



**WASHINGTON STATE  
GAMBLING COMMISSION  
MEETING**

**MARCH 14th, 2024**

Olympia, Washington

# COMMISSIONERS



Alicia Levy  
Chair



Julia Patterson  
Vice Chair



Bud Sizemore

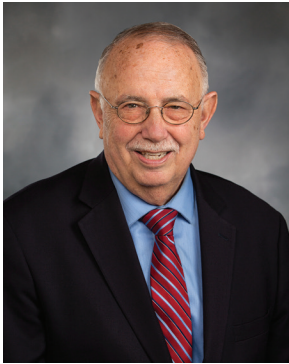


Sarah Lawson



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)



WAGamblingCommission



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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, March 14<sup>th</sup>, 2024

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

By phone: 360-726-3322, ID# 604 058 058#

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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9:30 am	Call to Order	Alicia Levy, Chair
<b>*Tab 1</b>	<b>Consent agenda</b>	<b>(Action)</b>
	February 8, 2024, Special Commission Meeting Minutes	<b>Pg. 3</b>
	New Licenses & Class III Gaming Employees	<b>Pg. 7</b>
	HBCR List	<b>Pg. 29</b>
	Director's Report	<b>Pg. 32</b>
	<i>Public Comment</i>	
<b>Tab 2</b>	<b>Presentation – Problem Gambling Awareness Month</b>	<b>Pg. 34</b>
	Roxane Waldron, MPA, Health Care Authority	
	Tana Russell, Deputy Director, ECPG	
<b>Tab 3</b>	<b>Legislative Update</b>	<b>Pg. 46</b>
		Tina Griffin, Director

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# Washington State Gambling Commission

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

February 8, 2024

## Gambling Special Commission Meeting Minutes

The meeting was held at the Liquor and Cannabis Board Building in Olympia, WA.

### Commissioners:

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

### Ex Officio Members Present:

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

### Staff Present:

Tina Griffin, Director; Gary Drumheller, Deputy Director; Kriscinda Hansen, Chief Financial Operator; Adam Amorine, Staff Attorney, and Interim Rules Coordinator; Troy Kirby, PIO; Damon Mentzer, Administrative Assistant; Suzanne Becker, Assistant Attorney General (AAG) and Julie Anderson, Executive Assistant

### Staff Present Virtually:

Bill McGregor, Special Agent Supervisor; Jim Melville, Special Agent and Nicole Frazer, Administrative Assistant

There were 5 people in the audience and 22 people attended virtually.

Chair Levy welcomed everyone to the Liquor and Cannabis Board and called the February meeting to order at 9:00 AM. She announced that the meeting would be recorded.

### 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 Ibsen moved to approve the consent agenda as presented by staff which includes holding the April 2024 meeting at the Gambling Commission office in Lacey.*

*Commissioner Sizemore seconded the motion.*

*The motion passed unanimously. 4:0*

### Tab 2 Rocky Mountain Elk Foundation

Jim Melville, Special Agent (SA) presented the materials for this tab. SA Melville reported that Rocky Mountain Elk Foundation is requesting to exceed the raffle limit in raffle prizes paid during a license year ending December 31, 2024.

***Commissioner Sizemore moved to approve Rocky Mountain Elk Foundation’s request to exceed \$300,000 limit and grant a \$550,000 limit in raffle prizes paid during the license year ending Dec. 31, 2024.***

***Commissioner Ibsen seconded the motion.***

***Motion passed 4:0.***

**Tab 3 Discussion – Budget Update**

**Kriscinda Hansen, Chief Financial Officer (CFO)** presented the materials for this tab. CFO Hansen presented a budget update that included a brief overview of the 2023 license fee changes.

Director Griffin explained that the soonest commissioners could see the new rule language for the proposed rules would be March, 2024. Commissioner Sizemore asked for a list of gross gambling receipts for each class of gambling.

CFO Hansen will give a more significant revenue update at the May commission meeting.

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

**Tab 4 – Legislative Update**

**Tina Griffin, Director**, presented the materials for this tab. Director Griffin gave a brief summary of the bills we are watching this session and the status as of January 30, 2024. She announced that Commissioner Ibsen had his confirmation hearing. We are still working with staff to schedule a hearing for Chair Levy.

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

**Tab 5 – IT Modernization Update**

**Gary Drumheller, Deputy Director (DD)** presented the materials for this tab. DD Drumheller presented a PowerPoint presentation on the progress made on the IT Modernization so far and what to expect in the near future.

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

**Tab 6 – Discussion – Firearms as a raffle prize**

**Sarah Lawson, Commissioner** presented the materials for this tab. She suggested some changes that would tighten up our regulation to bring it more in line as to how these raffles are being conducted in Washington State, and bring them in line with our state’s statutes. She suggested these three changes:

- The firearm must be authorized in Washington State.
- The certificate for a firearm must be from a Washington State licensed dealer.
- And a certificate must not be awarded to a person that is prohibited from owning a firearm in Washington State.

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

***Commissioner Ibsen moved to initiate rulemaking to amend WAC 230-06-025 Restrictions on firearms as prizes as presented.***

*Chair Levy seconded.  
Commissioner Sizemore opposed.  
Motion passed 3:1.*

**Tab 7 – Petition to Initiate Rulemaking – Authorize Centralized Surveillance**  
Bill McGregor, Special Agent Supervisor (SAS) presented the materials for this tab.

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

Vicki Christophersen representing Maverick Gaming thanked staff for their research and the robust discussions. She asked that staff initiate rulemaking.

Victor Mena, President of New Phoenix and Last Frontier Casinos. He supports authorizing centralized surveillance systems and believes it would benefit everyone.

Eric Persson, owner of Maverick Gaming. He thanked the staff for their work in the research of centralized surveillance. He supports this rulemaking.

*Commissioner Lawson moved to initiate rulemaking proceedings to authorize centralized surveillance for further discussion.*

*Commissioner Sizemore seconded the motion.*

*The motion passed 4:0.*

Director Griffin asked the Commissioners for further guidance. Chair Levy agreed that staff are subject matter experts and can develop the draft rule language for consideration.

**Tab 8 – Staff Rule Amendment for Discussion and Possible Filing – Adjacent Card rooms**  
Adam Amorine, Staff Attorney (SA), and Interim Rules Coordinator presented the materials for this tab.

Chair Levy asked for public comments.

Eric Persson owner Maverick Gaming stated that this amended rule language is a violation of the fifth amendment rights and is unconstitutional.

There was no action taken on this tab.

**Tab 9 – Discussion – Director Salary Review**

Chair Levy stated this tab would be heard at a later date.

Chair Levy asked for public comments.

Due to confusion on the start time of the meeting Chair Levy asked commissioners to vote on Tab 1 and Tab 2 again.

*Commissioner Lawson moved to approve the consent agenda as presented by staff which includes holding the April 2024 meeting at the Gambling Commission office in Lacey.*

*Commissioner Ibsen seconded the motion.*

*The motion passed unanimously. 4:0*

**Commissioner Sizemore moved to approve Rocky Mountain Elk Foundation's request to exceed \$300,000 limit and grant a \$550,000 limit in raffle prizes paid during the license year ending Dec. 31, 2024.**

**Commissioner Ibsen seconded the motion.**

**Motion passed 4:0.**

Chair Levy asked for public comment.

There was none.

**Chair Levy** announced at 10:59 AM Commissioners would adjourn to Executive Session to discuss current and potential agency litigation with legal counsel, including tribal negotiations for approximately one hour.

**At 12:00 PM Chair Levy** announced that the March 14 & 15 Gambling Commission meeting would be held at Liquor and Cannabis Board and adjourned the public meeting.





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

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PAGES:21

Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 21.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

**NEW APPLICATIONS**

**BINGO**

AMERICAN LEGION 00076  
00-00480 01-02842

115 N OLYMPIC AVE  
ARLINGTON WA 98223

MANSON GRANGE 00796  
00-25273 01-02838

157 E WAPATO  
MANSON WA 98831

**RAFFLE**

CALVARY CHAPEL OF TRI-CITIES  
00-25129 02-21340

10611 W CLEARWATER AVE  
KENNEWICK WA 99336

COMBAT VETERANS MOTORCYCLE ASSOC CHAPTER 11-6  
00-24896 02-21236

1565 SACAJAWEA AVE  
RICHLAND WA 99353

DENISE LOUIE EDUCATION CENTER  
00-25116 02-21332

5333 15TH AVE S  
SEATTLE WA 98108

EDMONDS ELEMENTARY STARS FOUNDATION  
00-24430 02-21039

190 SUNSET AVE. S #E  
EDMONDS WA 98020

HUMANE SOCIETY OF COWLITZ COUNTY  
00-18038 02-08124

1900 7TH AVE  
LONGVIEW WA 98632

KITSAP ALLIANCE FC  
00-19068 02-08325

3670 HALSEY LN  
BREMERTON WA 98310

MANSON GRANGE 00796  
00-25273 02-21385

157 E WAPATO  
MANSON WA 98831

PE ELL ASB  
00-22863 02-09258

519 N 2ND ST  
PE ELL WA 98572

SOZO SPORTS OF CENTRAL WA  
00-24153 02-20862

2200 S 36TH AVE  
YAKIMA WA 98903

ST MARY'S SCHOOL  
00-17283 02-09176

14601 E 4TH AVE  
SPOKANE VALLEY WA 99216

**PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT**

BIG BOTTOM ROADHOUSE  
00-25132 05-21830

9791 US HWY 12  
RANDLE WA 98377

PLATINUM PLATE LLC  
00-25272 05-21867

22303 MARINE VIEW DR S  
DES MOINES WA 98198

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

**NEW APPLICATIONS**

**PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT**

THE PENALTY BOX  
00-25188 05-21843

2510 84TH ST S STE 15  
TACOMA WA 98499

YELLA BEAK BAR & GRILL  
00-25241 05-21860

23525 SE 436TH ST  
ENUMCLAW WA 98022

**GAMBLING SERVICE SUPPLIER**

E & S DEAD GAMES  
00-21581 26-00383

23607 GLEN ALLEN PL  
MOUNT VERNON WA 98274

**COMMERCIAL AMUSEMENT GAMES OPERATOR**

PREZOTUS AMUSEMENTS LLC  
00-25243 53-21572

PO BOX 1664  
WOODINVILLE WA 98072

**CARD GAME NON HOUSE-BANKED**

FOE 03564  
00-03393 60-00558

12 W SOUTH AVE  
DEER PARK WA 99006

**NON HOUSE-BANKED CARD GAME**

ACE'S POKER  
00-19258 65-07548

10117 S TACOMA WAY  
LAKEWOOD WA 98499

**ANCILLARY SPORTS WAGERING VENDOR**

ARISTOTLE INTERNATIONAL INC  
10-00467 83-00035

205 PENNSYLVANIA AVENUE SE  
WASHINGTON DC 20003

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**DISTRIBUTOR REPRESENTATIVE**

WOOD, DEON M  
22-01354

NRT TECHNOLOGIES INC  
LAS VEGAS NV 89120

**MANUFACTURER REPRESENTATIVE**

ABA, DAVID C  
23-03857

EVERI PAYMENTS INC  
LAS VEGAS NV 89113-2175

BAKLADI GANGADHARA, VIDYASHREE  
23-03865

LIGHT & WONDER  
LAS VEGAS NV 89119

BOSCHETTI, RIKKI D  
23-03869

EVERI PAYMENTS INC  
LAS VEGAS NV 89113-2175

BUKKE, HARSHA VARDHAN  
23-03871

LIGHT & WONDER  
LAS VEGAS NV 89119

CHILIPKA, SEAN M  
23-01493

IGT  
LAS VEGAS NV 89113

CURRIE, JONATHAN R  
23-03876

EVERI GAMES INC.  
LAS VEGAS NV 89118

DELOS SANTOS, ERIKA JENEL S  
23-03853

EVERI PAYMENTS INC  
LAS VEGAS NV 89113-2175

DICKS, TAYLOR L  
23-03875

ECLIPSE GAMING SYSTEMS  
DULUTH GA 30096

EDINGTON, CHERYL A  
23-03854

EVERI GAMES INC.  
LAS VEGAS NV 89118

FRY, DONALD J  
23-03852

IGT  
LAS VEGAS NV 89113

LEVANCY, FRANTZCY  
23-03856

IGT  
LAS VEGAS NV 89113

MCMANMON, SEAN M  
23-00575

IGT  
LAS VEGAS NV 89113

NARASIMHA REDDY, CHAITHRA  
23-03874

LIGHT & WONDER  
LAS VEGAS NV 89119

NAYAK, SAMRATH  
23-03864

LIGHT & WONDER  
LAS VEGAS NV 89119

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**MANUFACTURER REPRESENTATIVE**

PAGALA, AMULYA 23-03872	LIGHT & WONDER LAS VEGAS NV 89119
PATHAK, UTKARSH 23-03867	LIGHT & WONDER LAS VEGAS NV 89119
PILLAREDDY, DILIP KUMAR 23-03873	LIGHT & WONDER LAS VEGAS NV 89119
SELVARAJ, AKASH 23-03861	LIGHT & WONDER LAS VEGAS NV 89119
SETTU MOHAMED, MOHAMED NIZAR 23-03859	LIGHT & WONDER LAS VEGAS NV 89119
SHEIK ALLAVUDEEN, IMRAN KHAN 23-03860	LIGHT & WONDER LAS VEGAS NV 89119
SLATER, CHRISTOPHER R 23-01031	IGT LAS VEGAS NV 89113
STEINER, CAROLL D 23-03851	EVERI PAYMENTS INC LAS VEGAS NV 89113-2175
SUBRAMANYAM, THARUN 23-03866	LIGHT & WONDER LAS VEGAS NV 89119
TAJPARA, DARSHAN N 23-03863	LIGHT & WONDER LAS VEGAS NV 89119
TANG, YOUNG X 23-01603	LIGHT & WONDER LAS VEGAS NV 89119
VELUSAMY, MADHANBABU 23-03862	LIGHT & WONDER LAS VEGAS NV 89119
VINODH, BALA 23-03868	EVERI PAYMENTS INC LAS VEGAS NV 89113-2175
VIRAGANATHAN, NIMALAN 23-03870	NRT TECHNOLOGY CANADA NA M1S5R3
WYETT, ISAAC W 23-03858	EVERI PAYMENTS INC LAS VEGAS NV 89113-2175

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

### NEW APPLICATIONS

#### CALL CENTER REPRESENTATIVE

BAGRICH, INNA  
32-00093

INCEPT CORPORATION  
CANTON OH 44718

GOTTHART, WILLIAM M JR  
32-00092

INCEPT CORPORATION  
CANTON OH 44718

WALLACE, CHRISTY A  
32-00094

INCEPT CORPORATION  
CANTON OH 44718

#### MAJOR SPORTS WAGERING REPRESENTATIVE

ARAFI, HAZIM O  
33-00612

ISI SPORTS  
LAS VEGAS NV 89128

BOCANEGRA, ALEKSIS V  
33-00604

FANDUEL SPORTSBOOK  
LOS ANGELES CA 90045

BRADWAY, DARREN E  
33-00489

ISI SPORTS  
LAS VEGAS NV 89128

CASTILLO VILLAMARES, JULIO C  
33-00487

ISI SPORTS  
LAS VEGAS NV 89128

DINYA, PETER  
33-00615

CAESARS SPORTSBOOK  
LAS VEGAS NV 89118

DYCUS, JOSHUA A  
33-00494

ISI SPORTS  
LAS VEGAS NV 89128

EKLUND, WILLIAM E  
33-00611

FANDUEL SPORTSBOOK  
LOS ANGELES CA 90045

GLEMBIN-GILLILAND, BRYSON K  
33-00607

ISI SPORTS  
LAS VEGAS NV 89128

KOLYOVSKA, KOSTADINA V  
33-00617

DRAFTKINGS  
BOSTON MA 02116

MAIO, ANTHONY D  
33-00616

DRAFTKINGS  
BOSTON MA 02116

MCMANMON, SEAN M  
33-00613

IGT  
LAS VEGAS NV 89113

ROJAS, CHRISTIAN R  
33-00614

CAESARS SPORTSBOOK  
LAS VEGAS NV 89118

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**MAJOR SPORTS WAGERING REPRESENTATIVE**

SCHULZ, TYLER J  
33-00618

FANDUEL SPORTSBOOK  
LOS ANGELES CA 90045

**MID-LEVEL SPORTS WAGERING REPRESENTATIVE**

ANTHONY, JESHUA L  
34-00040

LIGHT & WONDER  
LAS VEGAS NV 89119

HAYDUSHKI, IVAN I  
34-00041

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

**NON-PROFIT GAMBLING MANAGER**

BORDNER, CYNTHIA A  
61-04854

FOE 00002/SPOKANE  
SPOKANE WA 99208

CALLAWAY, KIPSON S  
61-03115

AMERICAN LEGION 00176  
VANCOUVER WA 98686-1442

DYKSTRA, STEVEN P  
61-04656

AMERICAN LEGION 00176  
VANCOUVER WA 98686-1442

GALEN, AMY J  
61-04778

FOE 00195/SNOHOMISH  
SNOHOMISH WA 98290

PEABODY, MICHAEL R  
61-04868

LOOM 01666  
NORTH BEND WA 98045

**SERVICE SUPPLIER REPRESENTATIVE**

HAYDUSHKI, IVAN I  
63-01140

BULLETPROOF SOLUTIONS INC  
FAIRFAX VA 22031

**CARD ROOM EMPLOYEE**

AMES, TAYLOR S  
68-37530

B

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

ANDERSON, STEVEN J  
68-06290

B

SILVER DOLLAR CASINO/MILL CREEK  
MILL CREEK WA 98012-6384

PERSON'S NAME  
LICENSE NUMBER

EMPLOYER'S NAME  
PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

ANTONE, ANTHONY R 68-37528	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
BAUTISTA, ERIC DEXTER V 68-37525	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
BLACKFORD, KATIE M 68-37546	B	ROXBURY LANES AND CASINO SEATTLE WA 98126
BURROW, SHELBY Y 68-37538	B	CASINO CARIBBEAN YAKIMA WA 98901
CARY, TREY S 68-37519	B	ROMAN CASINO SEATTLE WA 98178
CHAN, TOOCH 68-16988	B	NEW PHOENIX LA CENTER WA 98629
CORTEZ, KRYSTAL M 68-37529	B	CASINO CARIBBEAN YAKIMA WA 98901
DAGDAGAN, ELIZABETH A 68-30585	B	CASINO CARIBBEAN YAKIMA WA 98901
DOLLAR, BLAINE R 68-37521	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
DUCETTE, MICHAEL J 68-37522	B	IMPERIAL PALACE CASINO AUBURN WA 98002
DUNCAN, JEFFREY L 68-15872	B	CASINO CARIBBEAN YAKIMA WA 98901
FOWLER, CALEB R 68-37032	B	ZEPPOZ PULLMAN WA 99163
GAMBLE, MICHAEL A 68-37512	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
GLADWELL, NICKOLAS E 68-37513	B	JOKER'S CASINO SPORTS BAR & FIESTA RICHLAND WA 99352-4122
HANG, JIMMY H 68-37543	B	LAST FRONTIER LA CENTER WA 98629-0000
JACKSON, BLAINE S 68-37510	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461



PERSON'S NAME  
 LICENSE NUMBER

EMPLOYER'S NAME  
 PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

JEPPERSON, SHAYLEE R 68-37542	B	IMPERIAL PALACE CASINO AUBURN WA 98002
JONES-ROBINSON, FRANKIE 68-35891	B	RIVERSIDE CASINO TUKWILA WA 98168
KELLY, BENJAMIN J 68-16237	B	LANCER LANES AND CASINO CLARKSTON WA 99403-2219
KIRBY, WYNTERIA S 68-33461	B	JOKER'S CASINO SPORTS BAR & FIESTA CD RM RICHLAND WA 99352-4122
LEE, BYRON C 68-18573	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301
LUCAS, TENEECA C 68-32983	B	BUZZ INN STEAKHOUSE/EAST WENATCHEE EAST WENATCHEE WA 98802
MEARS, KEN S 68-37548	B	CASINO CARIBBEAN YAKIMA WA 98901
MESAROS, MICHELE D 68-37540	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
MILLETT, SARA D III 68-37517	B	WILD GOOSE CASINO ELLENSBURG WA 98926
MILLIN, TRAVIS D 68-37552	B	CASINO CARIBBEAN YAKIMA WA 98901
MITCHELL, KYLE M 68-37527	B	CRAZY MOOSE CASINO II/MOUNTLKE TERRACE MOUNTLAKE TERRACE WA 98043-2463
NOYOLA MAGALLON, JUANA 68-37547	B	CASINO CARIBBEAN YAKIMA WA 98901
PEREA, JAVIER J 68-37551	B	GREAT AMERICAN CASINO/TUKWILA TUKWILA WA 98168
PICKETT, JEREMIAH L 68-37539	B	ROXBURY LANES AND CASINO SEATTLE WA 98126
PLUMMER, ASHLEY D 68-33945	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
PRIETO, SYLVIA 68-37534	B	CRAZY MOOSE CASINO/PASCO PASCO WA 99301

PERSON'S NAME  
 LICENSE NUMBER

EMPLOYER'S NAME  
 PREMISES LOCATION

**NEW APPLICATIONS**

**CARD ROOM EMPLOYEE**

RAWSON, TAYLOR A 68-36858	B	RIVERSIDE CASINO TUKWILA WA 98168
RILANG, RILANG 68-37531	B	LILAC LANES & CASINO SPOKANE WA 99208-7393
ROGERS, KURRIN N 68-37532	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
ROONEY, PAUL M 68-06949	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
SALAZAR, ALEXIA R 68-37549	B	CASINO CARIBBEAN YAKIMA WA 98901
SHORE, JOSHUA M 68-31019	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
SMITH, DAVID P 68-37524	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
STAHL, DOUGLAS S 68-17998	B	CASINO CARIBBEAN YAKIMA WA 98901
STAJKOWSKI, BRIAN D 68-37526	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
STEELE, STEVEN G 68-35850	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
STEPHENS, ANDREW M 68-37537	B	CLEARWATER SALOON & CASINO EAST WENATCHEE WA 98802
STOVER, JEZIC B 68-37535	B	NEW PHOENIX LA CENTER WA 98629
TELFORD, SHARON R 68-20885	B	DRAGON TIGER CASINO MOUNTLAKE TERRACE MOUNTLAKE TERRACE WA 98043-2461
VELA, ADRIAN E 68-37520	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
WHISENHUNT, HEIDI L 68-37523	B	PAPAS CASINO RESTAURANT & LOUNGE MOSES LAKE WA 98837
WILTSHIRE, JAMIE G 68-37516	B	SLO PITCH PUB & EATERY BELLINGHAM WA 98225

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**CHEHALIS CONFEDERATED TRIBES**

ALMONTES, SERGIO S  
69-56374

BALLY, ALEXANDER A  
69-56378

BANUELOS, RAYMOND L  
69-41230

BROWNING, JALAB L  
69-56486

CLARK, HARLEN C  
69-56488

COLE, JORDAN L  
69-56375

CONKLIN, JONATHAN E  
69-56377

COOPER, CODY R  
69-56408

CRAWFORD, TARA J  
69-56431

DUNKLE, AMANDA R  
69-56449

GIBBONS, JORDAN M  
69-56490

HESS, CALEB A  
69-56371

HOLLIDAY, ERIN N  
69-56448

HUBBARD, STEVEN A  
69-56494

MARTIN, JEFFREY C  
69-56489

MC NAUGHT, GAGE D  
69-56493

MILLER, TREVOR R  
69-56372

PASION, JANET H  
69-56430

PAYNE, GEORGE A  
69-50446

PEREZ, CARLOS V JR  
69-56373

SHARP, DYLAN J  
69-56487

SMITH, ADAM J  
69-56433

WALDON, WILLIAM R  
69-54037

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**COLVILLE CONFEDERATED TRIBES**

ANKNEY, JONATHAN W  
69-55237

CAMPBELL, AGNICE S  
69-56452

GOMES-BALBERDI, JESSTIN I  
69-56453

GRANADOS, JAZMEN E  
69-56560

LULO GONZALEZ, JOSE  
69-56559

SANGSTER, SHANNON L  
69-56558

SHOCKMAN, CRAIG R  
69-56386

**COWLITZ INDIAN TRIBE**

ALEMAN, JOSE C  
69-56520

ALLEN, MONICA C  
69-56382

ARIAS, VICTOR  
69-56498

AUZQUI, BILL J  
69-56524

BOWLING, CRYSTAL H  
69-56503

BUERCKLEY, JEFFERY C  
69-56496

BUNDA, PATRICK S  
69-56483

CHAN, VANNET  
69-56522

DOUGHERTY, MATTHEW R  
69-56399

FINLEY, ANDREW J  
69-56521

GRAYBILL-TILLMAN, DARCY M  
69-56463

HALLER, ROBERT C JR  
69-56550

HOPPER, MADELYN N  
69-56442

HUBER, DAVID A  
69-56548

KALLGREN, MACY S  
69-56478

KANESHIRO, RUSSELL B  
69-46295

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**COWLITZ INDIAN TRIBE**

KENISTON, LORI J  
69-19791

LAMSSIES, MARTIN D  
69-41568

LANE, KIRSTEN H  
69-56504

LEPUACH, JACQUELINE MARIE L  
69-56544

LITTLEJOHN, THAINE H  
69-56466

LYKKEN, LISA F  
69-56480

MAISTRUK, MARIAN  
69-56481

MARTIN, LOGAN O  
69-56426

MARTINEZ-PLATON, KAREN H  
69-56505

MILLER, KATHERINE E  
69-56400

MORROW, ANTHONY S  
69-56546

MUSSO, MAYGON L  
69-56545

NASH, CHEVY L  
69-56485

PALKIN, VOLODYMYR O  
69-56411

PEDERSON, CHRISTOPHER T  
69-56401

PERIGOSA, VLADI  
69-56479

PETERSON, HOWARD E  
69-56482

PETERSON, ROBERT B  
69-56499

RATCLIFF, REGINA S  
69-56445

RUSSELL, TAYLOR E  
69-56414

SCHWARTZ, JOSHUA D  
69-56383

SIANTI-TATU, FIFI  
69-56523

SMITH, DONNA M  
69-56500

STONE, ARETHA D  
69-56513

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**COWLITZ INDIAN TRIBE**

THOMAS, RICHARD J JR  
69-53614

TUZ-MANRIOUE, MARIA I  
69-56506

VENTURA, KATHLEEN F  
69-56497

WALBURN, MICHAEL W  
69-56484

WATTERSON, JOY L  
69-56549

WEBB, HAILEY A  
69-56410

WELLS, SEBASTIAN A  
69-53961

**KALISPEL TRIBE**

BURK, CODY L  
69-56525

DAVIS, JACOB G  
69-56538

DRIVER, CHRISTOPHER D  
69-56526

DUBROCK, LYNDSEY N  
69-56424

HAYNES, SAYDELE M  
69-47134

HECKATHORN, RIAN C  
69-56469

LITTLE, TY S  
69-56407

RANDALL, ROSHAWN H  
69-56404

RODGERS, CHRISTIAN D  
69-56474

STOREBO, JEFFREY D  
69-56472

STROM, JASON M  
69-56369

VARGAS, JULIE L  
69-17241

WARDROP, SHANTEL L  
69-56473

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

LUMMI NATION

CARTER, WENDY M  
69-56462

CASAREZ, DAISY  
69-56565

COULTER, CHRISTOPHER B  
69-56576

FORRESTER, ANDREW S  
69-56460

JAMES, GERALD I  
69-56454

MARRERO VAZQUEZ, CARLOS A  
69-56461

MASON, CHRISTINE H  
69-56566

ROBERTSON, DALE L  
69-56575

SOLOMON, THERESA M  
69-56567

MUCKLESHOOT INDIAN TRIBE

AGANZA, FRANCES M  
69-15270

AGCAWILI, PATRICK J  
69-52996

FERETI, RYLEE P  
69-56501

GUTIERREZ, BYRON L  
69-56440

HEINS, APRIL N  
69-56389

MARTINEZ, HETZON A  
69-52961

NELUM, DARRYL L II  
69-56502

PERKINS, TIMOTHY S  
69-56397

UGADDAN, EUNICE Y  
69-56555

WOODS, DEMETRIC J  
69-55810

YIN, SONG B  
69-13590

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**NISQUALLY INDIAN TRIBE**

BROWN, DEREK F  
69-56390

FISHER, TY M  
69-56450

HUBBARD, JOSEPH A  
69-56529

JENKINS, TYLER J  
69-56392

MCGEE, DANIELLE E  
69-56552

MENDEZ, JOSE G JR  
69-56557

THRASHER, TANNER N  
69-56393

WILSON-MOON, JAMES M  
69-56391

YEAGER, SCOTT L  
69-56376

**NOOKSACK INDIAN TRIBE**

BROWN, TODD C  
69-56441

JOHNNY, JUSTIN E  
69-35553

RENSKERS, SHAYLEE E  
69-56418

VANROOYEN, WILLIAM D  
69-56419

**PORT GAMBLE S'KLALLAM TRIBE**

IVES, MATTHEW  
69-56451

**PUYALLUP TRIBE OF INDIANS**

AFLLEJE, JASMIN  
69-34731

BUCKNER, JORDAN R  
69-56533

BULLPLUME, MAURICIA T  
69-56429

BURICH, BRADLEY J  
69-56543

CHIM, COBE A  
69-56422

EDMISON, ALAN J  
69-56468



PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**PUYALLUP TRIBE OF INDIANS**

EVERYBODYTALKSABOUT, IVAN L  
69-56384

FLORES, HENRY L  
69-56367

HANCOCK, JAMEY P  
69-56534

HOLLOWAY, AHMAD O  
69-56380

IMSOUN, JAY'SOAN C  
69-56385

KEESY, KENNETH A  
69-56535

KHIM, VISAL G  
69-56531

KUAEA, TALALELE S  
69-56553

LOPEZ, BRANDY M  
69-52793

MALAUTEA-TUUPO, JORDAN M  
69-56396

MILLER, JORDAN C  
69-56428

MILLER, PATRICK O JR  
69-56409

MULIUFI, JADE T  
69-56532

NGUYEN, KEVIN B  
69-56423

OLLENNU, WINFRED A  
69-41357

ONOVWERUO, EMUOBO J  
69-56536

PHILLIPS, ALANA T  
69-53115

RA, BRITTANY S  
69-56395

RAMOS, XZAVIAN A  
69-56554

ROBINSON, KIELY P  
69-56387

SANTIAGO, VINCENT  
69-41364

SHINES, JONATHAN M  
69-56381

SOTO BATALLA, JOSE L  
69-56561

STRAUS, JOHN E  
69-34020

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**PUYALLUP TRIBE OF INDIANS**

STRICKLAND, TERRELL J  
69-56388

SWEENEY, DAVID M  
69-56439

VILLAREAL, CRISAMEL B  
69-56542

WOODS, DEMETRIC J  
69-55810

**QUINAULT NATION**

JACOBSEN, JOSEPH A  
69-36246

KITSELMAN, LACEY J  
69-25088

PEARCE, SAMUEL R  
69-56366

SANCHEZ, MICHAEL J  
69-10927

**SHOALWATER BAY TRIBE**

CAMPBELL, ELLA L  
69-56495

DANIEL, HUNTER W  
69-56514

SHORES, JOHN G  
69-56515

**SKOKOMISH TRIBE**

CADLE, ROLAND S  
69-56574

**SNOQUALMIE TRIBE**

ALVAREZ, NICHOLAS J  
69-56518

CHAMPAGNE, MICHAEL A JR  
69-56563

COVELLO, CORY T  
69-56458

GEE, ALI N  
69-56562

HEIDEMAN, KARA M  
69-56517

HICKMAN, TIMOTHY M  
69-56519

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**SNOQUALMIE TRIBE**

NAW SUT, JOHN  
69-56516

NIZAMI, RAHMATULLAH  
69-56459

SANDOVAL, SERGIO JR  
69-56405

THOMAS, OREANNA M  
69-56403

WARD, JADE F  
69-10123

**SPOKANE TRIBE**

BIRD, KATERI L  
69-50916

BUCK, SIRENA K  
69-52980

CUNNINGHAM, DECLAN J  
69-56465

DOFFEK, KARYN J  
69-56507

EIDSNESS, ZACKARY D  
69-56551

GROOMS, GORDEN E  
69-56420

JOHN, KEELEE E  
69-40639

LEE, KENDRA M  
69-56357

MCCAULEY, JAMES E  
69-56573

PILKINTON, CONNOR S  
69-56421

ROWATT, EMMA J  
69-56477

SAMUELS, DAVID R  
69-46700

THATCHER, TAYLOR M  
69-56530

TONASKET, NATHAN T  
69-56437

TONASKET, NICHOLAS A  
69-56438

WATTS, SHASTADI L  
69-56394

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**SQUAXIN ISLAND TRIBE**

BRINES, JENNIFER A  
69-46836

FLAIG, ELDON L JR  
69-56467

GARCIA MORAGA, ENRIQUE A  
69-56446

GOULEY, TROYLEE T  
69-56476

HEDGER, JOSHUA A  
69-56443

HENSON, DENALI A  
69-56447

PETERSON, SPARROW D  
69-56492

ROBERTS, ERIKKA K  
69-56444

SMALLWOOD, JAMES E  
69-56491

STEGMAN, TRISTYN J  
69-56432

TAGLES, KELLI M  
69-56425

**SUQUAMISH TRIBE**

HAYES, MYKHAEL KARL C  
69-56540

ROSENBAUM, SUZANNE C  
69-56406

SCHULTE, MICHAEL E III  
69-56365

STEEN, WILLIAM J  
69-56541

**SWINOMISH INDIAN TRIBAL COMMUNITY**

ABITIA, MONICA R  
69-08471

ADAMS, KRISTIN L  
69-56379

RICHTER, LON  
69-56547

WALKER, ALAN R  
69-44062

**THE TULALIP TRIBES**

ANCHETA, RONALD W  
69-16430

BACON, JENNIFER J  
69-51549

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

**THE TULALIP TRIBES**

CORNER, AMANDA K  
69-56455

DREYER, THOMAS M  
69-56370

FLORES, JUAN A  
69-56457

FRYBERG, ROBERT J  
69-56417

GARDEE, VICTOR N II  
69-46876

HAM, NICKLOUS G  
69-43317

HATCH, ALEXANDER D  
69-56537

HODGE, BENJAMIN  
69-56416

KING, MICHAEL B  
69-40547

MUHAMMAD, AIJAH M  
69-56368

MUNOZ, GINA L  
69-56412

RAMOS, ROBERT J  
69-56413

SNELL, JERMAINE A  
69-56314

STEPHENSON, ASHLEY O  
69-56456

WILLIAMS, VASHTI C  
69-45861

WILSON, KENNETH R  
69-43812

**UPPER SKAGIT INDIAN TRIBE**

CLEES, ADAM B  
69-56436

ELLISON, DAVID V  
69-56435

KEENE, NICHOLAS C  
69-56475

KISSELBURG, JAMES H  
69-56579

**YAKAMA NATION**

ALVISO, CHRISTIAN O  
69-42388

BLEVINS, ERICA D  
69-35587

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

**NEW APPLICATIONS**

**CLASS III GAMING EMPLOYEE**

YAKAMA NATION

CASTRO, TONI A  
69-56527

HAMERSLEY, JAMES W III  
69-56528

MILLER, BRANDON I  
69-56512

ORTEGA, RUBEN JR  
69-56599

POLK, TREVOR A  
69-53253

REYES, MATEO G  
69-40554

ROYBAL, VALERIE A  
69-56511

SALGADO, NESTOR M  
69-56398

SANCHEZ, YOLANDA I  
69-45874

SIFUENTES, TEENA M  
69-21046

SILVA, ISABEL N  
69-56508

TAKESGUN, GENEVIE  
69-56509

YALLUP, CELESTINE F  
69-56510



## HOUSE-BANKED PUBLIC CARD ROOM REPORT

<b>Licensed and Operating</b>			<b>38</b>		
	City	Commission Approval Date	License Expiration Date	Org #	License #
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/MOUNTLKE 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
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2024	00-21305	67-00267

<b>Licensed and Operating</b>			<b>38</b>		
	<b>City</b>	<b>Commission Approval Date</b>	<b>License Expiration Date</b>	<b>Org #</b>	<b>License #</b>
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, 2025	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****2**

	City	Commission Approval Date	License Expiration Date	Org #	License #
GRAND CASINO	SHORELINE			00-25290	67-00350
IMPERIAL PALACE CASINO	TUKWILA			00-24893	67-00348



# Washington State Gambling Commission

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

**TO:**           **Commissioners**                           **Ex-Officios**  
                  Alicia Levy, Chair                    Senator Steve Conway  
                  Julia Patterson, Vice Chair        Senator Jeff Holy  
                  Bud Sizemore                            Representative Shelly Kloba  
                  Sarah Lawson                           Representative Eric Robertson  
                  Anders Ibsen

**FROM:** Tina Griffin, Director

**DATE:** March 14, 2024

**SUBJECT:** Director's Report

## **Sports Pool Checks**

During the two-week period leading up to the Super Bowl, the Regulatory and Enforcement Unit conducted approximately 160 sports pool inspections at various commercial and nonprofit licensees.

Agents verified the sports pools and those that were offering them were compliant with RCW 9.46.0335. Those found to be non-compliant were educated on the proper operation of sports pools and some were also issued verbal warnings.

No license is required to conduct a sports pool, which is a board or piece of paper that is divided into 100 squares. Each square constitutes a chance to win the sports pool and is sold for \$1 or less. The purchaser puts their contact information in the square indicating the chance they purchased. Prior to the start of the athletic contest the pool is closed and sales cease. After the pool is closed, the prospective score is assigned randomly to each square. All money paid by entrants, less taxes, is paid as a prize(s) to the person holding the square assigned to the winning scores. The person or organization can only conduct one sports pool per athletic event.

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

### **New Regulations for Tribal-State Compacts**

On February 21, 2024, the Department of Interior (Department) published revisions to its regulations regarding the Department's review and approval of Tribal-State gaming compacts under IGRA.

The new regulations codify the Department's review process and consideration of substantive issues in decision letters, "deemed approved" letters, and technical assistance letters. The Department also incorporates case law as it relates to class III gaming compacts and codifies Departmental policies and interpretation of case law to provide clarity on how the Department will review certain provisions of compacts.

These new regulations also provide tools to protect Tribes against States from including compact provisions that are not directly related to the operation of gambling activities. The Department provided clarity by articulating their "direct connection" test and giving examples of provisions the Department found met the test and examples of those that have not met the test.

Included in the new regulations was clarity that a compact or amendment, 25 CFR Part 293.26, "...may include provisions addressing statewide remote wagering or internet gaming that is directly related to the operation of gaming activity on Indian lands. A compact may specifically include, for regulatory purposes, provisions allocating State and Tribal jurisdiction within the State over remote wagering or internet gaming originating outside Indian lands where:

- (a) State law and the compact or amendment deem the gaming to take place, for the purposes of State and Tribal law, on the Tribe's Indian lands where the server accepting the wager is located;
- (b) The Tribe regulates the gaming; and
- (c) The player initiating the wager is not located on another Tribe's Indian lands within the State, unless that Tribe has lawfully consented."

### **Disordered Gambling Advisory Workgroup**

The Workgroup's second meeting was held on March 13, 2024. A summary of the meeting will be provided at the commission meeting.

# Problem Gambling Awareness Month Update

**WSGC Public Meeting**  
**March 2024**

**Roxane Waldron, Administrator**  
**State Problem Gambling Program**  
**Div. of Behavioral Health and Recovery**

# New funding & expanded scope

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- ▶ Funding doubled 2023-2025 (E2SSB 5634)
- ▶ PG prevention – integrated, year-round
- ▶ Disordered Gambling Advisory Workgroup (DGAW)
- ▶ Medicaid coverage for pg assessment & treatment

# PG Prevention -- Expansion

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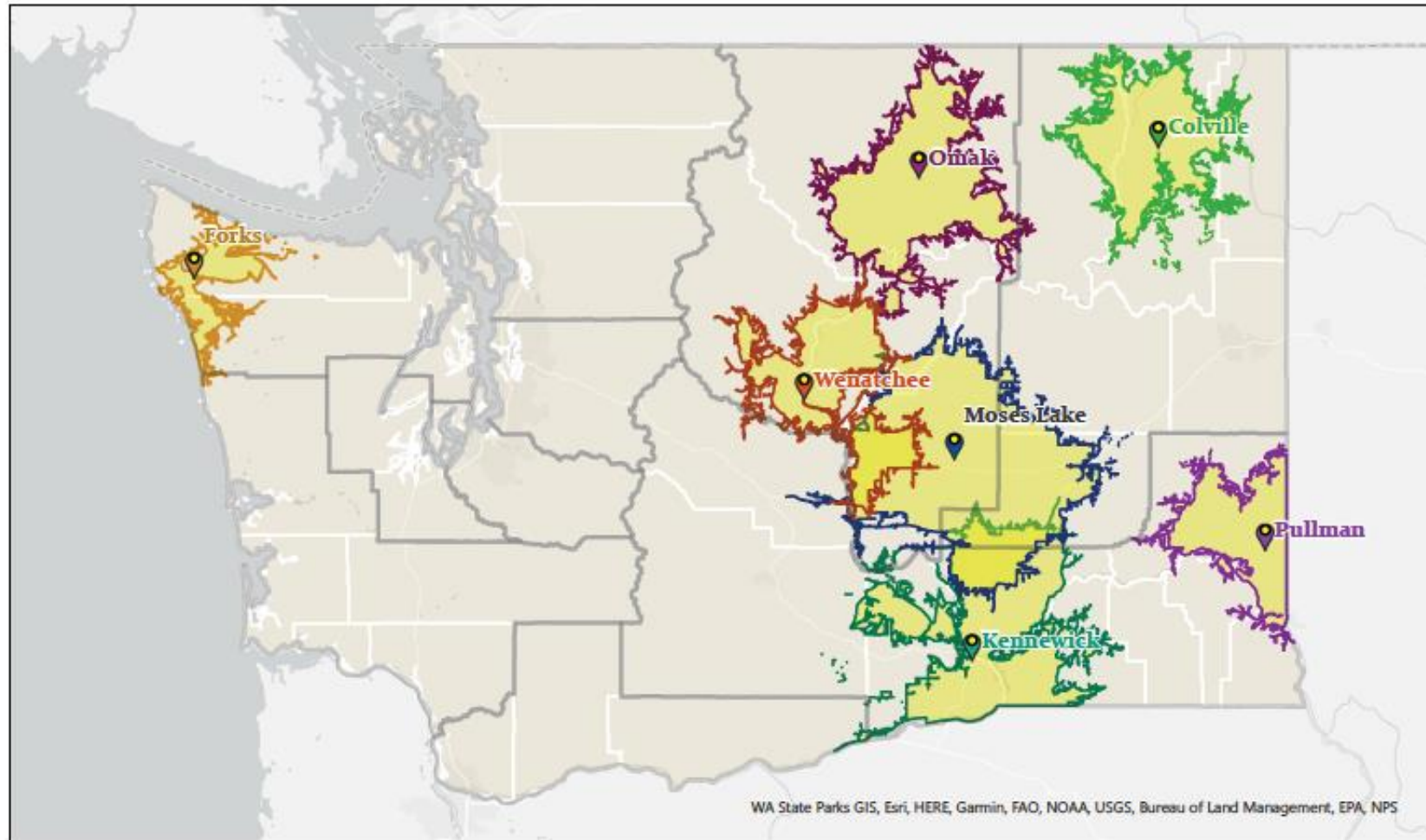
- ▶ **Integrated, year-round problem gambling prevention program with community involvement**
- ▶ Problem Gambling Prevention Workgroup (PGPW) – now to June 2025
- ▶ Integration with HCA's existing behavioral health prevention efforts
- ▶ Increased funding & coordination with external partners
- ▶ Focus on populations at an increased risk
- ▶ By 2027, inclusion in the Statewide Prevention Plan

# Workforce Development

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- ▶ **Geographic regions** (no Cert. Gambling Counselor within 1 hour drive)
- ▶ **Languages other than English** (populations at increased risk for pg)
- ▶ **Communities at higher risk** with no/inadequate pg services
- ▶ **Clinicians with lived experience** and/or from same communities

# Workforce Development -- Focus





# Apple Health now covers PG tx – 1/1/24

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- ▶ Behavioral Health Agencies that are DOH-certified for pg
- ▶ MCO-covered & Fee-for-service clients
- ▶ Problem gambling has been added to the Billing Guides
  - ▶ PG Assessments & Individual/conjoint/family/group sessions
- ▶ State PG Program will continue –
  - ▶ Contracted BHAs – move all Apple Health clients over by 4/1
  - ▶ Contracted sole providers – no change
- ▶ **Referrals to Problem Gambling Helpline: 1-800-547-6133**



**Roxane Waldron, Administrator**  
State Problem Gambling Program  
[Roxane.waldron@hca.wa.gov](mailto:Roxane.waldron@hca.wa.gov)  
360-867-8486

State Problem Gambling Program webpage:  
<https://www.hca.wa.gov/free-or-low-cost-health-care/i-need-behavioral-health-support/problem-gambling>

**Problem Gambling Helpline: 1-800-547-6133**  
(in WA State)

# Problem Gambling Awareness Month

Tana Russell, SUDP, NCTTP, WSCGC-II, CGT



## Who We Are

The Evergreen Council on Problem Gambling (ECPG) is a 501(c)(3) nonprofit organization committed to providing services and programs for those affected by problem gambling and gaming – individuals, their families, employers, students, treatment professionals, and the greater community – through gambling addiction treatment support, information and education, advocacy, research, and prevention efforts.

Founded in 1991, ECPG maintains a position of neutrality on gambling, recognizing that most people who gamble do so for recreation and entertainment and suffer no serious problems. However, for some, gambling and/or gaming can become serious addictions, devastating to the individual and family.



# Problem Gambling Awareness Month

National Theme:  
Every Story Matters

**IT'S YOUR LIFE. IT'S YOUR STORY.**

Connect With the Help You Need To Live the Life You Want.

If gambling is creating problems for you and your family, there is Hope.

Help Starts Here:  
24/7 Problem Gambling Helpline  
Call or Text 1-800-547-4223  
Chat at [evergreenpcg.org](http://evergreenpcg.org)

**EVERGREEN**  
Council on Problem Gambling  
Problem Gambling Awareness Month  
October 1-31, 2024



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**EVERGREEN**  
Council on Problem Gambling  
Problem Gambling Awareness Month  
October 1-31, 2024



# Problem Gambling Awareness Month

2024 Is Shaping

Up!



# PGAM Live-Stream



FREE WEBINAR:

## Problem Gambling or Solution Gambling?

How to support the Black Community's Cultural Realities

With Host:  
Tana Russell

Special Guests:  
Deborah C. Haskins, PhD  
Carmela Washington-Harvey, PhD



FREE LIVE-STREAM

March 8, 2024

1-2 p.m. PT (2 MT/3 CT/4 ET)



# Connections: Healthy Gambling and Gaming podcast



Raising Awareness in Black Communities

TBD

Recovery One Day At A Time

Rob Minnick



# Gambling Disorder Screening Day

March 12

Early Detection,  
Help, and Hope.  
All Start with Screening.

**GAMBLING DISORDER  
SCREENING DAY**  
Tuesday, March 12, 2024

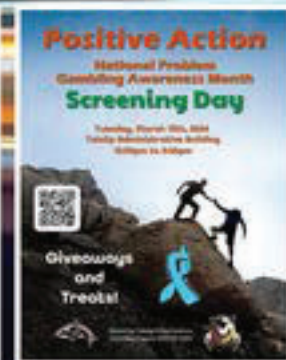
## Online Screening Tools

Take or Share Our Confidential Three Question  
eScreener:

Online Self-eScreener

Visit Cambridge Health Alliance's website and  
access a free, confidential online screening.

Online Screening Tool



# SUPER BOWL LVIII- 2024

News Release and Social



## ESPN Reports:

Here are how the Super Bowl betting figures have grown, according to the survey results, since 2019, the first year since legal betting began spreading across the nation:

- 2024 -- 68 million adults, \$23.1 billion bet.
- 2023 -- 50.4 million adults, \$16 billion bet.
- 2022 -- 31.4 million adults, \$7.61 billion.
- 2021 -- 23.2 million adults, \$4.3 billion.
- 2020 -- 26 million adults, \$6.8 billion.
- 2019 -- 22.7 million adults, \$6.0 billion.

# Thank You

Tana Russell, SUDP, NCTTP,  
WSCGC-II, CGT  
*Deputy Director*  
Evergreen Council on Problem  
Gambling  
[www.evergreencpg.org](http://www.evergreencpg.org)  
[trussell@evergreencpg.org](mailto:trussell@evergreencpg.org)  
360-352-6133





# Washington State Gambling Commission

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

**TO:**           **Commissioners**                               **Ex-Officios**  
Alicia Levy, Chair                               Senator Steve Conway  
Julia Patterson, Vice Chair               Senator Jeff Holy  
Bud Sizemore                               Representative Shelly Kloba  
Sarah Lawson                               Representative Eric Robertson  
Anders Ibsen

**FROM:** Tina Griffin, Director

**DATE:** March 14, 2024

**SUBJECT:** March Legislative Update

Below is a summary of the bills passed out of the 2024 Legislative session that impact the agency:

Bills we supported:

- HB 1961 Concerning animal cruelty in the first degree.  
Sponsored by Representative Low

This bill expands the seriousness of animal cruelty in the first degree beyond just sexual offenses against animals. It assigns a level III seriousness to animal cruelty cases that could inflict harm or injury or even death at illegal animal fighting events.

On March 1, 2024, HB 1961 was delivered to the Governor for his signature.

Other bills:

- HB 2216 Reducing barriers to state employment by eliminating two-year and four-year requirements that are unnecessary.

This bill eliminates degree requirements as the only way to meet the qualifications of a job unless that degree is required by law for an employee to perform the essential functions of a job.



This bill was delivered to the Governor on March 1, 2024.

- HB1530 Expanding the eligibility for employment of certain law enforcement and prosecutor office positions.

To address workforce issues, this bill allows law enforcement agencies, both general and limited jurisdiction agencies, to consider applications from citizens and lawful permanent residents.

The bill was delivered to the Governor on March 1, 2024.

- ESSB 5424 Concerning flexible work for general and limited authority Washington peace officers.

This bill allows for general and limited authority Washington peace officers to work less than full-time when feasible. The flexible work policy may include alternative work schedules that fit the needs of the law enforcement agency.

The bill was signed by the President on March 6, 2024.

- SHB 1105 Requiring public agencies to provide notice for public comment that includes the last date by which public comment must be submitted.

This bill:

- Mandates a public agency that is required to solicit public comment for a statutorily specified period of time and provide notice that it is soliciting public comment to include in the notice the first and last date of the comment period and the time by which written public comment may be submitted.
- Subjects an agency to civil penalties for failure to include in a notice for public comment the first and last day of the comment period and time by which written comment may be submitted.

This bill was delivered to the Governor on March 6, 2024.

- HB 2246 Concerning vacation leave accrual for state employees.

This bill increases the maximum number of hours of unused vacation leave a state employee may accrue from 240 to 280 hours.

The bill was signed by Senate President on March 5, 2024, and as of March 5, 2024, has yet to be delivered to the Governor.

- HB 1947 Concerning the governance of technology services in state government, including eliminating the office of the chief information officer and renaming the consolidated technology services agency.

This bill requires state agencies to:

- Annually certify that they comply with all Washington Technology Solutions' standards and policies rather than only certifying that its technology security program complies with the Office of Cybersecurity standards policies.
- Provide proposals to WaTech prior to purchasing or acquiring major information technology services. WaTech, rather than OFM, may require funding of major information technology projects, including incremental funding.

The bill was delivered to the Governor on March 1, 2024.

All bills from the 2023 and 2024 sessions that did not pass will have to be introduced as new bills in 2025.



**Rule Petition to Amend**

WAC 230-11-065 Raffle prizes.

WAC 230-11-067 Requesting commission approval prior to offering raffle prizes exceeding \$40,000 per prize or \$300,000 in a license year.

WAC 230-11-075 Limit number of guests for members-only raffles.

WAC 230-11-085 Modified and discounted pricing plans for tickets for members-only raffles.

WAC 230-11-086 Discounted pricing plans for tickets to members-only raffles.

WAC 230-11-087 Other pricing plans for members-only raffles.

WAC 230-11-105 Retain and store raffle records.

**MARCH 2024 – Final Action**

**JANUARY 2024 – Discussion and Possible Filing**

**NOVEMBER 2023 – Discussion and Possible Filing**

**SEPTEMBER 2023 – Commission Review**

**JULY 2023 – Rule-Making Petition Received**

<b>Tab 4: MARCH 2024 Commission Meeting</b>	<b>Statutory Authority 9.46.070</b>
<b>Who Proposed the Rule Change?</b>	
<p>Alex Baier, on behalf of Rocky Mountain Elk Foundation, Olympia, WA  Tiffany Brace, on behalf of Nonprofit Association of Washington, Seattle, WA  Keely Hopkins, on behalf of Congressional Sportsmen’s Foundation, Vancouver, WA  Matt Little, on behalf of Ducks Unlimited, Vancouver, WA  Nello Picinich, on behalf of Coastal Conservation Association, Vancouver, WA</p>	
<b>Background</b>	
<p><b>BOLD = Changes made since January 2024 Commission Meeting</b></p> <p>The rules package began as a four separate rules packages. In this new package, staff presents those parts of the rule package on which Commissioners agreed to initiate rulemaking in September 2023.</p> <p>Several nonprofits operating in Washington state proposed multiple amendments to rules related to raffles. The details of the suggested amendments on which the Commissioners agreed to initiate rulemaking are explained as:</p> <ol style="list-style-type: none"> <li>1) To keep up with inflation, petitioners request that, in WAC 230-11-085, the \$10 maximum on the price of a single ticket and \$25 maximum on the price of a discounted package of tickets be raised to \$25 and \$100, respectively, and that appropriate changes be made to WAC 230-11-086 and WAC 230-11-087.</li> <li>2) To ease the burden of record-keeping, petitioners would like a reduction to one year for the requirements to hold onto records for three years from the end of the licensee’s fiscal year in WAC 230-11-105.</li> <li>3) Allowing more guests to participate in a member-only raffle. Currently, WAC 230-11-075 states that guests must not exceed 25 percent of total attendance, which petitioners would like raised to 50 percent.</li> <li>4) Petitioners seek to increase the thresholds in WAC 230-11-067 so the additional recordkeeping and Commission approvals commence at higher levels than the current \$40,000 per prize or \$300,000 in a license year. If the thresholds cannot be fully adjusted for inflation, petitioners ask if the thresholds could be raised to \$80,000 per prize or \$500,000 in a license year.</li> </ol>	

In addition, Commission staff suggested amending WAC 230-11-067 to add additional requirements for high value raffles to protect the licensee and raffle ticket buyers if ticket sales fall short of expectations.

Since September, Commission staff developed the attached proposed amendments to the raffle rules that seek to address petitioners' and staff interests while maintaining adequate regulatory control. The changes proposed include:

- Increasing the thresholds that trigger submission of a raffle plan and commission approval prior to offering raffle prizes that exceed \$80,000 for a single prize or \$500,000 in cumulative prizes in a license year (WAC 230-11-065 and WAC 230-11-067).
- Requiring licensees that offer raffle prizes that exceed \$80,000 for a single prize or \$500,000 in cumulative prizes in a license year to award at least 50 percent of the net proceeds less expenses as a grand prize if ticket sales fall below the predetermined number of ticket sales disclosed in the raffle plan (WAC 230-11-067).
- Increasing the number of guests for members-only raffles (WAC 230-11-075).
- Clarifying WAC 230-11-085 to focus on modified pricing plans, such as a penny raffle.
- Offering discounted packages (WAC 230-11-086) and other pricing plans for members-only raffles (WAC 230-11-087) if every potential participant is also able to purchase an individual raffle ticket outside of discounted packages and other pricing plans.
- Allowing for destruction or disposal after one year of unsold tickets and certain ticket stubs, (WAC 230-11-105).

After the changes were drafted, Commission staff met with petitioners to review draft rules.

At the November 2023 Commission meeting, Commissioners asked staff to remind them of the initial discussion at the September Commission meeting related to increasing the thresholds of \$40,000 for a single prize or \$300,000 in cumulative prizes in a license year in WAC 230-11-065 and 230-11-067. Staff reviewed the September transcript and found no discussion on the topic of increasing the thresholds.

On December 20, 2023, the Commission received a letter from Rocky Mountain Elks Foundation and the Boys and Girls Club of the Columbia, which is attached.

At the January 2024 Commission meeting, Commissioners discussed the rate of inflation compared to the proposed increased prize thresholds. Following discussion, Commissioners approved increasing the thresholds to \$60,000 for a single prize or \$400,000 in cumulative prizes in a license year in WAC 230-11-065 and 230-11-067.

Attachments:

- Petition – Updated September 12, 2023
- September 2023 Rules Summary – Part I: Initiate Rulemaking
- September 2023 Rules Summary – Part III: Commissioner Policy Decision
- September 2023 Rules Summary – Staff-Initiated Raffle Rulemaking
- December 20, 2023 letter from Rocky Mountain Elks Foundation and Boys and Girls Club of the Columbia Basin.
- March 6, 2024 Letter from Outdoors for Our Heroes
- March 11, 2024 Letter from Matt Little and 14 WA nonprofit organizations.
- Revised rules for filing: WAC 230-11-065, WAC 230-11-067, WAC 230-11-075, WAC 230-11-085, WAC 230-11-086, WAC 230-11-087, and WAC 230-11-105.

**Policy Considerations**

The thresholds, \$40,000 for a single prize and \$300,000 in cumulative prizes in a license year, that trigger submission of a raffle plan and commission approval in WAC 230-11-067 exist to protect the charitable or nonprofit organization by making sure they have a well-developed plan to ensure success.

**Staff Recommendation**

**Staff recommends that the Commission take final action on the proposed amended rules after holding a public hearing. Rules would take effect 31 days after filing with the Office of the Code Reviser.**

## McLean, Lisa (GMB)

---

**From:** Matt Little <mlittle@ducks.org>  
**Sent:** Tuesday, September 12, 2023 11:21 AM  
**To:** McLean, Lisa (GMB); tiffany@nonprofitwa.org; abaier@rmef.org; eric.demers@pediatrix.com; Kirk A. Struble; nello.picinich@ccawashington.org; Keely Hopkins; Laura Pierce  
**Cc:** Nicks, Jim (GMB); Melville, Jim (GMB); McGregor, Bill (GMB)  
**Subject:** RE: Follow up on June 29 Meeting

---

### External Email

---

Yes, thank you Lisa. As we discussed on the phone, it sounds like updating all three of those WACs re: ticket pricing would make the most sense. Thank you for catching that and see you on Thursday.

Best,  
Matt

-----  
Matt Little  
Director of DU Public Policy, Western Region  
11805 NE 99th Street, Suite 1300  
Vancouver, WA 98682  
[mlittle@ducks.org](mailto:mlittle@ducks.org)  
(541) 678-2322



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**From:** McLean, Lisa (GMB) <lisa.mclean@wsgc.wa.gov>  
**Sent:** Tuesday, September 12, 2023 11:10 AM  
**To:** Matt Little <mlittle@ducks.org>; tiffany@nonprofitwa.org; abaier@rmef.org; eric.demers@pediatrix.com; Kirk A. Struble <kstruble@ducks.org>; nello.picinich@ccawashington.org; Keely Hopkins <khopkins@congressionalsportsmen.org>; Laura Pierce <laura@nonprofitwa.org>  
**Cc:** Nicks, Jim (GMB) <jim.nicks@wsgc.wa.gov>; Melville, Jim (GMB) <jim.melville@wsgc.wa.gov>; McGregor, Bill (GMB) <bill.mcgregor@wsgc.wa.gov>  
**Subject:** RE: Follow up on June 29 Meeting

**CAUTION:** - This email originated outside of Ducks Unlimited.

---

Hi Matt –

Based on our telephone conversation yesterday, your request to change WAC 230-11-085, raising the ticket price limits from \$10 for individual tickets and \$25 for a discounted package of tickets to \$25 and \$100, respectively, may have impacts on WAC 230-11-086 and WAC 230-11-087. Are you wanting to amend your petition to include these additional WACs?

If so, please respond affirmatively to this email so that staff can amend its summary to the Commissioners.

Thanks,

Lisa

Lisa C McLean  
Legislative and Policy Manager  
Washington State Gambling Commission  
P.O. Box 42400  
Olympia, WA 98504  
Office: (360) 486-3454  
Cell: (360) 878-1903  
[lisa.mclean@wsgc.wa.gov](mailto:lisa.mclean@wsgc.wa.gov)



---

**From:** Matt Little <[mlittle@ducks.org](mailto:mlittle@ducks.org)>

**Sent:** Thursday, July 20, 2023 12:21 PM

**To:** McLean, Lisa (GMB) <[lisa.mclean@wsgc.wa.gov](mailto:lisa.mclean@wsgc.wa.gov)>; [tiffany@nonprofitwa.org](mailto:tiffany@nonprofitwa.org); [abaier@rmef.org](mailto:abaier@rmef.org); [eric.demers@pediatrix.com](mailto:eric.demers@pediatrix.com); Kirk A. Struble <[kstruble@ducks.org](mailto:kstruble@ducks.org)>; [nello.picinich@ccawashington.org](mailto:nello.picinich@ccawashington.org); Keely Hopkins <[khopkins@congressionalsportsmen.org](mailto:khopkins@congressionalsportsmen.org)>; Laura Pierce <[laura@nonprofitwa.org](mailto:laura@nonprofitwa.org)>

**Cc:** Nicks, Jim (GMB) <[jim.nicks@wsgc.wa.gov](mailto:jim.nicks@wsgc.wa.gov)>; Melville, Jim (GMB) <[jim.melville@wsgc.wa.gov](mailto:jim.melville@wsgc.wa.gov)>; McGregor, Bill (GMB) <[bill.mcgregor@wsgc.wa.gov](mailto:bill.mcgregor@wsgc.wa.gov)>

**Subject:** RE: Follow up on June 29 Meeting

---

External Email

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Hi friends,

Our request is for the Washington State Gambling Commission to consider changes to the rules for charitable nonprofit fundraising as we discussed at the last meeting and are summarized in the attached document. We were very pleased with the conversation we had with Bill and your team and it sounded like many of our requests would have a favorable hearing in front of the Commission.

We don't believe our groups, which only represent a subset of the nonprofits affected by these rules, need a training unless you think that will help us collectively determine which rule requests we can bring to the next Commission meeting.

Please advise and thank you for your time and consideration.

Best,  
Matt

-----  
Matt Little

Director of DU Public Policy, Western Region  
11805 NE 99th Street, Suite 1300  
Vancouver, WA 98682  
[mlittle@ducks.org](mailto:mlittle@ducks.org)  
(541) 678-2322



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**From:** McLean, Lisa (GMB) <[lisa.mclean@wsgc.wa.gov](mailto:lisa.mclean@wsgc.wa.gov)>  
**Sent:** Friday, July 14, 2023 11:36 AM  
**To:** Matt Little <[mlittle@ducks.org](mailto:mlittle@ducks.org)>; [tiffany@nonprofitwa.org](mailto:tiffany@nonprofitwa.org); [abaier@rmef.org](mailto:abaier@rmef.org); [eric.demers@pediatrix.com](mailto:eric.demers@pediatrix.com); Kirk A. Struble <[kstruble@ducks.org](mailto:kstruble@ducks.org)>; [nello.picinich@ccawashington.org](mailto:nello.picinich@ccawashington.org); Keely Hopkins <[khopkins@congressionalsportsmen.org](mailto:khopkins@congressionalsportsmen.org)>  
**Cc:** Nicks, Jim (GMB) <[jim.nicks@wsgc.wa.gov](mailto:jim.nicks@wsgc.wa.gov)>; Melville, Jim (GMB) <[jim.melville@wsgc.wa.gov](mailto:jim.melville@wsgc.wa.gov)>; McGregor, Bill (GMB) <[bill.mcgregor@wsgc.wa.gov](mailto:bill.mcgregor@wsgc.wa.gov)>  
**Subject:** RE: Follow up on June 29 Meeting

**CAUTION:** - This email originated outside of Ducks Unlimited.

Oops, I wrote Alex's email wrong and don't want him to get left off the email string should someone "reply all"...

Lisa C McLean  
Legislative and Policy Manager  
Washington State Gambling Commission  
P.O. Box 42400  
Olympia, WA 98504  
Office: (360) 486-3454  
Cell: (360) 878-1903  
[lisa.mclean@wsgc.wa.gov](mailto:lisa.mclean@wsgc.wa.gov)



---

**From:** McLean, Lisa (GMB)  
**Sent:** Friday, July 14, 2023 11:34 AM  
**To:** Matt Little <[mlittle@ducks.org](mailto:mlittle@ducks.org)>; [tiffany@nonprofitwa.org](mailto:tiffany@nonprofitwa.org); [abaier@remef.org](mailto:abaier@remef.org); [eric.demers@pediatrix.com](mailto:eric.demers@pediatrix.com); [kstruble@ducks.org](mailto:kstruble@ducks.org); [nello.picinich@ccawashington.org](mailto:nello.picinich@ccawashington.org); Keely Hopkins <[khopkins@congressionalsportsmen.org](mailto:khopkins@congressionalsportsmen.org)>  
**Cc:** Nicks, Jim (GMB) <[jim.nicks@wsgc.wa.gov](mailto:jim.nicks@wsgc.wa.gov)>; Melville, Jim (GMB) <[jim.melville@wsgc.wa.gov](mailto:jim.melville@wsgc.wa.gov)>; McGregor, Bill (GMB) <[bill.mcgregor@wsgc.wa.gov](mailto:bill.mcgregor@wsgc.wa.gov)>  
**Subject:** Follow up on June 29 Meeting



Hi all –

To follow up on our meeting at the end of June, WSGC Special Agent Supervisor Bill McGregor remains open to organizing an advanced training for you and your colleagues. To organize that training, it would be most helpful for him to receive a written list of concerns from you all so that he can research the background of certain rules and be prepared to give you information about the context of the rule and how to apply it.

I will drop out of this conversation and suggest that you connect directly with Bill (with a cc to Agent in Charge (Regulation) Jim Nicks and Special Agent (Regulation) Jim Melville) so that he can begin working on the training.

With best regards,  
Lisa

Lisa C McLean  
Legislative and Policy Manager  
Washington State Gambling Commission  
P.O. Box 42400  
Olympia, WA 98504  
Office: (360) 486-3454  
Cell: (360) 878-1903  
[lisa.mclean@wsgc.wa.gov](mailto:lisa.mclean@wsgc.wa.gov)



# Washington nonprofit rules request changes for WA Gambling Commission

July 2023

## KEEPING UP WITH INFLATION

### WAC 230-11-100

(1) Licensees conducting raffles with gross gambling receipts of **fifty thousand dollars** or less in their previous license year and organizations conducting unlicensed raffles under the authority of RCW 9.46.0315 or 9.46.0321 must keep a record by month of the following:

- (a) Gross receipts; and
- (b) Prizes paid; and
- (c) Net income; and
- (d) Documentation of expenses; and
- (e) Documentation of how the proceeds were used.

(2) Licensees conducting raffles with gross gambling receipts over **fifty thousand dollars** in their initial license year, with gross gambling receipts over **fifty thousand dollars** in their previous license year, offering prizes that require approval per WAC 230-11-067, or conducting raffles using alternative drawing formats must prepare a detailed record for each raffle they conduct. Licensees must:

- (a) Record all data required in the standard format we provide; and
- (b) Maintain the following:
  - (i) Validated deposit receipts for each deposit of raffle proceeds; and
  - (ii) All winning tickets; and
  - (iii) Name, address, and telephone number of all winners of a prize with a fair market value of more than **fifty dollars**; and
  - (iv) **All ticket stubs for raffles** that participants are not required to be present at the drawing; and
  - (v) All unsold tickets for individual raffles for which gross gambling receipts exceed **five thousand dollars**; and
  - (vi) Invoices and other documentation recording the purchase or receipt of prizes; and
  - (vii) Invoices and other documentation recording the purchase of tickets and other expenses of the raffle; and
- (c) Complete all records no later than **thirty days following the drawing.**"

### Requests:

- Adjust dollar amounts upward to fully account for inflation since time of inception and/or include an annual or periodic increase to adjust for inflation
- Adjust Section 1(b)(iii) from \$50 to \$600 to align with IRS requirements
- Eliminate Section 2(b)(iv)

### WAC 230-11-067:

Requesting commission approval prior to offering raffle prizes exceeding **forty thousand dollars** per prize or **three hundred thousand** dollars in a license year.

### Requests:

- As above, can we adjust these dollar figures to account for inflation since inception?
  - If unable to justify a full adjustment for inflation, perhaps consider \$80,000 and \$500,00 respectively

### WAC 230-11-085:

(1) Licensees may use modified ticket pricing plans at members-only raffles when gross revenues do not exceed five thousand five dollars. One type of modified pricing plan is a penny raffle. A penny raffle is a raffle where licensees sell five hundred consecutively numbered tickets. Participants randomly choose tickets and pay the consecutive number of the ticket multiplied by a predetermined cost, for instance, one penny.

(2) In modified pricing plans, licensees may sell tickets to enter a raffle for different values, not to exceed **ten dollars** for a single ticket, if the licensee:

(a) Discloses to the participants the pricing plan before selling them a ticket to participate. The licensee must disclose to the participant the total number of tickets in the population available and the number of tickets at each price level; and

(b) Allows participants to randomly select their ticket from the population of remaining tickets and pay the amount printed on the ticket they select; and

(c) Establishes records for an adequate audit trail to determine gross gambling receipts; and

(d) Holds no more than two such drawings during a meeting or event; and

(e) Sells multiple tickets to enter one or more drawings as a package and the total price of the package must not exceed **twenty-five dollars**.

**Request:**

- As above, increase maximum price for single ticket from \$10 to \$25 (section 2) and the maximum price of a package of tickets from \$25 to \$100 (section 2(e)). This would serve to both help maximum ticket prices keep up with inflation as well as allowing better and more valuable prizes to be used in such raffles.

WAC 230-11-014:

(1) Raffle tickets must not be sold for more than **one hundred dollars** each; and

(2) Enhanced raffle tickets must not be sold for more than two hundred fifty dollars each.

**Request:**

- As above, increase to \$250 and allow for inflation annually/periodically.

-----

## **EASING RECORD KEEPING BURDEN**

WAC 230-07-130

(1) Charitable or nonprofit licensees, except agricultural fairs, must maintain records which clearly show how the licensee used or disbursed the funds from each licensed activity. These records must provide an audit trail satisfactory for us to verify that the funds were used for the licensees' stated purpose(s). These records must include, at least, canceled checks for the disbursements. (2) Charitable or nonprofit licensees must keep these records for **three years** from the end of the license year for which the record was created.

WAC 230-11-105

(1) Records for unlicensed raffles must be kept for one year following the date of the raffle drawing.

(2) Records for licensed raffles must be kept for **three years** from the end of the licensees' fiscal year in which the raffle was completed.

**Request:**

- Change record-keeping from 3 years to 1

WAC 230-11-100

(2) Licensees conducting raffles with gross gambling receipts over fifty thousand dollars in their initial license year, with gross gambling receipts over fifty thousand dollars in their previous license year, offering prizes that require approval per WAC [230-11-067](#), or conducting raffles using alternative drawing formats must prepare a detailed record for each raffle they conduct. Licensees must:

(a) Record all data required in the standard format we provide; and

(b) Maintain the following:

(i) Validated deposit receipts for each deposit of raffle proceeds; and

(ii) All winning tickets; and

(iii) Name, address, and telephone number of all winners of a prize with a fair market value of more than fifty dollars; and

(iv) All ticket stubs for raffles that participants are not required to be present at the drawing; and

(v) All unsold tickets for individual raffles for which gross gambling receipts exceed five thousand dollars; and

(vi) Invoices and other documentation recording the purchase or receipt of prizes; and

(vii) Invoices and other documentation recording the purchase of tickets and other expenses of the raffle; and

(c) Complete all records no later than thirty days following the drawing.

**Request:**

- Keep only winning tickets

WAC 230-11-100

(2) Licensees conducting raffles with gross gambling receipts over fifty thousand dollars in their initial license year, with gross gambling receipts over fifty thousand dollars in their previous license year, offering prizes that require approval per WAC [230-11-067](#), or conducting raffles using alternative drawing formats must prepare a detailed record for each raffle they conduct. Licensees must:

(a) Record all data required in the standard format we provide; and

(b) Maintain the following:

(i) Validated deposit receipts for each deposit of raffle proceeds; and

(ii) All winning tickets; and

(iii) Name, address, and telephone number of all winners of a prize with a fair market value of more than fifty dollars; and

(iv) All ticket stubs for raffles that participants are not required to be present at the drawing; and

(v) All unsold tickets for individual raffles for which gross gambling receipts exceed five thousand dollars; and

(vi) Invoices and other documentation recording the purchase or receipt of prizes; and

(vii) Invoices and other documentation recording the purchase of tickets and other expenses of the raffle; and

(c) Complete all records no later than thirty days following the drawing.

**Request:**

- Allow quarterly record-keeping/report by amend section 2(c) from, "...no later than thirty days following the drawing," to, "no later than thirty days following the quarter in which the drawing took place." This better aligns the record keeping requirement with the required quarterly report filings.

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**MEMBERS-ONLY RAFFLES ALLOWING FOR SPOUSES/GUESTS**

WAC 230-11-075:

The total number of guests participating in a raffle must not exceed **twenty-five percent** of the total attendance of the meeting. The organization must maintain records to show compliance with this requirement.

**Request:**

- Increase cap on guests from 25% to 50% to allow for spouses/partners/guests participating in members only raffles.

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## CREDIT CARD TRANSACTIONS AT END OF EVENT

WAC 230-06-035:

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

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

(a) Gambling promotions; or

(b) Transportation services to and from gambling activities; or

(c) Free or discounted food, drink, or merchandise which:

(i) Costs less than \$500 per individual item; and

(ii) Must not be traded back to you for cash; and

(iii) Must not give a chance to participate further in an authorized gambling activity.

(3) You must collect the price required to participate in the gambling activity in full **before** allowing someone to participate. Authorized payment methods include cash, check, gift certificate, gift card, or debit card.

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

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

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

**Request:**

- Consider allowing for 1 credit/debit card transaction **at the end** of an event (i.e. for raffle tickets purchased during the event, as well as live and silent auction items). This would serve to both make conducting raffles during an event more streamlined and simple, as well as helping to ease the financial burden on non-profits in regards to credit card fees imposed by credit card companies.

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## RAFFLE TICKET SALES ASSOCIATES

WAC 230-11-035:

(1) Organizations must not pay members or volunteers for selling tickets or managing or operating a raffle, unless the person is a full-time or part-time employee of the organization with duties other than selling tickets or managing or operating raffles.

(2) Licensees may provide members or volunteers with noncash incentives for selling tickets if the licensee:

(a) Bases the incentives on the number of tickets sold; and

(b) Gives incentives that do not exceed five percent of the gross gambling receipts of the raffle; and

(c) Maintains a record of the name, address, and telephone number of all persons receiving incentives.

### Requests:

- To comply with RCW and the WAC above, can we pay raffle ticket sales associates if they are paid via organizational revenue only, separate from raffle revenue (as we do for all our fundraising staff)
- Better define noncash incentives above or limit them only to organizational revenue, not from raffle proceeds

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## TECHNOLOGY – ALLOWING TELEPHONE PAYMENTS, PAYMENTS BY MAIL, AND YOUTH PARTICIPATION

(No WAC found, but these prohibitions below are listed [here](#) on page two under, “Selling tickets”:

• Tickets must be paid for in full by cash, check, or credit card. No IOU's.

• Tickets cannot be sold over the Internet or telephone.

• Tickets and/or payment for tickets cannot be mailed.

• Individuals under 18 years of age may sell tickets, only if (WAC 230-06-010):

- Your organization's primary purpose is to develop youth; and
- At least three members of your organization, age 18 or older, supervise the raffle; and
- A member, 18 years or older, manages the raffle.

### Requests:

- Consider allowing for ticket sales over the telephone (which is currently considered a “wire transfer”). Credit cards are already a permissible form of payment for raffle tickets for non-profits; taking a credit card payment over the phone is functionally the same as taking that same credit card payment face to face.
- Consider allowing for non-profits to be able to accept an order form for raffle tickets via mail, provided that physical tickets or ticket stubs are not sent via mail. This is already being permitted in WA in the case of both the WA Wild Sheep Foundation's Rocky Mountain Bighorn Sheep Raffle (info available on their website, [washingtonwsf.org](http://washingtonwsf.org)) as well as the “Buckrun Mule Deer Raffle Contest,” the information about which and the order form for is available to the public in the Washington Big Game Hunting Regulations at the bottom of page 3. This particular ad/order form also states, “Buy 5 entries, get 1 free!,” which

seems to also be out of compliance in regards to offering free tickets or offering discounted pricing plans for multiple ticket purchases.

- Allow college clubs or youth to sell tickets at their fundraising events if organizations have a charitable mission, not just to “develop youth”

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## TICKET BUNDLING AND DISCOUNT PLANS

### WAC 230-11-025:

- (1) Licensees may put tickets together in a bundle and sell them at a discount level if they:
  - (a) Create the discount levels before selling any raffle tickets; and*
  - (b) Do not change the discount levels during the raffle; and*
  - (c) Make single nondiscounted tickets available to all participants; and*
  - (d) Use up to three discount levels for each raffle; and**
- (2) Booklets of bundled discounted tickets must contain the number of tickets named in the discount levels; and*
- (3) Licensees must not remove tickets from a booklet to sell them individually; and*
- (4) Each booklet of bundled tickets must have the following information printed on the cover:
  - (a) A description of the discount levels; and*
  - (b) The number of tickets in the booklet; and*
  - (c) The total cost of the booklet; and*
  - (d) A consecutive number; and**
- (5) Licensees must establish controls and accounting procedures necessary to determine gross gambling receipts from ticket sale*

### **Requests:**

- Make establishing discount plans simpler by removing the pre-bundled booklet requirement or allow for bundled tickets to be broken out and sold individually at full price.
  - Raffles are a gambling activity and gamblers like to know their odds. If making odds known and available to the public, we cannot do discount plans because of the requirement of pre-bundling combined with the restriction of not being able to break out tickets from a bundle.
  - Extra tickets would have to be available if the goal is to sell say 100 tickets. We need to sell 100 to make our margin so can't simply set aside a portion of the tickets that are bundled to be part of the discount plan tickets in the hope that we can sell them all when there would be people who would want to buy at full price. The opposite is also true, we could sell out of all the pre-made bundles, have the discount plan advertised per raffle rules, and run into the situation where people refuse to buy a single ticket because we are refusing to sell the advertised bundle.



**Rule Petition to Amend**

- WAC 230-11-075 Limit number of guests for members-only raffles.
- WAC 230-11-085 Modified and discounted pricing plans for tickets for members-only raffles.
- WAC 230-11-086 Discounted pricing plans for tickets to members-only raffles.
- WAC 230-11-087 Other pricing plans for members-only raffles.
- WAC 230-11-105 Retain and store raffle records.

**SEPTEMBER 2023 – Commission Review**  
**JULY 2023 – Rule-Making Petition Received**

<b>Tab 6: SEPTEMBER 2023 Commission Meeting</b>	<b>Statutory Authority 9.46.070</b>
<b>Who Proposed the Rule Change?</b>	
<p>Alex Baier, on behalf of Rocky Mountain Elk Foundation, Olympia, WA  Tiffany Brace, on behalf of Nonprofit Association of Washington, Seattle, WA  Keely Hopkins, on behalf of Congressional Sportsmen’s Foundation, Vancouver, WA  Matt Little, on behalf of Ducks Unlimited, Vancouver, WA  Nello Picinich, on behalf of Coastal Conservation Association, Vancouver, WA</p>	
<b>Background</b>	
<p>Several nonprofits operating in Washington state have proposed multiple amendments to rules related to nonprofits and raffles. We have split the petition into three separate rules packages: 1) the suggested amendments on which the Commission may want to initiate rulemaking; 2) the suggested amendments on which the Commission may want to deny petitioners’ request; and 3) the suggested amendment that staff believes is a policy question on which the Commissioners should decide. This rules package is the <b>first part of the package</b> and is explained as:</p> <ol style="list-style-type: none"> <li>1) To keep up with inflation, petitioners request that, in WAC 230-11-085, the \$10 maximum on the price of a single ticket and \$25 maximum on the price of a discounted package of tickets be raised to \$25 and \$100, respectively, and that appropriate changes be made to WAC 230-11-086 and WAC 230-11-087.</li> <li>2) To ease the burden of record-keeping, petitioners would like a reduction to one year for the requirements to hold onto records for three years from the end of the licensee’s fiscal year in WAC 230-11-105.</li> <li>3) Allowing more guests to participate in a member-only raffle – Currently, WAC 230-11-075 states that guests must not exceed 25 percent of total attendance, which petitioners would like raised to 50 percent.</li> </ol> <p>Attachments:</p> <ul style="list-style-type: none"> <li>• Petition – Updated September 12, 2023</li> <li>• Original Petition – July 20, 2023</li> </ul>	
<b>Policy Considerations</b>	
Staff believes that the petitioners’ ideas for changes are worthy of consideration.	



- 1) WAC 230-11-085 sets the maximum prices for a single ticket and a discounted package of tickets at \$10 and \$25, respectively. Increasing these price limits to \$25 and \$100, respectively, does not raise any regulatory concerns with commission staff. The maximum ticket price in 1995 was \$5.00. It was raised to \$25 in 2009. Any change to WAC 230-11-085 may necessitate changes to WAC 230-11-086 and WAC 230-11-087, which also limit maximum prices to \$10 and \$25 for individual and packaged tickets.
- 2) The three-year record retention requirements in WAC 230-11-105 are connected to WAC 230-11-100, which requires licensees conducting raffles with gross gambling receipts of more than \$50,000 in a year to keep all winning tickets, all ticket stubs for raffles where participants were not required to be present, and all unsold tickets for individual raffles with gross gambling receipts of more than \$5,000. Commission staff understands the storage burden this requirement might place on some organizations conducting many raffles, but also believes that these items are necessary to check in the event of a complaint. Nonetheless, it might be possible to maintain a three-year retention requirement for some items but allow for destruction or disposal of the bulkier items after only a year.
- 3) WAC 230-11-075 defines the limit on the number of guests for a members-only raffle, currently set at 25 percent. Increasing the number of guests attending the event to 50 percent does not pose any regulatory concerns for staff.

**Staff Recommendation**

Staff recommends initiating rule-making proceedings for further discussion.



### Rule Petition to Amend

WAC 230-11-065 Raffle prizes.

WAC 230-11-067 Requesting commission approval prior to offering raffle prizes exceeding \$40,000 per prize or \$300,000 in a license year.

**SEPTEMBER 2023 – Commission Review**  
**JULY 2023 – Rule-Making Petition Received**

Tab 8: SEPTEMBER 2023 Commission Meeting	Statutory Authority 9.46.070
<b>Who Proposed the Rule Change?</b>	
<p>Alex Baier, on behalf of Rocky Mountain Elk Foundation, Olympia, WA Tiffany Brace, on behalf of Nonprofit Association of Washington, Seattle, WA Keely Hopkins, on behalf of Congressional Sportsmen’s Foundation, Vancouver, WA Matt Little, on behalf of Ducks Unlimited, Vancouver, WA Nello Picinich, on behalf of Coastal Conservation Association, Vancouver, WA</p>	
<b>Background</b>	
<p>Several nonprofits operating in Washington state have proposed multiple amendments to rules related to nonprofits and raffles. We have split the petition into three separate rules packages: 1) the suggested amendments on which the Commission may want to initiate rulemaking; 2) the suggested amendments on which the Commission may want to deny petitioners’ request; and 3) the suggested amendment that staff believes is a policy question on which the Commissioners should decide. This rules package is the <b>third part of the package</b>.</p>	
<p>The petitioners ask that the thresholds in WAC 230-11-067 be increased so the additional record keeping and Commission approvals commence at higher levels than the current \$40,000 per prize or \$300,000 in a license year. If the thresholds cannot be fully adjusted for inflation, petitioners ask if the thresholds could be raised to \$80,000 per prize or \$500,000 in a license year.</p>	
<p>The original rule was adopted in April 1983 when the Commission established \$40,000 as the cap on a single raffle prize, and \$80,000 as the cap on raffle prizes in a single year. The Commission could permit a licensee to exceed these limits on specific occasions if “good cause” was shown.</p>	
<p>WAC 230-11-065 was amended in 2010 to establish in a new rule (WAC 230-11-067) requiring submission of detailed raffle plan for Commissioner review and approval if a single raffle prize exceeded \$40,000 or \$80,000 annually. The new rule was amended in 2012 when the annual prize threshold that would trigger the need for Commission approval went from an \$80,000 cap to \$300,000. The threshold was also changed in WAC 230-11-065. The 2012 amendment also added a list of items licensees must submit with their plan to exceed the \$300,000 annual prize limit.</p>	
<p>Attachments:</p>	
<ul style="list-style-type: none"><li>• Petition</li><li>• WAC 230-11-065</li><li>• WAC 230-11-067</li></ul>	

### **Policy Considerations**

The \$40,000 per prize threshold and the \$300,000 in a calendar year threshold that trigger submission of a plan and Commission approval in WAC 230-11-067 exist to protect the charitable or nonprofit organization by making sure they have a well-developed plan to ensure success.

### **Staff Recommendation**

Under the requirements of the Administrative Procedure Act, the Commission must take action on a petition within 60 days of receiving it. Your options are to:

- Initiate rule-making proceedings for further discussion; or
- Deny the petition in writing, a) stating the reasons for the denial, specifically addressing the concerns stated in the petition, or b) indicating alternative means by which the agency will address the concerns raised in the petition.



### Staff Proposed Rule Making

WAC 230-11-067 – Requesting commission approval prior to offering raffle prizes exceeding \$40,000 per prize or \$300,000 in a license year.

### September 2023 – Initiate Rule Making

<b>Tab 10: September 2023 Commission Meeting Agenda.</b>	<b>Statutory Authority 9.46.070</b>
<b>Who Proposed the Rule Change?</b>	
Washington State Gambling Commission Staff	
<b>Background</b>	
<p>Staff seeks to amend WAC 230-11-067 to add additional requirements for high value raffles. The requirements would be intended to protect the raffle organizer and raffle ticket buyers in the event that ticket sales fall short of expectations.</p> <p>Attachments:</p> <ul style="list-style-type: none"><li>• WAC 230-11-067</li></ul>	
<b>Staff Recommendation</b>	
Staff recommends initiating rulemaking to add additional requirements for high value raffles.	

Dear Commissioners of the Washington State Gambling Commission,

We, the undersigned organizations, are writing you in an attempt to provide clarification for our reasons to request increases to the thresholds of prizes awarded by non-profits outlined in WAC 230-11-067 before being required to present a raffle plan to the Commission.

The primary reason for this request is an attempt to adjust the WAC to keep up with the high rate of inflation which has been experienced since their last revision. As an example, the average cost of a new car increased by 13% from 2013 to 2023 with other common prize values increasing at a similar or greater pace. With the cost of goods having increased at such a rate which has required us to come before the commission on a regular basis when we previously had not encountered these thresholds, it seemed natural to attempt to address these thresholds along with our other good-faith requests to improve raffles for all non-profits in Washington State.

An additional concern that was mentioned when discussing our proposed rule changes was that there may be some organizations who intentionally limit their fundraising efforts to avoid approaching these thresholds and the requirement to come before the Commission to present their raffle plan. We thought that if these thresholds are a challenge impacting our organizations, others may be facing this challenge as well but without the resources or confidence to engage with the commission directly.

We recognize that our organizations and many others place a high emphasis on the importance of raffle sales for fundraising efforts because they provide the average citizen a chance of winning a high value item that they typically could not afford to purchase on their own. All the while they are supporting an organization whose mission they deeply believe in via their raffle purchase.

Since our request, we have found that there are few organizations who submit applications to exceed these thresholds, which should play a role in considering this request to amend the WAC. While we are certainly amendable to different thresholds that the commission may be more comfortable with, we feel as though our request to increase thresholds established in WAC 230-11-067 to \$80,000 for individual prizes and \$500,000 for total prizes awarded are reasonable given the ever-changing economic climate.

Thank you for your consideration of this request and our other requests. We are available for any questions you may have.

Respectfully,

Kim Pope, Boys & Girls Club of the Columbia Basin

Alex Baier, Rocky Mountain Elk Foundation

**From:** [Washington State Gambling Commission](#)  
**To:** [Rules Coordinator \(GMB\)](#)  
**Subject:** Webform submission from: Request for public comment  
**Date:** Wednesday, March 6, 2024 10:34:40 AM

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External Email

Submitted on March 6, 2024 - 10:34am

Submitted by: Anonymous

Submitted values are:

**Select a Topic**

Petition for Rule Change: Raffle Rules

**Your Name**

Ron Vessey

**Organization**

Outdoors for Our Heroes

**Comments**

My name is Ron Vessey. I am the vice president of a small local non-profit called Outdoors for Our Heroes (OFOH). My comments are on behalf of OFOH.

OFOH's mission is to help service-connected disabled veterans build hope, confidence and family strength through quality outdoor adventures. Specifically, we provide hunting and fishing trips at zero cost to our disabled veterans. Our organization is 100% volunteer based meaning our Board members, officers and volunteers receive no compensation whatsoever.

The petition for rule change regarding raffle rules enables our organization to reduce our costs and commit even more resources to our disabled community. For this reason, we strongly support your proposed changes to the raffle rules.

Sincerely,

Ron Vessey  
Vice President  
Outdoors for Our Heroes  
[Ron@outdoorsforourheroes.org](mailto:Ron@outdoorsforourheroes.org)

**From:** [Washington State Gambling Commission](#)  
**To:** [Rules Coordinator \(GMB\)](#)  
**Subject:** Webform submission from: Request for public comment  
**Date:** Monday, March 11, 2024 1:48:23 PM

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External Email

Submitted on March 11, 2024 - 1:48pm

Submitted by: Anonymous

Submitted values are:

**Select a Topic**

Petition for Rule Change: Raffle Rules

**Your Name**

Matt Little

**Organization**

14 Washington Nonprofit Organizations

**Comments**

The following 14 Washington nonprofit organizations are in support of the petition to improve charitable raffle fundraising activities under WAC 230-11 Raffles. These proposed rule changes will allow our nonprofit organizations to raise more revenue for important and diverse charitable missions throughout Washington. Thank you for your consideration.

Nonprofits in support:

Coastal Conservation Association

Delta Waterfowl

Ducks Unlimited

Elizabeth Gregory Home

Girl Scouts of Eastern WA

Iwamoto Go Outreach Foundation

Nonprofit Association of Washington

Northeast Washington Wildlife Group

Rocky Mountain Elk Foundation

Seattle Go Center

Teddy Roosevelt Conservation Partnership

The Mountaineers

Washington Initiative for Boys & Men

Washington State High School Clay Target League

AMENDATORY SECTION (Amending WSR 13-19-056, filed 9/16/13, effective 10/17/13)

**WAC 230-11-065 Raffle prizes.** (1) Organizations must own the prizes offered to winners before the date of the drawing. However, if the winner has an option to receive a cash prize instead of the merchandise, the organization may enter into a contract to purchase the merchandise prize after the winner chooses his or her option. The organization must have the funds to make the purchase on account before the date of the drawing.

(2) At the time and date of any raffle drawing, the organization must have on deposit an unencumbered amount of money that is equal to or greater than all cash prizes being offered in the raffle. The organization must have these funds deposited in the gambling receipts account, if required, or in a recognized Washington state depository authorized to receive funds. The organization must not reduce the balance of funds available from this account below the required amount before awarding the prize(s).

(3) Raffle prizes must:

(a) Be available at the time and place of the drawing; and

(b) If cash, be United States currency or an equivalent amount of negotiable instruments; and

(c) For licensees, not exceed (~~forty thousand dollars~~) \$60,000 per prize or (~~three hundred thousand dollars~~) \$400,000 in total raffle prizes in a license year, except as authorized in WAC 230-11-067.

(4) For enhanced raffles, a purchase contract is not necessary for smaller noncash prizes, but the bona fide charitable or nonprofit organization must be able to demonstrate that such a prize is available and sufficient funds are held in reserve in the event that the winner chooses a noncash prize.

AMENDATORY SECTION (Amending WSR 12-05-067, filed 2/15/12, effective 3/17/12)

**WAC 230-11-067 Requesting commission approval prior to offering raffle prizes exceeding (~~forty thousand dollars~~) \$60,000 per prize or (~~three hundred thousand dollars~~) \$400,000 in a license year.** (1) The commissioners may vote to approve a licensee to exceed raffle prize limits if a licensee shows good cause in writing.

(2) Prior to offering raffle prizes that exceed (~~forty thousand dollars~~) \$60,000 per prize, the licensee must submit a raffle plan to us that includes at least the following information:

(a) The organization's goals for conducting the raffle; 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) Specific details of the raffle rules including:

(i) Date of the drawing; and

(ii) Cost of raffle tickets; and

(iii) Prizes available; and

(iv) Security of prizes; and

(v) Plans for selling raffle tickets; and



(vi) Description of how the licensee protects the integrity of the raffle; and

(d) An explanation of how the proceeds from the raffle will be used; and

(e) A plan to protect the licensee in the event of low ticket sales and other risks. Provided, that if the organization determines that ticket sales are below the number of tickets disclosed in the raffle plan required to award the grand prize, the winner must receive at least 50 percent of the net proceeds in excess of expenses; and

(f) An explanation of how the licensee will purchase the prize(s) for the raffle; and

(g) A projected budget including:

(i) Estimated gross gambling receipts, expenses, and net income for the raffle; and

(ii) Minimum number of projected ticket sales to break even; and

(iii) Corresponding sales and prize levels with projected revenues and expenses for each level; and

(iv) Minimum and maximum prizes available; and

(h) Any other information that we request or any information the licensee wishes to submit.

(3) Prior to offering raffle prizes that exceed (~~three hundred thousand dollars~~) \$400,000 in a license year, 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.

AMENDATORY SECTION (Amending WSR 06-20-040, filed 9/26/06, effective 1/1/08)

**WAC 230-11-075 Limit number of guests for members-only raffles.**

If guests are allowed to participate in the raffle, the total number of guests (~~participating in a raffle~~) at the event must not exceed (~~twenty-five~~) 50 percent of the total attendance (~~of the meeting~~). The organization must maintain records to show compliance with this requirement.

AMENDATORY SECTION (Amending WSR 07-21-116, filed 10/22/07, effective 1/1/08)

**WAC 230-11-085 Modified (~~and discounted~~) pricing plans for tickets for members-only raffles.** (1) Licensees may use modified ticket pricing plans at members-only raffles when gross revenues do not exceed (~~five thousand five dollars~~) \$5,005. One type of modified

pricing plan is a penny raffle. A penny raffle is a raffle where licensees sell ~~((five hundred))~~ 500 consecutively numbered tickets. Participants randomly choose tickets and pay the consecutive number of the ticket multiplied by a predetermined cost, for instance, one penny.

(2) In modified pricing plans, licensees may sell tickets to enter a raffle for different values, not to exceed ~~((ten dollars))~~ \$10 for a single ticket, if the licensee:

(a) Discloses to the participants the pricing plan before selling them a ticket to participate. The licensee must disclose to the participant the total number of tickets in the population available and the number of tickets at each price level; and

(b) Allows participants to randomly select their ticket from the population of remaining tickets and pay the amount printed on the ticket they select; and

(c) Establishes records for an adequate audit trail to determine gross gambling receipts; and

(d) Holds no more than two such drawings during a meeting or event ~~(; and~~

~~(e) Sells multiple tickets to enter one or more drawings as a package and the total price of the package must not exceed twenty-five dollars)).~~

AMENDATORY SECTION (Amending WSR 06-20-040, filed 9/26/06, effective 1/1/08)

**WAC 230-11-086 Discounted pricing plans for tickets to members-only raffles.** In discounted pricing plans, licensees may sell tickets for a discounted price based on the number of tickets a player purchases if:

(1) The amount of the discount is set before any raffle tickets are sold; and

(2) Participants are allowed to purchase a single ticket; and

(3) There is only one discount plan for each raffle; and

(4) The cost of a single ticket, without a discount, does not exceed ~~((ten dollars; and~~

~~(5) The total cost of a discount package does not exceed twenty-five dollars))~~ \$100; and

~~((6))~~ (5) The cost of a single ticket is printed on each ticket (for example, one dollar each); and

~~((7))~~ (6) The discounted tickets are identified by a unique ticket audit numbering system; and

~~((8))~~ (7) The licensee establishes an audit system that includes internal controls and procedures to determine gross gambling receipts from the sale of tickets using a discounted pricing plan.

AMENDATORY SECTION (Amending WSR 17-23-170, filed 11/21/17, effective 12/22/17)

**WAC 230-11-087 Other pricing plans for members-only raffles.**

(1) Licensees may sell multiple tickets to enter one or more drawings



## Staff Proposed Rule Making

New Rule

WAC 230-03-182 Additional requirements for nonhouse-banked, Class F, and house-banked card rooms.

Repeal

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

March 2024 – Final Action

January 2024 – Discussion and Possible Filing

October 2023 – Initiate Rule Making

### Tab 5: MARCH 2024 Commission Meeting Agenda.

Statutory Authority 9.46.070

#### Who Proposed the Rule Change?

Washington State Gambling Commission Staff

#### Background

##### **BOLD = Changes made since February 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.

At the Commission meeting on February 8, 2024, Eric Persson stated that he believes the amended rule language is unconstitutional and is a violation of his fifth amendment rights.

Attachment:

- Email from Vicki Christopherson on January 15, 2024

#### **Policy Considerations**

In 2010, the Commissioners authorized card rooms licensed prior to the effective date of the rule, to be adjacent to each other regardless of the physical attributes of the buildings into perpetuity.

#### **Staff Recommendation**

Staff recommends refiling the rule striking the last sentence in subsection 2, which states, “The provisions of subsection (1) of this section will take effect upon the issuance of a new license.”

Or

The commissioners could take final action on the rule as presented after the rules hearing with an effective date of 31 days after filing with the Code Reviser.

**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](#)

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External Email

Good morning Tina and Damon,

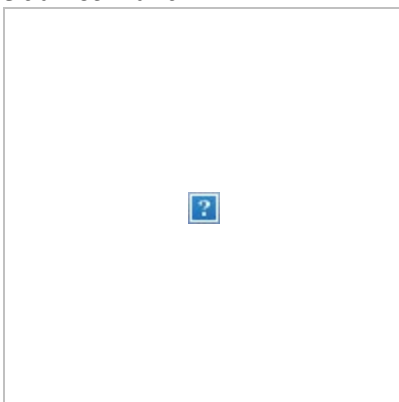
Thanks for the robust conversation during the commission meeting last week. We appreciate the willingness to clarify the issues surrounding this rule.

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.



**Staff Proposed Rule Making**  
 New Rule WAC 230-06-068 – Problem Gambling Signage

**MARCH 2024 – Discussion and Possible Filing**  
**April 2023 – Initiate Rule Making**

<b>Tab 6: MARCH 2024 Commission Meeting Agenda.</b>	<b>Statutory Authority 9.46.070</b>
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<b>Who Proposed the Rule Change?</b>
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Washington State Gambling Commission
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<b>Background</b>
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At the April 2023 Commission meeting, Commissioners initiated rule making on problem gambling signage other. After reviewing the rules of 18 states and two Canadian provinces, staff prepared the attached rule language that, if adopted, would become part of the Commission’s rule chapter that applies to all licensees.

This rulemaking aims to address problem gambling by:

- Requiring licensees to display problem gambling signage at all public entrances and exits to the gambling area of the business; in or near the gambling area(s); and in any areas where cash or electronic transfers of funds are available to patrons within the designated gambling area.
- Requiring all advertising materials to contain a responsible gambling message.
- Requiring all advertising, marketing, or promotional materials to include a clear “opt-out” method that would allow patrons to unsubscribe from future advertising, marketing, or promotional communications.

In January and February 2024, staff sought feedback on the proposed rule language from:

- Roxane Waldron, Program Manager of the state’s Problem Gambling program within the Health Care Authority,
- Maureen Greeley, Director of the Evergreen Council on Problem Gambling, and
- All licensees, except sport wagering vendors and individuals.

To ensure our tribal partners are informed of agency rule making, we will be providing new rule notices and information on feedback sessions for all rules being considered by the Commission.

Attachment:

- WAC 230-06-068
- February 29, 2024, email from Gideon Cauffman, Vice-Chair of the Jamestown S’Klallam Tribal Gaming Commission

<b>Policy Considerations</b>
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As the Commission considers staff-proposed language for a new rule on problem gambling signage, Commissioners may want to keep in mind the provisions already contained in statute:

- RCW 9.46.071(b): The Washington state gambling commission, the Washington horse racing commission, and the state lottery commission shall jointly develop problem gambling and gambling disorder informational signs, which include a toll-free hotline number for individuals

with a gambling problem or gambling disorder. The signs shall be placed in the establishments of gambling licensees, horse racing licensees, and lottery retailers.

- RCW 9.46.072: An entity licensed under RCW 9.46.070(1) which conducts or allows its premises to be used for conducting bingo on more than three occasions per week shall include the following statement in any advertising or promotion of gambling activity conducted by the licensee: “CAUTION: Participation in gambling activity may result in pathological gambling behavior causing emotional and financial harm. For help, call 1-800-547-6133.” For purposes of this section, “advertising” includes print media, point-of-sale advertising, electronic media, billboards, and radio advertising.

**Staff Recommendation**

**Staff recommends filing the attached draft rule language for further discussion after holding a public hearing.**

NEW SECTION

**WAC 230-06-068 Problem gambling signage and posting requirements.** (1) The commission will provide licensees with problem gambling, gambling disorder, and responsible gambling informational signs, which include a responsible gambling message and a toll-free helpline number for problem gambling and gambling disorders. The signs must be conspicuously posted: At all public entrances and exits to the gambling area of the business; in or near the gambling area(s); and in any areas where cash or electronic transfers of funds are available to patrons within the designated gambling area.

(2) All advertising materials must contain a responsible gambling message.

(a) Advertising is any notice or communication to the public of any information concerning the gambling-related business of the licensee through broadcasting, publication, or any other means of dissemination.

(b) For bingo licensees conducting bingo on more than three occasions per week, advertisements must follow RCW 9.46.072.

(c) The responsible gambling message must include, at a minimum, the statement "play responsibly" or similar language and the toll-free telephone helpline number for problem gambling and gambling disorders. Provided, an alternative to the responsible gambling message would be to contain the words "If you or someone you know has been harmed by gambling and wants help, call 1-800-GAMBLER."

(3) All direct advertising, marketing, or promotional materials must include a clear and conspicuous method allowing patrons to unsubscribe from future advertising, marketing, or promotional communications.

(4) This rule does not apply to major, mid-level, or ancillary sports wagering vendors.

**From:** [Gideon Cauffman](#)  
**To:** [Rules Coordinator \(GMB\)](#)  
**Subject:** Public signage for problem gambling  
**Date:** Thursday, February 29, 2024 11:14:09 AM

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External Email

Greetings,

I support the rule change for problem gambling signage. It would be helpful for the entire community of Washington.

Kind Regards,

Gideon Cauffman  
Vice-Chair  
Jamestown S'Klallam Tribal Gaming Commission

Sent from my iPhone



## Staff Proposed Rulemaking

### New Rules

WAC Chapter 230-15

### Amend

WAC 230-15-050 Minimum cash on hand requirements.

## MARCH 2024 – Initiate Rulemaking

Tab 7: MARCH 2024 Commission Meeting Agenda.

Statutory Authority 9.46.070

### Who Proposed the Rule Change?

Washington State Gambling Commission Staff

### Background

At the November 2023 Commission meeting, Commissioners asked staff to work with stakeholders to determine if rulemaking could address recent stakeholder concerns regarding the minimum cash on hand requirements for house-banked card rooms.

Currently, our rules require house-banked card game licensees to have sufficient cash on hand to redeem all chips issued for play and pay out all prizes. Failure to keep funds to cash in chips, pay prizes, or redeem gambling related checks is prima facie evidence of fraud (WAC 230-15-050).

To ensure that house-banked card game licensees have sufficient cash on hand to redeem all chips for play and pay out all prizes, we require, by rule, house-banked card rooms to have a minimum amount of cash on hand based on a formula:

- At least \$1,000 for each house-banked table on the gambling floor, plus
- The amount of the largest single prize available, excluding progressive, player-supported, and house jackpot prizes.

Staff has found that the formula to calculate “*sufficient cash on hand to redeem all chips issued for play and pay out all prizes*” may not be adequate for all house-banked card game licensees. Rulemaking is needed to address staff’s concerns as follows:

- Some house-banked card rooms have had difficulty cashing out players’ chips at the cashier’s cage even though they met our minimum cash on hand requirements. These were cases where a player did not win a large prize, but were rather cashing out a large amount of chips from winning multiple smaller hands.
- It is rare for players to win large prizes in the tens of thousands of dollars at house-banked card rooms. Rather, general day to day operations in house-banked card rooms involves multiple players purchasing chips at tables and then redeeming chips at the cashier’s cage. Card rooms generally maintain cash in the cashier’s cage based on the volume of gambling in their facility, not based on the potential for someone to win a rare large prize.
- Consistency with other states. Other states minimum cash on hand requirements are based on volume of gambling, rather than a single large prize that may or may not be won. For example, the Nevada Gaming Control Board’s calculation for minimum cash on hand is a per table requirement plus 1% of gross gaming revenue (volume) from the last fiscal year. The National Indian Gaming Commission has the same calculation as Nevada for minimum cash on hand.
- In 2023, wager limits were increased from \$300 to \$400. Players are now able to buy more chips for play, and in turn, card rooms may have to redeem more chips at the cashier’s cage. The minimum cash on hand formula should address this potential greater influx of gaming.
- The “*largest single prize*” offered by almost every card room in the state is an odds-based prize that has an aggregate payout limit attached to it according to WAC 230-15-490. For example, a

card room that offers a game that has 8000-1 odds and \$400 wagering limits can limit the prize to \$20,000 according to WAC 230-15-490. The \$20,000 aggregated prize becomes the “*largest single prize*” according to the formula in WAC 230-15-050. This was the same “*largest single prize*” amount in 2008 when the wagering limits were only \$200.

Staff has also found that rules only allow house-banked card game licensees to write checks for progressive jackpots, player supported jackpots, and house jackpots. Current rules do not specifically authorize checks to be written for large odds-based and fixed-based prizes (e.g. the prizes in Masque’s card game).

Attachments:

- WAC 230-15-050

#### **Staff Recommendation**

**Staff recommends initiating rulemaking to amend WAC 230-15-050 and create new rules related to how prizes can be paid.**

**WAC 230-15-050 Minimum cash on hand requirements.** (1) Card game licensees must have sufficient cash on hand to redeem all chips issued for play and pay out all prizes.

(2) Within three hours of opening for the business day, at a time included in the internal controls, house-banked card game licensees must have at least the following minimum amount of cash on premises in their cage, safe, and vault combined:

(a) One thousand dollars for each house-banked table on the gambling floor; plus

(b) The amount of the largest single prize available excluding progressive jackpot, player-supported jackpot, and house jackpot prizes.

For example: If a house-banked card room has 15 house-banked tables and a largest single prize of \$23,000, before opening, the cage must have at least \$38,000 on hand: 15 tables x \$1,000 = \$15,000 + largest single prize of \$23,000 = \$38,000.

(3) Except for the restrictions on player-supported jackpot pay outs in WAC 230-15-405 and progressive jackpot pay outs in WAC 230-15-690, licensees may pay prizes by check if sufficient funds are available on deposit.

(4) Failure to keep funds to cash in chips, pay prizes, or redeem gambling related checks is prima facie evidence of fraud. Meeting the minimum cage cash amount does not relieve the licensee from the requirement to have sufficient funds available to redeem all chips and pay out all prizes.

[Statutory Authority: RCW 9.46.070. WSR 22-01-182, § 230-15-050, filed 12/20/21, effective 1/20/22; WSR 09-03-024 (Order 640), § 230-15-050, filed 1/9/09, effective 2/9/09; WSR 07-23-081 (Order 620), § 230-15-050, filed 11/20/07, effective 1/1/08; WSR 07-09-033 (Order 608), § 230-15-050, filed 4/10/07, effective 1/1/08.]