



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

Gambling Commission Headquarters
Lacey, WA

COMMISSIONERS



Bud Sizemore
Chair



Julia Patterson
Vice Chair



Alicia Levy



Lauren King

EX OFFICIOS



Senator
Steve Conway



Senator
Jeff Holy



Representative
Shelley Kloba



Representative
Brandon Vick



David Trujillo
Director

STAFF



Washington State Gambling Commission

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WAGamblingCommission



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STATE OF WASHINGTON

GAMBLING COMMISSION

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

September Gambling Commission Meeting Agenda

Join Microsoft Teams Meeting

Thursday, September 10, 2020

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

Commissioners may take action on business items.

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

PUBLIC MEETING

11:00-1:30	Executive Session – Closed to the Public Discuss potential agency litigation with legal counsel, including tribal negotiations.	<i>Bud Sizemore, Chair</i>
Tab 1 2:00	Call to Order *Consent Agenda <ul style="list-style-type: none"> August 13, 2020 Commission Meeting Minutes (Action) New Licenses and Class III Employees Licenses 	<i>Bud Sizemore, Chair</i>
Tab 2	* RULE FOR DISCUSSION AND POSSIBLE FILING <ul style="list-style-type: none"> Credit, loans, or gifts prohibited 	(Action) <i>Ashlie Laydon, Rules Coordinator</i>
Tab 3	*RULE PETITION FOR DISCUSSION AND POSSIBLE FILING <ul style="list-style-type: none"> Wagering Limits for nonhouse-banked card games 	(Action) <i>Ashlie Laydon, Rules Coordinator</i> <i>Jon Munck, Petitioner</i>
Tab 4	* RULE PETITION FOR DISCUSSION AND POSSIBLE FILING <ul style="list-style-type: none"> Amusement games authorized 	(Action) <i>Ashlie Laydon, Rules Coordinator</i> <i>Steve Manning, Petitioner</i>
Tab 5	* RULE PETITION FOR DISCUSSION AND POSSIBLE FILING <ul style="list-style-type: none"> Sale of raffle tickets over the telephone or internet 	(Action) <i>Ashlie Laydon, Rules Coordinator</i> <i>Dean Hanks, Petitioner</i>
Tab 6	Gambling Commission Budget <ul style="list-style-type: none"> FY 2021 Budget Approval (Action) FY 2021 Budget Forecast (Action) FY 2021 Budget Proposals (Action) 	<i>Christopher Stanley, Chief Financial Officer</i>
Tab 7	2021 Agency Request Legislation	<i>Brian Considine, Legal and Legislative Manager</i>
	Public Comment can be provided: <ul style="list-style-type: none"> Before and during the Commission meeting you may email Julie.anderson@wsgc.wa.gov ; or During the meeting you may use the Microsoft Office Teams Chat Box; If you are attending the meeting by phone, we will offer you an opportunity to comment. 	
	Adjourn	

Upon advance request, the Commission will pursue reasonable accommodations to enable persons with disabilities to attend Commission meetings. Questions or comments pertaining to the agenda and requests for special accommodations should be directed to Julie Anderson, Executive Assistant at (360) 486-3453 or TDD (360) 486-3637. Questions or comments pertaining to rule changes should be directed to the Ashlie Laydon, Rules Coordinator (360) 486-3473. Please silence your cell phones for the public meeting



STATE OF WASHINGTON
GAMBLING COMMISSION

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

August Gambling Commission Meeting Minutes

Gambling Commission Headquarters

Virtual Meeting

***August 13, 2020**

Commissioners Present:

Bud Sizemore, Chair (Present)

Julia Patterson (Via Teams)

Alicia Levy (Via Teams)

Lauren King (Via Teams)

Ex Officio Members Present:

Senator Steve Conway (Via Teams)

Representative Shelley Kloba (Via Teams)

Staff Present:

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

Staff Present-Virtual:

Tina Griffin, Assistant Director; Brian Considine, Legal and Legislative Manager; Julie Lies, Tribal Liaison; Heather Songer, Public Information Officer; Ashlie Laydon, Rules Coordinator; Adam Teal, Staff Attorney; and Suzanne Becker, Assistant Attorney General.

Public Meeting Call to Order

Chair Sizemore called the virtual meeting to order at 10:05 AM and announced that the commissioners would go directly into executive session to discuss potential litigation, including tribal negotiations, with legal counsel. Chair Sizemore asked Julie Anderson to call the roll. All commissioners were present. He announced that the public meeting would reconvene at 1:00 PM.

Executive session adjourned at 12:32 PM. The commissioners took a short break until 1:00 PM.

Public meeting reconvened at 1:03 PM.

Chair Sizemore asked Director Trujillo to call roll to ensure a quorum. All commissioners were present.

There were 65 people who attended the virtual meeting.

Tab 1

Commissioner Patterson moved to approve the consent agenda as presented.

Commissioner Levy seconded the motion.

Director Trujillo called the roll.

The motion passed 4:0

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

Tab 2

Rule Petition for Discussion and Possible Filing - Online Gambling

Ashlie Laydon, Rules Coordinator (RC), presented the materials for this tab. Petitioner Tavares Morales was not present. **Chair Sizemore** asked RC Laydon if the Gambling Commission could repeal RCW 9.46.240. **RC Laydon** replied that the Commission could not repeal the law because RCW 9.46.240 prohibits online gambling, except as it relates to sports wagering, in accordance with tribal-state compacts.

There was no public comment.

Commissioner Levy moved to deny this petition as presented by staff.

Commissioner Patterson seconded the motion.

Director Trujillo called the roll.

The motion passed 4:0

Tab 3

Rule Petition for Discussion and Possible Filing – Defining “scientific”

Ashlie Laydon, RC, presented the materials for this tab. SB 6120, signed by Governor Jay Inslee on March 26, 2020, amends RCW 9.46.0209(1)(i) to include “scientific” to the list of purposes for which a bona fide charitable or nonprofit organization may be organized and operate; and therefore qualify for licensure to operate gambling activities authorized under the Gambling Act. The Gambling Commission needs to adopt a rule defining “scientific” for charitable and nonprofit applicants. Staff will reach out to stakeholders who are organized and operating for scientific purposes and have applied for licensure in the past. Staff recommends initiating rule-making to adopt a rule defining “scientific.

There was no public comment.

Commissioner Levy moved to initiate rulemaking to adopt a rule defining “scientific” as recommended by staff.

Commissioner King seconded the motion.

Director Trujillo called the roll.

The motion passed 4:0

Tab 4

Presentation- Gambling Commission Financial Update

Christopher Stanley, Chief Financial Officer (CFO), presented the materials for this tab. CFO Stanley provided the agency budget review and a financial update. He presented two draft decision packages for the commissioners’ consideration.

- Sports Wagering/ Forgive Sports Wagering Loan. The Washington State Gambling Commission (WSGC) requests forgiveness of the \$6 million loan made in Engrossed Substitute House Bill 2638 of the 2020 Legislative Session. He stated that forgiveness of the loan will allow WSGC greater flexibility in implementing the legislation that authorized sports wagering at tribal facilities. Funds not utilized specifically for implementing the bill will be able to be used for the investigation of illegal and unlicensed criminal gambling activity.

- **CE/Criminal Crime and Protect the Public.** The Washington State Gambling Commission requests \$3 million per year from the state’s General Fund to support its criminal investigation efforts regarding gambling-related crimes. CFO Stanley stated that over the past 10 years, gambling crime has risen and is anticipated to rise further as California, Montana, Oregon and other states legalize sports wagering. In that same time period, the criminal enforcement unit of WSGC has remained stagnant and overwhelmed with cases.

CFO Stanley further explained that a significant amount of gambling crime is committed by unlicensed individuals or by individuals who take advantage of their position at legal establishments. Because of the prolonged, ongoing use of licensee funds for criminal investigations, combined with the steady increase in gambling crime, fees on licensees as well as cost-recovery amounts billed to sovereign tribes have risen over time. By adequately funding criminal enforcement efforts with general fund dollars rather than utilizing valuable licensee dollars and preserving them for regulation efforts, we can keep both tribal amounts and non-tribal licensee fees low into the future and keep Washingtonians safe from financial predators that target vulnerable individuals.

CFO Stanley will present the agency’s budget for the Commission’s consideration and approval at the September commission meeting.

There was no public comment.

Tab 5

Presentation- Agency Request Legislation

Brian Considine, Legal and Legislative Manager (LLM), presented the materials for this tab. LLM Considine presented an updated draft bill for discussion. The proposed draft would create an exception in RCW 9.46.0209 for nonprofit senior organizations and community centers and allow them to offer bingo, so long as it is revenue neutral or “low stakes.” The bill also increases the limit of unlicensed gambling activities from 2 to 12 in RCW 9.46.0321, Lastly, it modifies the definition of “raffle” to allow the Gambling Commission more flexibility in who it authorizes to operate or manage raffles for a nonprofit. The last opportunity for the Commission to review the agency request legislation will be at the September commission meeting.

In closing, **Director Trujillo** announced that Commissioner Ed Troyer will be recognized for his outstanding service as a commissioner on the Washington State Gambling Commission at a commission meeting soon. He also congratulated Heather Songer, Gambling Commission Public Information Officer, on her recent marriage.

Vice Chair Patterson spoke about the Problem Gambling Task Force (PGTF) that she chairs and the work that is being done on its subcommittees regarding policy changes. The PGTF plans to meet on Sept. 21 to hone and refine its recommendations for the Commission’s consideration. Commissioner Patterson will present at an upcoming meeting.

Chair Sizemore mentioned the retirement of Cowlitz Indian Tribe Chairman Bill Iyall. He congratulated Chairman Harju on his appointment.

Chair Sizemore announced that the September commission meeting would be virtual and to continue to watch the agency website for up-to-date information.

Chair Sizemore adjourned the August commission meeting at 2:05 PM.



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

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PAGES:12

Based upon the licensing investigations, staff recommends approving all new Licenses and Class III employees listed on pages 1 to 12.

ORGANIZATION NAME

LICENSE NUMBER

PREMISES LOCATION

NEW APPLICATIONS

RAFFLE

LAKE CHELAN ROTARY COMMUNITY & INTERNATIONAL F
00-24566 02-21093

102 WAPATO PL
CHELAN WA 98816

THE HUMANE SOCIETY FOR TACOMA AND PIERCE COUNT
00-24685 02-21140

1515 16TH ST
SUMNER WA 98390-2113

PUNCHBOARD/PULL-TAB COMMERCIAL STIMULANT

BALLROOM
00-24653 05-21676

456 N 36TH ST
SEATTLE WA 98103

JAMESTOWN SALOON
00-24602 05-21692

19711 SMOKEY POINT BLVD
ARLINGTON WA 98223

LAST CALL BAR
00-24669 05-21685

109 FERRY ST
SEDRO WOOLLEY WA 98284

LUCKY LIQUOR
00-24639 05-21668

10325 E MARGINAL WAYS
TUKWILA WA 98168

PROSPECTORS STEAK AND SPIRITS
00-24663 05-21683

101 9TH ST
GOLD BAR WA 98251

NON HOUSE-BANKED CARD GAME

PROSPECTORS STEAK AND SPIRITS
00-24663 65-07512

101 9TH ST
GOLD BAR WA 98251

PERSON'S NAME
LICENSE NUMBER

EMPLOYER'S NAME
PREMISES LOCATION

NEW APPLICATIONS

MANUFACTURER REPRESENTATIVE

BROWNING, BRANT N
23-03119

ARISTOCRAT TECHNOLOGIES INC
LAS VEGAS NV 89135

DOWELL, ROBERT M
23-03118

ARIES TECHNOLOGY LLC
GROVE OK 74344-6251

EDWARDS, JENNIFER L
23-03114

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

ONEILL, JEFFREY T
23-03115

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

SOLOMON, LEE S
23-03116

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

WATSON, STEVEN M
23-03117

EVERI PAYMENTS INC
LAS VEGAS NV 89113-2175

SERVICE SUPPLIER REPRESENTATIVE

RUFFIN, RYBECCA R
63-00938

MAVERICK WASHINGTON
KIRKLAND WA 98034

CARD ROOM EMPLOYEE

ATWOOD, DARYL J
68-04323

B

BLACK PEARL RESTAURANT & CARD
SPOKANE VALLEY WA 99206-471

BLANKENSHIP, JON A
68-10595

B

HAWKS PRAIRIE CASINO
LACEY WA 98516

BOTTIN, DIANA R
68-35770

B

CLUB HOLLYWOOD CASINO
SHORELINE WA 98133

BOYLE, NICKLEUS L
68-35785

B

GOLDIE'S SHORELINE CASINO
SHORELINE WA 98133

BUTLER, TARIANA S
68-35753

B

GREAT AMERICAN CASINO/LAKEWOOD
LAKEWOOD WA 98499

CATALINE, EVAN D
68-20543

B

GREAT AMERICAN CASINO/EVERETT
EVERETT WA 98204

COCHRAN, TYLER J
68-35775

B

LUCKY DRAGONZ CASINO
SEATTLE WA 98178

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

CONDYLES, JOHN P 68-02527	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
EDGAR, TRISTON J 68-34167	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804
FREEMAN, MACKENZIE J 68-35781	B	CRAZY MOOSE CASINO II/MOUNTLAK MOUNTLAKE TERRACE WA 9804
FRENCH, JAYME J 68-35779	B	MACAU CASINO LAKEWOOD WA 98499
GEARARDO, MICHELE A 68-19308	B	ROYAL CASINO EVERETT WA 98204
HAK, SOTH 68-34495	B	FORTUNE CASINO - RENTON RENTON WA 98055
HANSEN, OKSANA Y 68-35751	B	GREAT AMERICAN CASINO/EVERETT EVERETT WA 98204
HUYNH, CAO V 68-16711	B	LUCKY DRAGONZ CASINO SEATTLE WA 98178
JONES, SCOTT A 68-35766	B	BLACK PEARL RESTAURANT & CARD SPOKANE VALLEY WA 99206-471
KRAYNYK, LESYA S 68-35772	B	CARIBBEAN CARDROOM KIRKLAND WA 98034
LIU, JINGHAN 68-32887	B	GOLDIE'S SHORELINE CASINO SHORELINE WA 98133
LONG, VANNARITH 68-30467	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
LOUNSBERY, WILLIAM P 68-35776	B	LUCKY DRAGONZ CASINO SEATTLE WA 98178
MCKEE, NICHOLAS G 68-35586	B	GREAT AMERICAN CASINO/LAKEWOOD LAKEWOOD WA 98499
MEHUS, TYSON D 68-35784	B	CLUB HOLLYWOOD CASINO SHORELINE WA 98133
NOTOA, ANI T 68-35768	B	ROYAL CASINO EVERETT WA 98204

PERSON'S NAME
 LICENSE NUMBER

EMPLOYER'S NAME
 PREMISES LOCATION

NEW APPLICATIONS

CARD ROOM EMPLOYEE

OWENS, KELLY M 68-35760	B	ACES CASINO ENTERTAINMENT SPOKANE VALLEY WA 99216
SMOOT, DANIEL F 68-35786	B	BLACK PEARL RESTAURANT & CARD SPOKANE VALLEY WA 99206-471
SWINTON, SORIAH M 68-35782	B	CLUB HOLLYWOOD CASINO SHORELINE WA 98133
TRICHANH, SOUMALA 68-04739	B	ROMAN CASINO SEATTLE WA 98178
WATERS, JARED C 68-35783	B	CLUB HOLLYWOOD CASINO SHORELINE WA 98133
WEBB, TIFFANY L 68-35773	B	JAMESTOWN SALOON ARLINGTON WA 98223
WHITAKER, ZACHERY T 68-33381	B	RIVERSIDE CASINO TUKWILA WA 98168

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

CHEHALIS CONFEDERATED TRIBES

CREAR, TRAVIS J
69-48780

COLVILLE CONFEDERATED TRIBES

BANUELOS BUSTILLOS, BENJAMIN
69-48789

BRADSHAW, SHAWN M
69-48816

CHAPA, D'ANGELO J
69-48892

LINDSEY, DARIAN M
69-43688

LIZARDE, CARLOS S
69-48797

MEJIA, JESSE A
69-48778

NICHOLS, KARY J
69-48790

SMITH, NOLAN A JR
69-22866

COWLITZ INDIAN TRIBE

BOUCHARD, TROY E
69-48818

DELORIA, ELIZABETH R
69-48815

DEVACK, KYLE W
69-48757

EAGLE, DAVID L
69-41043

HOLLANDER, TYLER S
69-48863

LEON, RAYMOND A
69-48793

MARTELL, GAGE F
69-48862

MEDINA, DENNIS A
69-48791

MILLER, ROBYN R
69-48758

NING, XIAO L
69-48820

OEUNG, KUYING
69-46358

PEARSON, LISA K
69-48887

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

COWLITZ INDIAN TRIBE

RIGGS, COLE A
69-44516

SCOTT, JARROD E
69-48819

SLOOP, MICHAEL D
69-39058

KALISPEL TRIBE

ATKINSON, JOHN M
69-25636

COOTE, PATINA J
69-46543

DELANGE, JENNIFER L
69-48858

FREEMAN, ALAN J
69-36882

GREEN, CHARLES A III
69-48838

MILLER, JULIA M
69-36885

MOORE, BRANDON E
69-27266

NISQUALLY INDIAN TRIBE

DHANENS, MADISON R
69-48798

DUNSWORTH, BILLY L JR
69-34515

GARCED MUNOZ, RAFAEL A
69-48756

JOHNSON, DONNA M
69-48882

STANCIL, HEATH A
69-31751

WALKER, RICHARD T
69-48799

PUYALLUP TRIBE OF INDIANS

ALBERT, ANTONIO R
69-48880

ALVAREZ, DEBORAH B
69-38482

ARCE, ALAN K
69-48877

ARMSTEAD, DIAMONDAJAH L
69-48879

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

BAKER, JASMIN R
69-48784

BAUTISTA, DOMINGO R
69-48872

BLUEHORSE, JAZMINE R
69-48803

BOYCE, ELISA M
69-48746

BROWN, CHARLES D
69-48698

BROWN, ELISHA D
69-31385

CABALSE, MARISSA A
69-48775

CHATMAN, MILTON L III
69-48850

CURRY, AARON E
69-48841

DE MATTEIS, MARK E
69-48849

DILLON, FRIEDA D
69-19403

ESQUIVEL NAVARRETE, ANGEL D
69-48871

FIDEE, ALEXANDER M
69-48867

FIEBER, PEGGY A
69-44811

FINELY, MICHAEL J
69-48868

FRANCIS, GUY A
69-15151

FRANKS, ISIAH M
69-48745

GOODWIN, JONATHAN L
69-48844

GURR, SAOFAAPITO V
69-48809

HILL, JENAA R
69-48747

JENKINS, KEMONEE T
69-48810

JOHNSON, LATRELL R
69-48848

LA, MICHAEL
69-48875

LAYTON, TAMMI R
69-05979

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

LUGO, WILFREDO J
69-46101

MADRUGA, SAVANNA E
69-48808

MENDOZA, DEVIN C
69-48813

MILLER, KYLE R
69-48777

MOORE, BYRON M
69-48865

MOREHEAD, DAVID C
69-48843

MULIPOLA, ANGELA S
69-29317

MUSTIN, ROJAY T
69-48814

NGUYEN, LOAN T
69-48697

PAIMA-BARKER, BRADLEY R
69-48864

PERRIGO, SABIAN T
69-48741

PIERRE, FISHER L
69-48873

PIXLEY, DAVID A JR
69-48804

PROMSAKHA, SARNTHANA
69-48742

PYATT, AMBROSE JR
69-46625

QUENGA, PETER JOSEPH S
69-48851

RHYMES, KEYON L
69-39993

RUTLAND, ROCELLE M
69-48776

SALA, SEPULONA J
69-35893

SAM, GILBERT L JR
69-06491

SIBBITS, EDMOND J JR
69-48805

SMITH, KATRINA T
69-48847

STUMPH MARTINEZ, JANUARY C
69-48845

SWIMS UNDER, STEVEN J
69-37802

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

PUYALLUP TRIBE OF INDIANS

THOMPSON, ERICA J
69-41251

TRIPLETT, ANTHONY L
69-48869

TURNER, STEVEN D
69-48802

VARGAS ROMERO, GUADALUPE
69-48846

WADE, DARSHAN C
69-48870

WALLWORK, FORREST P
69-48783

WARD, BOBBY J
69-01522

WILLIAMS, NICKOLAS A
69-48750

WINTERHAWK, JON JR
69-39395

QUINAULT NATION

ESTABROOK, TAMMY R
69-48792

SKILLINGS, JESSE D
69-48861

SMITH, JASMINE
69-35739

SKOKOMISH TRIBE

MARTINEZ, JORDAN I
69-48787

SCHORRAN, JOSHUA C
69-45047

ZOOK, ERIC L
69-03103

SNOQUALMIE TRIBE

CONE, JOSHUA M
69-32272

MARTIN, DAVID A
69-28496

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SPOKANE TRIBE

BLUM, DANIEL J
69-48840

BOWLEY, CHRISTINA M
69-48824

CLARK, NATHANIEL D
69-48751

GUINDON, DESIRAE A
69-48781

SICAM, JUDITH L
69-48876

THOMPSON, VALERIE R
69-48822

WEASELHEAD, DALE A
69-48801

WILLIAMS, KEENAN T
69-48823

YBARRA, TAMERA M
69-48788

SQUAXIN ISLAND TRIBE

GENT ANDERSON, DESTINY B
69-48800

HUGHES, THOMAS C
69-48811

HUTCHINS, ASHTON R
69-48768

JOYCE, TRAVIS D
69-48702

MAHONY, ELIJAH J
69-48859

NATHANSON, KELLEY R
69-48759

PETERSON, RACHEL L
69-42871

RADOVICH, MELISSA J
69-48794

SALWAY, LEVI W
69-37195

SHRUM, DARLENE A
69-03327

WARDLOW, SARAH A
69-14658

WHITWAM, STEVEN M
69-48888

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

STILLAGUAMISH TRIBE

CHAPOT, JULIE D
69-48812

FOGLE, DOREEN K
69-48866

HAMILTON, MARK D
69-32487

HASLOCK, SELENA A
69-48857

HUNTER, MEGHAN M
69-48782

OLESEN, MATTHEW R
69-48856

RICHARDSON, CALYSSA N
69-48828

RODOLFO, JEFFERSON A
69-22929

STEPHENS, LARIANNE P
69-48779

TERRY, DANIEL L
69-48796

THOMAS, AYSIA S
69-48831

WASHINGTON, DOMINIQUE D
69-48855

WILLIS, RYAN S
69-48795

SUQUAMISH TRIBE

COLE, APRIL L
69-48785

CROOKS, VICTORIA N
69-48786

ELMSTROM, AARON J
69-48881

HECK, CHRISTOPHER D
69-48830

LANGWORTHY, ADAM E
69-48829

LEIGH, JULIAN A
69-48834

MURPHY, NOEL A
69-48772

OSWALT, LAURIE R
69-48827

RENTZ, DIANNE E
69-48833

RENTZ, JUSTIN W
69-48835

PERSON'S NAME

CERTIFICATION / ELIGIBILITY NUMBER

NEW APPLICATIONS

CLASS III GAMING EMPLOYEE

SUQUAMISH TRIBE

RICHEY, DANI M
69-45235

RYALS, JAMES L
69-39422

SMITH, MIYA A
69-48836

SNOW, CIARRA N
69-48832

VAAI, KOLONE S
69-48826

SWINOMISH INDIAN TRIBAL COMMUNITY

EVANS, AARON M
69-48860

GOODPASTER, BRET M
69-40406

THE TULALIP TRIBES

BERRYMAN, KYLE J
69-48766

BRALEY, KYLE B
69-48659

GAUBE, CLARENCE E JR
69-38820

GEORGE, KEITH D
69-48767

GOMEZ-NERI, JULIO C
69-48852

HURTADO, PAOLA F
69-48765

JENSEN, APRIL D
69-33838

LABANDELO, NORWIN E
69-48854

LEGASSE, BRIAN T
69-40987

MARTINEZ, LILLIAN M
69-48764

MCCOLLUM-BLAIR, JOHNNY J
69-27700

SPJUT, HILARY T
69-38068

ST ONGE, MONICA M
69-40403

WILLIAMS, COLE W
69-48853



HOUSE-BANKED PUBLIC CARD ROOM REPORT

Current House- Banked Locations Operating			44		
	City	Commission Approval Date	License Expiration Date	Org #	License #
ACES CASINO ENTERTAINMENT	SPOKANE VALLEY	Mar 13, 2014	Dec 31, 2020	00-23112	67-00325
ALL STAR CASINO	SILVERDALE	Jan 14, 1999	Jun 30, 2021	00-18357	67-00058
BLACK PEARL RESTAURANT & CARD ROOM	SPOKANE VALLEY	Jan 10, 2013	Sep 30, 2020	00-22440	67-00321
BUZZ INN STEAKHOUSE/EAST WENATCHEE	EAST WENATCHEE	Oct 10, 2002	Dec 31, 2020	00-11170	67-00183
CARIBBEAN CARDROOM	KIRKLAND	Nov 14, 2019	Sep 30, 2020	00-24515	67-00343
CASINO CARIBBEAN	KIRKLAND	Nov 14, 2019	Sep 30, 2020	00-24512	67-00341
CASINO CARIBBEAN	YAKIMA	Nov 14, 2019	Sep 30, 2020	00-24513	67-00342
CHIPS CASINO/LAKEWOOD	LAKEWOOD	Apr 8, 1999	Dec 31, 2020	00-17414	67-00020
CLEARWATER SALOON & CASINO	EAST WENATCHEE	Feb 14, 2019	Dec 31, 2020	00-24296	67-00339
CLUB HOLLYWOOD CASINO	SHORELINE	Sep 9, 2010	Jun 30, 2021	00-22132	67-00303
COYOTE BOB'S CASINO	KENNEWICK	Jul 10, 2009	Mar 31, 2021	00-21848	67-00282
CRAZY MOOSE CASINO II/MOUNTLAKE TERRACE	MOUNTLAKE TERRACE	Jul 10, 2009	Mar 31, 2021	00-21849	67-00283
CRAZY MOOSE CASINO/PASCO	PASCO	Jul 10, 2009	Mar 31, 2021	00-21847	67-00281
EMERALD DOWNS	AUBURN	May 11, 2017	Mar 31, 2021	00-23814	67-00335
FORTUNE CASINO - RENTON	RENTON	Jan 8, 2015	Sep 30, 2020	00-23339	67-00327
FORTUNE CASINO - TUKWILA	TUKWILA	Oct 8, 2015	Jun 30, 2021	00-23465	67-00329
GOLDIE'S SHORELINE CASINO	SHORELINE	May 13, 1999	Dec 31, 2020	00-17610	67-00016
GREAT AMERICAN CASINO/EVERETT	EVERETT	Nov 12, 1998	Dec 31, 2020	00-19513	67-00194
GREAT AMERICAN CASINO/LAKEWOOD	LAKEWOOD	Aug 14, 2003	Jun 30, 2021	00-19258	67-00184
GREAT AMERICAN CASINO/TUKWILA	TUKWILA	Jan 15, 1998	Sep 30, 2020	00-12554	67-00012
HAWKS PRAIRIE CASINO	LACEY	Jul 12, 2001	Jun 30, 2021	00-17579	67-00091
IRON HORSE CASINO	AUBURN	Jan 9, 2003	Dec 31, 2020	00-19477	67-00192

Current House- Banked Locations Operating**44**

	City	Commission Approval Date	License Expiration Date	Org #	License #
JOKER'S CASINO SPORTS BAR & FIESTA CD RM	RICHLAND	Nov 12, 1998	Dec 31, 2020	00-15224	67-00006
LANCER LANES/REST AND CASINO	CLARKSTON	Nov 13, 2008	Sep 30, 2020	00-21681	67-00276
LAST FRONTIER	LA CENTER	Feb 11, 1999	Sep 30, 2020	00-11339	67-00055
LILAC LANES & CASINO	SPOKANE	Jul 12, 2007	Jun 30, 2021	00-21305	67-00267
MACAU CASINO	TUKWILA	Nov 14, 2019	Sep 30, 2020	00-24514	67-00344
MACAU CASINO	LAKEWOOD	Nov 14, 2019	Sep 30, 2020	00-24516	67-00345
NOB HILL CASINO	YAKIMA	Sep 12, 2001	Dec 31, 2020	00-13069	67-00173
PALACE CASINO LAKEWOOD	LAKEWOOD	Jan 14, 1999	Dec 31, 2020	00-16542	67-00028
PAPAS CASINO RESTAURANT & LOUNGE	MOSES LAKE	Aug 13, 1998	Jun 30, 2021	00-02788	67-00004
RC'S AT VALLEY LANES	SUNNYSIDE	Nov 16, 2017	Mar 31, 2021	00-16220	67-00336
RIVERSIDE CASINO	TUKWILA	Aug 14, 2003	Jun 30, 2021	00-19369	67-00187
ROMAN CASINO	SEATTLE	Feb 10, 2000	Mar 31, 2021	00-17613	67-00057
ROXY'S BAR & GRILL	SEATTLE	Nov 18, 2004	Jun 30, 2021	00-20113	67-00231
ROYAL CASINO	EVERETT	Sep 9, 2010	Jun 30, 2021	00-22130	67-00301
SILVER DOLLAR CASINO/MILL CREEK	BOTHELL	Sep 9, 2010	Jun 30, 2021	00-22131	67-00302
SILVER DOLLAR CASINO/RENTON	RENTON	Sep 9, 2010	Jun 30, 2021	00-22134	67-00305
SILVER DOLLAR CASINO/SEATAC	SEATAC	Sep 9, 2010	Jun 30, 2021	00-22128	67-00299
SLO PITCH PUB & EATERY	BELLINGHAM	Aug 12, 1999	Jun 30, 2021	00-16759	67-00038
THE PALACE	LA CENTER	Apr 9, 1998	Jun 30, 2021	00-16903	67-00010
WILD GOOSE CASINO	ELLENSBURG	Apr 8, 2004	Dec 31, 2020	00-20009	67-00212
WIZARDS CASINO	BURIEN	Feb 11, 2010	Dec 31, 2020	00-21998	67-00287
ZEPPOZ	PULLMAN	Nov 13, 2008	Mar 31, 2021	00-18777	67-00209

Applications Pending**1**

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



Rule Petition to Amend

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

September 2020 – Discussion & Possible Filing

September 2019 – Commission Review

August 2019 –Rule-Making Petition Received

Tab 2: SEPTEMBER 2020 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Steven Berven, Richland, Washington

Background

Bold = Changes made after the September 2019 Commission Meeting.

The petitioner originally proposed to amend WAC 230-06-035(3) to allow for the use of credit cards as another method of payment and allow pull-tab operators to extend credit up to \$200. At the September 2019 meeting, the Commissioners decided to initiate rule-making and explore allowing credit cards to be used for all gambling activities where it is not currently allowed.

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

The rule has been amended as follows:

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

Attachments:

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

Stakeholder Outreach

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

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

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

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

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

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

- **Susan Kingbury-Comeau, Mt. Si Senior Center**
- **Robert Materne, Jr., The Swinging Doors**
- **Mason Nostrom, Tims Tavern**

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

Eighteen stakeholders oppose the proposed language. Businesses do not want to pay the transaction fee to the credit card companies for allowing customers to use credit cards, deal with disputes and/or complaints between customers and credit card companies, feel that there is a risk of credit card chargebacks and fraud, worry they would have reduced cash coming in but would still have to pay out cash prizes, feel that it may be difficult to track credit sales versus cash sales, worry that it may inaccurately reflect sales, and are concerned that it would contribute to problem gambling.

- **Phillip DeLaRosa, Silos Sports Bar and Grill**
- **Marnie Hayes, Firehouse Pub**
- **David Winfrey**
- **Barbara Jones, White Horse Saloon**
- **Ron Franzen, Jackson Street Bar & Grill**
- **Denice Velasquez, Jamestown Saloon**
- **Tammy Hull, Litz's Bar and Grill**
- **Dale and Laure Simpson, Acorn Saloon & Feeding Station**
- **Brett Brophy, B Cubed Enterprises LLC**
- **Elizabeth Baxter, TJs Bar & Grill**
- **Eileen Kim, Log Cabin Bar & Grill**
- **Jan Minster, The Channel Marker Pub & Grill**
- **Frances Staley, Maxi's Restaurant**
- **William Hensens, Game Neighborhood Grill & Bar**
- **Gail McCoy, Lennard K's Boat**

- **Michael Smith, Sequim Senior Services**
- **Freida Sanger, Gwen's Venture LLC dba Rock the Dock Pub & Grill**
- **Carrie Buckel, The Lime/Who's**

Staff Recommendation

If Commissioners still wish to consider the use of credit cards, staff recommends filing the draft language which will allow operators the option to accept credit cards as a method of payment for card games, pull-tabs, and bingo (raffles already allow the use of credit cards). Amusement games are excluded at this time because it was not contemplated when the petition was accepted by the Commissioners and staff have not had the opportunity to explore how credit cards could be used for amusement games while ensuring they operate as intended by the legislature and how the use of credit cards for amusement games may impact minors who play these games.

WAC 230-06-035 Credit, loans, or gifts prohibited. (1)

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

(2) Gifts are items licensees give to their customers.

Licensees must not connect these gifts to gambling activities we regulate unless the gifts are:

(a) Gambling promotions; or

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

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

(i) Costs less than five hundred dollars per individual item; and

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

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

(3) You must collect the price required to participate in the gambling activity in full before allowing someone to participate. Licensees must collect cash, check, gift

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

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

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

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

[Statutory Authority: RCW 9.46.070. WSR 07-21-116 (Order 617), § 230-06-035, filed 10/22/07, effective 1/1/08; WSR 06-17-132 (Order 601), § 230-06-035, filed 8/22/06, effective 1/1/08.]

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

dispensers. Electronic video pull-tab dispensers must be approved by us prior to use.

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

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

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

(a) Use a video monitor for entertainment purposes only;
and

(b) Open all, or a portion of, the pull-tab in order to read encoded data that indicates the win or loss of the pull-tab if the dispenser is equipped to automatically open pull-tabs;
and

(c) Dispense the pull-tab to the player and not retain any portion of the pull-tab; and

(d) Read the correct cash award from the pull-tab either when it is dispensed or when the pull-tab is reinserted into the dispenser; and

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

(f) Provide:

(i) An electronic accounting of the number of pull-tabs dispensed; and

(ii) A way to identify the software version and name; and

(iii) A way to access and verify approved components; and

(iv) Security on the dispenser to prevent unauthorized access to graphic and prize amount displays.

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

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

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

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

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

[Statutory Authority: RCW 9.46.070. Recodified by WSR 14-23-048 (Order 709), § 230-14-047, filed 11/14/14, effective 12/15/14.

Statutory Authority: RCW 9.46.070 and 9.46.110. WSR 14-09-040 (Order 698), § 230-14-047, filed 4/11/14, effective 5/12/14.

Statutory Authority: RCW 9.46.070. WSR 08-03-052 (Order 621), § 230-14-047, filed 1/11/08, effective 2/11/08.]

Stakeholder Feedback on Petition

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

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

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



Washington State
GAMBLING
COMMISSION

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



--

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

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

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

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

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

Thank you,

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

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

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

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

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

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

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

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

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

Name: Duane B. Lusby

Organization: loyal order of Moose

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

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

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

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

Jason Lajeunesse

sent from cellular
206-850-3075

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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

[<image001.jpg>](#)

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

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

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

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

Sent from my iPhone

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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

[<image001.jpg>](#)

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

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

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

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

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

Thank you.

Regards,

Susan

Susan Kingsbury-Comeau

Executive Director, Mt. Si Senior Center

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

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

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

Website: www.mtsiseniorcenter.org/

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

Good morning,

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

Attached you'll find a copy of the following:

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

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

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



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

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

Barbara Jones
White Horse Saloon
Arlington, Washington

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

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

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



Washington State
GAMBLING
COMMISSION

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



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

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

Chris Schumacher
ShuJack's Bar and Grill

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

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



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

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

Sent from [Mail](#) for Windows 10

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

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



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

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

Thank you

Frances

Maxis Restaurant.

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

Hello Ashlie,

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

Thanks for letting me comment.

Pete

Pete Grignon | Sr. VP Finance/CFO

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

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

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

Good afternoon,

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

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Feel free to contact me if you have any questions.

Ashlie Laydon

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

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



Washington State
GAMBLING
COMMISSION

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



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

Hi Ashlie,

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

Melissa

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



Washington State
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--

Melissa Patterson

PHoPS Treasurer

treasurer@phops.com

phopstreasurer@gmail.com

Parrot Heads of Puget Sound



www.phops.com (Seattle)

"Northwest Latitudes, Laid Back Attitudes"

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

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

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



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



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

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

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

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



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



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

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

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

Name: TeAire Baier

Organization: Fraternal Order of Eagles #2647

Comments:

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

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

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

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

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

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

Thanks

Cindy Inman Auxiliary Secretary Granite Falls Eagles

[Sent from Yahoo Mail on Android](#)

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

Good morning,

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

Attached you'll find a copy of the following:

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

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

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



Washington State Gambling Commission

4565 7th Ave SE

Lacey, WA 98503

1st Floor Conference Room; Rainier Room

(360) 407-3780

Pin: 950119#

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

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

Thank you,
Linda Davey
Pat Rudd

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

Good afternoon,

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

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

Feel free to contact me if you have any questions.

Ashlie Laydon

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



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

We already shut down our business long time ago.

Thanks

Regards
Sam Virk
206-387-1000

Be Healthy, Kind & Human!!!

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

Good morning,

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

Attached you'll find a copy of the following:

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

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

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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

[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

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

<mime-attachment>

<December 3, 2019; Agenda.pdf>

<Rules Summary; Use of Credit.pdf>

Stakeholder Feedback on Draft Language

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

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

Submitted by anonymous user: 162.17.167.22

Submitted values are:

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

Name: Susan Kingbury-Comeau

Organization: Mt. Si Senior Center

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

The results of this submission may be viewed at:

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

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

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

Submitted by anonymous user: 96.93.106.134

Submitted values are:

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

Name: Robert Materne, Jr.

Organization: The Swinging Doors

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

The results of this submission may be viewed at:

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

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

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

Submitted by anonymous user: 50.34.156.221

Submitted values are:

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

Name: Mason Nostrom

Organization: Tims Tavern

Comments:

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

The results of this submission may be viewed at:

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

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

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

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

Name: Carla Dodgson

Organization: Bern's Tavern

Comments:

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

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

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

The results of this submission may be viewed at:

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

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

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

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

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

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

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

Submitted by anonymous user: 50.35.159.211

Submitted values are:

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

Name: Dan McCoy

Organization: McCoy's Distributing, Inc.

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

The results of this submission may be viewed at:

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

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

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

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

Good morning,

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

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

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

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

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

You may submit your feedback to me directly or through our

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

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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



(360) 486-3473

|



ashlie.laydon@wsgc.wa.gov



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

Yes, I approve.

Steve Nelson

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

Good morning,

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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

Image result for wa gambling commission



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

Good Afternoon,

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

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

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

Good morning,

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

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



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



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

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

Thank you,

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



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

Good morning,

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

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

Thank you,

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

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

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



Washington State
GAMBLING
COMMISSION

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



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

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

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

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Washington State Gambling Commission

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

Image result for wa gambling commission



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

Yes, I approve.

George Penner

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

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



Washington State
GAMBLING
COMMISSION

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



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

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

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

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

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☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov
<[image001.jpg](#)>

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

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

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

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

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

Thank you.

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

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

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Washington State Gambling Commission

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



--

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

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

Yes we approve of the rule changes.

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

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



Washington State
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COMMISSION

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



--

Curtis Epping - Owner

funlandlb@gmail.com

Phone: 360-642-2223

Funland

200 S. Pacific

Long Beach, WA 98631

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

Ashlie,

Good afternoon,

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

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

I've also included similar feedback below.

Thank you!

Sarah Dahleen

Director of Advancement and Marketing

Hamlin Robinson School

1701 20th Ave S

Seattle, WA 98144

206-763-1167 ext 116

www.hamlinrobinson.org

Where learning has no limits.



From: Jen Fukutaki <jfukutaki@hamlinrobinson.org>

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

To: Sarah Dahleen <sdahleen@hamlinrobinson.org>

Subject: Feedback to gambling commission

Sarah,

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

Jen Fukutaki

Director of Community Services / HRS Learning Center

Hamlin Robinson School

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

Where learning has no limits.

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

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Thank you,

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



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

Yes, I approve.
Renton Rotary Treasurer

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

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

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Washington State
GAMBLING
COMMISSION

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



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

Dear Ashlie,

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

Judy A Smith, Wa/Id Rainbow Foundation

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

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P.O. Box 42400 | Olympia, WA 98504-2400
☎ (360) 486-3473 | ✉ ashlie.laydon@wsgc.wa.gov



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GAMBLING
COMMISSION

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

Hi Ashlie,

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

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

Have a wonderful week!

Gratefully,

Kelly

[Kelly Becker](#)

LifeWire | Development Director

P.O. Box 6398 | Bellevue, WA 98008

Phone: 425-562-8840 ext. 253

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



You make a difference

From: Laydon, Ashlie (GMB) <ashlie.laydon@wsgc.wa.gov>
Sent: Monday, August 17, 2020 12:22 PM
Cc: Considine, Brian (GMB) <brian.considine@wsgc.wa.gov>
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Washington State Gambling Commission

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



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

Yes, I approve.

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

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Washington State Gambling Commission

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

Image result for wa gambling commission



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

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

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

Name: Phillip DeLaRosa

Organization: Silos Sports Bar and Grill

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

The results of this submission may be viewed at:

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

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

Hi!

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

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

I can't stop charge backs.

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

I would then have zero cash to pay out winnings.

Make sense?

Sent from my iPhone

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

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[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

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

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

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

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

I don't get it !!

Please don't pass this.

But as always you will do what you want.

David Winfrey

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

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Washington State
GAMBLING
COMMISSION

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



--

Dave

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

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

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

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

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

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COMMISSION

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

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

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

Good morning,

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

Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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

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



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

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

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

Good morning,

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Virus-free. www.avg.com

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

Hello,

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

So that's a straight NO answer! Thanks!

Tammy

Sent from my iPhone

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

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[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

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

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

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

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

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

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

Sincerely,

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

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

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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



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

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

Respectfully

Brett Brophy

B Cubed Enterprises LLC owner

Sent from my iPhone

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<ashlie.laydon@wsgc.wa.gov> wrote:

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Ashlie Laydon

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Washington State Gambling Commission

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

[<image001.jpg>](#)

[<image002.gif>](#)

[<image003.png>](#)

[<image004.jpg>](#)

[<image005.png>](#)

<WAC230-06-035; revised.docx>

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

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

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

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

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

would have to have more cash on hand.

Elizabeth Baxter

TJs Bar & Grill

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

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

Hello,

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

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

Eileen Kim - Log Cabin Bar & Grill

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

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Thank you,

Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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



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

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

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

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

No to this change.

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

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

Re :Feed back on rule change:

To Ms. Laydon,

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

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

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

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

Frances. Maxis Restaurant.

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

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

> Good morning,

>

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>

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

>

> Thank you,

>

> Ashlie Laydon

> Rules Coordinator | Legal and Records Division

> Washington State Gambling Commission

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

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

> [Image result for wa gambling commission]<<https://www.bing.com/images/search?view=detailV2&ccid=yF92E72D&id=5036C96943B39BBC261736DD9BFB3264AD67EDCF&thid=OIP.yF92E72Djjnhkq9PIYy-wHaCG&mediaurl=https%3a%2f%2fwsgc.wa.gov%2fsites%2fall%2fthemes%2fdrupalbasecustom%2fassets%2fimages%2flogo.png&exp=211&expw=744&q=wa+gambling+commission&simid=608038746621544909&selectedIndex=2>>

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

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

>

>

>

>

>

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

At a 2.5% fee... No thanks

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

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Thank you,

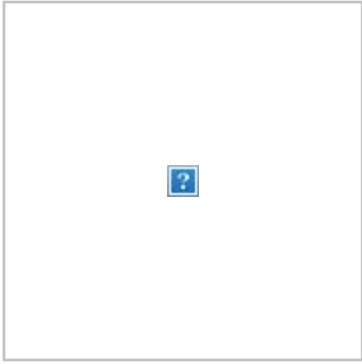
Ashlie Laydon

Rules Coordinator | Legal and Records Division

Washington State Gambling Commission

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



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

Hi Ashlie,

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

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

Thank you.

Gail McCoy
Lennard K's Boat

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

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



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

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

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

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

We would be against these changes.

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

Michael Smith

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

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

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

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



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

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

Submitted by anonymous user: 98.237.133.46

Submitted values are:

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

Name: Frieda Sanger

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

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

The results of this submission may be viewed at:

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

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

Hello -

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

Regards,
Carrie Buckel

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

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



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

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

Submitted by anonymous user: 73.109.61.8

Submitted values are:

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

Name: Richard Neal

Organization: G.F.Y 4EVER

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

The results of this submission may be viewed at:

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



Rule Petition to Amend

WAC 230-15-135- Wagering limits for nonhouse-banked card games.

September 2020 – Commission Review
August 2020 –Rule-Making Petition Received

Tab 3: SEPTEMBER 2020 Commission Meeting Agenda. Statutory Authority 9.46.070

Who Proposed the Rule Change?

Jon Munck, Everett, Washington

Background

Jon Munck, of Everett, Washington, is requesting to amend WAC 230-15-135, Wagering limits for nonhouse-banked card games, by removing the maximum single wager limit of \$300 in poker.

Under the current rules, the maximum amount of a single wager must not exceed forty dollars; however, Class F and house-banked card game licensees may offer a single wager not to exceed three hundred dollars. The petitioner wishes to remove this three-hundred-dollar wager limit for nonhouse-banked poker played at house-banked card rooms.

The petitioner feels this change is needed because this limit basically results in one stake level of play in Washington stating: “Capping the maximum bet at \$300 forces players to play in a way that exposes them to more variance, which means that this law as its currently written contributes to problem gambling because it encourages a drawing/chasing game, catering more towards addictive personalities. My assumption is that the law exists to protect players that are addicts, but it often has the opposite affect [sic].”

The petitioner feels the effect of this change would allow for every stake level of Texas Hold'em to be played and new players would be drawn to the game because he believes there would be different tiers of play allowing the less skilled an ability to play at an easier level. The petitioner also feels that this change would result in increased player participation, increased player protection, better player experience, and increased tax revenue.

Maximum single wager limits for poker have increased over time, as reflected in the table below.

Maximum Amount of a Single Wager for Poker			
	Nonhouse-banked Licensees	Class F Endorsed Licensees	House-Banked Licensees
Prior to 2008	\$25	\$25	\$25
January 1, 2008	\$40	\$40	\$40
January 1, 2013	\$40	\$40	\$40
		\$100 for Texas Hold'em	\$100 for Texas Hold'em
September 26, 2016	\$40	\$100	\$300
December 23, 2016	\$40	\$300	\$300

This proposed change would impact all card room licensees. As of August 2020, there were 193 commercial and nonprofit nonhouse-banked card rooms, 3 Class F endorsed licensees, and 44 house-banked card room licensees.

Attachments:

- Petition
- WAC 230-15-135

Staff Recommendation

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

- 1) Initiate rule-making proceedings by filing the rule as proposed for further discussion; or
- 2) Deny the petition, in writing, a) stating the reasons for 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 recommends denial of this petition. All Washington authorized gambling activities are limited in nature and scope by RCW 9.46.010 and therefore have wagering limits.

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web Rules Coordinator \(GMB\)](#)
To: [WSGC Web Rules Coordinator \(GMB\)](#)
Subject: Request a Rule Change Submission from wsgc.wa.gov
Date: Wednesday, August 5, 2020 12:54:18 PM

Submitted on Wednesday, August 5, 2020 - 12:54pm
Submitted by anonymous user: 172.58.43.197
Submitted values are:

Petitioner's Name: Jon Munck
Mailing Address: 12728 52nd Dr SE
City: Everett
State: wa
Zip Code: 98208
Phone:
Email: munckjon000@gmail.com

Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.

==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: WAC 230-150-135. 1(c)

I am requesting the following change: Remove the rule that forces a 300\$ bet limit. Make poker true no-limit. Or at the very least expand the max bet to 2000\$

This change is needed because:

Poker in Washington is currently diluted by laws that put a chokehold on optimal play. The law as written causes there to be one stake level: 1/3. Players have been frustrated by this for a long time.

3/5, 5/5 and 5/10 basically don't exist because post-flop play is so inorganic because players are forced to play suboptimally in what essentially becomes a 5-300 limit game. Capping the maximum bet at 300 forces players to play in a way that exposes them to more variance, which means that this law as its currently written contributes to problem gambling because it encourages a drawing/chasing game, catering more towards addictive personalities. My assumption is that the law exists to protect players that are addicts, but it often has the opposite affect.

Because most players are encouraged to (and do) just play 1/3, the player pool at that level is much more varied than it normally would be, and is generally a tougher game, which pushes out recreational players that would otherwise play at those stakes with similarly skilled opponents.

The effect of this rule change will be:

Players won't be forced to play suboptimally.

Every stake level of NL Hold Em will feel more natural. Players everywhere will be happier.

New players will enter the game because our lowest stake (1/3) won't be such a tough game. This will increase commerce and have positive affect on businesses within our state.

3/5, 5/5, and 5/10 games will exist in this state, causing an influx of commerce from Canada and the surrounding states. This

effect will take a while, because players will need to first realize that playing in Washington is actually good. It is likely that Washington could become a destination spot for Japanese vacationers (where gambling is illegal) due to how accessible travel between us is. All of this equates to more tax revenue.

Less variance at higher stakes games, more protection for the players.

More business revenue from more rake leading to more tax being collected.

Better conditions for casino employees. They no longer have to enforce rules that aren't good and don't make sense to players. Players are often angry or frustrated when they learn about the 300max rule in the middle of a hand, and take that frustration out on the house, the dealer, or another player.

More taxable tips generated for casino employees.

Better player experience. At the end of the day this is what really matters. If players like playing poker they'll come out to casinos that have friendly staff and GOOD RULES. If they can't do that they resort to home games which takes all of the revenue from the private business and the state.

The results of this submission may be viewed at:

<https://wsgc.wa.gov/node/18/submission/1747>

WAC 230-15-135 Wagering limits for nonhouse-banked card

games. Card room licensees must not exceed these wagering limits:

(1) **Poker** -

(a) There must be no more than five betting rounds in any one game; and

(b) There must be no more than four wagers in any betting round, for example, the initial wager plus three raises; and

(c) The maximum amount of a single wager must not exceed forty dollars; however, Class F and house-banked card game licensees may offer a single wager not to exceed three hundred dollars;

(2) **Games based on achieving a specific number of points** - Each point must not exceed five cents in value;

(3) **Ante** - No more than the maximum wager allowed for the first betting round for any game, except for Panguingue (Pan). The ante may, by house rule:

(a) Be made by one or more players, but the total ante may not exceed the maximum wager allowed for the first betting round; and

(b) Be used as part of a player's wager;

(4) **Panguingue (Pan)** - The maximum value of a chip must not exceed ten dollars. An ante must not exceed one chip. We prohibit doubling of conditions. Players going out may collect no more than two additional chips for going out from each participating player.

[Statutory Authority: RCW 9.46.070. WSR 18-05-029, § 230-15-135, filed 2/9/18, effective 7/1/18. Statutory Authority: RCW 9.46.070 and 9.46.0201. WSR 16-23-153, § 230-15-135, filed 11/22/16, effective 12/23/16; WSR 16-18-024, § 230-15-135, filed 8/26/16, effective 9/26/16. Statutory Authority: RCW 9.46.070 and 9.46.0282. WSR 12-21-048 (Order 680), § 230-15-135, filed 10/12/12, effective 1/1/13; WSR 09-21-013 (Order 658), § 230-15-135, filed 10/9/09, effective 11/9/09. Statutory Authority: RCW 9.46.070. WSR 09-09-056 (Order 642), § 230-15-135, filed 4/10/09, effective 7/1/09; WSR 07-21-116 (Order 617), § 230-15-135, filed 10/22/07, effective 1/1/08; WSR 07-09-033 (Order 608), § 230-15-135, filed 4/10/07, effective 1/1/08.]



Rule Petition to Amend

WAC 230-13-005- Amusement games authorized.

September 2020 – Commission Review
August 2020 – Rule-Making Petition Received

Tab 4: SEPTEMBER 2020 Commission Meeting Agenda.

Statutory Authority 9.46.070

Who Proposed the Rule Change?

Steve Manning, Tacoma, Washington

Background

Steve Manning, of Tacoma, Washington, is proposing to amend WAC 230-13-005, Amusement games authorized, to allow amusement games to award gift certificates and/or gift cards as merchandise prizes from a third-party retail business. Under current rules, amusement games must only award merchandise prizes. Gift certificates and/or gift cards do not constitute merchandise prizes.

The petitioner feels that this change will attract more people to play amusement games, local retailers will benefit from the sale of the prize and from the winner coming in to the issuing business to redeem their merchandise, and the money spent will remain in the community.

The petitioner feels this change is within the spirit and intent of the rule as merchandise prizes are still being awarded and therefore would not have an impact on regulation or enforcement.

Attachments:

- Petition
- WAC 230-13-005

Staff Recommendation

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

- 1) Initiate rule-making proceedings by filing the rule as proposed for further discussion; or
- 2) Deny the petition in writing, a) stating the reasons for denial and specifically address the concerns stated in the petition, or b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition.

Staff recommends denying this petition because the Commissioners and staff spent considerable time in 2016 reviewing this issue and determined that a prohibition on offering cash and/or gift cards as prizes was appropriate. Staff believes the prohibition is still appropriate and that cash/gift cards cannot be considered a merchandise under the amusement game laws.

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web Rules Coordinator \(GMB\)](#)
To: [WSGC Web Rules Coordinator \(GMB\)](#)
Subject: Request a Rule Change Submission from wsgc.wa.gov
Date: Wednesday, August 5, 2020 12:57:45 PM

Submitted on Wednesday, August 5, 2020 - 12:57pm
Submitted by anonymous user: 24.16.220.95
Submitted values are:

Petitioner's Name: Steve Manning
Mailing Address: 4714 Fairwood Blvd. NE, Unit 702
City: Tacoma
State: WA
Zip Code: 98422
Phone: 253-245-0100
Email: shamcom@msn.com

Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.

==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: WAC 230-13-005

I am requesting the following change:

Current rule:

(6) (b) Pull-tabs and other gambling activities, gift certificates or gift cards do not constitute merchandise prizes.

Proposed rule:

(6) (b) Pull-tabs and other gambling activities, gift certificates or gift cards do not constitute merchandise prizes, unless issued by a 3rd party retail business i.e. coffee house, spa, department store, gas station etc.

This change is needed because: Toys, trinkets, stuffed animals, etc. mainly appeal to young people, There is a demand for more practical prizes from adults. By allowing Amusement Operators to purchase gift cards or gift certificates from local retailers to award as prizes to be won in 100% skill games many more people will be attracted to these games. Local business will also prosper, from the sale of the prize and because the prize winner must physically come to the issuing business to redeem their merchandise. This gives the business a chance to make a regular customer out of the prize winner. Finally, the money spent on these prizes will stay in the community, instead of going overseas where almost all "toys and trinkets" are made. The effect of this rule change will be: This will allow amusement operators to expand the type of merchandise prizes they can offer to their customers and provide opportunities for other local businesses. This would have no impact on regulation or enforcement as a merchandise prize is still being awarded within the spirit and intent of rule (6) "Amusement games must only award merchandise prizes."

WAC 230-13-005 Amusement games authorized. (1) We

authorize the approved groups of amusement games set forth in this chapter. Operators must only operate amusement games that meet the standards of at least one of the authorized groups.

(2) Commercial businesses or nonprofit or charitable organizations may apply for licenses for amusement games.

(3) Charitable or nonprofit organizations also may conduct group 1 through 11 amusement games without a license when authorized to do so under RCW 9.46.0321 and 9.46.0331.

(4) Operators must operate amusement games as either:

(a) An attended amusement game.

(i) An "attended amusement game" means an amusement game that requires the presence or assistance of a person (attendant) in the regular operation of the game; and

(ii) These games must award a merchandise prize to players if players achieve the objective with one cost of play; and

(iii) An attendant accepts cash, check, tickets or scrip to play the amusement game. The tickets and scrip are not redeemable for cash and must show the name of the operator or sponsor; or

(b) A coin or token activated amusement game.

(i) A "coin or token activated amusement game" means an amusement game that uses a mechanical, electronic, or electro-mechanical machine to allow the player to activate the game by inserting coins, cash, tokens, or tokens on an electronic token card; and

(ii) These games may dispense merchandise prizes, or coupons, tickets, tokens, or tokens onto an electronic token card redeemable for merchandise prizes; and

(iii) Coupons, tickets, tokens or tokens on an electronic token card can be electronically stored for redemption under this section as long as the coupons, tickets, tokens or tokens on an electronic token card are:

(A) Deposited into, and tracked on, a separate amusement game accounting system; and

(B) Not commingled with any tracking, reward, or other gambling related redemption systems; and

(C) Redeemed only for merchandise prizes.

(5) Amusement games must not:

(a) Award additional plays as prizes; or

(b) Allow coupons, tickets, tokens or tokens on electronic token cards that are awarded to be replayed; or

(c) Result in any cash payment being awarded.

(6) Amusement games must only award merchandise prizes.

(a) Merchandise prizes mean noncash prizes including toys, novelties, retail items such as electronic goods, clothing, accessories, as well as food, beverages and other items sold by the operator as a normal part of their business in compliance with all other state laws and regulations, except as provided in (b) of this subsection.

(b) Pull-tabs and other gambling activities, gift certificates or gift cards do not constitute merchandise prizes, unless issued by a third party retail business i.e. coffee house, spa, department store, gas station, etc.

(7) Electronic token card means a card issued by the operator that stores purchased credits available to play the amusement game separate from the coupons, tickets, or tokens awarded or dispensed as prizes from the play of the amusement game. Coupons, tickets, or tokens awarded as prizes cannot be

used to play amusement games and must only be redeemed for merchandise prizes.

[Statutory Authority: RCW 9.46.070, 9.46.0201. WSR 16-22-049, § 230-13-005, filed 10/28/16, effective 11/28/16; WSR 16-09-045 (Order 719), § 230-13-005, filed 4/15/16, effective 7/15/16.

Statutory Authority: RCW 9.46.070 and 9.46.0331. WSR 15-15-063 (Order 713), § 230-13-005, filed 7/10/15, effective 8/10/15.

Statutory Authority: RCW 9.46.070. WSR 07-15-064 (Order 612), § 230-13-005, filed 7/16/07, effective 1/1/08.]



Rule Petition to Amend

Sale of raffle tickets over the telephone or internet.

September 2020 – Commission Review
July 2020 – Rule-Making Petition Received

Tab 5: SEPTEMBER 2020 Commission Meeting Agenda.	Statutory Authority 9.46.070
Who Proposed the Rule Change?	
Dean M. Hanks, Tacoma, Washington	
Background	
<p>Dean Hanks, of Tacoma, Washington, is proposing to amend the rules to allow raffle tickets to be sold over the telephone and internet by licensed charitable and/or nonprofit organizations. Sales would be paid via a credit card. Ticket stubs would be mailed to the purchaser.</p> <p>The petitioner feels this change is needed because, due to COVID-19, people are not able to conduct raffles face-to-face, and by doing it over the telephone and/or internet, nonprofit organizations could make up for some of the lost revenue.</p> <p>Attachments:</p> <ul style="list-style-type: none">• Petition	
Staff Recommendation	
<p>Under the requirements of the Administrative Procedure Act, the Commission must take action on a petition within 60 days of receiving it. Your options are:</p> <ol style="list-style-type: none">1) Initiate rule-making proceedings by filing the rule as proposed for further discussion; or2) Deny the petition in writing, a) stating the reasons for denial and specifically address the concerns stated in the petition, or b) where appropriate, indicate alternative means by which the agency will address the concerns raised in the petition. <p>Staff recommends denying the petition as RCW 9.46.240 prohibits the sale of raffle tickets over the telephone or the internet and the Commission cannot consider the change requested unless it is authorized by the Legislature in the Gambling Act.</p>	

From: dan.heisel@watech.wa.gov on behalf of [WSGC Web Rules Coordinator \(GMB\)](#)
To: [WSGC Web Rules Coordinator \(GMB\)](#)
Subject: Request a Rule Change Submission from wsgc.wa.gov
Date: Wednesday, July 22, 2020 10:34:40 AM

Submitted on Wednesday, July 22, 2020 - 10:34am
Submitted by anonymous user: 209.147.113.71
Submitted values are:

Petitioner's Name: Dean M. Hanks
Mailing Address: 2300 South Washington Street
City: Tacoma
State: WA
Zip Code: 98405
Phone: 2537563875
Email: hanksd@bellarmineprep.org
Rule Petition Type: Amend Rule – I am requesting WSGC to change an existing rule.
==Amend Rule – I am requesting WSGC to change an existing rule.==

List rule number (WAC) if known: unkonwn

I am requesting the following change: I am requesting that the staff and Commission examine the current rule that does not allow for raffle tickets to be sold by phone or over the internet. I am proposing that rule be amended and that registered licensees be allowed to sell raffle tickets online or over the phone with credit card transactions and the paid ticket then being sent to the purchaser. The transactions would be done by a designated raffle manager who would take the call or the order over the internet, fill out the raffle ticket and mail the stub of the ticket to the purchaser. The net effect is no difference to the purchaser and actually provides more effective controls for the issuing organization as the tickets are centralized and assure sequential selling.

This change is needed because: As Not for Profits and others who have faithfully followed the rules have suffered in this pandemic climate with the inability to meet with people face to face or in groups where the tickets are normally sold. This has severely impacted the fundraising efforts of many worthy charities during a time where funds are needed the most. At my organization, Bellarmine Prep in Tacoma we experienced a loss of more than \$100,000 due to our inability to sell raffle tickets by phone or online. This revision would allow Washington State not for profits to still adhere to the guidelines regarding sequential numbers and be able to generate much needed revenue.

The effect of this rule change will be: As stated previously, the change would allow raffles to continue by phone or internet with a designated manager handling all transactions and issuing hard copy tickets to the purchasers. The significant change is that due to COVID restrictions not allowing groups or face to face interaction, non profits could continue their raffles and generate the needed support for the programs and services.

The results of this submission may be viewed at:



Budget Review & Financial Update

September 10, 2020
Christopher Stanley
Chief Financial Officer



FY 2020 ended better than anticipated

FY 2020 Revenue by Category/Subsource

Total Revenue by Category	2020 Expected Revenue	2020 Actual Revenue	2020 Projected Remaining	2020 Revenue Variance
Activity Licenses - Commercial	\$ 4,630,530	\$ 4,942,439	\$ -	\$ 311,909
Activity Licenses - Non-Profit	\$ 955,285	\$ 1,034,110	\$ -	\$ 78,825
Individual Licenses	\$ 2,692,284	\$ 2,774,704	\$ -	\$ 82,420
Vendor Licenses	\$ 1,423,855	\$ 1,299,810	\$ -	\$ (124,045)
Tribal Reimbursements	\$ 3,658,340	\$ 3,884,891	\$ -	\$ 226,551
Other Sources*	\$ 292,632	\$ 1,587,582	\$ -	\$ 1,294,950
Agency Total	\$ 13,652,926	\$ 15,523,537	\$ -	\$ 1,870,611

**Note: Actual revenue from "other sources" includes a \$1.25M fine paid in September 2019.*

FY 2020 ended better than anticipated

FY 2020 Sub-Program / Program Index-Level View

Agency Total by Object	2020 Total Budgeted	2020 Spent To-Date	2020 Projected Remaining	2020 Variance (Bd-Sp-Pr=Var)
FTEs	119.25	106.90		12.35
Salaries	\$ 9,390,636	\$ 7,976,197	\$ -	\$ 1,414,439
Benefits	\$ 3,350,007	\$ 2,896,449	\$ -	\$ 453,558
Contracts	\$ 14,700	\$ 9,255	\$ -	\$ 5,445
Goods & Services	\$ 2,560,038	\$ 2,873,554	\$ -	\$ (313,516)
Travel	\$ 313,560	\$ 228,687	\$ -	\$ 84,873
Capital Expenses	\$ 527,784	\$ 237,113	\$ -	\$ 290,671
Grants & Benefits	\$ 2,712	\$ 2,725	\$ -	\$ (13)
Agency Total	\$ 16,159,437	\$ 14,223,981	\$ -	\$ 1,935,456

The agency has underspent its budget for FY 2020 by 12% due to standard vacancy savings.

FY 2021 started better than anticipated

FY 2021 Revenue by Category/Subsource

Total Revenue by Category	2021 Expected Revenue	2021 Actual Revenue	2021 Projected Remaining	2021 Revenue Variance
Activity Licenses - Commercial	\$ 4,632,920	\$ 279,923	\$ 3,489,711	\$ (3,129,525)
Activity Licenses - Non-Profit	\$ 956,652	\$ 49,858	\$ 681,768	\$ (654,418)
Individual Licenses	\$ 2,692,116	\$ 280,705	\$ 1,526,504	\$ (643,143)
Vendor Licenses	\$ 1,450,927	\$ 46,900	\$ 879,958	\$ (374,362)
Tribal Reimbursements	\$ 3,766,508	\$ 480,419	\$ 3,450,077	\$ 163,988
Other Sources*	\$ 243,144	\$ 1,749	\$ 55,721	\$ (241,395)
Agency Total	\$ 13,742,267	\$ 1,139,554	\$ 10,083,738	\$ (2,518,975)

FY 2021 started better than anticipated

FY 2021 Sub-Program / Program Index-Level View

Agency Total by Object	2021 Total Budgeted	2021 Spent To-Date	2021 Projected Remaining	2021 Variance (Bd-Sp-Pr=Var)
FTEs	119.25	88.15		31.10
Salaries	\$ 9,672,358	\$ 572,214	\$ 7,997,295	\$ 1,102,849
Benefits	\$ 3,328,791	\$ 226,304	\$ 2,751,847	\$ 350,640
Contracts	\$ 14,700	\$ -	\$ 12,801	\$ 1,899
Goods & Services	\$ 2,507,272	\$ 210,392	\$ 2,122,477	\$ 174,403
Travel	\$ 313,560	\$ 641	\$ 260,721	\$ 52,199
Capital Expenses	\$ 442,789	\$ 37,750	\$ 248,430	\$ 156,609
Grants & Benefits	\$ 2,712	\$ -	\$ 2,362	\$ 350
Agency Total	\$ 16,282,182	\$ 1,047,301	\$ 13,395,931	\$ 1,838,950

The agency has underspent its budget for FY 2021 by 8% due to the July furloughs and vacancy savings.

Formal Adoption of FY 2021 Budget

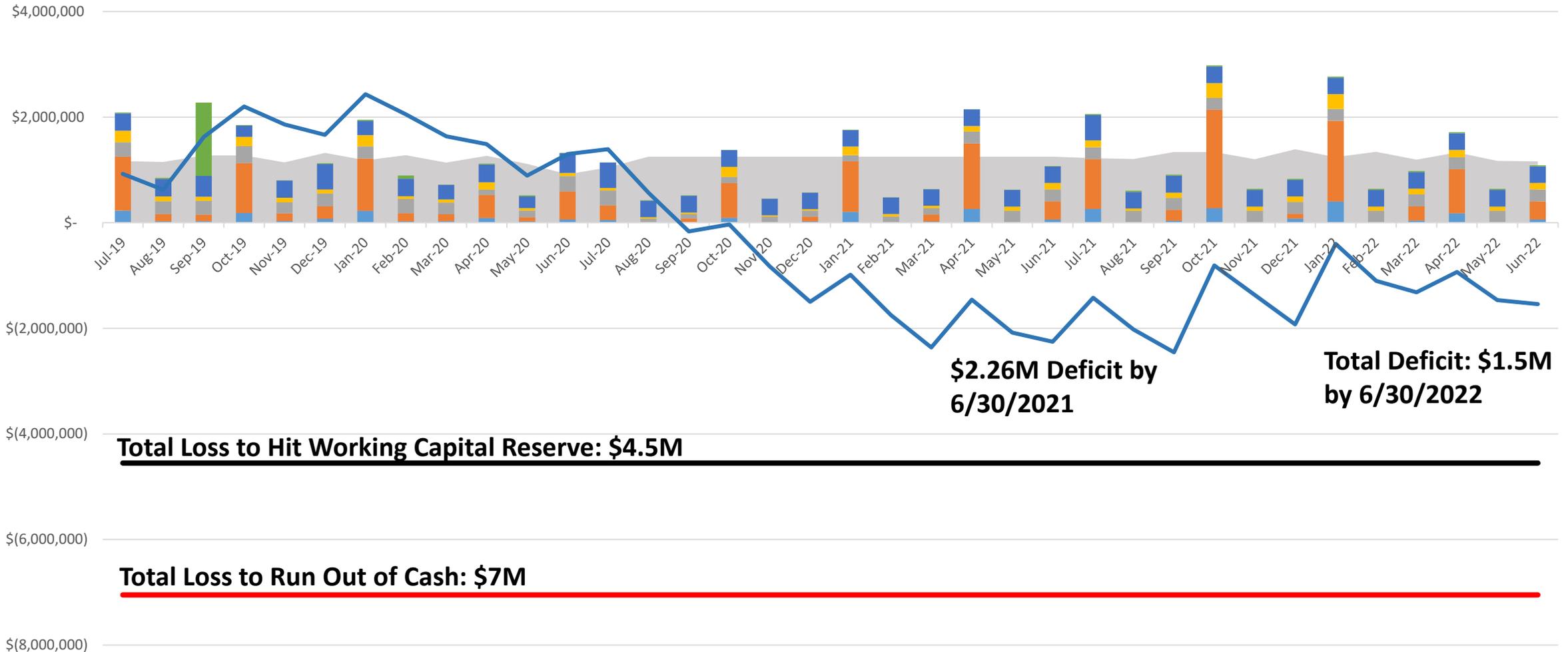
FY 2021 Sub-Program / Program Index-Level View

Agency Total by Object	2021 Total Budgeted	2021 Spent To-Date	2021 Projected Remaining	2021 Variance (Bd-Sp-Pr=Var)
FTEs	151.05	88.15		62.90
Salaries	\$ 12,968,232	\$ 572,214	\$ 11,293,169	\$ 1,102,849
Benefits	\$ 4,466,664	\$ 226,304	\$ 3,889,720	\$ 350,640
Contracts	\$ 14,700	\$ -	\$ 12,801	\$ 1,899
Goods & Services	\$ 2,979,060	\$ 210,392	\$ 2,594,265	\$ 174,403
Travel	\$ 409,080	\$ 641	\$ 356,241	\$ 52,199
Capital Expenses	\$ 1,504,716	\$ 37,750	\$ 1,310,357	\$ 156,609
Grants & Benefits	\$ 2,712	\$ -	\$ 2,362	\$ 350
Agency Total	\$ 22,345,164	\$ 1,047,301	\$ 19,458,914	\$ 1,838,950

This formal budget includes \$6.062M in additional spending assumed for the implementation of sports wagering.

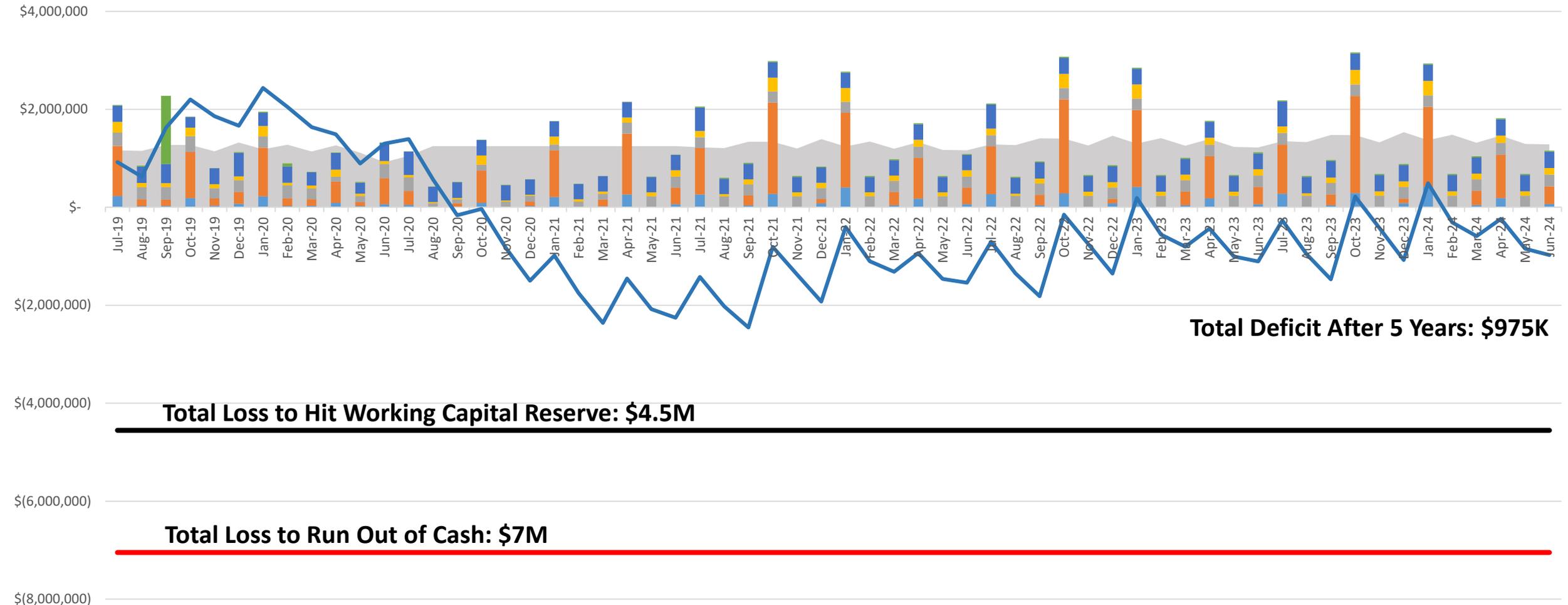
Gambling Revolving Fund Official Forecast

**Based on Projected Expenditures over 18 months with Inflation*



Gambling Revolving Fund Official Forecast

**Based on Projected Expenditures over 18 months with Inflation*



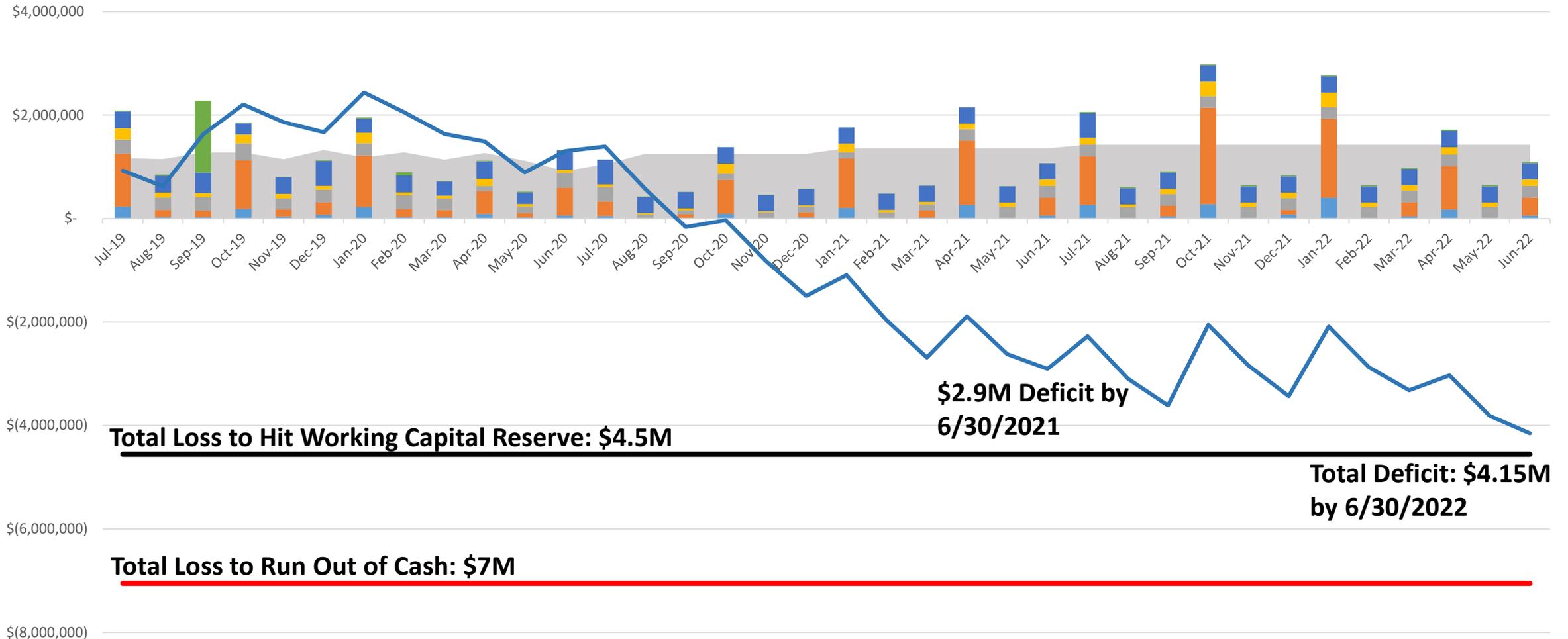
Total Deficit After 5 Years: \$975K

Total Loss to Hit Working Capital Reserve: \$4.5M

Total Loss to Run Out of Cash: \$7M

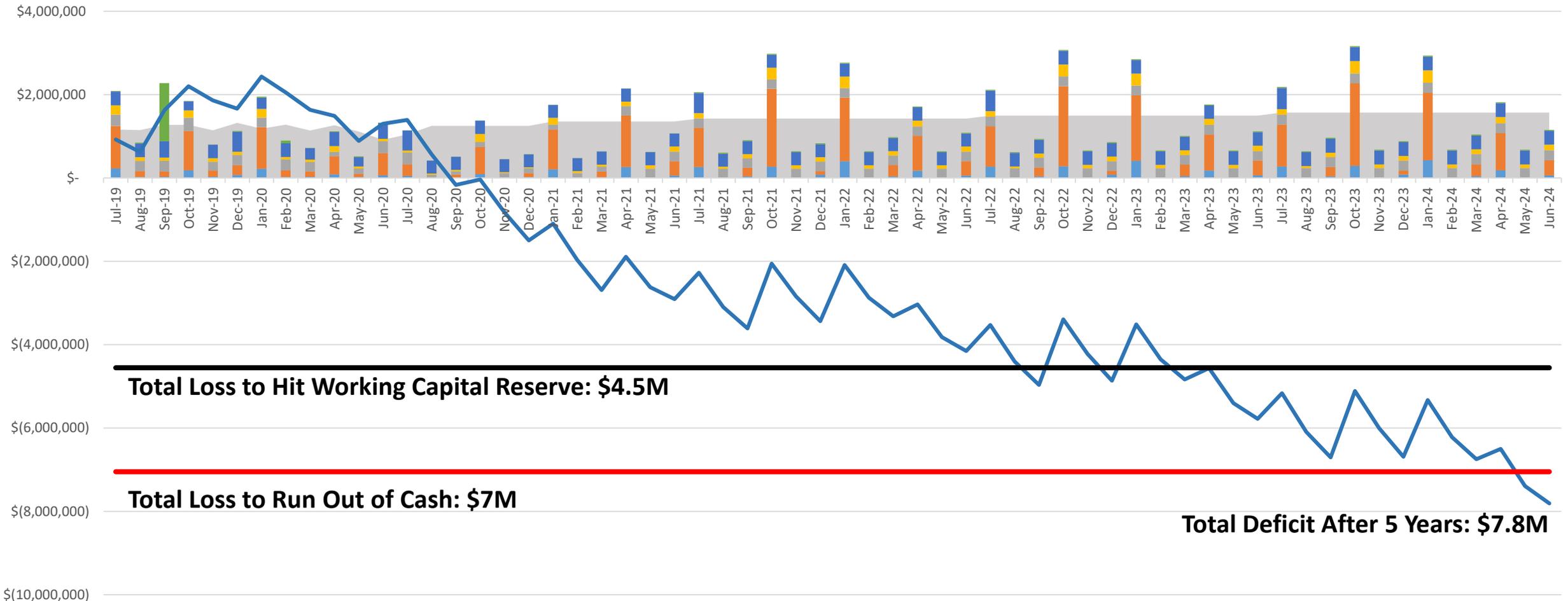
Gambling Revolving Fund Alternate Forecast

**Based on Approved Budgeted Levels with Inflation*



Gambling Revolving Fund Alternate Forecast

**Based on Approved Budgeted Levels with Inflation*



Budget Proposals

1. Leave in place the \$6M Transfer from General Fund
 - a. See Package: PL-SW – Forgive Sports Wagering Loan
 - b. Submitted for the 2021 Second Supplemental Budget (current fiscal year)

2. Fund Criminal Enforcement with General Fund
 - a. See Package: PL-CE – Reduce Crime and Protect the Public
 - b. Submitted for the 2021-23 Biennial Budget (next fiscal period starting July 1, 2021)



Questions?

Christopher Stanley
Chief Financial Officer





Agency Recommendation Summary

The Washington State Gambling Commission requests \$3 million per year of General Fund-State funds to support its criminal investigation efforts regarding gambling-related crimes. Over the past 5 years, gambling crime has risen 25 percent and is anticipated to rise further as California, Montana, Oregon and other states legalize sports wagering. In that same time period, the criminal enforcement unit of WSGC has had to increase staffing levels to partially combat the overwhelming number of gambling-related cases. Unfortunately, we have lost a number of agents to retirement or other positions and have had tremendous difficulty recruiting for the positions. This not only impedes our ability to investigate new cases, but also hampers our ability to assist prosecutors that may not have a background in the specialized nature of gambling crimes which have complex financial components. Ultimately, criminals are more easily able to prey on individual victims through loan-sharking and financial exploitation of the elderly and commit more crimes of opportunity at legal gambling sites, such as theft, identity theft, financial fraud, and money laundering the ill-gotten gains from narcotics trafficking and other criminal behavior. Of all the cases investigated by the unit since 2015, 90 percent of gambling crime was predominantly committed by unlicensed individuals and only 10 percent by individuals who take advantage of their position at legal establishments. Fees levied by the WSGC under RCW 9.46.070 are for the purposes of licensing and regulating legal gambling in the state of Washington. However, due to a lack of funding for criminal investigations, WSGC has historically been forced to tap into its licensee and tribal revenue streams in order to investigate gambling crime. Because of the prolonged, ongoing use of licensee funds for criminal investigations, combined with the steady increase in gambling crime, fees on licensees as well as cost-recovery fees assessed on sovereign tribes have risen over time. By adequately funding WSGC's Criminal Enforcement Unit with general fund dollars rather than shifting valuable licensee dollars meant for regulation efforts, we can keep both tribal and non-tribal licensee fees low into the future and keep Washingtonians safe from predators that target vulnerable individuals by perpetrating gambling-related crimes while maintaining a focus on dismantling the underlying criminal organizations.

Fiscal Summary

Fiscal Summary <i>Dollars in Thousands</i>	Fiscal Years		Biennial	Fiscal Years		Biennial
	2022	2023	2021-23	2024	2025	2023-25
Staffing						
FTEs	16.0	16.0	16.0	16.0	16.0	16.0
Operating Expenditures						
Fund 001 - 1	\$3,000	\$3,000	\$6,000	\$3,000	\$3,000	\$6,000
Total Expenditures	\$3,000	\$3,000	\$6,000	\$3,000	\$3,000	\$6,000

Decision Package Description

Since 1854, when the Territorial Legislature of Washington Territory codified its first criminal code, some form of gambling has always been illegal. In 1909, the Legislature recodified the criminal code and expressly stated that "It shall be the duty of all peace officers to search for and seize all tables, slot machines, or [other machines] commonly used for gambling." Today, certain forms of gambling (animal fights, bookmaking, online betting, to name a few) remain illegal while other forms (bingo, pull-tabs, computerized lottery terminals, to name a few) are now regulated. WSGC has developed a fee schedule for non-tribal licensees as well as cost-sharing agreements with sovereign tribes that cover the necessary costs to regulate gambling, including criminal investigations of illegal activity, but those fees are reaching a ceiling for licensees as the pool of licensed operators diminishes.

What's the problem?

Fees that are charged by WSGC are not adequate to cover necessary expenditures required to keep gambling legal and honest.

Why not simply raise fees?

Between 1973 and 1993, the gambling industry was almost entirely dominated by non-tribal gaming. There were hundreds of licensees profit and non-profit and dozens of card rooms. Fees were easy to keep down for individual licensees because costs could be shared by a larger pool. In 1993, when tribal gaming began to take shape in Washington, the industry began to shift, and gradually over the past 25 years, non-tribal gaming is a very small share of the market, whereas tribal gaming almost entirely dominates the industry. While both groups are charged fees (for tribal operations, its known as "cost-sharing"), the larger pool to share non-tribal regulatory costs has shrunk dramatically. This lower level of licensees as well as technological and process enhancements has reduced the need for greater staffing, but the costs of staffing levels necessary to adequately monitor activity at non-tribal establishments is still higher than what current fee revenues can support. As a result, WSGC has been drawing down its fund balance to cover the difference.

Why not simply raise fees? The term "non-tribal licensees" is a fairly non-descript moniker, but in reality, these are small businesses, churches, senior centers, community centers, main street taverns, fraternal organizations, etc. Most of our licensees aren't a wealthy international gaming organization that can easily absorb fee increases as it would a rounding error. Most of WSGC's licensees are right on the margins of profitability, and are already being decimated by a global pandemic and ensuing economic crisis. They're employees. They're community members. Yes, WSGC could raise fees, but that could mean the difference between staying open or closed for a local restaurant that relies on pull-tab customers for profitability.

Why not simply increase allocated costs to tribes?

Tribes are sovereign nations, and as such, may not be taxed or levied a fee upon. In the state compacts between Washington and the 29 federally recognized tribes within our borders, we have negotiated a cost-sharing agreement wherein the tribes reimburse the state for very specific costs related to regulating tribal gaming. Tribes are billed monthly using a per-hour charge negotiated each fall between the tribes and WSGC. It is simply not realistic to shift more costs to tribal nations because the work simply does not exist for which we could bill.

Is there really that much gambling crime in the state?

Yes, in fact there is. In 2018, WSGC's criminal enforcement unit (between nine and twelve special agents at any one time) logged almost 12,000 hours of investigation time on criminal cases, and that isn't including the yearly training for all law enforcement officers and administrative tasks that are part of any employee's job function. WSGC regularly receives reports of animal fighting, money laundering, theft, identity theft, financial fraud, financial exploitation of the elderly, book-making, and other criminal profiteering crimes - all of which require intelligence gathering, cooperation with other agencies (including local, state, and federal agencies), and standard investigative work. Rarely does a criminal limit oneself to petty crimes and low-impact crime. Often, when a smaller crime is discovered, such as check fraud, our investigators follow a trail of illicit behavior to larger crimes such as money laundering, loan sharking, and even violent crimes such as murder.

Below is a table that shows the total number of closed cases, open cases, and hours spent per case. It shows that while closed cases and hours per case have remained constant, representative of the static staffing levels in the unit, that the number of open cases has grown dramatically. This is a clear representation of the growth in gambling crime and how current funding levels have been insufficient to tackle its rise.

	Closed Cases	Open Cases	Hours/Case
2015	55	3	73
2016	49	5	75
2017	50	27	80
2018	63	34	84
2019	36	41	74

Assumptions and Calculations

Expansion, Reduction, Elimination or Alteration of a current program or service:

This does not expand or alter a current program or service.

Detailed Assumptions and Calculations:

Proposed funding levels are derived from the budgeted levels for fiscal years 2020 and 2021. Typically in a funding replacement scenario, funds from the supplanted fund (in this case, Fund 884-6, the Gambling Revolving Account) are reduced. In this instance, we are requesting that \$3 million per year of Fund 001-1, General Fund-State be appropriated to the agency while Fund 884-6, Gambling Revolving Account is not reduced. This would allow the Commission to use its fund to cover regulatory costs for several years into the future. Without these additional funds, the Washington State Gambling Commission is currently looking at losses at over \$1.5 million per year based on pre-COVID calculations of revenue and expenditures.

Gambling Revolving Account (884-6)						
Projected Balance Sheet - 19-21 and 21-23 Biennium - 119.25 FTEs						
	Actual	Projected		Projected	Proposed	
	FY20	FY21	Biennium Total	FY22	FY23	Biennium Total
Beginning Balance =	7,048,652	7,789,301		4,974,204	3,339,370	
Revenue =	15,968,262	14,169,090	30,137,352	14,594,162	15,031,987	29,626,149
Expenditures* =	15,227,613	16,984,187	32,211,800	16,228,996	17,040,446	33,269,443
Rev minus Exp =	740,649	(2,815,098)	(2,074,448)	(1,634,834)	(2,008,459)	(3,643,293)
Balance at FY end =	7,789,301	4,974,204		3,339,370	1,330,910	
FTEs =	107.3	119.3		119.3	119.3	
Working Capital Balance Target (2 mos Exp.) =		\$2,830,698		\$2,704,833	\$2,840,074	

Workforce Assumptions:

N/A

How is your proposal impacting equity in the state?

This proposal shares the cost of the criminal enforcement unit with the public, through the use of General Fund-State funds, which reduces the burden of this cost on licensees and tribal partners.

Strategic and Performance Outcomes

Strategic Framework:

This funding request is an integral part of WSGC's goal to strengthen stakeholder relationships (Goal 4, WSGC Strategic Plan 2018-2022). We have overhauled our fee structure to simplify fees and actively engage our industry partners in rule-making. This piece of our strategy communicates to our stakeholders that we recognize that they are not solely responsible for preventing gambling crime. Indeed, most crime is committed by unlicensed individuals who pay nothing into the regulatory system and only cause costs to rise, driving up cost-recovery fees on the legal industry.

Performance Measures	Incremental Changes 2022	Incremental Changes 2023	Incremental Changes 2024	Incremental Changes 2025
002888 - Percentage of criminal cases resulting in arrests or charges filed.	5%	5%	5%	5%

Performance Outcomes:

By funding the Criminal Enforcement Unit with a stable funding source such as the General Fund, cases can be worked more efficiently without the risk of interruption or delay. This can result in more arrests and an increase in referrals to prosecutors.

Other Collateral Connections

State Workforce Impacts:

N/A

Intergovernmental:

Tribal support is anticipated as state funding of criminal enforcement activities will minimize increases in costs allocated to tribes.

State Facilities Impacts:

N/A

Changes from Current Law:

N/A

Puget Sound Recovery:

N/A

Legal or Administrative Mandates:

N/A

Stakeholder Response:

Stakeholder support is anticipated as state funding of criminal enforcement activities will minimize increases of fees that are currently diverted to fund these activities.

IT Addendum

Does this Decision Package include funding for any IT-related costs, including hardware, software, (including cloud-based services), contracts or IT staff?

No

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Washington State Gambling Comm
2019-21 Second Supplemental Budget Session
Policy Level - SW - Forgive Sports Wagering Loan

Agency Recommendation Summary

This request, while submitted by the Gambling Commission, relates to Section 804 in the underlying enacted operating budget. The Washington State Gambling Commission (WSGC) requests forgiveness of the \$6 million loan made in Engrossed Substitute House Bill 2638 of the 2020 Legislative Session. Forgiveness of the loan will afford WSGC the ability to meet the Legislative intent of the law to build a strong regulatory system while taking steps to address the black market and illegal activity related to sports gambling. Funds not utilized specifically for implementing the bill will be able to be used for the investigation of illegal and unlicensed criminal gambling activity.

Fiscal Summary

Fiscal Summary <i>Dollars in Thousands</i>	Fiscal Years		Biennial	Fiscal Years		Biennial
	2020	2021	2019-21	2022	2023	2021-23
Operating Expenditures						
Fund 001 - 1	\$0	(\$6,000)	(\$6,000)	\$0	\$0	\$0
Total Expenditures	\$0	(\$6,000)	(\$6,000)	\$0	\$0	\$0

Decision Package Description

[Engrossed Substitute House Bill 2638](#) of the 2020 Legislative Session authorized sports wagering in Washington and restricted it to tribal casinos. In order to implement the bill, Section 14 included a \$6 million loan to the gambling commission (text below).

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1      NEW SECTION.   Sec. 14.   The sum of six million dollars is
2      appropriated from the general fund—state for the fiscal year ending
3      June 30, 2020, and is provided solely for expenditure into the
4      gambling revolving account. The gambling commission may expend from
5      the gambling revolving account from moneys attributable to the
6      appropriation in this section solely for enforcement actions in the
7      illicit market for sports wagering and for implementation of this
8      act. The appropriation in this section constitutes a loan from the
9      general fund to the gambling revolving account that must be repaid
10     with net interest by June 30, 2021.

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The [enacted 2020 supplemental operating budget](#) included a provision in Section 804 “For the State Treasurer—Transfers” that transfers \$6 million back from the Gambling Revolving Account (WSGC’s primary operating fund) as a repayment of the initial loan (text below).

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18     Gambling Revolving Account: For transfer to the
19     state general fund as repayment of the loan
20     pursuant to Engrossed Substitute House Bill No. 2638
21     (sports wagering/compacts), $6,000,000 for fiscal
22     year 2021. . . . . $6,000,000

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WSGC requests that the repayment provision above be removed from the operating budget and that language be included in Part IX “Miscellaneous” that amends ESHB 2638 to strike lines 7-10 of Section 14 and ending the section at line 6 with the phrase, "solely for enforcement actions."

What’s the problem?

There are two problems:

1. While WSGC is utilizing the startup loan and working hard to implement the intent of the sports wagering legislation, the loan assumed there would be sports to bet on and an ability to have tribal sportsbooks up and running in enough time so there would be revenue coming into the WSGC to pay the loan back within a year. However, COVID-19 has been a major setback for the gambling industry, and sportsbooks have been impacted significantly with the shutdown or reduction of most sporting events through 2020. This has also impacted WSGC's ability to increase our focus on the black market and illegal activities associated with sports gambling. As such, we will likely not generate enough - or any - revenue with which to repay the loan.
2. The WSGC will spend virtually its entire reserve fund to maintain basic operations during the gambling shutdown. Forgiveness of the loan with the flexibility to use any excess money for criminal law enforcement activities gives the agency the ability to meet the Legislative intent of the sports wagering law and protect the public by keeping gambling legal and honest without looking to impose licensing or cost

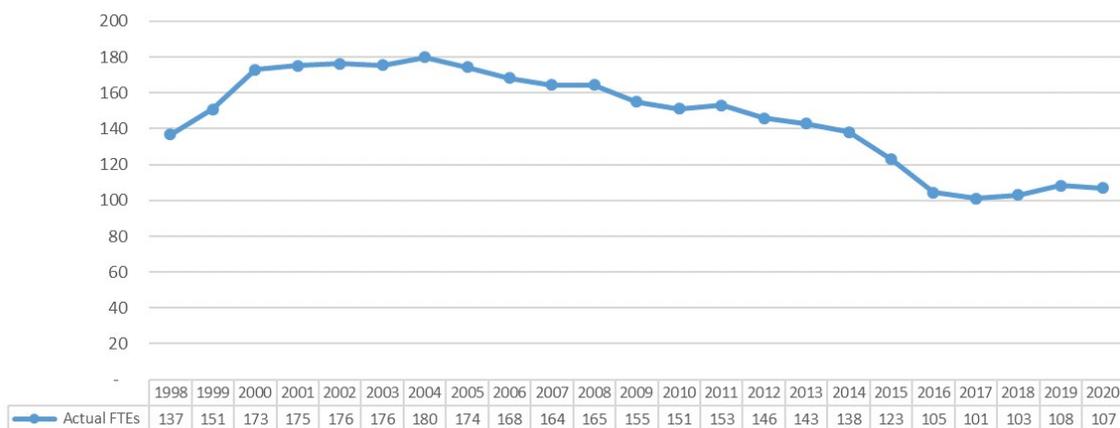
increases to a gambling industry that cannot afford cost increases at this time.

Why not simply accelerate negotiations, raise fees, or reduce expenditures?

Tribal negotiations on gaming issues are time-intensive and nuanced, even on requests to negotiate on basic compact items such as “what constitutes a gaming facility”. They are nuanced and time-intensive for good reason: The first line of the Gambling Act in RCW 9.46.010 states "The public policy of the state of Washington on gambling is to keep the criminal element out of gambling and to promote the social welfare of the people by limiting the nature and scope of gambling activities and by strict regulation and control", and the tribes rely heavily – if not solely – on the income that gaming provides. Accelerating negotiations puts both parties at risk – a methodical and thoughtful approach limits the possibility for vague and potentially inaccurate language that could impact tribal gaming revenue. Additionally, Tribes are sovereign co-regulatory partners and we cannot impose standards/regulations for tribal sports gambling. Instead, we must in good faith negotiate a tribal sports gambling system that meets the five pillars identified by the Legislature, protects the public by keeping gambling legal and honest, and meets each sovereign tribe's legal, economic, and regulatory priorities before each compact amendment can be finalized. Negotiations were always going to take some time and the pandemic has not made things easier.

Increasing fees on non-tribal licensees is not a feasible option, particularly during the current pandemic and economic crisis. These licensees are small businesses churches, senior centers, community centers, main street taverns, fraternal organizations, etc. Most of WSGC's 2000+ commercial and non-profit licensees are right on the margins of profitability and the economic crisis is severely impacting them. A fee increase will likely cause instability in our regulated industry, and the WSGC does not see causing instability due to a fee increase as a solution that will protect the public by keeping gambling legal and honest. Instead, it will only hurt the agency's mission by pushing more of our 2000+ licensees and their 16,000+ employees to look for short cuts possibly abandon best practices if they are at risk in losing their business or job through no fault of their own.

Lastly, further reducing expenditures is also not a feasible option as doing this will lead to a significant reduction in regulation and investigations of criminal activity. WSGC has seen a 33.6 percent reduction in staffing since 2013 when it began making staffing reductions in response to decreased non-tribal licensee revenue. In fact, actual FTE staffing is at the lowest levels in the almost 25 years that accounting records are available. The WSGC cannot create and regulate a new gambling activity like sports gambling using existing resources. Additionally, the agency cannot increase our focus on the black market and criminal activity, as contemplated by the Legislature, without additional funding. This focus was considered necessary because it will benefit all Washingtonians and begin to reduce the black market that does not have the same consumer protection and responsible gaming protections as the regulated market.



In that 25 years, the state has seen a substantial increase in gambling activity, including the significant increase in tribal gaming. Over the past 10 years for which we have data, gross gambling receipts in the state-licensed sector alone have risen over 20 percent. The expanded gambling sector and the increased activity not only means an increase in legal, regulated activity, but also an increase in illegal activity. Just recently, the Commission increased our authorized FTE levels to 119.25 FTEs to respond to the increase in workload, but due to difficulties in filling positions combined with the current economic crisis, WSGC has remained at it’s low staffing levels, putting tremendous strain on existing agents and staff.



How does WSGC’s request solve the two problems?

Forgiveness ensures that (1) the Gambling Commission has the financial resources needed to establish a strong regulatory sports gambling structure without compromising any Legislative objective set out in the new law; and (2) added flexibility to use any unused portions of the funding for our law enforcement activities will allow us to continue our current law enforcement activities without any increased public safety risk and without raising fees on our licensees.

The gambling industry, including tribal gaming, and the sports industry likely will not rebound from their current fiscal crisis until mid-to-late 2021 at the earliest. Our latest revenue forecast indicates that we will lose \$4.4 million over the next fiscal year, leaving us with only \$1.5 million to cover our structural deficit and future emergencies – *if* the forecast holds over the next year. This forecast was newly created in response to the economic crisis and like the most recent state revenue forecast, it comes with a great deal of uncertainty. Forgiveness of the loan ensures the WSGC can continue to protect the public from illegal activities while having the necessary resources to create a new sports gambling regulatory structure while also increasing our focus on the black market as contemplated by the Legislature when they passed the bill.

Finally, it also ensures that we can continue with our plan to meet legislative intent to focus on the illegal black market and criminal activities, such as money laundering, that have been stalled due to COVID and the shutdown of sporting events.

Assumptions and Calculations

Expansion or alteration of a current program or service:

This does not expand a current program or service, but rather maintains the existing regulatory structure for gambling in the state of Washington.

Detailed assumptions and calculations:

See attached Financial Forecast

Workforce Assumptions:

N/A

Strategic and Performance Outcomes

Strategic framework:

This funding request is an integral part of implementing WSGC's entire strategic plan as well as meeting the statutory mandate to keep gambling legal and honest. We are committed to good-faith negotiations that lead to an outcome that works for all parties.

Goal 1: Increase the Commission's role in helping people who are suffering from gambling disorders. This request allows us to continue to focus on problem gambling issues because otherwise we will likely have to pull some resources from that area if we need to cut costs or staffing and will not have the same negotiation power to ensure we continue to progress in better addressing the issue.

Goal 2: Strengthen legislative relationships. This request strengthens legislative relationships because it continues to establish that our law enforcement activities are important and deserving of general fund money and that we can deliver on the integrity/black market issues about which the legislature is concerned.

Goal 3: Staff continuity and succession planning. This request helps with continuity and succession planning because it allows us to continue to be a lean, strong regulator while adding staff at the outset to ensure sports gambling is regulated properly in our state. By maintaining appropriate staffing levels and ensuring continuity of staff, we will ensure our gambling industry is run well and with integrity.

Goal 4: Strengthen stakeholder relationships. Lastly, this request strengthens our stakeholder relationships with all our licensees and tribal co-regulator partners. Providing flexibility through utilizing the sports wagering startup funds for longer than a year and utilizing leftover funds to stabilize our criminal enforcement funding will strengthen our stakeholder relationships and keep license fees stable in the future.

Performance outcomes:

By stabilizing WSGC funding, we expect all performance outcomes to remain steady. Without this package, it is anticipated that all of our performance outcomes will suffer as resources decline precipitously.

Other Collateral Connections

Puget Sound recovery:

N/A

Legal or administrative mandates:

N/A

Intergovernmental:

Tribal support is anticipated as forgiving the sports wagering loan would provide both negotiating tribes and WSGC with the flexibility of time to reach a compact amendment that works for all parties.

Stakeholder response:

Stakeholder support from tribal, commercial, and nonprofit stakeholders is expected as forgiveness of the loan with the flexibility of spending leftover funds for law enforcement activities benefits the entire industry.

Changes from current law:

Section 804 needs to be amended to remove the transfer of \$6 million from the Gambling Revolving Account, and language would need to be included in Part IX "Miscellaneous" that amends ESHB 2638 to strike lines 7-10 of Section 14.

State facilities impacts:

N/A

State workforce impacts:

Adopting this request would prevent further cuts to WSGC staff that ensure that gambling in the state of Washington is legal, safe, and honest.

IT Addendum

Does this Decision Package include funding for any IT-related costs, including hardware, software, (including cloud-based services), contracts or IT staff?

No

Objects of Expenditure

Objects of Expenditure <i>Dollars in Thousands</i>	Fiscal Years		Biennial	Fiscal Years		Biennial
	2020	2021	2019-21	2022	2023	2021-23
Obj. M	\$0	(\$6,000)	(\$6,000)	\$0	\$0	\$0

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