thresholds that triggers the need for licensees to engage an independent certified public accounting firm to audit, review, or compile financial statements.

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

*Commissioner Lawson moved to deny the petition because the current thresholds are important to maintain the commissions CPA assurance.  
Commissioner Sizemore seconded.  
Motion passes 5:0.*

**Tab 12 – Petition to Initiate Rulemaking – Sports Wagering**

**Lisa C. McLean, Legislative and Policy Manager (LPM)**, presented the materials for this tab. **Austin Zeck** of Spanaway, WA, seeks to expand sports wagering through rulemaking. The petitioner was not present.

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

*Commissioner Lawson moved to deny the request because its outside of the agency's purview and ultimately up to the Legislature.*

*Vice Chair Patterson seconded the motion.*

*Motion passed 5:0.*

**Tab 13 – Legislative Update presented by Lisa McLean**

**Lisa C. McLean, Legislative and Policy Manager (LPM)**, presented the materials for this tab. She introduced Rep. Eric Robertson as our newest Ex Officio. The legislature started on Monday and is a short session. Lisa went over the bills in the packet and asked if the Commissioners wished to take a position on any of the bills.

- Budget Proviso
- Animal Cruelty bill, HB 1961
- Gambling treatment court diversion program, HB2055

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

*Commissioner Lawson moved to authorize moves to authorize the Gambling Commission to seek a budget proviso for the IT Modernization as well as write letters of support for HB 1961 and HB 2055.*

*Vice Chair Patterson seconded the motion.*

*Motion passed 5:0.*

**Chair Levy** asked for public comment.

There was none.

**Chair Levy** announced that the meeting is adjourned at 2:26 PM and will reconvene tomorrow at 9:00 AM for Executive Session only.



# Washington State Gambling Commission

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

**January 22, 2024**

## **Gambling Commission Special Executive Session Meeting Minutes**

The meeting was held at the Gambling Commission Headquarters, Lacey, WA.

### **Commissioners:**

**Chair Alicia Levy – Via Teams**

**Vice Chair Julia Patterson – Via Teams**

**Sarah Lawson – Via Teams**

**Anders Ibsen – Via Teams**

**Bud Sizemore – Excused**

### **Staff Present Virtually:**

Lisa Benavidez, Human Resources Director and Julie Anderson, Executive Assistant

Chair Levy called the virtual meeting to order at 3:05 PM. The purpose of the special executive session is to discuss the performance of a public employee.

There was no action taken.

### **Adjournment**

Chair Levy adjourned the meeting at 4:16 PM.



COMMISSION APPROVAL LIST  
(New Licenses & Class III Gaming Employees)  
February 2024

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PAGES:14

Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 14.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

**NEW APPLICATIONS****BINGO**

BPOE 02755

00-12335 01-02807

15 S COLORADO ST

KENNEWICK WA 99336

JOHN MUIR ELEMENTARY PTSA

00-12327 01-02839

14012 132ND AVE NE

KIRKLAND WA 98034

VFW 03057/WESTPORT

00-00282 01-01921

211 E PACIFIC AVE

WESTPORT WA 98595

**RAFFLE**

COLUMBIA RIVER WALLEYE ANGLERS ASSOCIATION

00-25247 02-21380

801 W COLUMBIA ST

PASCO WA 99301

COWLITZ USBC ASSOCIATION

00-21983 02-08980

76 VEYS DR

KELSO WA 98626

JOHN MUIR ELEMENTARY PTSA

00-12327 02-21389

14012 132ND AVE NE

KIRKLAND WA 98034

MINERAL LAKE LIONS FOUNDATION

00-25239 02-21379

113 FRONT ST E

MINERAL WA 98355

PIKE PLACE MARKET FOUNDATION

00-15360 02-02752

85 PIKE ST STE 500

SEATTLE WA 98101

SAFE CROSSINGS FOUNDATION

00-25219 02-21373

4210 SW OREGON ST

SEATTLE WA 98116

WOODLAND PARK ZOOLOGICAL SOCIETY

00-19341 02-08376

5500 PHINNEY AVE N

SEATTLE WA 98103

**PUNCHBOARD/PULL-TAB NONPROFIT**

BPOE 00823

00-00053 05-01430

11605 SE MCGILLIVRAY BLVD

VANCOUVER WA 98683

**PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT**

JP'S

00-25200 05-21857

365 SPRING ST STE B

FRIDAY HARBOR WA 98250

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

**NEW APPLICATIONS**

**PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT**

JT'S SPORTS BAR  
00-25236 05-21856

14920 HWY 99  
LYNNWOOD WA 98087

SCRATCH PIZZA & BILLIARDS  
00-24839 05-21734

5219 PACIFIC HWY E  
FIFE WA 98424

**MANUFACTURER**

PAVILION PAYMENTS GAMING SERVICES  
20-00275 20-00275

7201 W LAKE MEAD BLVD  
LAS VEGAS NV 89128

**NON HOUSE-BANKED CARD GAME**

JP'S  
00-25200 65-07546

365 SPRING ST STE B  
FRIDAY HARBOR WA 98250

**ANCILLARY SPORTS WAGERING VENDOR**

PAVILION PAYMENTS GAMING SERVICES, INC.  
10-00579 83-00039

7201 W LAKE MEAD BLVD  
LAS VEGAS NV 89128

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**DISTRIBUTOR REPRESENTATIVE**

CAMPBELL, JAY  
22-01351

INTERBLOCK USA LLC  
LAS VEGAS NV 89118

SINGH, MANJYOT  
22-01350

INTERBLOCK USA LLC  
LAS VEGAS NV 89118

**MANUFACTURER REPRESENTATIVE**

ALMAGUER, LESLIE L  
23-03813

PAVILION PAYMENTS GAMING SERVICES  
LAS VEGAS NV 89128

ANGELES, PHILIP  
23-03808

PAVILION PAYMENTS GAMING SERVICES  
LAS VEGAS NV 89128

GETER, BENJAMIN D  
23-03809

PAVILION PAYMENTS GAMING SERVICES  
LAS VEGAS NV 89128

HABIB, ABBAS M  
23-03812

PAVILION PAYMENTS GAMING SERVICES  
LAS VEGAS NV 89128

JOSEPH, TAVAMANI RAJADURAI  
23-03849

LIGHT & WONDER  
LAS VEGAS NV 89119

MARIAPPAN, MURUKESAN  
23-03845

LIGHT & WONDER  
LAS VEGAS NV 89119

MORGAN, LEON W  
23-03811

PAVILION PAYMENTS GAMING SERVICES  
LAS VEGAS NV 89128

NAGARAJAN, SHANMUGAM  
23-03847

LIGHT & WONDER  
LAS VEGAS NV 89119

RIOS, ANTHONY  
23-03810

PAVILION PAYMENTS GAMING SERVICES  
LAS VEGAS NV 89128

UMASANKAR, PRIYADHARSHINI  
23-03846

LIGHT & WONDER  
LAS VEGAS NV 89119

WEILL, JASON J  
23-03848

IGT  
LAS VEGAS NV 89113

WORKMAN, JASON K  
23-03850

IGT  
LAS VEGAS NV 89113

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**MAJOR SPORTS WAGERING REPRESENTATIVE**

GE, GEORGE L  
33-00605

CAESARS SPORTSBOOK  
LAS VEGAS NV 89118

WALKER, STEPHEN P  
33-00608

DRAFTKINGS  
BOSTON MA 02116

ZHENG, YIMIN  
33-00606

CAESARS SPORTSBOOK  
LAS VEGAS NV 89118

**MID-LEVEL SPORTS WAGERING REPRESENTATIVE**

KERNS, MITCHELL A  
34-00038

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

ROBINSON, BRANDON L  
34-00039

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

**ANCILLARY SPORTS WAGERING REPRESENTATIVE**

MCMILLAN, MATTHEW T  
35-00044

UNITED TOTE COMPANY  
LOUISVILLE KY 40222

**NON-PROFIT GAMBLING MANAGER**

UTTECH, MARNE J  
61-04696

FOE 03144  
VASHON WA 98070

**SERVICE SUPPLIER REPRESENTATIVE**

KERNS, MITCHELL A  
63-01137

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

ROBINSON, BRANDON L  
63-01138

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

SHARP, ADAM L  
63-01135

SURVEILLANCE SYSTEMS  
ROCKLIN CA 95677

TERLAJE, VANCE PAUL O  
63-01136

SURVEILLANCE SYSTEMS  
ROCKLIN CA 95677



PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

ARAYA, POULOSE 68-37473	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
BACCUS, GEORGE D 68-37485	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
BALDWIN, CORAL A 68-37508	B	SILVER DOLLAR CASINO/MILL CREEK MILL CREEK WA 98012-6384
BURNS, COLIN T 68-37498	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
CRAIG, MELISSA A 68-37492	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
DECKER, WHITNEY D 68-37481	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
DOBSON, STONEY B JR 68-37486	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
DUONG, KOBE J 68-37493	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
GREENE, SHELLEY E 68-32818	B	FORTUNE CASINO - RENTON RENTON WA 98055
HARRINGTON, WILLIAM A 68-37500	B	ACES POKER MOUNTLAKE TERRACE WA 98043
HEFLIN, RASHON A 68-37511	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
HILL, RICHARD E 68-22751	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
HILL, TRAVIS M 68-37505	B	IMPERIAL PALACE CASINO AUBURN WA 98002
INSLEY, ROBERT L 68-37491	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
JOE, CHRISTINA K 68-36503	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
KORTAN, SARA C 68-30312	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

LANCASTER, AMBER L 68-35912	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
LAUPOLA, RON S 68-37495	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
LE, PHU H 68-37480	B	ROMAN CASINO SEATTLE WA 98178
LOLOHEA, MOSESE T 68-37479	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
LUTGEN, TARA L 68-14362	B	ROYAL CASINO EVERETT WA 98204
MARTIN, SHANE M 68-37484	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
MAXIE, CHRISTOPHER M 68-37506	B	IMPERIAL PALACE CASINO AUBURN WA 98002
MOORE, ANDREA D 68-37483	B	PALACE CASINO LAKEWOOD LAKEWOOD WA 98499-8434
NASH, TRACE E 68-37501	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
NOBLE, KANEM C 68-37515	B	BLACK PEARL RESTAURANT & CARD ROOM SPOKANE VALLEY WA 99206-4719
ORTIZ, JOSEPH M 68-37482	B	FORTUNE CASINO - LACEY LACEY WA 98516
OTRADOVEC, ANDREW J 68-23940	B	JOKER'S CASINO SPORTS BAR & FIESTA CD RM RICHLAND WA 99352-4122
PAGE, GABRIEL R 68-37478	B	THE PALACE LA CENTER WA 98629
PARKER, ADONNIS T 68-37476	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
PENG, KRISTA B 68-32917	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
PETRUSCHAK, YUKARI 68-06758	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463

PERSON'S NAME  
 LICENSE NUMBER

EMPLOYER'S NAME  
 PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

PRATER, PAYGE K 68-35812	B	CASINO CARIBBEAN YAKIMA WA 98901
SANDS, JAMIE R 68-17451	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
SHERPA, SAILEA P 68-34468	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
SHIRLEY, WILLIAM S 68-37514	B	IMPERIAL PALACE CASINO AUBURN WA 98002
SKILLINGS, ROBERT R JR 68-37475	B	THE PALACE LA CENTER WA 98629
SOHM, JOSEPH M 68-03925	B	CHIPS CASINO/LAKEWOOD LAKEWOOD WA 98499
STADELMAN, MARTIN J 68-33268	B	COYOTE BOB'S CASINO KENNEWICK WA 99336
STEFFENSON, RENEE M 68-37496	B	JOKER'S CASINO SPORTS BAR & FIESTA CD RM RICHLAND WA 99352-4122
TAYLOR, SHALEI S 68-37502	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
TRAN, HANH T 68-21228	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
ZIEBELL, CARLA L 68-37490	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**CHEHALIS CONFEDERATED TRIBES**

CERVANTES, ALFREDO A  
69-56307

FRANKS, MICHELLE L  
69-56306

FREEMAN, GEORGE A  
69-56302

HAMMELL, ALEX K  
69-48045

HOLMES, TRISTAN D  
69-56305

HUYNH, MICHAEL A  
69-56304

LACY, SHELBY L  
69-56308

MASSEY, KEVIN M  
69-56303

MOSBY, BRANDON N  
69-56268

OLNEY, ANTHONY R  
69-23037

**COLVILLE CONFEDERATED TRIBES**

CAVAZOS, CINDY L  
69-56341

GORR, JOE D  
69-56344

JOSEPH, LEVI J  
69-56250

KAULAITY, EMILY M  
69-23489

MOGAN, JOSEPH B  
69-56343

SANCHEZ, JESUS W  
69-56249

SHOCKMAN, SONIA M  
69-56342

**COWLITZ INDIAN TRIBE**

BRENNER, PAULA S  
69-56285

CHHUOY, SOPHANNA  
69-56246

COLE, CHANIYA N  
69-56290

COX, JEFFRY A  
69-56332

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**COWLITZ INDIAN TRIBE**

DAVIS, JACOB A  
69-56228

DERBY, HOLLAND T  
69-56333

DULANEY, KALAYLA M  
69-56325

FOX, MICAH J  
69-56231

HELM, MADISON M  
69-56230

KU, JOSEPH  
69-56227

LEGRY, ZACHARY N  
69-56287

MARTIN, MICHAEL R  
69-56323

RICE, STACEY A  
69-41707

RUSSELL, DANIEL R  
69-56334

SHERLOCK, LOGAN R  
69-56289

SMITH, AIDAN P  
69-56324

SMITH, CHRISTOPHER R  
69-56291

TAYLOR, ISAAC R  
69-56286

UPHAM, ADRIAN A  
69-56229

WIENECKE, SIENNA D  
69-56326

WOOD, KEVIN C  
69-50676

**KALISPEL TRIBE**

ALEXANDER, RANDY C  
69-56288

BARLOW, JOANI S  
69-56348

GOURNEAU, KATHRYN A  
69-56267

GRASSEL, PETER J  
69-46111

LEE, JILLIAN M  
69-56266

SZILASI, TERRY J  
69-56313

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

LUMMI NATION

CHAND, CHRISTOPHER R  
69-56259

HONCOOP, CINDY K  
69-56222

JEFFERSON, GERALD M  
69-42098

MAGANA SCHMID, AARON C  
69-56221

ZWIERS, SIDNEY L  
69-56220

MUCKLESHOOT INDIAN TRIBE

ARNOLD, KEITH L  
69-56301

BURGESS, THOMAS D  
69-56350

DIEP, STEPHENIE  
69-56351

HANCHOR, AUGUSTINE K  
69-56352

JAVIER, JECEL S  
69-56264

KING, CECILIA E  
69-56273

MALAKI, TOLUIVA T  
69-56263

PHILLIPS, ZANE H  
69-56353

REYES SALADO, ELMAN E  
69-56300

SAM, JUANITA K  
69-17441

SULIMAN, ANNA M  
69-25566

WILSON, ERIN E  
69-56262

NISQUALLY INDIAN TRIBE

BOYD, DENISE D  
69-56261

CONTRERAS, VINCENT B  
69-56270

FLORES, LORENA P  
69-56260

FONTANOS, ALLAN JAY S  
69-56297

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**NISQUALLY INDIAN TRIBE**

FRITSCHLE, COLLIN P  
69-56339

GATAN, CAITLYN MARI B  
69-56269

MILLER, KIM E  
69-56204

SCHRAM, REID A  
69-56210

WILLIE, KELLI L  
69-56340

**NOOKSACK INDIAN TRIBE**

PETRITZ, RICHARD C  
69-51050

**PORT GAMBLE S'KLALLAM TRIBE**

BOVAIR, DESTINY K  
69-56355

CROCKETT, ALEXANDER L  
69-56223

FRIEND, MILENA B  
69-56224

HUBBARD, JINTANA S  
69-56225

SAPIDA, JOY CAMILLE T  
69-56356

TOWLER, MERILEE A  
69-56226

**PUYALLUP TRIBE OF INDIANS**

BALLARD, GRISELLE A  
69-56364

CALHOUN, DESTINEE A  
69-56275

CHIN, NATHANIEL J  
69-56361

DAVIDSON, ARIEL C  
69-56345

EARL, FRANK J JR  
69-56274

GUTTER, PIERRE C  
69-56328

HELLER, ROBERT K  
69-56311

HOANG, MICHELLE L  
69-56362

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**PUYALLUP TRIBE OF INDIANS**

JOHNSON, MELONY M  
69-56363

LARSH, MELIA S  
69-56284

MALIG, GEMMA G  
69-56347

MANGAOANG, MARIELLE L  
69-56318

MCINTOSH-SHANKLIN, JOSYIAH S  
69-56265

MURRAY, TAYA N  
69-56329

NIEHAUS, COLE J  
69-56322

PALOMINO, JESSE R  
69-56312

SCHUMACHER, CAMERON M  
69-56320

SIDDLE, SHANA R  
69-56321

WILLIAMS, DION L  
69-56319

**SKOKOMISH TRIBE**

LUBINSKI, JENNIFER A  
69-56292

ROGERS, YVONNE L  
69-56317

**SNOQUALMIE TRIBE**

HARRIS, JERRY B  
69-56360

KLEMM, TINA M  
69-56338

LAO, PHILLIP S  
69-43147

MONSALVE, DAVID  
69-56337

NGUYEN, NHI T  
69-56293

RAMOS FONTANEZ, LYNNETTE  
69-38670

STEYAERT, JACOB R  
69-56295

VALADEZ, ANDREW R  
69-56294



PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

SNOQUALMIE TRIBE

XIE, MIN  
69-56296

SPOKANE TRIBE

BAK, DENG R  
69-56310

GIBSON, NATHAN L  
69-56327

GORTON, BEVERLY A  
69-56278

HARMS, BRENDAN M  
69-56299

HARTMAN, PAUL D JR  
69-56276

RAMIREZ, RACHEL D  
69-56349

SIMPSON, ANDREW L  
69-56283

SPRENKEL, VIENNA M  
69-56279

TAYLOR, LUCINDA N  
69-56309

UTTER, TIFFANY M  
69-56331

WILSON, EMILY J  
69-56277

SQUAXIN ISLAND TRIBE

BURCH, KRISTY L  
69-56316

CLARY, MARLA J  
69-56346

ELLIOTT, DAVID V  
69-43910

EVANS, MICHAEL J  
69-56245

HAGER, THOMAS E  
69-56247

POUCH, ELIJAH Z  
69-56315

SUQUAMISH TRIBE

FINKBONNER, KAIDEN M  
69-56271

SEVERE, KEVIN L  
69-56354

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**SWINOMISH INDIAN TRIBAL COMMUNITY**

GRAVES, KELLY C  
69-56257

KNOX, IAN J  
69-56258

SAMUELSEN, ADIYA  
69-56256

SEDGWICK, BENJAMIN A  
69-56281

SHELTON, MADDISON A  
69-36995

TRIGG, JAMEY L  
69-56282

WOODY, MATTHEW J  
69-56335

**THE TULALIP TRIBES**

CASTILLO, RENE  
69-37546

DAHL, KIMBERLEY A  
69-17289

JOHNSON, MARYLENE P  
69-56280

MERCADO, JOEMAR F  
69-56330

**YAKAMA NATION**

PENA, MARK J  
69-56359

RIVERA, ANTHONY M  
69-50869



## HOUSE-BANKED PUBLIC CARD ROOM REPORT

<b>Licensed and Operating</b>		<b>39</b>			
	City	Commission Approval Date	License Expiration Date	Org #	License #
ACE'S POKER	LAKEWOOD	Aug 14, 2003	Jun 30, 2024	00-19258	67-00184
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2024	00-18357	67-00058
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2024	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2024	00-11170	67-00183
CARIBBEAN CARDROOM	KIRKLAND	Nov 14, 2019	Sep 30, 2024	00-24515	67-00343
CASINO CARIBBEAN	KIRKLAND	Nov 14, 2019	Sep 30, 2024	00-24512	67-00341
CASINO CARIBBEAN	YAKIMA	Nov 14, 2019	Sep 30, 2024	00-24513	67-00342
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2024	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2024	00-24296	67-00339
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2024	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2024	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2024	00-21847	67-00281
DRAGON TIGER CASINO MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Dec 29, 2023	Jun 30, 2024	00-22459	67-00315
FORTUNE CASINO - LACEY	LACEY	Jul 14, 2022	Mar 31, 2024	00-24868	67-00347
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2024	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2024	00-23465	67-00329
GOLDIES SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2024	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2024	00-19513	67-00194
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2024	00-12554	67-00012
IMPERIAL PALACE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2024	00-19477	67-00192
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2024	00-15224	67-00006
LANCER LANES AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2024	00-21681	67-00276

<b>Licensed and Operating</b>			<b>39</b>		
	<b>City</b>	<b>Commission Approval Date</b>	<b>License Expiration Date</b>	<b>Org #</b>	<b>License #</b>
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2024	00-21305	67-00267
MACAU CASINO	LAKEWOOD	Nov 14, 2019	Sep 30, 2024	00-24516	67-00345
NEW PHOENIX	LA CENTER	Oct 6, 2022	Jun 30, 2024	00-24981	67-00349
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2024	00-13069	67-00173
PALACE CASINO LAKEWOOD	LAKEWOOD	Dec 26, 2023	Dec 31, 2024	00-16542	67-00028
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2024	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2024	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2024	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2024	00-17613	67-00057
ROXBURY LANES AND CASINO	SEATTLE	Nov 18, 2004	Jun 30, 2024	00-20113	67-00231
SILVER DOLLAR CASINO/MILL CREEK	MILL CREEK	Sep 9, 2010	Jun 30, 2024	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2024	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2024	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2024	00-16759	67-00038
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2024	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2024	00-20009	67-00212
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2024	00-18777	67-00209

<b>Licensed but Not Currently Operating</b>			<b>5</b>		
	<b>City</b>	<b>Commission Approval Date</b>	<b>License Expiration Date</b>	<b>Org #</b>	<b>License #</b>
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2024	00-23814	67-00335
LUCKY DRAGONZ CASINO	SEATTLE	Mar 10, 2022	Jun 30, 2024	00-23001	67-00323
MACAU CASINO	TUKWILA	Nov 14, 2019	Sep 30, 2024	00-24514	67-00344
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2024	00-22130	67-00301
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2024	00-21998	67-00287

**Applications Pending****1**

	City	Commission Approval Date	License Expiration Date	Org #	License #
IMPERIAL PALACE CASINO	TUKWILA			00-24893	67-00348

# **WASHINGTON STATE GAMBLING COMMISSION**

## **2024 Commission Meetings Schedule**

**January 11<sup>th</sup> & 12<sup>th</sup>  
Thursday & Friday**

**Gambling Commission Headquarters  
4565 7<sup>th</sup> Avenue SE  
Lacey, WA (Hybrid)**

**February 8<sup>th</sup> & 9<sup>th</sup>  
Thursday & Friday**

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

**March 14<sup>th</sup> & 15<sup>th</sup>  
Thursday & Friday**

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

**\*April 25<sup>th</sup> & 26<sup>th</sup>  
Thursday & Friday**

**WSGC Headquarters  
4565 7<sup>th</sup> Avenue SE  
Lacey, WA 98503 (Hybrid)**

**May 9<sup>th</sup> & 10<sup>th</sup>  
Thursday & Friday**

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

### **June**

**NO MEETING**

**July 11<sup>th</sup> and 12<sup>th</sup>  
Thursday & Friday**

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

**August 8<sup>th</sup> & 9<sup>th</sup>  
Thursday & Friday**

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

**September 12<sup>th</sup> & 13<sup>th</sup>  
Thursday & Friday**

**TBD**

**\*October 17<sup>th</sup> & 18<sup>th</sup>  
Thursday & Friday**

**TBD**

**November 14<sup>th</sup> & 15<sup>th</sup>  
Thursday & Friday**

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

### **December**

**NO MEETING**

Gambling Commission meetings are typically held on the second Thursday and Friday of the month. Dates identified with an \* asterisk are scheduled later in the month due to conference schedules.



# Washington State Gambling Commission

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

February 8, 2024

**TO:**               **COMMISSIONERS**                               **EX OFFICIO MEMBERS**  
Alicia Levy, Chair   Senator Steve Conway  
Julia Patterson, Vice-Chair                               Senator Jeff Holy  
Bud Sizemore   Representative Shelley Kloba  
Sarah Lawson   Representative Eric Robertson  
Anders Ibsen

**FROM:**           Jim Melville, Special Agent, Regulatory Unit

**SUBJECT:**       Rocky Mountain Elk Foundation Inc.'s Request to Exceed \$300,000  
Limit in Raffle Prizes Paid during the License Year Ending  
December 31, 2024

## Background:

Our rules require licensees to get your approval before offering raffle prizes that exceed \$300,000 in a license year, WAC 230-11-067.

To seek that approval, the licensee must submit a raffle plan that includes:

- (a) The organization's goals for conducting raffles; and
- (b) A brief overview of the licensee's mission and vision including the type of programs supported by the licensee and clients served; and
- (c) Plans for selling raffle tickets; and
- (d) Brief overview of prizes awarded; and
- (e) Estimated gross gambling receipts, expenses, and net income for the raffles; and
- (f) Any other information that we request or any information the licensee wishes to submit.

## Request for Your Approval:

Rocky Mountain Elk Foundation is seeking your approval to offer raffle prizes exceeding \$300,000 during their current license year which ends on December 31, 2024.

4565 7th Avenue SE  
Lacey, WA 98503  
wsgc.wa.gov

PO Box 42400  
Olympia, WA 98504  
360-486-3440

901 N Monroe St Suite 240  
Spokane, WA 99201  
509-325-7900

Staff recommends you approve Rocky Mountain Elk Foundation's request to exceed the annual raffle prize limit of \$300,000 for their license year January 1, 2024 – December 31, 2024.





**ROCKY MOUNTAIN  
ELK FOUNDATION**

Washington State Gambling Commission  
Attention: Jim Melville, Special Agent  
4565 7<sup>th</sup> Avenue S.E.  
Lacey, WA 98503

**RE: Rocky Mountain Elk Foundation, Inc. (License # 00-11750) request to exceed \$300,000 limit in raffle prizes paid in the January 1 to December 31, 2024 license year.**

Dear Mr. Melville and the Washington State Gambling Commission,

Please accept this letter as the Rocky Mountain Elk Foundation, Inc.'s (RMEF) request to exceed the \$300,000.00 prize limit for raffle prizes pursuant to WAC 230-11-067(3) for the license year January 1 to December 31, 2024. RMEF's mission is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. RMEF does this through habitat enhancement and conservation, wildlife research, and education. To accomplish its mission, RMEF relies heavily on its fundraising system, which features Big Game Banquets that include auctions and raffles. RMEF raffles are legal, fair and responsible. Allowing this waiver will allow RMEF to continue its mission and to put more money "on-the-ground" in Washington.

In 2023, the RMEF State Leadership Team for Washington, composed of local volunteers and residents, had at their disposal \$564,000.00 to spend in the State for the fulfillment of RMEF's mission and the betterment of Washington's lands and wildlife. For the 2023 license year, RMEF expects gross gambling receipts of approximately \$850,000.00, with estimated expenses of \$300,000.00 and an estimated net income of \$550,000.00. As is evidenced by the estimates provided, RMEF fundraising is efficient and, therefore, allows a large portion of the money raised to remain in the State for the benefit of its wildlife and residents.

The Washington State Gambling Commission has approved RMEF's requests to exceed the annual raffle prize limit in prior years. Last year, the Commission approved RMEF's request and set a \$500,000 limit. Our end-of-year totals were approximately \$20,000 under that limit. Due to changing economic conditions we anticipate an increased reliance on raffles in 2024. Increased reliance on raffle income, coupled with anticipated inflation in the cost and market value of prizes, we are asking for a raffle prize value limit of \$550,000 for 2024. We are grateful to the Commission for consideration and support now and in the past.

Thank you for your consideration of this request. Approving this request will allow RMEF to increase its mission delivery, which benefits habitat, wildlife and all the residents of Washington.

Please feel free to contact me at (425) 293-2160 or [abaier@rmef.org](mailto:abaier@rmef.org) if you have any questions or need additional information.

Sincerely,

Alex Baier  
Regional Director of Western Washington, RMEF

**ROCKY MOUNTAIN ELK FOUNDATION, INC.**  
**Raffle Plan: Request to Exceed \$300,000 Raffle Prizes Paid Limit During License Year**  
**(January 1 to December 31, 2024)**

**WAC 230-11-067(3)**

**(a) Organization's Goals for Conducting Raffles**

The Rocky Mountain Elk Foundation, Inc. (RMEF) conducts raffles in the State of Washington to raise funds in support of our mission. Raffles are an important facet of RMEF's diverse fundraising efforts, which include auctions, membership dues, retail sales, and charitable solicitations. RMEF's goal is to continue fundraising efforts in Washington to support additional habitat enhancement, land protection, and public access projects.

**(b) A Brief Overview of the License's Mission and Vision Including the Type of Programs Supported by the Licensee and Clients Served**

RMEF's mission is to ensure the future of elk, other wildlife, their habitat and our hunting heritage.

RMEF's four mission programs are land conservation and access, habitat stewardship, wildlife management, and hunting heritage. In support of our mission, RMEF is committed to: conserving, restoring and enhancing natural habitats; promoting the sound management of wild elk, which may be hunted or otherwise enjoyed; restoring elk to their native ranges; and educating members and the public about habitat conservation and our hunting heritage.

**Acres Conserved and Enhanced:** More than 8.6 million acres of wildlife habitat

**Acres Opened and/or Secured for Public Access:** More than 1.5 million acres opened and/or secured for hunting and other outdoor recreation

**Conservation and Hunting Heritage Outreach Projects Complete:** More than 13,800 projects

**Number of Members:** More than 225,000 nationwide, over 12,000 of which live in Washington.

**Number of Chapters:** More than 500 nationwide, 23 of which are in Washington.

**Number of Volunteers:** More than 12,000 nationwide, over 300 of which live in Washington.

The statistics above give a succinct picture of what RMEF accomplishes nationwide with support from members and volunteers, along with local, state and federal agencies. Washington-based members, volunteers and partners contribute to our ability to raise funds in support of our mission and deliver high-quality mission across Washington.

Since our inception, RMEF has put over \$133 million dollars on-the-ground to benefit the wildlife and residents of the State of Washington, a large portion of which was raised at our Big Game Banquets through raffles. In 2023, RMEF earmarked a minimum of \$564,000 for mission delivery in Washington from RMEF's raffle and banquet program. The dollars we provided were used to leverage an additional \$1.1 million from our dedicated partners. Every year, RMEF's Washington-based volunteers participate on a committee that reviews proposals and decides how to leverage this earmarked funding to deliver mission across Washington. Additionally, our volunteers plan and organize several boots-on-the-ground projects to aid our primary partner, the Washington Department of Fish and Wildlife, in whatever way they need most at that time.

In recent years, RMEF used this income to support other local non-profits such as First-Hunt Foundation and Youth Outdoors Unlimited who mentor first time hunters and provide opportunities for physically disabled and terminally ill youth to hunt. Similarly, in 2023 we supported Washington Outdoor Women who teach women outdoor survival skills, Cross the Divide, Outdoors For Our Heros, and Salmon for Soldiers who provide outdoor recreational opportunities to the veteran community.

The dollars we raise are also used to restore habitat after catastrophic wildfires near Asotin, Yakima, and Ellensburg by removing invasive plant species, rebuilding water sources in vital winter ranges, and planting native sagebrush. RMEF funded valuable research on the impact of hoof disease on Western Washington's elk herds conducted by Washington State University with money raised at our events. In 2023 we partnered with the Swinomish Tribe and Puget Sound Energy to fund a research project to examine survival rates, mortality causes, and habitat selection of the North Cascades elk herd.

Perhaps what RMEF is most known for is the use of funds generated via raffles and banquets to permanently conserve large swaths of land which are then conveyed to the State for public ownership and to be managed for the benefit of wildlife. One such project in Washington is the [Merrill Lake](#) property. RMEF, in partnership with the WDFW and other private and public partners, purchased the former timberland property, permanently protecting and providing public access to 1,453 acres of critical riparian habitat at the foot of Mount St. Helens. RMEF conveyed this property to the WDFW for public ownership and management.

RMEF and our partners have completed several other large-scale projects in addition to the Merrill Lake Acquisition in the last 5 years. We completed Phase III of the [Cowiche](#) project and along with the Tucannon property project, representing approximately 4,500 acres conserved. Both properties were conveyed to the WDFW for long-term public ownership and management. RMEF has also worked to convey property to the US Forest Service to provide better public access to existing public lands and protect vital wildlife habitat.

Directly across the boarder in northeast Oregon, in November of 2023, RMEF and our partners were able to successfully acquire a [15,000+ acre parcel](#) which the Oregon Department of Fish and Wildlife had been trying for since the 1960's. This landscape level acquisition conserved over 100 miles of the 2<sup>nd</sup> most ecologically important river in Oregon, the Minam River, which provides habitat to federally and state listed species such as Steelhead and Spring Chinook. It also conserved prime summer and winter elk range, migration corridors for mule deer, and a variety of habitat types that support all of the critters who call them home.

Large-scale conservation projects that benefit the residents of Washington are only possible when we can leverage funding raised through raffles and other grassroots activities.

### **(c) Plans for Selling Raffle Tickets**

RMEF chapters in Washington sell raffle tickets in face-to-face transactions by volunteers throughout the State. Each chapter typically conducts numerous raffles which are drawn at an annual event, called the Big Game Banquet, as well as other smaller events and raffles that may occur from time to time. RMEF volunteers also sell raffle tickets at various businesses who support our mission by allowing the local chapter to spend their weekends selling in their store. The raffles are advertised on RMEF's website, through RMEF's bi-monthly magazine, *Bugle*, and through a variety of local publications and signage.

### **(d) Brief Overview of Prizes Awarded**

Various merchandise including sporting goods, equipment, home goods, gift certificates, firearms, and hunting and fishing trips.

**(e) Estimated Gross Gambling Receipts, Expenses, and Net Income for the Raffles**

2024 Estimated Gross Gambling Receipts: \$875,000.00

2024 Estimated Gross Expenses: \$325,000

2024 Estimated Net Income (Gross Gambling Receipts Less Prize Expenses): \$550,000.00

**(f) Any Other Information That We Request or Any Information the Licensee Wishes to Submit**

RMEF's National staff and Regional Directors continue to meet with chapter chairs, state chairs, and volunteers to provide training on the importance of complying with Washington's charitable gambling laws, record keeping requirements, and the conduct of charitable raffles. RMEF staff and volunteers remain committed to conducting raffles in Washington in a lawful and transparent manner.

RMEF is providing this Raffle Plan to better inform the Washington State Gambling Commission of our raffle activities and charitable work in the State. We respectfully request permission to exceed the \$300,000 raffle prize limit for the 2024 license year. If the Washington State Gambling Commission determines that a new prize limit is advisable, RMEF respectfully requests a limit of \$550,000 for the 2024 license year. Thank you for your consideration of this request.



# Washington State Gambling Commission

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

February 8, 2024

**TO: COMMISSIONERS**

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

**EX OFFICIO MEMBERS**

Senator Steve Conway  
Senator Jeff Holy  
Representative Shelley Kloba  
Representative Eric Robertson

**FROM: KRISCINDA HANSEN, CHIEF FINANCIAL OFFICER**

**SUBJECT: BUDGET UPDATE**

Materials will be presented at the commission meeting



# Washington State Gambling Commission

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

February 8, 2024

**TO: COMMISSIONERS**

Alicia Levy, Chair  
Julia Patterson, Vice-Chair  
Bud Sizemore  
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Anders Ibsen

**EX OFFICIO MEMBERS**

Senator Steve Conway  
Senator Jeff Holy  
Representative Shelley Kloba  
Representative Eric Robertson

**FROM: TINA GRIFFIN, DIRECTOR**

**SUBJECT: FEBRUARY 2024 LEGISLATIVE UPDATE**

Below is a summary of the bills we are watching this session and the status as of January 30, 2024.

Bills we are supporting:

- HB1961, Concerning animal cruelty in the first degree.  
Sponsored by Representative Low.

This bill would expand the seriousness of animal cruelty in the first degree beyond just sexual offenses against animals. If adopted, the bill would assign a level III seriousness also to animal cruelty cases that could inflict harm or injury or even death at illegal animal fighting events.

The letter of support was sent to the committee chair and prime sponsor. The bill passed out of the House and was referred to the Senate Law and Justice committee.

- HB2055, Creating a gambling treatment diversion court pilot program.  
Sponsored by Representative Stearns.

This bill would have the Administrative Office of the Courts conduct a gambling treatment diversion court pilot program to treat persons determined to be affected by an addictive disorder related to gambling and who committed a crime for which they have pled guilty or been convicted in furtherance or as a result of gambling. The pilot program would be established in three counties of the state within the court of appeals divisions.

The following amendments were made to the bill passed out of committee: the program is to be available for participants by July 1, 2026, reduction in the number of courts in the pilot program from 3 to 1, the court in which the pilot is established must be a Superior Court, and eliminate the provision authorizing the Supreme Court to adopt rules for the program.

The letter of support was sent to the committee chair and prime sponsor. I testified in support of the bill on behalf of the commission. As of January 30, 2024, the bill passed out of committee and was referred to Rules.

Commissioner confirmation hearings:

- SGA 9345 Anders Ibsen

Senate Business, Finance, Gambling, and Trade held a hearing and passed the appointment out of committee on January 30, 2024.

- SGA 9355 Alicia Levy

Working with committee staff to schedule a hearing.

The newly introduced House and Senate bills directly impacting the gambling industry did not make it out of committee by cutoff, which addressed such topics as authorizing sweepstakes, authorizing online raffles, and increasing the gross gambling receipts limits for unlicensed raffles, bingo, and amusement games.



# Washington State Gambling Commission

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

February 8, 2024

**TO: COMMISSIONERS**

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

**EX OFFICIO MEMBERS**

Senator Steve Conway  
Senator Jeff Holy  
Representative Shelley Kloba  
Representative Eric Robertson

**FROM: GARY DRUMHELLER, DEPUTY DIRECTOR**

**SUBJECT: IT MODERNIZATION UPDATE**

Materials will be presented at the commission meeting





# Washington State Gambling Commission

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

**February 8, 2024**

**TO: COMMISSIONERS**

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

**EX OFFICIO MEMBERS**

Senator Steve Conway  
Senator Jeff Holy  
Representative Shelley Kloba  
Representative Skyler Rude

**FROM: PUBLIC COMMENT**

**SUBJECT: Discussion – Firearms as Prizes**

**Attachments:**

- Letter Dated December 8, 2023, from Washington Council of Police & Sheriffs, Washington State Fraternal Order of Police, Outdoors for our Heroes, Washington State High School Clay Target League, Youth Outdoors Unlimited, One Outdoors, Restoration Outdoors, Coastal Conservation Association Washington, Rocky Mountain Elk Foundation, National Wild Turkey Federation, Pheasants Forever, Cascade Retrievers
- Letter of December 8, 2023, from Washingtonians for Wildlife Conservation
- Letter of December 10, 2023, from Washington Waterfowl Association
- Email of December 12, 2023, from Rocky Mountain Elk Foundation
- Email of December 31, 2023, from Whistling Wings Hunting Retriever Club

**WAC 230-06-025 Restrictions on firearms as prizes.** Only charitable or nonprofit organizations operating a raffle may award firearms, air guns, or other mechanical devices which are capable of discharging dangerous projectiles, including but not limited to, BB or CO<sub>2</sub> guns, rifles, shotguns, pistols or revolvers, or crossbows as a prize. If the prize awarded is restricted from transfer by state or federal law, the licensee must award the winner a certificate, redeemable by a licensed firearms dealer, for the prize offered.

[Statutory Authority: RCW 9.46.070. WSR 06-17-132 (Order 601), § 230-06-025, filed 8/22/06, effective 1/1/08.]



WASHINGTON  
COUNCIL of  
POLICE &  
SHERIFFS



December 8, 2023

Dear Washington State Gambling Commission,

Our nonprofit charitable organizations, associations and businesses represent tens of thousands of Washingtonians who engage in wildlife and habitat conservation, law enforcement and public safety, veterans support, mental health and trauma response, youth hunting, dog training, and high school shooting sports and depend on WAC 230-06-025 to continue these important missions. We would be happy to meet with you individually to discuss how proposed modifications to WAC 230-06-025 would negatively impact our organizations and those we serve.

To raise funds for important charitable missions, many nonprofit organizations like ours conduct family-friendly fundraising events where people purchase raffle tickets in the hopes of winning donated prizes such as art, vacations, gift certificates and sporting goods. What draws many attendees to these events is the opportunity to win a firearm such as a shotgun or hunting rifle, like the youth model 3-shot shotgun pictured here, to be used for hunting, procuring food or participating in school clay target team sports.

Our attendees are often people from middle-class families who collectively raise significant revenue for our missions and help build the next generation of community leaders and committed conservationists. To give you a few examples of the legacy these events support:

- The Washington Council of Police and Sheriffs is proud to represent thousands of fully commissioned peace officers in Washington State. Many of these brave men and



women volunteer their time with important nonprofits doing incredible work to support our communities. Fundraising, including raffles, are the lynch pin to providing life-changing support to Washingtonians in need. Please do not unnecessarily restrict their fundraising efforts.

- Outdoors for our Heroes has improved the lives of 1,256 service disabled veterans and enhanced many more family members in the process over the past seven years through outdoor adventures.
- Youth Outdoors Unlimited is a Washington based non-profit organization dedicated to taking youth diagnosed with life threatening illnesses or physical disabilities on the hunting or fishing adventure of their dreams.
- The Washington State Fraternal Order of Police represents peace officers throughout the state of Washington. Our members volunteer their time to raise money and provide needed assistance to officers in need. One avenue to accomplish this is through raffling of donated items. We ask that you allow our members to continue these practices that help provide needed support to officers and their families.
- One Outdoors and Restoration Outdoors allocates funding for trauma healing and conservation projects all over the world. We recently used funds raised to take women fishing who are sex trafficking victims healing from trauma. We also led rivers cleanups and habitat restoration projects in the United States, as well as supported rhino anti-poaching efforts in Africa.
- Ducks Unlimited has conserved more than 15.5 million acres of wetlands and grasslands that provide essential habitat for fish and birds and help mitigate the effects of climate change.
- National Wild Turkey Federation has conserved or enhanced more than 22 million acres of forest habitat benefitting many wildlife species.
- Pheasants Forever has conducted over 75,000 habitat projects on over 24 million acres nationwide.
- Rocky Mountain Elk Foundation has protected or enhanced more than 8.6 million acres of wildlife habitat and opened or improved public access to more than 1.5 million acres.
- Coastal Conservation Association Washington's mission is to advise and educate the public on the conservation of our marine resources.
- Cascade Retrievers is one of many dog trainers devoted to helping families and handlers of all ages grow their dog's natural skills in the field. At Cascade Retrievers and other fundraising events, dog owners and families raise funds to help people in need and support their local communities.

Per RCW 9.41, assault weapons are not legal in Washington, they cannot be brought in from other states for these events, and a certificate can only apply to Washington Federal Firearms Licensed dealers (FFLs). At every fundraising event where a firearm is offered, a licensed FFL dealer is present to bring the firearms to the event and, after the event, conduct the transfer just like they would at a licensed sporting goods store. This includes all the necessary background checks and waiting periods.

Our organizations care deeply about the safe handling and use of firearms. Many of our members have voluntarily taken certified firearms safety training courses through WDFW that have been required for hunters for decades, as well as through other certified trainings.

We support the concept of clarifying the WAC below to reiterate that only firearms legal in Washington can be raffled at these events or brought in from out of state.

**WAC 230-06-025 - Restrictions on firearms as prizes.**

*Only charitable or nonprofit organizations operating a raffle may award firearms, air guns, or other mechanical devices which are capable of discharging dangerous projectiles, including but not limited to, BB or CO2 guns, rifles, shotguns, pistols or revolvers, or crossbows as a prize. If the prize awarded is restricted from transfer by state or federal law, the licensee must award the winner a certificate, redeemable by a licensed firearms dealer, for the prize offered.*

We would like to call to your attention the following unintended consequences of removing WAC 230-06-025:

- Significant nonprofit charitable revenue comes from firearms at fundraising events. For Ducks Unlimited, which uses 83 cents of every dollar raised to conserve wetlands habitats, more than \$600,000 per year in wetlands revenue would be threatened in Washington State alone. Rocky Mountain Elk Foundation efforts to conserve habitat for elk and other wildlife in Washington would be impacted at approximately \$275,000 each year.

- High school trapshooting sports are the fastest growing school sports in America, with 13 teams participating in Washington. The funding from raffles helps support their teams and events, like the Washington State Tournament pictured here.



- State wildlife agency conservation funding is highly dependent on funding generated from firearms and ammunition taxes through the Pittman-Robertson (PR) Act of 1937. In 2021, WDFW received \$8.3 million of their budget for wildlife and habitat conservation from PR. These taxes are paid by manufacturers upon the initial transfer of any legal firearm, including firearms that are offered as a raffle prizes. In 2022, PR funding added \$1.1 billion in conservation funding to state wildlife agencies nationwide, approximately 80% apportioned for wildlife restoration grants and 20% for hunter education and firearm safety training.
- Hunters also contribute significant dollars to state conservation efforts through hunting license sales. In the 2019-2021 biennium, hunters contributed \$41.5 million to conservation. Along with Pittman-Robertson Act revenue, hunters contributed 15% of the agency's overall operating budget during this period.
- Loss of funding through WAC 230-06-025 would also decrease the ability of our groups to improve the lives and mental health of veterans and those healing from trauma, and would threaten public safety by decreasing services to those in need.

In conclusion, WAC 230-06-025 provides nonprofits with opportunities to raise critical funding for important charitable missions in a safe and responsible manner that is in compliance with the letter and spirit of Washington State Law.

We welcome the opportunity to meet with you to answer any questions and continue the conversation. Thank you for this opportunity to share with you our thoughts and concerns.

Sincerely,

Teresa Taylor, Executive Director, Washington Council of Police & Sheriffs

Marco Montebianco, President, Washington State Fraternal Order of Police

Tony Leingang, Washington State President, Outdoors for our Heroes

Melissa Craig, State Director, Washington State High School Clay Target League

Cindy Carpenter, Executive Director, Youth Outdoors Unlimited

Jake Collier, CEO, One Outdoors

Kaiden VanDalen, Washington State Community Relations, Restoration Outdoors

Nello Picinich, Executive Director, Coastal Conservation Association Washington

Matt Little, Policy Director, Ducks Unlimited

Ryan Bronson, Director of Government Affairs, Rocky Mountain Elk Foundation

Russell McDonald, Washington State Chapter President, National Wild Turkey Federation

Chad Harvey, Regional Representative, Pheasants Forever

Colin Ching, Owner, Cascade Retrievers



## Washingtonians for Wildlife Conservation

PO Box 40122  
Bellevue, WA 98015-4122  
(425) 221-3986  
w4wc.org

December 8, 2023

Washington State Gambling Commission  
PO Box 42400  
Olympia, WA 98504

Dear Washington State Gambling Commission:

Many nonprofit charitable organizations, associations, and businesses represent tens of thousands of Washingtonians who engage in wildlife and habitat conservation, law enforcement and public safety, veterans support, mental health and trauma response, youth hunting, dog training, and high school shooting sports, and depend on WAC 230-06-025 to continue these important missions. Washingtonians for Wildlife Conservation is one of those organizations. We are dependent on our raffle as our yearly source and income and the proposed change to WAC 230-06-025 would devastate us.

Washingtonians for Wildlife Conservation is an educational and outreach organization who strives to educate the citizens of Washington state about the successful use of wildlife management practices that currently provide viable wildlife populations for everyone to enjoy. We are an alliance of individuals and organizations concerned with the health and well-being of Washington's wildlife, and wildlife management methods. WWC was formed to organize and unite wildlife interest groups to:

- Protect the rights of Washington state citizens.
- Defend the management techniques used to control wildlife populations.
- Encourage management by wildlife professionals based on scientific data rather than false rhetoric and emotion.
- Oppose animal-rights extremists and their ultimate goal of no consumptive use of wildlife.


With the proposed changes to WAC 230-06-025, it would cripple our important mission. Hunters contribute vital dollars to state conservation efforts through hunting license sales. In the 2019-2021 biennium, hunters contributed \$41.5 million to conservation. Along with Pittman-Robertson Act monies, hunters contributed 15% of the WDFW's overall operating budget during this period.

In conclusion, WAC 230-06-025 provides nonprofits with opportunities to raise critical funding for

important charitable missions in a safe and responsible manner that follows the letter and spirit of Washington State Law.

Washingtonians for Wildlife Conservation opposes these changes to WAC 230-06-025. Thank you for allowing us to provide these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark Pidgeon". The signature is written in a cursive, flowing style.

Mark Pidgeon  
President





# WASHINGTON WATERFOWL ASSOC.

HUNTERS FOR CONSERVATION

[www.waduck.org](http://www.waduck.org)

December 10, 2023

Washington State Gambling Commission  
PO Box 42400  
Olympia, WA 98504

Dear Washington State Gambling Commission:

Many nonprofit charitable organizations, associations, and businesses represent tens of thousands of Washingtonians who engage in wildlife and habitat conservation, law enforcement and public safety, veterans support, mental health and trauma response, youth hunting, dog training, and high school shooting sports, and depend on WAC 230-06-025 to continue these important missions. Washingtonians Waterfowl Association is another one of these organizations.

We are the premiere waterfowl organization in Washington State. We are:

- a non-profit 501(c)(3) tax-exempt organization established in 1945.
- dedicated to the enhancement of waterfowl habitat and waterfowl recreation.
- with 11 chapters throughout the State of Washington.
- working closely with the **Washington Department of Fish & Wildlife (WDFW)** and the **U.S. Fish & Wildlife Service (USFWS)** on waterfowl conservation projects – **ALL** within the State of Washington and **ALL** on public lands.

At Washington Waterfowl Association, we've always taken our wildlife seriously, but never more so than today. With the reduction in the amount of habitat available to them, waterfowl need our help now more than ever to provide the safe havens they need to breed, nest, and raise their young, and WWA provides that help.

We strive to preserve, protect, and improve the sport of waterfowling, in the State of Washington. To that end, we teach respect for all waterfowl species, and improve habitat for them. We conduct educational programs related to waterfowl, conservation, sportsmanship, and hunter safety.

Our fundraising efforts allow us to continue our "hands-on" approach to waterfowl conservation, 100% in the State of Washington and all upon lands open to public hunting. The monies raised enable us to complete our various projects, including but not limited to:

- administration of the WA State Migratory Bird Stamp and Print Program.
- construction, installation, and maintenance of mallard nesting tubes, wood duck nesting boxes, and goose nesting platforms.

**The Whole Duck -- Habitat, Heritage, Hunting, Legal, Legislation, Research...**



# WASHINGTON WATERFOWL ASSOC.

HUNTERS FOR CONSERVATION

[www.waduck.org](http://www.waduck.org)

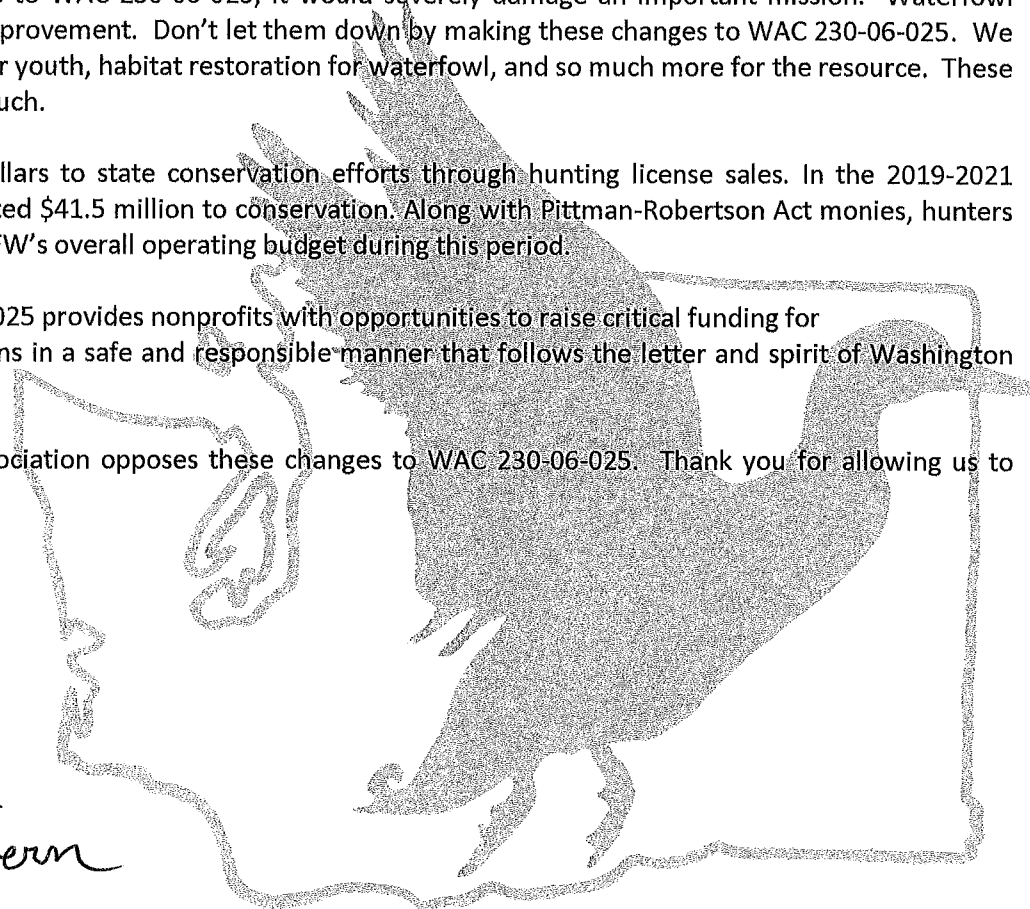
- assisting the WDFW with waterfowl habitat rehabilitation projects, nest counts, duck and goose banding projects, construction, installation and maintenance of water control structures, dikes, ponds and viewing platforms/blinds for the disabled hunter as well as the birdwatchers; and
- annually sponsoring and providing complete scholarship funding to send two boys and two girls to the weeklong Washington State Youth Conservation Camp held each year at Moran State Park on Orcas Island, WA

With the proposed changes to WAC 230-06-025, it would severely damage an important mission. Waterfowl depend on us for habitat improvement. Don't let them down by making these changes to WAC 230-06-025. We provide hunter education for youth, habitat restoration for waterfowl, and so much more for the resource. These changes would hurt us so much.

Hunters contribute vital dollars to state conservation efforts through hunting license sales. In the 2019-2021 biennium, hunters contributed \$41.5 million to conservation. Along with Pittman-Robertson Act monies, hunters contributed 15% of the WDFW's overall operating budget during this period.

In conclusion, WAC 230-06-025 provides nonprofits with opportunities to raise critical funding for important charitable missions in a safe and responsible manner that follows the letter and spirit of Washington State Law.

Washington Waterfowl Association opposes these changes to WAC 230-06-025. Thank you for allowing us to provide these comments.



Respectfully,

Paul McGovern  
President

**The Whole Duck -- Habitat, Heritage, Hunting, Legal, Legislation, Research...**

## McLean, Lisa (GMB)

---

**From:** Ryan Bronson <rbronson@RMEF.ORG>  
**Sent:** Tuesday, December 12, 2023 11:20 AM  
**To:** McLean, Lisa (GMB)  
**Subject:** Firearms raffles  
**Attachments:** 2022 PHS\_WA.pdf

**Categories:** Firearms

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### External Email

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Lisa-

I wanted to reach out to be resource if the commission needs clarification on non-profit organizations' use of firearms in charitable gambling. As an organization whose members are primarily hunters we utilize raffles for firearms as a significant part of our fundraising. Our Washington events use firearms that are legal to be owned and purchased under both state and federal law- and firearms that are prohibited in Washington are not used in our fundraising.

It was anecdotally expressed in the recent commission hearing that prohibited 'assault weapons' can be won by Washington residents and transferred by dealers in other states. This is not true. Chapter 9.41 RCW governs firearms possession, import and sales- including 9.41.22 regarding out of state purchases. RMEF and other conservation organizations fully comply with state and federal firearms laws, and charitable gambling does not provide any loophole around the firearms laws.

Legal firearms as prizes constitute a significant part of our fundraising in Washington and enable us to accomplish a great deal of habitat conservation work in the state. I have included a summary of our work in Washington as a reference.

Sincerely,

Ryan Bronson  
RMEF Government Affairs



**Ryan Bronson | Director of Government Affairs**  
Rocky Mountain Elk Foundation  
763-478-1194 phone | mobile  
[rbronson@rmef.org](mailto:rbronson@rmef.org) | [www.rmef.org](http://www.rmef.org)

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any errant transmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any copies of it and notify the sender by reply e-mail. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message or any attachments if you are not the intended recipient. The Rocky Mountain Elk Foundation reserves the right to monitor all e-mail communications through its network.



# WASHINGTON

PROJECT HISTORY SUMMARY | As of December 31, 2022



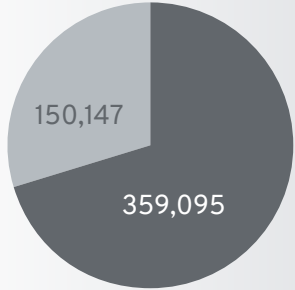
Since 1985, RMEF and its partners have completed 755 conservation and hunting heritage outreach projects in Washington with a combined value of more than \$133 million. These projects conserved and enhanced 509,242 acres of habitat and opened or improved public access to 130,661 acres.

<b>TOTAL VALUE OF RMEF EFFORTS IN WASHINGTON</b>		<b>\$133,032,572</b>
<b>LAND CONSERVATION &amp; ACCESS*</b>		
* Land Conservation projects reflect value of land protected at time of transaction rather than expenditures.		<b>TOTAL \$</b>
		<b>\$109,757,912</b>
<b>HABITAT STEWARDSHIP</b>		
<b>RMEF \$</b>	<b>PARTNER \$</b>	<b>TOTAL \$</b>
\$3,527,742	\$9,839,868	\$13,367,610
<b>WILDLIFE MANAGEMENT</b>		
<b>RMEF \$</b>	<b>PARTNER \$</b>	<b>TOTAL \$</b>
\$1,420,290	\$5,144,246	\$6,564,536
<b>HUNTING HERITAGE</b>		
<b>RMEF \$</b>	<b>PARTNER \$</b>	<b>TOTAL \$</b>
\$576,001	\$2,766,513	\$3,342,514

## NUMBER OF PROJECTS

Land Conservation & Access	37
Habitat Stewardship	417
Wildlife Management	139
Hunting Heritage	162
<b>Total Projects</b>	<b>755</b>

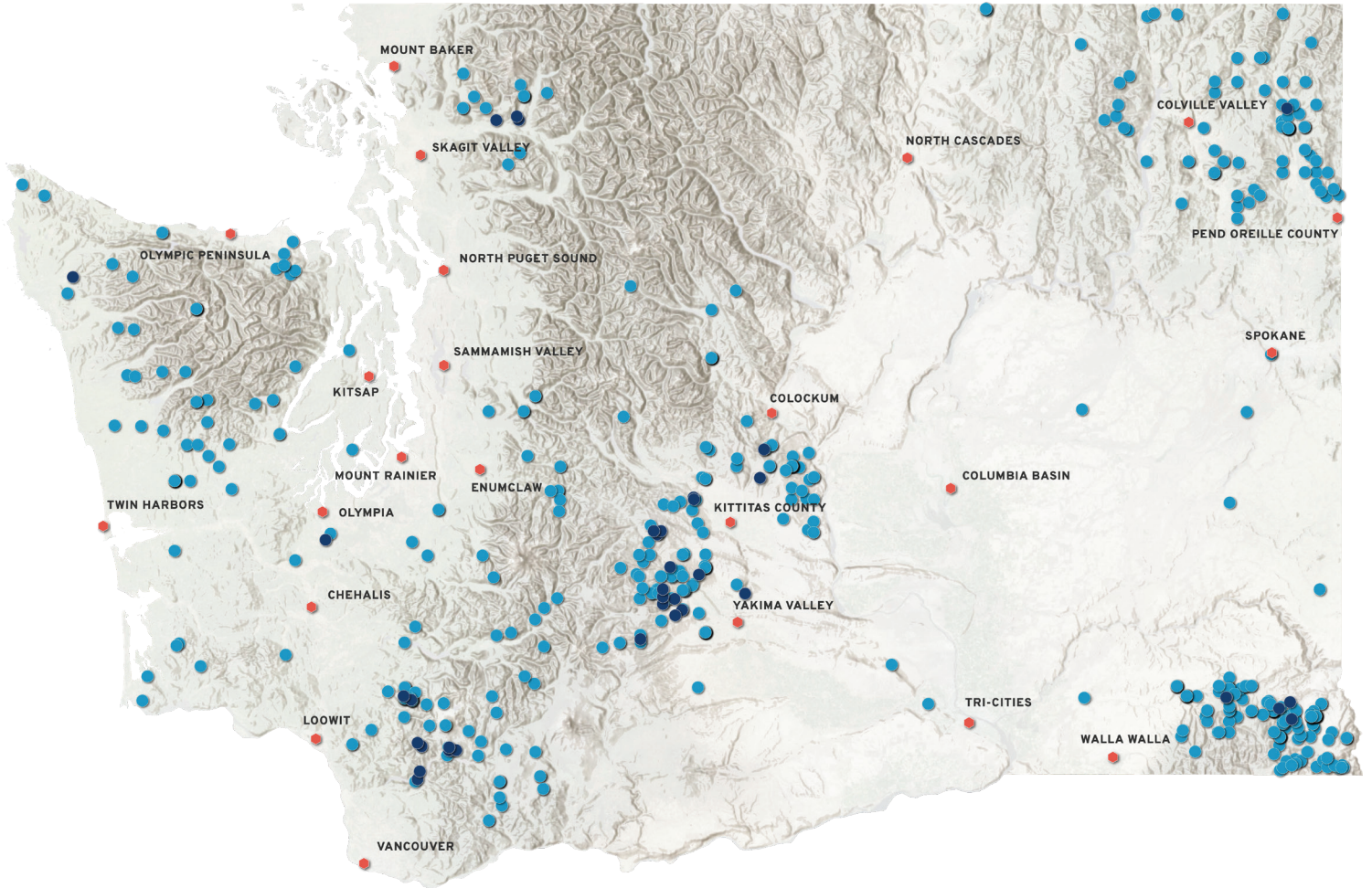
## ACRES AFFECTED



■ Acres Conserved  
■ Acres Enhanced

RMEF Chapters 23

**RMEF.ORG**



# WASHINGTON

- RMEF CHAPTERS
- LAND CONSERVATION
- HABITAT STEWARDSHIP & WILDLIFE MANAGEMENT

**From:** [Anderson, Julie \(GMB\)](#)  
**To:** [Anderson, Julie \(GMB\)](#)  
**Subject:** Comments on the potential repeal of WAC 230-06-025  
**Date:** Tuesday, January 2, 2024 9:42:14 AM

---

**From:** Benjamin Thompson <[bzt0235@gmail.com](mailto:bzt0235@gmail.com)>  
**Sent:** Sunday, December 31, 2023 6:52 PM  
**To:** AgencyWebsite (GMB) <[agency.website@wsgc.wa.gov](mailto:agency.website@wsgc.wa.gov)>  
**Cc:** Pam Ulsh <[Prescascadehrc@gmail.com](mailto:Prescascadehrc@gmail.com)>; Betsy Reali <[bnb\\_reali@msn.com](mailto:bnb_reali@msn.com)>; Davie Berg <[davieberg8@gmail.com](mailto:davieberg8@gmail.com)>; Lo, Lily <[ririro@gmail.com](mailto:ririro@gmail.com)>  
**Subject:** Comments on the potential repeal of WAC 230-06-025

External Email

12/31/2023

Dear Washington State Gambling Commission,

Our organizations represent Washingtonians of all ages and backgrounds who engage in sport dog training and competitions. We have common interests and partner with other organizations who conduct wildlife and habitat conservation, promote youth hunting and shooting sports and provide veterans support through outdoor activities. Our organizations depend on WAC 230-06-025 to generate essential funds to continue these missions. Most fundraising events conducted by the organizations are based upon diverse donations received from individuals and businesses and comply with RCW 9.41. There are usually a few large items such as firearms that can be essential items that make a fundraising event successful. We support the concept of clarifying WAC 230-06-025 to state that only firearms legal in Washington can be raffled at these events and must comply with RCW 9.41. By repealing this entire section, it would hamper the ability of these organizations to generate funds to support our missions.

We would be happy to answer any questions or provide additional information if requested.

Thank you for the opportunity to share our thoughts and concerns on this matter.

Sincerely,

Benjamin Thompson  
Whistling Wings Hunting Retriever Club

Betsy Reali  
Rainier Hunting Retriever Club

Pam Ulsh

Cascade Hunting Retriever Club

Davie Klindell  
Neuwaukum River Retriever Club

Lily Lo  
Northwest Pointing Labrador Club



**Rule Petition to Amend and Adopt New Rules  
Authorizing Centralized Surveillance.**

**February 2024 – Request to Initiate Rulemaking**

**Tab 7: February 2024 Commission Meeting Agenda.**

**Statutory Authority 9.46.070**

**Who Proposed the Rule Change?**

Vicki Christopherson on behalf of Maverick Gaming

**Background**

Vicki Christopherson on behalf of Maverick Gaming is requesting to create a regulatory structure to allow centralized surveillance of house-banked card rooms under common ownership.

The petitioner stated this change can help house-banked card rooms with common ownership:

- Ensure compliance with regulations
- Maintain a safe and secure environment for guests and staff
- Protect gaming operations and the public.

The petitioner seeks to update the WAC to reflect the advancements in technology and opportunity for house-banked card rooms under common ownership to implement centralized surveillance monitoring systems designed to ensure that gaming is conducted in an honest, competitive, and safe environment.

In November 2021, a petition was received from Tim Merrill of Maverick Gaming to authorize centralized surveillance. In January 2022, the Commission chose to initiate rule-making that would address policy considerations outlined by staff. In February 2023, staff recommended withdrawing rulemaking due to the policy concerns outlined by staff. At the February 2023 commission meeting, the petitioner withdrew their petition with the understanding that staff would work with them on this topic over the next 18 months.

At the January 2024 commission meeting, staff provided an update on the discussions with Maverick Gaming and research done to date on the topic. Maverick Gaming also provided an update on their research done to date.

The purpose of surveillance systems is to, in a way that is not publicly accessible, document events that:

- Ensure the licensed gambling activities are conducted honestly and free of criminal elements and activities,
- Protect the public and employees, and
- Safeguard the licensee's assets.

Currently, rules require Class F and house-banked card room licensees to maintain analog or digital closed-circuit television (CCTV) systems within their licensed premises that are monitored by the licensee's card room employees.

Attachments:

- Petition
- January 2024 Commission staff PowerPoint Presentation
- January 2024 Maverick Gaming PowerPoint Presentation



## Policy Considerations

Staff did not find any jurisdiction in the U.S. currently allowing for centralized surveillance rooms for card room activities by rule or regulation. The petitioner has received special permission in Colorado and Nevada to operate a centralized surveillance room.

Staff confirmed that Maverick Gaming operates centralized surveillance in Nevada through a variance granted by Nevada Gaming Control Board (NGCB) Chair. The variance was granted to the NGCB casino surveillance standard requirements under Regulation 5.160. The circumstances for which variances are authorized are not outlined in statute or regulation.

Staff confirmed that Maverick Gaming operates centralized surveillance in Colorado as authorized under Division of Gaming's Internal Control Minimum Procedures, Section 13, Surveillance system standards, which requires each casino to have an "in-house" surveillance room, except for commonly owned casinos within the same county. They also authorize licensees to seek variances related to surveillance.

Staff have the following policy concerns:

- Location of centralized surveillance room, i.e., in-state, out-of-state, within the same county of card rooms being monitored, etc.
- The number of card rooms the centralized surveillance room can monitor and staffing requirements.
- Licensure of the centralized surveillance room and its employees.
- Network and operating requirements of the centralized surveillance rooms.
- Access to surveillance video by our staff and law enforcement.
- Ability to keep the surveillance system as a CCTV with the ability to view surveillance showing fluid motion and detail, without interruption.
- Type of security encryption used to transmit surveillance video.
- Communication between the card room and the centralized surveillance room.
- Responsibility for violations in the centralized surveillance room when they are tied to multiple licensed card rooms.

Attachments:

- Letters requesting approval for centralized surveillance in Nevada.
- Colorado Division of Gaming Internal Control Minimum Procedures Variance Request Forms

## Staff Recommendation

Under the requirements of the Administrative Procedures Act, the Commission must act on a petition within 60 days of receiving it. Your options are:

- Initiate rule making proceedings by filing the rule as proposed for further discussion or
- 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.

## Mentzer, Damon (GMB)

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**From:** Washington State Gambling Commission <no-reply@wsgc.wa.gov>  
**Sent:** Wednesday, January 17, 2024 3:33 PM  
**To:** Rules Coordinator (GMB)  
**Subject:** Webform submission from: Request a rule change

External Email

Submitted on January 17, 2024 - 3:32pm

Submitted by: Anonymous

Submitted values are:

**Petitioner's Name**

Vicki Christophersen

**Address**

721 4th Ave #3329  
Kirkland, Washington. 98033

**Phone**

[3604852026](tel:3604852026)

**Email**

[vicki@christopherseninc.com](mailto:vicki@christopherseninc.com)

**Rule Petition Type**

New Rule - I am requesting WSGC to adopt a new rule.

## New Rule Selection Function

**Subject or purpose of the rule**

To create regulatory structure to allow centralized surveillance of house banked card rooms under common ownership.

**The rule is needed because**

The Washington State Gambling Commission should initiate rulemaking to develop a regulatory framework to allow for centralized surveillance for cardrooms under common ownership. Centralized surveillance can help house bank card rooms with common ownership ensure compliance with regulations and maintain a safe and secure environment for guests and staff. A centralized surveillance operation better protects gaming operations and the public.

Centralized surveillance is an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for patrons – efficient and consistent operations across properties. Well-crafted centralized surveillance is designed to ensure that gaming is conducted in an honest, competitive, and safe environment – public safety is increased by providing a surveillance operator and supervision over the process within a

centralized room which would have a larger footprint than the current surveillance room model. Additionally, a centralized system will allow external regulatory access to enable gambling agents to review live footage, obtain necessary evidence in a timely manner without having to drive to individual properties to obtain footage, increasing efficiency and creating cost savings.

In the past, the need for separate surveillance systems was apparent. Separate systems provided additional functionality and security when systems were not capable of management from a central location. With today's digital IP systems, functionality has improved significantly. A single, networked system reduces cabling needs without restricting cabling distances.

**The effect of this rule change will be**

Updated Washington Administrative Code that better reflects the advancements in technology and opportunity for house banked card rooms under common ownership to implement centralized surveillance monitoring systems designed to ensure that gaming is conducted in an honest, competitive, and safe environment. This will provide an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for guests and staff.



WASHINGTON STATE  
**GAMBLING  
COMMISSION**

# Update on Centralized Surveillance

January 11, 2024

Presented By:

Tina Griffin, Executive Director

Bill McGregor, Special Agent Supervisor

# Follow-Up from Rulemaking

January 2022 - Maverick Gaming petitioned for rulemaking

February 2023 – Staff recommended denial of petition

- Maverick Gaming withdrew the petition with the understanding that staff would work with them on this topic over the next 18 months



# Objective of Today's Presentation

To provide an update on research done to date and the ongoing conversations regarding possible approaches to Maverick's request to authorize centralized surveillance monitoring in Washington.



# What other states have authorized centralized surveillance?

- Colorado – Through Internal Control Procedures<sup>1</sup>
  - “Each casino must have a surveillance room in-house. Exceptions would only be for commonly owned casinos, which are within the same County. The surveillance room must be within one of the commonly owned casinos.”<sup>1</sup>
  - Each combined surveillance room must be staffed for each individual license in accordance with the minimum staffing requirements.<sup>1</sup>
  - For combined surveillance rooms with a second and third casino, manned surveillance is required if the total number of gaming devices (slots and table games) between all casinos is 500 or more.<sup>1</sup>
  - There are no other specific requirements for combined surveillance rooms.

Note: Per Colorado Revised Statute 44-30-105 and Code of Colorado Regulations 207-1, Rule 19, Limited gaming is only authorized in the following Colorado cities: Central, county of Gilpin; Black Hawk, county of Gilpin; and Cripple Creek, county of Teller.

<sup>1</sup> Colorado Limited Gaming Control Commission’s Internal Control Minimum Procedures, Section 13.G.



# What other states have authorized centralized surveillance?

- Nevada - Only through a Variance
  - The Board Chair may exempt a licensee from complying with any casino surveillance standard<sup>1</sup>.
  - Variance criteria and requirements are determined by the Board Chair.
  - Location of surveillance rooms are dependent on the licensees annual gross gambling revenue<sup>2</sup>:
    - More than \$15 million must maintain and operate surveillance from a surveillance room in a licensed gambling establishment
    - Less than \$15 million must be maintained and operated from a secure location.

<sup>1</sup> NV Regulation 5.160(8).

<sup>2</sup>NV Surveillance Standards for Nonrestricted Licensees 1.01(5), 1.020, and 2.010.





# Approaches States Have Used to Authorize Centralized Surveillance

- Move surveillance requirements from rule to Internal Control Minimum Procedures (Colorado)
- Allow Director or Commissioners to authorize a rule variances on a case-by-case basis (Nevada)



# Topics for Future Discussions

- Location of monitoring room
- Ratio of centralized surveillance rooms to house-banked card rooms
- Staffing requirements
- Who would be the monitoring entity
- Equity
- Network requirements



# Questions

Tina Griffin, Executive Director

Bill McGregor, Special Agent Supervisor





**MAVERICK**  
G A M I N G

Washington Centralized Surveillance

Jan 7, 2022

# Overview

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## OVERVIEW

Maverick Gaming proposes to centralize surveillance monitoring for our Washington properties. The centralized surveillance monitoring would provide the ability to observe card room gambling activity from individual card rooms to a secure centralized surveillance room. All existing surveillance equipment (cameras, DVRs, monitors, surveillance software and other related equipment) will remain at each property, in the existing surveillance rooms, secured.

## THE OBJECTIVE

- Improve public safety and the safety of our patrons and team members.
- Centralize reporting, training, supervision, and communication to provide consistency throughout our property's surveillance monitoring.
- Provide gaming agents with real time access to surveillance to enable better response time to criminal activities, timely investigations and video evidence collection.

Proposal

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To better protect our gaming operations and the public, Maverick proposes a centralized surveillance operations.

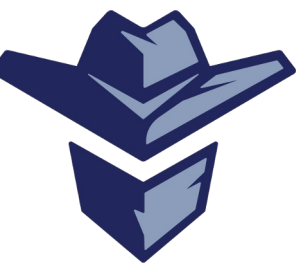
A centralized surveillance operation provides:

- An efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for patrons – efficient and consistent operations across properties;
- Is designed to ensure that gaming is conducted in an honest, competitive, and safe environment – public safety is increased by providing a surveillance operator and supervision over the process within a centralized room which would have a larger footprint than the current surveillance room model; and
- External regulatory access to enable WSGC agents to review live footage, obtain necessary evidence in a timely manner without having to drive to individual properties to obtain footage - saves the WSGC time and money.





- Drawing from our successful experience in other jurisdictions employing centralized surveillance, we propose the establishment of a streamlined and efficient surveillance system for cardrooms. By centralizing surveillance operations, we can share expertise seamlessly across all cardrooms. This approach facilitates the swift exchange of information, ensuring uniformity in reviews and reports. This, in turn, increases public safety and the safety of our guests and employees.
- Build a centralized Surveillance Room operated on a 24-hour/7-days per week basis with multiple observers and supervisory personnel.
- Our proposed centralized team would be comprised of our existing surveillance team with addition of new team members with specialized skills.
- Property management is trained on the system if immediate access is required at a remote location for local viewing in the event of connection issue.
- All properties have and will continue to have their own totally functioning and operational surveillance systems and rooms.
- Our centralized surveillance room will act as the main viewing area and will have remote viewing for all properties.



# Advantages to having Centralized Surveillance

Centralized surveillance can help the casino ensure compliance with these regulations and maintain a safe and secure environment for guests and staff. A manager in the room with all the observers ensuring procedures are followed every time for consistency in gathering everything that is needed.



# Advantages of Centralized Surveillance:



## Standardized Processes:

Incident Response Time Improvement: Implementing standardized processes across cardrooms has shown to decrease incident response times by an average of 15%, enhancing the overall security posture.

## Supervision and Training:

Training Cost Efficiency: Centralized supervision and training result in cost savings of approximately 10%, with a 20% improvement in staff proficiency, contributing to more effective surveillance practices.

## Centralized Viewing and Reporting:

Enhanced Incident Documentation: Centralized report writing improves the accuracy and completeness of incident reports, leading to a 25% reduction in investigations time and a more thorough analysis of gambling activities.

## External Surveillance Access:

Improved Oversight and Collaboration: Allowing external surveillance observers, as well as WSGC agents, to review footage live and remotely as needed enhances collaboration and oversight. This feature has shown to decrease response times to potential threats by 18%, providing an additional layer of security and responsiveness to cardroom operations.



## Advantages of Centralized Surveillance:

**Enhanced Security:** Centralized surveillance allows for comprehensive monitoring of the entire casino premises, including gaming floor, entrances, exits, and other sensitive areas. This helps in preventing theft, cheating, and other criminal activities.

**Quick Response to Incidents:** Having all surveillance monitors and operators in one location enables a swift response to any incidents or suspicious activities. This helps security personnel intervene promptly and prevent potential problems from escalating. With multiple personnel in the room, each can focus on specific tasks to enable a timely response.

**Efficient Monitoring:** Centralized surveillance facilitates efficient monitoring of multiple areas simultaneously, ensuring that no part of the casino is left unobserved. Observers can quickly switch between different cameras and areas as needed. The ability to work as a team to monitor and track individuals, groups or activities to eliminate risk to staff and patrons.

**Coordination with Security Personnel:** Centralized surveillance rooms can easily communicate with on-the-ground security personnel, allowing for real-time coordination during security incidents or emergencies. One observer watching the incident and getting video evidence. One observer calling law enforcement or management. One observer on the radio communicating with the security personnel.

**Evidence Collection:** In the event of disputes, theft, or other incidents, a centralized surveillance room can provide high-quality video evidence to assist in investigations and legal proceedings. The ability to have state-of-the-art equipment with centralized conveniences that would allow WSGC to see video evidence at anytime by logging into a secure point to point connection.



# Disadvantages of **NOT** having Centralized Surveillance



*Sample of Current room set up*

**Limited coverage:** With only one observer, it's practically impossible to monitor the entire casino, gaming tables, cashiers, conduct reviews, write incident reports, observe fills/credits, and any other items that happen and need video captured. This limited coverage increases the chances of missing important incidents or suspicious activities.

**Inadequate response time:** In the event of an incident a single operator may struggle to respond quickly and effectively due to the inability to multitask or handle that type situation alone (they freeze). This could result in delayed or inadequate responses to security threats.

**Monitoring fatigue:** Continuous monitoring of multiple screens and areas can lead to operator fatigue and decreased vigilance. This fatigue can impair the operator's ability to remain attentive and focused, potentially leading to missed security breaches. Per WAC 230-15-320, an observer is only allowed to be out of the room for a total of 30 minutes per shift. By having more observers monitoring this will allow for increased break times.

**Lack of backup and support:** In the absence of additional operators, there is no one to provide backup or support in case of emergencies, technical issues, or the need for immediate assistance. This lack of redundancy can compromise the overall security of the casino.

**Risk of collusion:** In a single-operator scenario, there is an increased risk of collusion or compromise, as the operator may not have the necessary checks and balances to ensure their integrity and prevent unethical behavior.

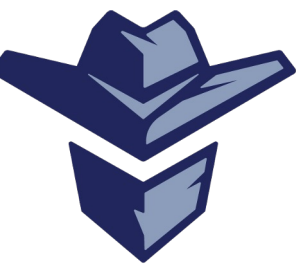


## Our Experience:

We operate centralized surveillance in Nevada and Colorado. In both states, the regulator's established robust requirements for centralized surveillance and we were granted the approvals based on the regulator's review of our proposed operations and technology employed.

The benefits we have highlighted for you are based on our experience with converting from the standalone surveillance rooms to a centralized surveillance model in our Nevada and Colorado operations.

Each jurisdiction had their own set of standards and requirements to authorize approvals for centralized surveillance, as provided in the next slides.



## Colorado Requirements – Centralized Surveillance Approval Process

“Each casino must have a surveillance room in-house. Exceptions would only be for commonly owned casinos, which are within the same County. The surveillance room must be within one of the commonly owned casinos.”<sup>1</sup>

- Each combined surveillance room must be staffed for each individual license in accordance with the minimum staffing requirements.<sup>1</sup>
- For combined surveillance rooms with a second and third casino, manned surveillance is required if the total number of gaming devices (slots and table games) between all casinos is 500 or more.<sup>1</sup>
- The approval process for Colorado requires firewall testing and review of centralized surveillance room and compliance with Internal Control Minimum Procedures.

<sup>1</sup> Colorado Limited Gaming Control Commission’s Internal Control Minimum Procedures, Section 13.G. <sup>2</sup>

<sup>2</sup>Revised Statutes (C.R.S. ) 44-30-105.



# Nevada - Centralized Surveillance Approval Process

The Nevada Gaming Control Board Chairman may exempt a licensee from complying with any casino surveillance standard. All requests for exemption must be in writing and state the reasons for the request and the alternative measures, if any, the licensee will undertake to accomplish the objectives of the casino surveillance standard.<sup>1</sup>

- Variance criteria and requirements are determined by the Board Chairman.

<sup>1</sup> NV Regulation 5.160(8).

<sup>2</sup> NV Surveillance Standards for Nonrestricted Licensees 1.01(5), 1.020, and 2.010.





## Nevada - Surveillance Staffing Requirements:

Surveillance room and staffing requirements are dependent on annual gross gambling revenue<sup>2</sup>:

- More than \$15 million must maintain and operate surveillance from a surveillance room in a licensed gambling establishment. The surveillance room must be attended at all times by personnel trained in the use of the equipment, knowledge of the games and house rules. When necessary, surveillance rooms may be unattended for periods of time not to exceed one (1) hour in any eight (8)-hour period to allow appropriate meal and rest breaks.
- Less than \$15 million must be maintained and operated from a secure location. There is no requirement for a manned surveillance room, there must be at least one person on the property at all times with a working knowledge and the ability to operate the surveillance equipment, and who can provide immediate access to the secured location to Board agents.
- **This is similar to California requirements for card rooms with less than 31 table games, they do not require manned surveillance rooms.** <sup>3</sup>

<sup>1</sup> NV Regulation 5.160(8).

<sup>2</sup>NV Surveillance Standards for Nonrestricted Licensees 1.01(5), 1.020, and 2.010.

<sup>3</sup>Cal. Code Regs. tit. 4§ 12396. Surveillance. (B)(3)(d)

# Network Topology

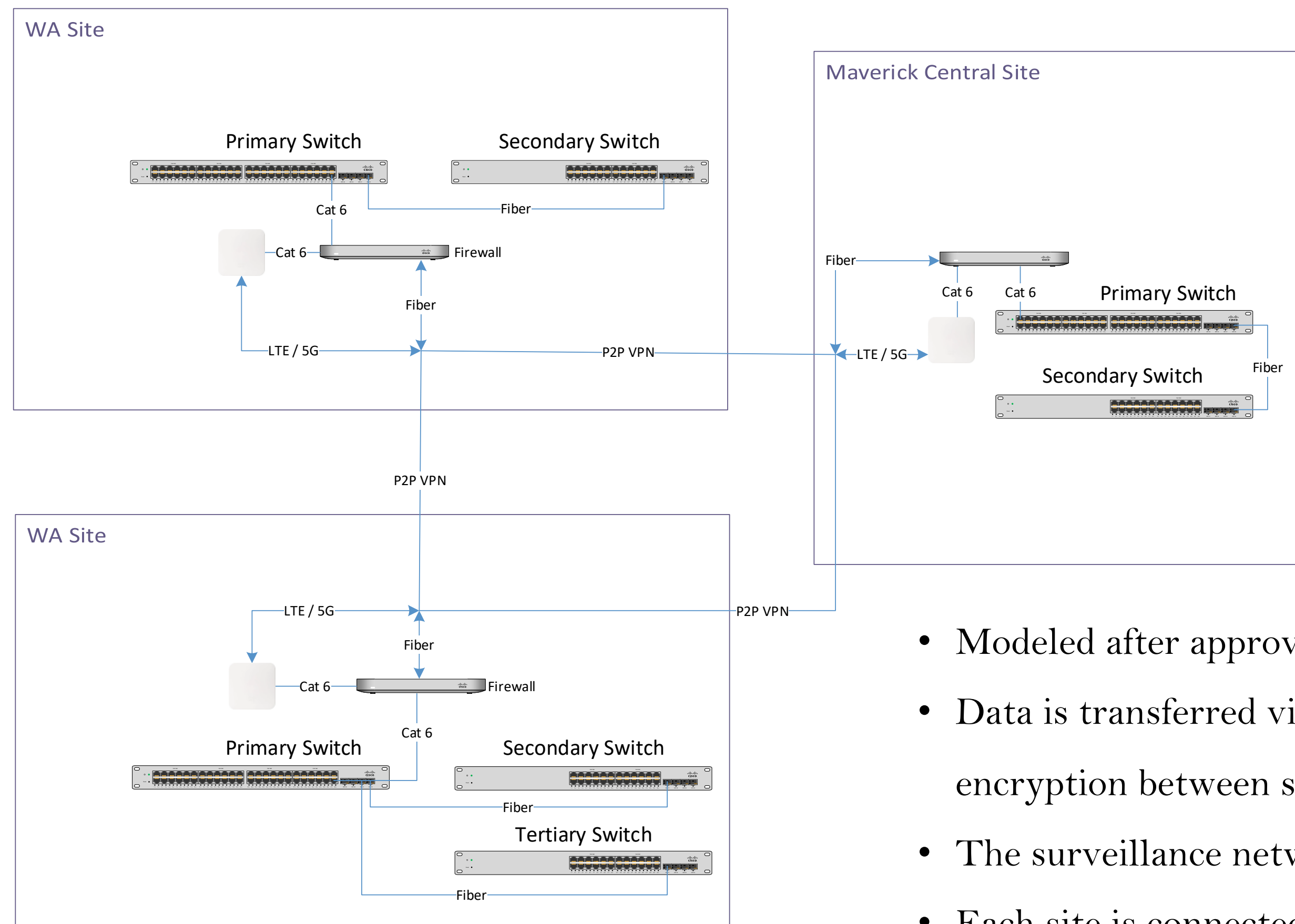
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3



# Centralized Networking Topology

The interconnected system will utilize a secure transmission line, firewalled and password-protected on both ends, ensuring encrypted video transmission that can only be terminated by the host location.

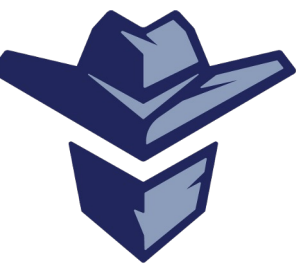


- Modeled after approved implementations in NV and CO
- Data is transferred via secure point to point tunnels utilizing 128bit encryption between site firewalls
- The surveillance network is restricted and isolated from other networks
- Each site is connected with fiber provided by local Telcos with cellular (LTE / 5G) redundancy

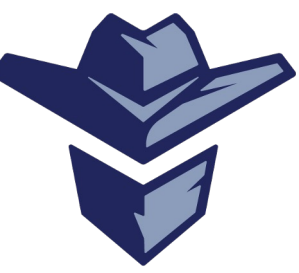
# Conclusion

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4



- A centralized surveillance room provides an efficient and effective means of maintaining security, ensuring regulatory compliance, and providing a safe and enjoyable environment for guests and staff.
- A centralized surveillance monitoring system is designed to ensure that gaming is conducted in an honest, competitive, and safe environment.
- In the past, the need for separate surveillance systems was apparent. Separate systems provided additional functionality and security when systems were not capable of management from a central location. With today's digital IP systems, functionality has improved significantly. A single, networked system reduces cabling needs without restricting cabling distances.
- Video Management System (VMS) solutions can designate accesses and denials of feeds to users individually, at a central location or throughout a facility, from cameras all networked to the same system. Additionally, digital networks can provide added functionality.



- Integrated analytics create a searchable database of stored video and provide data on customer movement and behavior.
- Integrated IP surveillance systems provide more data, more capability, and more accuracy for casino surveillance and security operations than ever before.
- Surveillance systems and capabilities have drastically changed since the Washington Administrative Code was written. The WACs could not have addressed the capabilities as they are today.
- We propose to update the WACs to accommodate changes in technology and move Washington forward with centralized surveillance rooms.
- We look forward to continued conversations with WSGC and team. When those conversations reach the appropriate time, we will reach out to initiate rule making changes.



**MAVERICK**  
SPORTS

THANK YOU

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June 2, 2020

Chairwoman Sandra Douglass Morgan  
Nevada Gaming Control Board  
555 E. Washington Suite 2600  
Las Vegas, Nevada 89101

Re: Maverick Gaming, LLC Request for Centralized Surveillance Room  
– Amended from our May 29, 2020 submission to include Exhibit A

Dear Chairwoman Morgan,

We respectfully request approval to centralize our surveillance functions in our Red Lion Hotel and Casino (“Red Lion”) for all of our Northern Nevada properties, to include Wendover Nugget Hotel and Casino (“Nugget”), Red Garter Hotel and Casino (“Red Garter”), and Gold Country Inn Hotel and Casino (“Gold Country”).

The Nugget is the only property that falls within the requirements of Regulation 5 Surveillance Standard 2.010(8) of having a surveillance room being attended at all times. The Red Garter and Red Lion are a category “C” licensee and the Gold Country is a



category “D” therefore the surveillance rooms are not manned at all times, however we do have personnel that have a working knowledge and ability to operate the surveillance equipment and can provide immediate access to the secured surveillance rooms. Please see Exhibit A for property location specifics.

Our Nugget property had five (5) surveillance staff and a Director prior to the closure due to COVID-19. The Red Lion had a Surveillance Supervisor. The Red Garter and Gold Country, based on their close proximity to Nugget, and Red Lion, respectively, leveraged the staff at the Nugget and Red Lion.

With our proposed centralized surveillance team, we would have five (5) to six (6) surveillance staff and a Manager at the Red Lion that would be manned at all times. With Elko having a higher population than Wendover, we feel that we will be able to attract and retain more qualified surveillance staff at the Red Lion. Our Surveillance Director at the Nugget would be retained to handle the Nugget and Red Garter surveillance equipment and provide immediate access to Board agents when required. We also intend to train other members of the management team that will have working knowledge of the surveillance equipment. This will enable our teams at each property to facilitate investigations and NV GCB agent requests and provide immediate access to the surveillance room/area. Please see Exhibit A for employee specifics.

We submitted revised detailed Surveillance Plans for the Nugget, Red Lion, and Gold Country on May 28, 2020 to the Enforcement Division Operations Unit to address all Regulation 5 Surveillance Standard requirements.

We will submit a revised detailed Red Garter Surveillance Plan prior to reopening that property. We are using the closure period to improve the surveillance capabilities and coverage.

All of our properties have and will continue to have their own

totally functioning and operational surveillance systems and rooms/area. Our centralized surveillance room at the Red Lion will act as the main viewing area and have remote viewing for all properties.

Pursuant to Regulation 5 Surveillance Standard 12, this is accomplished through a secured transmission line that is firewalled and password protected on both ends. The video transmission is encrypted and can be terminated by the host location.

We understand that the following conditions for approval will be imposed and we are committed to complying with said conditions:

1. Our surveillance room, system and camera coverage is to be inspected and approved by the Enforcement Division prior to the centralization.
2. Our staffing levels within the centralized room will be maintained at the levels outlined in this request for approval.
3. Each property will maintain a fully functional surveillance system with the ability to monitor and record gaming activity as required by Regulation 5 Surveillance Standards.
4. Each property will have complete override capability to interrupt or shut down the remote surveillance to the Red Lion centralized room.
5. Board agents will be granted immediate access to the centralized room and to the other property surveillance rooms/area.

Please let us know if you have any questions or would like further clarification. We appreciate your consideration of this request.

Best regards,



Kim McCabe

SVP Compliance  
702-677-1270

Cc: Enforcement Division Operations Unit  
Michelle Campbell, Agent Enforcement Division  
Brian McIntosh, Supervisor Enforcement Division  
Ryan Sullivan, Special Agent Enforcement Division

# Exhibit A

## Property Location and Surveillance Employee Specifics:

The Wendover Nugget is located at 1225 Wendover Blvd. Wendover, NV. This property had four (4) surveillance staff, one(1) Supervisor and a Director prior to the closure due to COVID-19. With the centralization, the Nugget will consist of the Director and trained management staff to fill in when access is needed to the surveillance room. The training of the management team will begin the week of June 1, 2020.

The Red Garter is located at 1225 Wendover Blvd. Wendover, NV and relied on the staff at the Wendover Nugget. The Red Garter is 1.6 miles from the Nugget.

The Red Lion is located at 2065 Idaho Street, Elko, NV and had a Surveillance Supervisor. The centralized department will consist of five(5) to six (6) staff and a Manager. The existing Supervisor will be promoted to Manager and we will hire surveillance operators and technicians. We are in the process of recruiting for these positions. We will offer a transfer to some of the Nugget Surveillance staff that are willing to travel or move to Elko.

Gold Country is located at 2050 Idaho Street, Elko, NV and relied on the staff at Red Lion. Gold Country is 350 feet from the Red Lion.

The furthest property from the Red Lion is the Wendover Nugget, which is 107 miles.



STEVE SISOLAK  
Governor

## NEVADA GAMING CONTROL BOARD

1919 College Parkway, P.O. Box 8003, Carson City, Nevada 89702  
555 E. Washington Avenue, Suite 2600, Las Vegas, Nevada 89101  
3650 S. Pointe Circle, Suite 203, P.O. Box 31109, Laughlin, Nevada 89028  
557 W. Silver Street, Suite 207, Elko, Nevada 89801  
9790 Gateway Drive, Suite 100, Reno, Nevada 89521  
750 Pilot Road, Suite I, Las Vegas, Nevada 89119

SANDRA D. MORGAN, *Chairwoman*  
TERRY JOHNSON, *Member*  
PHIL KATSAROS, *Member*

June 5, 2020

Las Vegas  
(702) 486-2000  
Fax: (702) 486-2045

Ms. Kim McCabe  
Senior Vice President of Compliance  
Red Lion Inn and Casino  
2065 Idaho Street  
Elko, Nevada 89801

Re: Correspondence #2020-C407  
Surveillance Room Consolidation

Dear Ms. McCabe:

The Nevada Gaming Control Board has reviewed your correspondence received on June 2, 2020, requesting approval for a consolidated surveillance room.

According to your correspondence, the consolidated surveillance room will be located at Red Lion Inn and Casino to incorporate ongoing surveillance operations with Wendover Nugget Hotel and Casino, Red Garter Hotel and Casino, and Gold Country Inn and Casino.

Your consolidation request is approved, provided the following conditions are adhered to:

1. The surveillance room, system and camera coverage must be inspected and approved by the Enforcement Division after consolidation.
2. The consolidated room must maintain or exceed your current staffing levels.
3. All casino surveillance rooms must remain fully functional with the capability to monitor and record all gaming activity within the casinos. Additionally, all surveillance locations must have override capability to interrupt the remote surveillance location if needed.
4. Board agents must be granted immediate access 24 hours a day to the consolidated surveillance room and/or original surveillance rooms upon request.

Ms. Kim McCabe  
Page 2

Further questions should be directed to the Enforcement Division's Operations Unit at 555 East Washington Avenue, Suite 2600, Las Vegas, Nevada 89101.

Sincerely,

A handwritten signature in cursive script that reads "Terry Johnson".

Terry Johnson, Esq.  
Board Member

TJ/MC

cc: Sandra D. Morgan, Chairwoman  
Phil Katsaros, Board Member  
Enforcement (Las Vegas/Elko)  
Audit Division  
Tax and License Division  
Records and Research Services



June 2, 2020

Chairwoman Sandra Douglass Morgan  
Nevada Gaming Control Board  
555 E. Washington Suite 2600  
Las Vegas, Nevada 89101

Re: Maverick Gaming, LLC Request for Centralized  
Surveillance Room – Amended from our May 29, 2020  
submission to include Exhibit A

Dear Chairwoman Morgan,

We respectfully request approval to centralize our surveillance functions in our Red Lion Hotel and Casino (“Red Lion”) for all of our Northern Nevada properties, to include Wendover Nugget Hotel and Casino (“Nugget”), Red Garter Hotel and Casino (“Red Garter”), and Gold Country Inn Hotel and Casino (“Gold Country”).

The Nugget is the only property that falls within the requirements of Regulation 5 Surveillance Standard 2.010(8) of having a surveillance room

being attended at all times. The Red Garter and Red Lion are a category “C” licensee and the Gold Country is a category “D” therefore the surveillance rooms are not manned at all times, however we do have personnel that have a working knowledge and ability to operate the surveillance equipment and can provide immediate access to the secured surveillance rooms. Please see Exhibit A for property location specifics.

Our Nugget property had five (5) surveillance staff and a Director prior to the closure due to COVID-19. The Red Lion had a Surveillance Supervisor. The Red Garter and Gold Country, based on their close proximity to Nugget, and Red Lion, respectively, leveraged the staff at the Nugget and Red Lion.

With our proposed centralized surveillance team, we would have five (5) to six (6) surveillance staff and a Manager at the Red Lion that would be manned at all times. With Elko having a higher population than Wendover, we feel that we will be able to attract and retain more qualified surveillance staff at the Red Lion. Our Surveillance Director at the Nugget would be retained to handle the Nugget and Red Garter surveillance equipment and provide immediate access to Board agents when required. We also intend to train other members of the management team that will have working knowledge of the surveillance equipment. This will enable our teams at each property to facilitate investigations and NV GCB agent requests and provide immediate access to the surveillance room/area. Please see Exhibit A for employee specifics.

We submitted revised detailed Surveillance Plans for the Nugget, Red Lion, and Gold Country on May 28, 2020 to the Enforcement Division Operations Unit to address all Regulation 5 Surveillance Standard requirements.

We will submit a revised detailed Red Garter Surveillance Plan prior to reopening that property. We are using the closure period to improve the surveillance capabilities and coverage.

All of our properties have and will continue to have their own totally functioning and operational surveillance systems and rooms/area. Our centralized surveillance room at the Red Lion will act as the main viewing area and have remote viewing for all properties.



Pursuant to Regulation 5 Surveillance Standard 12, this is accomplished through a secured transmission line that is firewalled and password protected on both ends. The video transmission is encrypted and can be terminated by the host location.

We understand that the following conditions for approval will be imposed and we are committed to complying with said conditions:

1. Our surveillance room, system and camera coverage is to be inspected and approved by the Enforcement Division prior to the centralization.
2. Our staffing levels within the centralized room will be maintained at the levels outlined in this request for approval.
3. Each property will maintain a fully functional surveillance system with the ability to monitor and record gaming activity as required by Regulation 5 Surveillance Standards.
4. Each property will have complete override capability to interrupt or shut down the remote surveillance to the Red Lion centralized room.
5. Board agents will be granted immediate access to the centralized room and to the other property surveillance rooms/area.

Please let us know if you have any questions or would like further clarification. We appreciate your consideration of this request.

Best regards,



Kim McCabe  
SVP Compliance  
702-677-1270

Cc: Enforcement Division Operations Unit  
Michelle Campbell, Agent Enforcement Division  
Brian McIntosh, Supervisor Enforcement Division  
Ryan Sullivan, Special Agent Enforcement Division

# Exhibit A

## Property Location and Surveillance Employee Specifics:

The Wendover Nugget is located at 1225 Wendover Blvd. Wendover, NV. This property had four (4) surveillance staff, one(1) Supervisor and a Director prior to the closure due to COVID-19. With the centralization, the Nugget will consist of the Director and trained management staff to fill in when access is needed to the surveillance room. The training of the management team will begin the week of June 1, 2020.

The Red Garter is located at 1225 Wendover Blvd. Wendover, NV and relied on the staff at the Wendover Nugget. The Red Garter is 1.6 miles from the Nugget.

The Red Lion is located at 2065 Idaho Street, Elko, NV and had a Surveillance Supervisor. The centralized department will consist of five(5) to six (6) staff and a Manager. The existing Supervisor will be promoted to Manager and we will hire surveillance operators and technicians. We are in the process of recruiting for these positions. We will offer a transfer to some of the Nugget Surveillance staff that are willing to travel or move to Elko.

Gold Country is located at 2050 Idaho Street, Elko, NV and relied on the staff at Red Lion. Gold Country is 350 feet from the Red Lion.

The furthest property from the Red Lion is the Wendover Nugget, which is 107 miles.

# Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



This form must be completed in its entirety as a MS WORD document prior to submission for consideration. Submission must be made VIA EMAIL as an ATTACHMENT.

Date: 12/3/19  
Casino: Z Casino  
Prepared By: Tahsha Braning  
Job Title: Internal Compliance Officer  
Phone Number: 303-271-2526  
Email: tbraning@jzscasino.com

DIVISION USE ONLY	
Reviewed by:	<u>Variance Committee</u>
Approved / Denied:	<u>APPROVED</u>
Variance Number:	<u>512</u>
Approved by:	<u>Variance Committee</u>
Date:	<u>12/3/2019</u>
Variance Expires:	<u>12/3/2022</u>
File Updated By:	<u>LP</u>

## Variance Request from ICMP...

ICMP Section Title: Surveillance  
ICMP Section Number: 13  
ICMP Sub-Section Title: C

**Colorado Division of Gaming**  
**Reserves the right to revoke or**  
**amend this variance at any time**

## ICMP Wording:

*{In this area, please copy/paste or type the ICMP wording affected by the variance request. If the variance affects an entire ICMP Section summarize the section addressed by the variance}*

Regarding ICMP Section 13, Surveillance subsection C “The licensee must have a failure notification system that provides notification of any recording failure within 15 minutes. All recording failures must be addressed within one hour of system notification”, please consider the following as our plan for complying:

# Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



## Variance Requested and Justification:

*{Please draft the proposed internal control procedures by explaining the compensating control(s) and/or procedure(s) that will be implemented to replace the required outlined ICMP procedure(s) noted above. Also include a valid justification as to why the variance from the ICMP is necessary.}*

- Z Casino will have the Security Team conduct surveillance equipment checks every half hour when the surveillance room is unmanned, and if the connection to Surveillance at Grand Z (Variance #7) fails. All recording failures must be addressed within one hour of system notification and all video losses, that are not a result of routine maintenance, that exceed 15 minutes for critical cameras or an hour on other required gaming cameras will be immediately reported to the Division.
- In addition, we would like to use a Tablet during slot drop in order to complete the half hour checks more efficiently.
  1. Tablet will be stored in the surveillance room when not in use
  2. Tablet will not have public access or access by anyone outside Z Casino
  3. Tablet will be password protected
  4. No other apps will be installed on the tablet other than the native OS system, apps that cannot be removed and the browser to check the IP address
  5. If for any reason equipment checks cannot be completed via the tablet the drop team will stop, lock up the carts and keys every thirty minutes and Security will physically complete the equipment checks
- 

Z Casino does have a failure notification system in place that provides notification of any recording failure within 15 minutes but the room is unmanned at times. The system does not notify outside of the room.

# Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



This form must be completed in its entirety as a MS WORD document prior to submission for consideration. Submission must be made VIA EMAIL as an ATTACHMENT.

**Date:** 12/3/19  
**Casino:** Z Casino  
**Prepared By:** Tahsha Braning  
**Job Title:** Internal Compliance Officer  
**Phone Number:** 303-271-2526  
**Email:** tbraning@jzscasino.com

<b>DIVISION USE ONLY</b>	
<b>Reviewed by:</b>	<u>Neely</u>
<b>Approved / Denied:</b>	<u>Approved</u>
<b>Variance Number:</b>	<u>517</u>
<b>Approved by:</b>	<u>Neely</u>
<b>Date:</b>	<u>11/15/2019</u>
<b>Variance Expires:</b>	<u>11/15/2020</u>
<b>File Updated By:</b>	<u>LP</u>

<b>Variance Request from ICMP...</b>	
<b>ICMP Section Title:</b>	<u>Surveillance</u>
<b>ICMP Section Number:</b>	<u>13</u>
<b>ICMP Sub-Section Title:</b>	<u>C</u>

**Colorado Division of Gaming  
Reserves the right to revoke or  
amend this variance at any time**

<b>ICMP Wording:</b>
<p><i>{In this area, please copy/paste or type the ICMP wording affected by the variance request. If the variance affects an entire ICMP Section summarize the section addressed by the variance}</i></p> <p>Regarding ICMP Section, Surveillance subsection C "The licensee must have a failure notification system that provides notification of any recording failure within 15 minutes. All recording failures must be addressed within one hour of system notification."</p>

# Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



## Variance Requested and Justification:

*{Please draft the proposed internal control procedures by explaining the compensating control(s) and/or procedure(s) that will be implemented to replace the required outlined ICMP procedure(s) noted above. Also include a valid justification as to why the variance from the ICMP is necessary.}*

### **Requested Variance:**

Z Casino will have the Grand Z Surveillance operator conduct Surveillance equipment checks every half hour when the surveillance room at Z Casino is unmanned. All recording failures must be addressed within one hour of system notification and all video losses, that are not a result of a routine maintenance, that exceed 15 minutes for critical cameras or an hour on other required gaming cameras will be immediately reported to the Division.

### **Justification:**

Z Casino does have a failure notification system in place that provides notification of any recording failure within 15 minutes but currently the Security Team conducts the equipment checks every half hour. Allowing the Operator at the Grand Z to monitor the failure notification system for Z Casino would allow failures to be addressed sooner rather than later.

**If the connection between Grand Z Casino and Z Casino fails, and the Grand Z surveillance operator is unable to monitor the failure notification system, Z Casino staff will follow procedures outlined in Variance # 8.**

# Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



This form must be completed in its entirety as a MS WORD document prior to submission for consideration. Submission must be made VIA EMAIL as an ATTACHMENT.

**Date:** 12/3/19  
**Casino:** Grand Z Casino  
**Prepared By:** Tahsha Braning  
**Job Title:** Internal Compliance Officer  
**Phone Number:** 303-271-2526  
**Email:** tbraning@jzscasino.com

DIVISION USE ONLY	
Reviewed by:	<u>Neely</u>
Approved / Denied:	<u>Approved</u>
Variance Number:	<u>713</u>
Approved by:	<u>Neely</u>
Date:	<u>11/15/2019</u>
Variance Expires:	<u>11/15/2020</u>
File Updated By:	<u>LP</u>

## Variance Request from ICMP...

**ICMP Section Title:** Surveillance  
**ICMP Section Number:** 13  
**ICMP Sub-Section Title:** C

**Colorado Division of Gaming**  
**Reserves the right to revoke or amend this variance at any time**

## ICMP Wording:

*{In this area, please copy/paste or type the ICMP wording affected by the variance request. If the variance affects an entire ICMP Section summarize the section addressed by the variance}*

Regarding ICMP Section, Surveillance subsection C "The licensee must have a failure notification system that provides notification of any recording failure within 15 minutes. All recording failures must be addressed within one hour of system notification."

# Colorado Division of Gaming Internal Control Minimum Procedures (ICMP) Variance Request Form



## Variance Requested and Justification:

*{Please draft the proposed internal control procedures by explaining the compensating control(s) and/or procedure(s) that will be implemented to replace the required outlined ICMP procedure(s) noted above. Also include a valid justification as to why the variance from the ICMP is necessary.}*

### **Requested Variance:**

Z Casino will have the Grand Z Surveillance operator conduct Surveillance equipment checks every half hour when the surveillance room at Z Casino is unmanned. All recording failures must be addressed within one hour of system notification and all video losses, that are not a result of a routine maintenance, that exceed 15 minutes for critical cameras or an hour on other required gaming cameras will be immediately reported to the Division.

### **Justification:**

Z Casino does have a failure notification system in place that provides notification of any recording failure within 15 minutes but currently the Security Team conducts the equipment checks every half hour. Allowing the Operator at the Grand Z to monitor the failure notification system for Z Casino would allow failures to be addressed sooner rather than later.

**If the connection between Grand Z Casino and Z Casino fails, and the Grand Z surveillance operator is unable to monitor the failure notification system, Z Casino staff will follow procedures outlined in Variance # 8.**





**Staff Proposed Rule Making**

WAC 230-06-046 – Additional requirements for licensed business premises of nonhouse-banked, Class F, and house-banked card rooms.

**FEBRUARY 2024 - Discussion**  
**JANUARY 2024 – Discussion and Possible Filing**  
**OCTOBER 2023 – Initiate Rule Making**

**Tab 8: FEBRUARY 2024 Commission Meeting Agenda.**

**Statutory Authority 9.46.070**

**Who Proposed the Rule Change?**

Washington State Gambling Commission Staff

**Background**

**BOLD = Changes made since January 2024 Commission Meeting**

Staff suggests amendment of WAC 230-06-046, or the creation of a new rule, related to additional requirements for licensed business premises of nonhouse-banked, Class F, and house-banked card rooms. The rule currently establishes conditions under which card rooms cannot be adjacent to each other. Staff believes that there is a need to further clarify under which limited conditions nonhouse-banked, Class F, and house-banked card rooms can be adjacent to each other.

Staff developed clarifying language to ensure that adjacent card rooms operate as separate and distinct licensed business premises. Staff also determined that this rule is more appropriately located in Chapter 230-03, which relates to pre-licensing procedures, rather than in Chapter 230-06 detailing rules for all licenses. To accomplish this movement between chapters, the Commission needs to adopt a new rule in Chapter 230-03, which is a revised version of the old rule. The old rule would then be repealed on an expedited basis as redundant. Attached is the current WAC 230-06-046, the proposed new rule (WAC 230-03-182), and the filing for a repeal of WAC 230-06-046.

**At the January 2024 commission meeting, Commissioners:**

- Authorized staff to initiate rulemaking on an expedited basis for repeal of WAC 230-06-046 once the new WAC 230-03-182 became effective and
- Filed WAC 230-03-182 for further discussion with additional language to subsection 3 to further identify adjacent cardrooms licensed as of July 1, 2018, are not bound by the requirements.

**Attachments:**

- WAC 230-06-046
- Revised WAC 230-03-182 as filed
- Repeal of WAC 230-06-046

### Stakeholder Feedback

On January 15, 2024, we received an email from Vicki Christopherson with proposed rule language they would like Commissioners to consider. See attached email and proposed rule language with their comments.

### Staff Recommendation

Final action cannot be taken on this rule until the March 2024 meeting.

Options available to you this month include, but are not limited to:

- Have further discussion on the proposed changes offered by stakeholders;
- Take action to amend the language filed at the January 2024 meeting, which may require a new CR102 filing;
- Direct staff to do further research; and/or
- Continue discussion and possible action (refile rule language, take final action, withdraw rule-making, etc.) on the rule at the March meeting.

**WAC 230-06-046 Additional requirements for licensed business premises of nonhouse-banked, Class F, and house-banked card rooms.**

(1) The licensed business premises of nonhouse-banked, Class F, and house-banked card rooms may not be adjacent to each other if each licensed business premises:

(a) Shares inside public access between the two licensed business premises; or

(b) Has employee access between the two licensed business premises visible to the public; or

(c) Shares windows or similar structures that allow customers to see into the other licensed business premises.

(2) Subsection (1) of this section does not apply to nonhouse-banked, Class F, and house-banked card room physical locations that have any of the features listed in subsection (1) of this section and were licensed on the effective date of this rule.

(3) Adjacent card rooms must post signs at each entrance that is accessible by the public to clearly notify customers of the licensed business premises' identity.

[Statutory Authority: RCW 9.46.070. WSR 18-05-029, § 230-06-046, filed 2/9/18, effective 7/1/18. Statutory Authority: RCW 9.46.070 and 9.46.0282. WSR 10-07-102, § 230-06-046, filed 3/19/10, effective 7/1/10.]

NEW SECTION

**WAC 230-03-182 Additional requirements for nonhouse-banked, Class F, and house-banked card rooms.** (1) The licensed business premises of nonhouse-banked, Class F, and house-banked card rooms may not be adjacent to each other unless:

(a) Each is a fully separate and distinct licensed business premises; and

(b) There is a solid wall, with no internal access, between the two premises; and

(c) Each licensed business premises must operate as an independent commercial stimulant as defined in RCW 9.46.0217.

(2) Subsection (1) of this section does not apply to nonhouse-banked, Class F, and house-banked card room physical locations that have any of the features listed in subsection (1) of this section and were licensed as of July 1, 2018. The provisions of subsection (1) of this section will take effect upon the issuance of a new license.

(3) Adjacent card rooms must post signs at each entrance that is accessible by the public to clearly notify customers of the licensed business premises' identity.

REPEALER

The following section of the Washington Administrative Code is repealed:

WAC 230-06-046      Additional requirements for licensed  
business premises of nonhouse-banked,  
Class F, and house-banked card rooms.

**From:** [Vicki Christophersen](#)  
**To:** [Griffin, Tina \(GMB\)](#); [Jason Bacigalupi](#); [Eric Persson](#)  
**Cc:** [Davies, Brooke](#); [Mentzer, Damon \(GMB\)](#)  
**Subject:** Adjacent card room rule  
**Date:** Monday, January 15, 2024 11:26:31 AM  
**Attachments:** [Proposed WAC 230-03-182 - Revised - with explanatory comments.docx](#)

---

External Email

Good morning Tina and Damon,

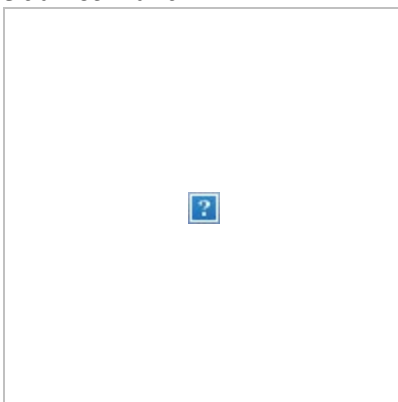
Thanks for the robust conversation during the commission meeting last week. We appreciate the willingness to clarify the issues surrounding this rule.

It was difficult to track the changes in real time and we are not sure that the language amendments discussed actually accomplish what we believe was the goal. To that end we have attached the approach we would prefer to the proposed rule and look forward to further discussions with you.

Thanks!



Vicki Christophersen  
Christophersen Inc.  
[www.christopherseninc.com](http://www.christopherseninc.com)  
360.485.2026



NEW SECTION

**WAC 230-03-182 Additional requirements for nonhouse-banked, Class F, and house-banked card rooms.** (1) The licensed business premises of nonhouse-banked, Class F, and house-banked card rooms may not be adjacent to each other unless:

(a) Each is a fully separate and distinct licensed business premises; and

(b) There is a solid wall, with no internal ~~public access,~~ between the two premises, ~~and that no employee access between the two premises is visible to the public;~~ and

(c) Each licensed business premises must operate as an independent commercial stimulant as defined in RCW 9.46.0217.

(2) Subsection (1) of this section does not apply to nonhouse-banked, Class F, and house-banked card room physical locations that ~~are adjacent to each other have any of the features listed in subsection (1) of this section~~ and were licensed on the effective date of this rule. ~~The provisions of subsection (1) of this section will take effect upon the issuance of a new license.~~

(3) Adjacent card rooms must post signs at each entrance that is accessible by the public to clearly notify customers of the licensed business premises' identity.

**Commented [JB1]:** The existing rule prohibits public access between the two premises, but also allows for employee access between the two premises, so long as it is not "visible to the public" - this change keeps this consistent.

**Commented [JB2]:** This language is from the existing rule - which prohibits adjacent locations from having certain features - however, the new rule, rather than prohibiting features, requires that adjacent locations have certain features. This change clarifies that difference - otherwise - as written, existing licensed adjacent card rooms would not be grandfathered unless they "have any of the features listed in subsection (1)".

**Commented [JB3]:** It is unclear what the intent of this is because the provisions of subsection (1) would be effective upon the effective date of the rule - so including an additional section that triggers the effectiveness of the requirements on the issuance of a new license is confusing.