

STATE OF WASHINGTON
OFFICE OF ADMINISTRATIVE HEARINGS

ATTORNEY GENERAL
OF WASHINGTON
JUN 28 2015
GOVERNMENT COMPLIANCE
& ENFORCEMENT

In The Matter Of the Denial of a Public
Card Room Employee License to:

BAO TRAN N. NGUYEN,
Vancouver, Washington

OAH Docket No. 12-2015-GMB-00011

INITIAL ORDER

Agency: Gambling Commission
Program: Lic. Reg. & Enforce. Division
Agency No: CR 2015-01668

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1. ISSUES

- 1.1. Did Bao Tran N. Nguyen violate RCW 9.46.075(1), (2), and (8); and WAC 230-03-085(1), (3), and (8)(a), to warrant the denial of Ms. Nguyen's application by the Washington State Gambling Commission of a card room employee's license?
- 1.2. Did Bao Tran N. Nguyen fail to prove by clear and convincing evidence that she is qualified for licensure under Chapter 9.46 RCW, as required by RCW 9.46.153(1)?

2. ORDER SUMMARY

- 2.1. The Washington State Gambling Commission ("Commission") received an application in September 2015 from Bao Tran N. Nguyen for a public card room employee license. Ms. Nguyen had earlier been licensed by the Commission, but the Commission sought to revoke that license in 2005 because the Commission had concluded that Ms. Nguyen had engaged in illegal bookmaking activities. Ms. Nguyen moved without notifying the Commission of her change of address. The Commission was unable to serve on Ms. Nguyen an order summarily suspending her license. Ms. Nguyen's license expired by its own terms on June 14, 2005. Ms. Nguyen failed to convince the Commission that, in 2015, she was qualified for licensure by the Commission. This Initial Order affirms the Commission's denial of a public card room employee's license.

3. HEARING

- 3.1. Hearing Date: Wednesday, April 27, 2016.
- 3.2. Administrative Law Judge: John M. Gray, ALJ.
- 3.3. Appellant: Bao Tran N. Nguyen ("Ms. Nguyen").
 - 3.3.1. Representative: Ms. Nguyen appeared and represented herself.
 - 3.3.2. Witnesses:
 - 3.3.2.1. Kelvin Tran.
- 3.4. Agency: Washington State Gambling Commission (the "Commission").
 - 3.4.1. Representative: Gregory J. Rosen, Assistant Attorney General
 - 3.4.2. Witnesses:
 - 3.4.2.1. Adam Mike Lopez, Special Agent, Gambling Commission.
 - 3.4.2.2. Diane Milner-Stevenson, Former Special Agent, Gambling Commission.
 - 3.4.2.3. Dan Wegenast, Special Agent, Gambling Commission.
- 3.5. Exhibits: The Commission's Exhibits 1 through 15 were admitted, without objection. Ms. Nguyen offered no exhibits.
- 3.6. All witnesses were sworn before they testified.
- 3.7. This hearing was governed by the Prehearing Conference Order dated January 28, 2016.

4. FINDINGS OF FACT

The ALJ finds the following facts by a preponderance of the evidence:

Jurisdictional Facts:

- 4.1. Ms. Nguyen applied to the Commission for a public card room employee license on September 14, 2015. Exhibit 15.
- 4.2. The Director of the Commission signed a Notice of Administrative Charges and Opportunity for Adjudicative Proceeding ("NAC") directed to Ms. Nguyen on October 28, 2015. In the NAC, the Director denied Ms. Nguyen's license application. The Commission served the NAC by placing two copies in the United States mail to Ms. Nguyen on October 30, 2015, one by regular mail and the other by certified mail.
- 4.3. Ms. Nguyen filed a Request for Administrative Hearing and Interpreter with the Commission, which the Commission received on November 19, 2015.

The Parties and Witnesses:

- 4.4. Ms. Nguyen is the applicant for a public card room employee's license from the Commission. She earlier held a Class "B" house-banked card room employee's license from the Commission. That license expired in 2005. Before the license expired, Ms. Nguyen worked at the New Phoenix Casino and the Last Frontier Casino in Clark County. Ms. Nguyen is married to Calvin Tran. After her license expired, she spent the last eleven years raising the couple's children. She has worked some part-time jobs. She wishes to obtain a new gambling license and to work in the gambling industry because she has no education or degree. This is the field in which she has experience and an opportunity to earn money beyond what part-time and minimum wage jobs can provide.
- 4.5. Kelvin Tran is the husband of the applicant, Ms. Nguyen. He was a participant in some of the events in 2004 and 2005 that led to the Commission's decision to summarily suspend Ms. Nguyen's earlier license. Mr. Nguyen was himself licensed by the Commission. Mr. Tran obtained another gambling license in 2007. Ms. Nguyen and Mr. Train have a daughter who is has a 4.0 grade point average and is an honor roll student.
- 4.6. The Commission is an agency of Washington State. The Commission is the agency charged by the legislature with enforcing the gambling laws enacted by the legislature.

- 4.7. Adam Mike Lopez is a Special Agent employed by the Commission. He has worked for the Commission for over twenty-six years. His duties have included field operations, regulatory work, administrative and criminal investigations, work in the tribal gaming unit, and work in the special investigations unit. He now works as a Background Investigator in the Licensing Division. He investigates whether applicants, such as Ms. Nguyen, are qualified to be licensed by the Commission. Over the years, he has received many hours of training in order to perform his various jobs.
- 4.8. Diane Milner-Stevenson is a former Special Agent employed by the Commission. She no longer works for the Commission because she cannot meet the physical demands (i.e., bad knees). She is retired. When working, she received training from the Hawaiian Law Enforcement Academy. She worked in Honolulu between 1985 and 1995. She received basic equivalency from the Washington State Justice and Training Commission. She was taught Washington laws. When she worked for the Commission, she was assigned to the Special Investigations Unit, investigating crimes and their nexus to illegal gambling. She has worked as an undercover agent for about fifteen years, including her work investigating Ms. Nguyen's activities in 2004. In her other work as an undercover agent, she encountered organized crime conspiracies. She has experience compiling complex facts. She received training regarding bets and the modus operandi of the procedures, setup, and hierarchies of betting operations.
- 4.9. Dan Wegenast is a Special Agent Supervisor employed by the Commission. He has worked for the Commission for about seventeen years. He has supervised the tribal gaming unit and the criminal investigation unit. He has experience investigating homicides and sexual offenses. At the Commission, he has experience investigating theft, cheating, and provides in-house training.

Bookmaking Activities:

- 4.10. In 2004, Ms. Nguyen held a house-banked class "B" card room employee license issued by the Commission. Although summarily suspended by the Director on March 17, 2005, the license expired by its own terms on June 14, 2005.

- 4.11. The Commission learned of an illegal gambling operation in southwestern Washington, primarily in Vancouver and La Center in Clark County. This was a massive betting operation involving twenty bookies in Vancouver alone, and hundreds of bettors. The operation occurred in other states as well, including Oregon, New Mexico, and Nevada. All were connected to the Commission's 2004 investigation.
- 4.12. Bookies charge a "vigorish" on the bets made by a bettor. A "vigorish" is the fee that the bookie charges the bettor. If the bettor wins the bet, the bettor does not owe the "vig." If the bettor loses the bet, the bettor owes the vig. Since someone in a position like that of Ms. Nguyen reports to a bookie "up the line," that latter bookie usually charges a five percent fee. In order to make any money, Ms. Nguyen needed to charge the bettor a percentage in addition to the five percent fee, usually a ten percent fee.
- 4.13. Special Agent Milner-Stevenson was one of two or more special agents assigned to work undercover to investigate and stop the illegal gambling operation in Clark County. Her assignment began in February 2004, and she frequently placed bets with a Commission-licensed employee of the New Phoenix and Last Frontier Casinos, Jamie Bui. Ms. Bui took bets for professional sports games. From the time that Special Agent Milner-Stevenson began placing wagers with Ms. Bui, on May 10, 2004, until the end of the NBA season on June 15, 2004, Special Agent Milner-Stevenson placed sixty-four wagers totaling \$11,000 and paid \$605 in vigorish fees.
- 4.14. During her undercover work, Special Agent Milner-Stevenson did not use her real name. She used an alias identity: "Jenny."
- 4.15. Special Agent Milner-Stevenson placed different kinds of bets. A "straight-up" bet is a single wager. A "parlay" is several bets made at one time. To win a parlay, the bettor must win all of the bets.
- 4.16. Another undercover special agent, J. Semmens, introduced Special Agent Milner-Stevenson to Ms. Nguyen at the New Phoenix Casino, in La Center, Washington. In same evening, Special Agent Milner-Stevenson also met with Ms. Bui and her husband, Tony Vu. Conversation between these people, and some floor supervisors who worked at the same casino, focused on bets for the NBA game then being shown on TV.

- 4.17. Special Agent Milner-Stevenson continued her undercover work in Clark County after she met Ms. Nguyen through the end of 2004. During most of that time, most of her betting was done through Ms. Bui and others. It was primarily in November 2004 that Special Agent Milner-Stevenson engaged in betting activities with Ms. Nguyen.
- 4.18. Ms. Nguyen and Ms. Bui worked together.
- 4.19. On November 8, 2004, Special Agent Milner-Stevenson attempted to place a bet through Ms. Bui. Ms. Bui instructed Special Agent Milner-Stevenson to place her bet through Ms. Nguyen.
- 4.20. Special Agent Milner-Stevenson met with Ms. Nguyen that same evening at the Last Frontier Casino. Ms. Bui had told Special Agent Milner-Stevenson that Ms. Nguyen would go on her break at 5:30 PM. At about 5:25 PM, Special Agent in the women's restroom of the Last Frontier Casino. Special Agent Milner-Stevenson Milner Stevenson saw Ms. Nguyen and they began a conversation about the NFL game that evening. As they talked, a floor supervisor approached. Ms. Nguyen told Special Agent Milner-Stevenson, "Shhhh! I'll see you later," and walked away. After a short time, Ms. Nguyen caught Special Agent Milner-Stevenson's eye and nodded to her, indicating to join her in the women's bathroom. The two met there and Special Agent Milner-Stevenson placed two wagers with Ms. Nguyen, each for \$200.
- 4.21. Ms. Nguyen called Special Agent Milner-Stevenson on November 14, 2004 and asked if Special Agent Milner-Stevenson wished to place any NFL wagers. Special Agent Milner-Stevenson placed several bets with Ms. Nguyen on that date.
- 4.22. Also on November 14, 2004, Ms. Bui told Special Agent Milner-Stevenson that Ms. Nguyen would handle Special Agent Milner-Stevenson's bets. At that point, Ms. Nguyen came on the line and Special Agent Milner-Stevenson placed some NBA wagers.
- 4.23. After that, Ms. Nguyen would handle Special Agent Milner-Stevenson's bets when the latter was unable to contact Ms. Bui.

- 4.24. Ms. Nguyen charged Special Agent Milner-Stevenson a \$10 "vig" for her loss on the November 14, 2004, NFL game between New England and Buffalo. Exhibit 10, page 4, first line entry.
- 4.25. On November 17, 2004, Special Agent Milner-Stevenson visited Ms. Bui's residence and found that Ms. Nguyen was also present. Ms. Nguyen and husband Kelvin Tran and their children were living at Ms. Bui's residence while looking for an apartment.
- 4.26. Later that evening, Special Agent Milner-Stevenson telephoned Ms. Bui, who answered the phone and, upon learning who was calling, handed the phone to Ms. Nguyen. Special Agent Milner-Stevenson placed several bets for \$100 each.
- 4.27. Ms. Nguyen charged Special Agent Milner-Stevenson \$10 "vig" on six bets on NBA games, which Special Agent Milner-Stevenson lost. Exhibit 10, page 4, entries for November 17, 2004.
- 4.28. On November 21, 2004, Ms. Nguyen returned Special Agent Milner-Stevenson's phone call. Special Agent Milner-Stevenson placed four \$200 wagers with Ms. Nguyen.
- 4.29. Ms. Nguyen charged Special Agent Milner-Stevenson two \$20 "vigs" on two NFL games on which Special Agent Milner-Stevenson had bet \$200 each. Exhibit 10, page 5, entries dated November 21, 2004.
- 4.30. On December 8, 2004, agents arrested Ms. Nguyen and Ms. Bui at Mr. Tran's residence. An Immigration and Customs Enforcement ("ICE") agent was also present. Mr. Tran consented to the Commission's search of the residence. Exhibit 7.
- 4.31. Special Agent Wegenast was another agent present on December 8 at the arrests and search of Mr. Tran's apartment. He stayed outside the apartment until Special Agent Milner-Stevenson said that he had obtained consent for the search.
- 4.32. Among the items seized on December 8 was a composition notebook belonging to Ms. Nguyen. Ms. Nguyen kept records of bets and amounts owed by or owed to bettors in this composition notebook. Ms. Nguyen's name appears on the cover. Exhibit 8.

- 4.33. Special Agent Wegenast prepared Case Report No. 2004-00904-A26 on December 14, 2004, detailing the search of the premises on December 8, 2004.
- 4.34. After her investigation in Clark County was complete, Special Agent Milner-Stevenson wrote an undercover case report that describes in detail her betting activities with Ms. Nguyen and Ms. Bui. Exhibit 6.
- 4.35. Special Agent Milner-Stevenson also wrote Case Report No. 2004-02290 that described her betting activities with Ms. Nguyen specifically.
- 4.36. In a separate report, Special Agent Milner-Stevenson also wrote Case Report No. 2004-00904-AT40, setting forth all of that agent's betting activities from October 3, 2004, through December 6, 2004. The table the bettor picked to win in shown in capital letters. The table also shows the type of bet (NFL or NBA), the amount of the bet, and the odds. The table also shows whether the agent won or lost the bet and the amount of vigorish charged if she lost. The final column shows a running balance due or owed. Exhibit 10.
- 4.37. Special Agent Milner-Stevenson created Exhibit 10 primarily for two reasons: (a) it was her duty to report the facts in her undercover activity and (b) she played the role of a bettor who should be keeping these kinds of records.
- 4.38. Special Agent Julie Sullivan conducted a suitability investigation on Ms. Nguyen after the Commission received her application for a license in 2015. Special Agent Lopez works with Special Agent Sullivan and is familiar with her work. Special Agent Sullivan prepared Case Report No. 2015-01668, the suitability investigation, that was the basis for the Commission's denial of Ms. Nguyen's license in 2015. Exhibit 1. Special Agent Sullivan was unavailable to testify on April 27, 2016, because she was working outside the United States on the date of this hearing.
- 4.39. Ms. Nguyen previously had a license issued by the Commission. Based on Special Agent Milner-Stevenson's investigation and case report regarding Ms. Nguyen (and others), the Commission summarily suspended Ms. Nguyen's license on March 17, 2005. Exhibit 13.

- 4.40. The Commission was unable to revoke Ms. Nguyen's license after the summary suspension because Ms. Nguyen had moved and did not inform the Commission of her new address. Ms. Nguyen's license expired by its own terms on June 14, 2015.
- 4.41. After her license expired in 2005, but before she applied in 2015, Ms. Nguyen applied for a housebanked card room license on May 12, 2006, but withdrew the application before the Commission made its decision to approve or deny the application.
- 4.42. Ms. Nguyen also applied for a housebanked card room license on July 30, 2008, but she also withdrew that application.
- 4.43. On December 3, 2008, Ms. Nguyen applied for a Class III license, which would apply in work at a tribal casino. The record does not show the disposition of that application.
- 4.44. Ms. Nguyen proposes to work at the Riverside Casino in Tukwila, Washington. She again resides in Vancouver, Washington, both when she applied for the license in 2015 and at the time of hearing. In her application, she disclosed that she was arrested on December 8, 2004, for "professional gambling" but that the charges were dismissed. Exhibit 15.
- 4.45. For the last eleven years, Ms. Nguyen has both stayed at home, raising her children, and has worked part-time jobs. She chooses to return to gambling because she has no higher education and no degree.
- 4.46. Ms. Nguyen requested an interpreter for this hearing. Mychi Doan is an English-Vietnamese interpreter. Ms. Doan has experience as an interpreter in administrative hearings and in court. No party objected to Ms. Doan serving as the interpreter in this case. Ms. Doan took the interpreter's oath.

5. CONCLUSIONS OF LAW

Based upon the facts above, the ALJ makes the following conclusions:

Jurisdiction:

- 5.1. The Office of Administrative Hearings has jurisdiction to hear and initially decide this matter in an adjudicative proceeding. RCW 9.46.140;

34.05.413, 34.12.030(1), and WAC 230-17-025. The Commission received Ms. Nguyen's request for an administrative hearing twenty days after the Commission served Ms. Nguyen with the Notice of Administrative Charges. Ms. Nguyen timely filed her request for an administrative hearing.

- 5.2. Other: Ms. Doan is qualified to serve as the English-Vietnamese interpreter in this case.

Statutes, Rules, and Analysis

- 5.3. The Commission bases its proposed revocation of Ms. Nguyen's gambling license on the provisions of RCW 9.46.075(1), (2), and (8); RCW 9.46.153(1); and WAC 230-03-085(1), (3), and (8)(a). See, Commission's Memorandum of Legal Authorities, page 13. Conclusions of Law No. 5.4 through 5.7 contain the applicable language of these statutes and administrative rules.
- 5.4. RCW 9.46.075 is the Commission's legislative grant of authority to deny, suspend, or revoke gambling licenses or permits. "The commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the applicant or licensee, or any person with any interest therein:
- 5.4.1. (1) has violated, failed or refused to comply with the provisions, requirements, conditions, limitations or duties imposed by chapter 9.46 RCW and any amendments thereto, or any rules adopted by the commission pursuant thereto, or when a violation of any provision of chapter 9.46 RCW, or any commission rule, has occurred upon any premises occupied or operated by any such person or over which he or she has substantial control;
- 5.4.2. (2) Knowingly causes, aids, abets, or conspires with another to cause, any person to violate any of the laws of this state or the rules of the commission;
- 5.4.3. (8) fails to prove, by clear and convincing evidence, that he, she or it is qualified in accordance with the provisions of [chapter 9.46 RCW][.]

5.5. RCW 9.46.153(1) is a statute containing a separate statement of RCW 9.46.075(8) and that requires applicants to prove their eligibility for a license:

It shall be the affirmative responsibility of each applicant and licensee to establish by clear and convincing evidence the necessary qualifications for licensure of each person required to be qualified under this chapter, as well as the qualifications of the facility in which the licensed activity will be conducted[.]

5.6. "Clear and convincing evidence," as that term is used in RCW 9.46.153(1), is a higher burden of proof than "preponderance of the evidence." See, *Hardee v. Department of Social and Health Services*, 172 Wn.2d 1, 6-18, 256 P.3d 339 (2011).

5.7. The Commission also relies on its administrative rules. WAC 230-03-085 states in plain language when the Commission will deny, suspend, or revoke an application, license or permit. "We [referring to the Commission] may deny, suspend, or revoke any application, license or permit, when the applicant, licensee, or anyone holding a substantial interest in the applicant's or licensee's business or organization:

5.7.1. (1) Commits any act that constitutes grounds for denying, suspending, or revoking licenses or permits under RCW 9.46.075; or

5.7.2. (3) Has demonstrated willful disregard for complying with ordinances, statutes, administrative rules, or court orders, whether at the local, state, or federal level; or

5.7.3. (8)(a) Poses a threat to the effective regulation of gambling, or creates or increases the likelihood of unfair or illegal practices, methods, and activities in the conduct of gambling activities, as demonstrated by: Prior activities[.]"

5.8. The facts in this case are largely undisputed. Ms. Nguyen appealed the license denial, not because she disputes the facts presented by the Commission with regard to her 2004 bookmaking activities, but because she argues that she is now a changed person and deserves a second chance.

- 5.9. The ALJ concludes that the Commission has proved by a preponderance of the evidence that Ms. Nguyen violated RCW 9.46.075(1), (2), and (8) and WAC 230-03-085(1), (3), and (8)(a). The undisputed facts show that Ms. Nguyen engaged in bookmaking as that term is defined in RCW 9.46.0213: "accepting bets, upon the outcome of future contingent events, as a business or in which the bettor is charged a fee or "vigorish" for the opportunity to place a bet."
- 5.10. Ms. Nguyen argues that she never accepted money from, or paid money to, Special Agent Milner-Stevenson. However, Ms. Nguyen's composition notebook convinces the ALJ otherwise.
- 5.11. Consequently, the ALJ concludes that Ms. Nguyen engaged in "professional gambling" as that term is defined in RCW 9.46.0269. Even if Ms. Nguyen accepted no money or paid no money at all to Special Agent Milner-Stevenson, RCW 9.46.0269(1)(a) provides, "A person is engaged in "professional gambling" for the purposes of this chapter when: (a) Acting other than as a player or in the manner authorized by this chapter, the person knowingly engages in conduct which materially aids any form of gambling activity; or [.] " Ms. Nguyen knowingly engaged in conduct that materially aided the gambling activity of bookmaking. She knew she was engaged in illegal conduct because of the surreptitious behavior in which she engaged to keep from being discovered by others and exemplified by her secretive behavior in "shushing" Special Agent Milner-Stevenson and conducting a meeting in the women's bathroom at the Last Frontier Casino.
- 5.12. On her part, Ms. Nguyen argues that she is a different person now and will not engage in illegal activity again. The ALJ notes that ten years passed from the time her last gambling license expired until the time she applied for the license, the denial of which is now under appeal.
- 5.13. Is ten years a sufficient period of time in which to give Ms. Nguyen a second chance? A second chance is Ms. Nguyen's goal here. Neither RCW 9.46.075 nor WAC 230-03-085 contains any time limits that restrict the Commission's ability to deny a license to an applicant because of the applicant's prior misconduct or criminal behavior. By the same token, neither the statute nor the rule expressly states that certain prior misconduct or criminal behavior forever bars an applicant from a new gambling license.

- 5.14. Special Agent Lopez stated that the Commission considers certain crimes to be automatic disqualifiers. Those crimes (or types of crimes) are crimes against persons (regardless of classification as felony or misdemeanor), the distribution of narcotics, crimes involving moral turpitude, and any involvement in illegal gambling. He also testified that any person who had engaged in bookmaking activities could not show by clear and convincing evidence that the Commission should issue another gambling license to that person.
- 5.15. The Commission's position is clear. Ms. Nguyen's prior bookmaking activities, in its view, bar her from receiving a new gambling license. The Commission is the state agency charged with the administration of the state gambling laws. Its agents have years of experience with licensees who pose no problems to the effective regulation of gambling, and with other licensees who pose that exact problem.
- 5.16. The evidence shows that Ms. Nguyen engaged in the behavior for which the Commission summarily suspended her license in 2005. Ms. Nguyen's evidence consists of a plea for a second chance and an absence of gambling offenses since 2005. It is commendable that Ms. Nguyen has no new offenses since 2005. She cannot point to any positive steps that she took that would persuade, by clear and convincing evidence, that she no longer poses that threat to the effective regulation of gambling. If issued a new license, she would return to working in a casino. Lots of money is present in casinos, held by people willing to gamble, and that poses a temptation. Ms. Nguyen was tempted the last time, and the last time Ms. Nguyen was found out was through the work of an undercover agent. The Commission has shown that Ms. Nguyen is capable of stealthy behavior. Ms. Nguyen is a pleasant person in a hearing room and comes across as sincere, and possibly she is, but the ALJ is not persuaded by the higher burden of proof she is required to produce for a new gambling license. To put it differently, the ALJ is left in the position of a 50/50 guess: maybe she will offend again, maybe she won't. That is not the level of proof required by clear and convincing evidence.
- 5.17. The ALJ concludes that Ms. Nguyen has not shown by clear and convincing evidence that she is qualified for licensure under this chapter. The ALJ concludes that the Commission's denial of Ms. Nguyen's application for a gambling license should be affirmed.

6. INITIAL ORDER

IT IS HEREBY ORDERED THAT the Commission's Decision to deny a public card room employee license to Bao Tran N. Nguyen is **AFFIRMED**.

Signed at Tacoma, Washington, on the date of mailing.



Administrative Law Judge
Office of Administrative Hearings

Appeal Rights Initial Order

Any party to this proceeding may file a Petition for Review of this initial order. The written petition for review must be mailed to the Washington State Gambling Commission at:

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504

The petition for review must be **received** by the Commission within **twenty (20) days** from the date this initial order was mailed to the parties. A copy of the petition for review must be sent to all parties of record. The petition for review must specify the portions of the initial order with which the party disagrees, and must refer to the evidence in the record which supports the party's position. The other party's reply must be **received** at the address above, and served on all parties of record, within **thirty (30) days** from the date the petition for review was mailed.

Any party may file a cross appeal. Parties must file cross appeals with the Washington State Gambling Commission within ten days of the date the petition for review was filed with the Washington State Gambling Commission. Copies of the petition or cross appeal must be served on all other parties or their representatives at the time the petition or appeal is filed.

CERTIFICATE OF MAILING IS ATTACHED

CERTIFICATE OF SERVICE FOR DOCKET NO. 12-2015-GMB-00011

I certify that true copies of this document were served from Tacoma, Washington upon the following as indicated:

<p>Bao Tran N. Nguyen 11510 NE 112th Drive Unit #I 61 Vancouver, WA 98662 Appellant</p>	<p><input checked="" type="checkbox"/> First Class Mail, Postage Prepaid <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>
<p>Gregory Rosen Assistant Attorney General Office Of The Attorney General Po Box 40100 Olympia, WA 98504 Agency Representative</p>	<p><input checked="" type="checkbox"/> First Class Mail, Postage Prepaid <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>

Date: Monday, June 27, 2016

OFFICE OF ADMINISTRATIVE HEARINGS



Holly Vest
Legal Assistant



