

STATE OF WASHINGTON
OFFICE OF ADMINISTRATIVE HEARINGS

ATTORNEY GENERAL
OF WASHINGTON
JUL 14 2016
GOVERNMENT COMPLIANCE
& ENFORCEMENT

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

KAO SAECHAO,
Kent, Washington

OAH Docket No. 04-2016-GMB-00004

INITIAL ORDER

Agency: Gambling Commission
Program: Lic. Reg. & Enforce. Division
Agency No: CR 2016-00004

1. ISSUES

- 1.1. Has Kao C. Saechao ("Mr. Saechao") violated RCW 9.46.075(1), (4), and (8) and WAC 230-03-085(1), (3), and (8)(a) and (b) to warrant the denial of Mr. Saechao's application by the Washington State Gambling Commission (the "Commission") of a card room employee's license?
- 1.2. Has Mr. Saechao proved by clear and convincing evidence that he has the necessary qualifications for licensure required under this chapter as required by RCW 9.46.153(1)?

2. ORDER SUMMARY

- 2.1. The Commission received an application in December 2015 from Mr. Saechao for a public card room employee license. Mr. Saechao was convicted in federal court of bank embezzlement in 2004. After that, Mr. Saechao applied in 2015 for a gambling license. This Initial Order affirms the Commission's 2015 denial of a public card room employee's license.

3. HEARING

- 3.1. Hearing Date: Tuesday, June 14, 2016.
- 3.2. Administrative Law Judge: John M. Gray, ALJ.
- 3.3. Appellant: Kao Saechao ("Mr. Saechao").
 - 3.3.1. Representative: Mr. Saechao appeared and represented himself.

3.3.2. Witnesses:

3.3.2.1. No other witnesses appeared on behalf of Mr. Saechao.

3.4. Agency: Washington State Gambling Commission.

3.4.1. Representative: Gregory J. Rosen, Assistant Attorney General

3.4.2. Witnesses:

3.4.2.1. Julie Sullivan, Special Agent, Gambling Commission.

3.5. Others Present: Lorraine Lee, Chief ALJ, Office of Administrative Hearings; also, an observer from the Gambling Commission.

3.6. Exhibits: The Commission's Exhibits 1 through 16 were admitted, without objection. Mr. Saechao offered no exhibits.

3.7. All witnesses were sworn before they testified.

3.8. There was no prehearing conference and no prehearing conference order to govern this case.

4. FINDINGS OF FACT

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

Jurisdictional Facts:

4.1. The Director of the Commission signed a Notice of Administrative Charges and Opportunity for Adjudicative Proceeding ("NAC") directed to Mr. Saechao on March 8, 2016. The Commission served the NAC by placing two copies in the United States mail to Mr. Saechao on March 9, 2016, one by regular mail and the other by certified mail.

4.2. Mr. Saechao filed a Request for Administrative Hearing and Interpreter with the Commission, which the Commission received on March 31, 2016.

The Commission Denied Mr. Saechao's Present License Request:

- 4.3. Mr. Saechao applied for a public card room employee license, which the Commission received on December 24, 2015. Exhibit 1.
- 4.4. In his 2015 license application, Mr. Saechao disclosed that he had been convicted in 2003 of bank embezzlement.¹ He listed the city, county, and state of the conviction as Seattle, King County, Washington. Exhibit 1, page 2.
- 4.5. Special Agent Julie Sullivan is a Special Agent employed by the Commission. She has worked for the Commission since 2001. She has over 200 hours of in-house training as well as training time through the Washington State Criminal Justice Training Commission. She has a B.A. in criminal justice from Washington State University. She is certified as a fraud examiner. She works in the Licensing Operating Division investigating criminal and financial issues.
- 4.6. Special Agent Sullivan performed a suitability investigation on Mr. Saechao on January 4, 2016. She wrote Case Report No. 2016-00004 that summarized her investigation. In that case report, she concluded:

In 2003, SAECHAO pled guilty to Felony Bank Embezzlement involving him embezzling \$24,442.76 from his employer while he worked at Bank of America as a branch manager. He used the funds for his personal use. He was sentenced to probation and the terms of his probation included the requirement that he not participate in any gambling activity and that he pay restitution to the bank. He was found guilty of violating the terms of his probation twice, by gambling. In 2013, he applied for a gambling license and failed to truthfully disclose his criminal history. As a result of his misrepresentation or concealment, a license was issued. Subsequently, after a post licensing review, his license was revoked. Aside from his recent \$20 payment to the court, he hasn't made any payments on his court ordered fines and fees since 2011. He poses a threat to the effect regulation of gambling as demonstrated through his previous administrative history and his criminal record. SAECHAO does not prove by clear and convincing evidence that he qualifies for licensure. Exhibit 8, page 5.

¹ The exhibits show that the plea agreement was in December 2003 and the acceptance of the plea, judgment, and sentencing were in 2004.

4.7. Relying on Special Agent Sullivan's case report, the Commission issued a Denial of Public Card Room Employee License Application on March 8, 2016. Exhibit 2.

4.8. As of December 31, 2015, Mr. Saechao still owed \$23,777.76. Exhibits, page 14.

Mr. Saechao's Conviction of Bank Embezzlement:

4.9. On August 18, 2003, the United States Attorney for the Western District of Washington filed an information against Mr. Saechao alleging that he committed bank embezzlement in violation of 11 U.S.C. §656. Exhibit 9, pp. 18-19.

4.10. On December 11, 2003, the United States Attorney for the Western District of Washington filed a Superseding Information (Felony) against Mr. Saechao. The superseding information charged one count of bank embezzlement. The statute allegedly violated was 18.U.S.C. §656. The charge was as follows:

Between in or about February 2003, and continuing until on or about February 22, 2003, in Tukwila, within the Western District of Washington, defendant KAO CHIENG SAECHAO, being a bank employee, that is, a bank teller manager at Bank of America, with the intent to injure the bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, did knowingly and willfully embezzle and misapply moneys, funds, and credits that had been entrusted to the care and custody of the said Bank in an amount totaling Twenty Four Thousand Four Hundred Forty Two Dollars and Seventy Six Cents (\$24,442.76); in that during the time period described above, defendant KAO CHIENG SAECHAO, without authorization, removed funds in the amount set forth above from his assigned cash drawer and teller locker and used the funds for his own personal use and benefit. Exhibit 3.

4.11. On December 19, 2003, the United States Attorney and Mr. Saechao, represented by a Federal Public Defender, Paula Semmes Deutsch, signed a Plea Agreement, entered by the Court the same date. In this Plea Agreement, Mr. Saechao pleaded guilty to the charge of bank embezzlement. Among other provisions, Mr. Saechao stated he agreed that

he understood that, by pleading guilty, he knowingly and voluntarily waived the right to plead not guilty and to persist in a plea of not guilty. Exhibit 9, pp. 20-25; see esp. page 21, paragraph 4, subsection a.

- 4.12. In the same Plea Agreement, Mr. Saechao agreed to the statement of facts that also appeared in the Superseding Information, Finding of Fact No. 4.9, above. The one difference between the two statements is the omission of the words "Southcenter Branch" following the words "Bank of America" in the Superseding Information. Exhibit 9, page 23.
- 4.13. In the same Plea Agreement, Mr. Saechao accepted responsibility for his actions, agreed that his plea of guilty was voluntary, and agreed that the Plea Agreement constituted the entire Plea Agreement between him and the United States of America. Exhibit 9, pp. 24-25.
- 4.14. In the same Plea Agreement, Mr. Saechao agreed to pay restitution to the Bank of America in the total amount of \$24,442.76. The Plea Agreement divided the restitution into two amounts: one of \$9,000 and the other of \$15,442.76, the sum of which is \$24,442.76. Paragraph 7 of the Plea Agreement ends with this sentence: "These restitution amounts shall be due and payable immediately and shall be paid in accordance with a schedule of payments as set by the United States Probation Office and ordered by the Court." Exhibit 9, pp. 22-23, paragraph 7. Regarding how Mr. Saechao was to make the restitution payments, see further at Finding of Fact No. 4.28, below.
- 4.15. On January 9, 2004, Mr. Saechao pleaded guilty to the one count of bank embezzlement in the Superseded Information described in Finding of Fact No. 4.9. The sentence was not imposed on January 9. Exhibit 4.
- 4.16. On March 17, 2004, the United States District Court imposed the sentence on Mr. Saechao. Mr. Saechao was represented by counsel, Paula Semmes Deutsch of the Federal Public Defender's Office. The Court sentenced Mr. Saechao to five years of probation and did not impose actual jail time. The Court also imposed two sets of conditions, one called "standard conditions of supervision" and the other called "additional probation terms." Exhibit 5.
- 4.17. Among the fourteen additional probation terms were three terms that are pertinent to this case:

The defendant shall be prohibited from gambling and the defendant shall not enter, frequent, or be otherwise involved with any legal or illegal gambling establishment or activity, except if approved by defendant's probation officer.

The defendant shall attend Gambler's Anonymous meetings if directed to do so by the defendant's probation officer.

Restitution in the amount of \$24,442.76 is due immediately. Any unpaid amount is to be paid during the period of supervision in monthly installments amounting to not less than 10% of the defendant's gross monthly household income. Interest on the restitution shall be waived. Exhibit 5, page 3.

The First Probation Violation:

- 4.18. On August 28, 2007, Special Agent Lee Streitz, a Commission employee, made a routine surveillance inspection at the Great American Casino in Kent, Washington. That casino's surveillance observer told Special Agent Streitz that the casino was aware of a bulletin from the Commission advising that Mr. Saechao had been banned from gambling and entering all gambling establishments until March 15, 2009. The surveillance observer told Special Agent Streitz that Mr. Saechao was a regular player at Great American Casino. Exhibit 12, page 3.
- 4.19. Mr. Saechao had recently come to the casino's attention when he complained to a casino supervisor about a game then being played. This occurred on August 13, 2007, and was a recent event in the surveillance observer's memory when Special Agent Streitz visited the casino a few weeks later. The supervisor wrote an incident report dated August 13, 2007. Exhibit 12, page 6.
- 4.20. The casino provided Special Agent Streitz with a printout of Mr. Saechao's "players club history." The first date listed is November 11, 2005, and the last date listed is August 13, 2007. The print out is twenty-two pages in length and identifies hundreds of entries of play by Mr. Saechao. All of the dates listed in the printout occurred after Mr. Saechao pleaded guilty to bank embezzlement and after the Court forbade him from gambling or entering, frequenting, or being otherwise involved with any legal or illegal gambling establishment or activity, and there was no evidence that Mr.

Saechao's probation officer gave him permission to do so contrary to the condition in Mr. Saechao's sentence. Exhibit 12, pp. 8-29.

- 4.21. Mr. Saechao's probation officer was Jeff Robson. Exhibit 12, page 3.
- 4.22. Special Agent Streitz sent a copy of his case report, number 2007-01451, to Mr. Robson. The date of Special Agent Streitz's case report was September 5, 2007. Exhibit 12.
- 4.23. The United States brought Mr. Saechao back to United States District Court on the alleged probation violation. On September 25, 2007, Mr. Saechao pleaded guilty to violations of four conditions of probation originally imposed in 2005. Two of those violations are pertinent to this license denial case: gambling and failing to make restitution payments. The other two, failing to work regularly at a lawful occupation and failing to support his dependents, are not pertinent to this license denial case. Mr. Saechao pleaded guilty to all four probation violations. Exhibit 6.
- 4.24. Mr. Saechao's assigned counsel was, again, Paula Semmes Deutsch. Exhibit 6, page 1.
- 4.25. The Court sentenced Mr. Saechao to one day in prison with credit for time served when originally arrested and fingerprinted. Exhibit 6, page 3.
- 4.26. The Court placed Mr. Saechao in probation for a term of four years. The Court again imposed special conditions of supervision, including those conditions quoted in Finding of Fact No. 4.17. Thus, probation was extended to 2011. Exhibit 6, pp. 4 and 5.
- 4.27. Mr. Saechao was to pay restitution in accordance with the Schedule of Payments attached to the judgment. Exhibit 6, page 4.
- 4.28. In the Schedule of Payments, the Court instructed Mr. Saechao to pay in this manner: "Any unpaid amount shall be paid to Clerk's Office, United States District Court, 700 Stewart Street, Seattle, WA 98101." Exhibit 6, page 7.

The Second Probation Violation:

- 4.29. Mr. Saechao was again brought before the United States District Court for violation of the condition prohibiting him from gambling and

entering gambling establishments. The gambling occurred on April 16 and 17, 2008, which occurred after Mr. Saechao pleaded guilty in 2004 and after he pleaded guilty to the first probation violation in 2007. Exhibit 7, page 1.

- 4.30. The Court sentenced Mr. Saechao to three months in prison and again imposed conditions on his release after serving three months: he could not gamble or enter a gambling establishment and he had to pay restitution in the amount of \$24,442.76, minus any money he already paid. Exhibit 7, pp. 2 and 4.
- 4.31. The Court also placed Mr. Saechao on probation for three years, thus extending probation to 2011. Exhibit 7, page 3.
- 4.32. As of July 24, 2008, Mr. Saechao had not paid any amounts as restitution in accordance with the Court's orders. Exhibit 7, page 5.
- 4.33. The Court again instructed Mr. Saechao to pay restitution through the Clerk's Office, United States District Court, 700 Stewart Street, Seattle, WA 98101. Exhibit 7, page 7.

The 2013 Gambling License:

- 4.34. Mr. Saechao applied for a public card room employee's license on September 19, 2013. Exhibit 9.
- 4.35. On page 2 of the application, the Commission asks all applicants: "Have you ever: (a) forfeited bail or paid a fine over \$25 (incl. traffic fines); (b) been arrested; (c) been charged with a crime; (d) been convicted; (e) been jailed; (f) been placed on probation?" The question continues: "You must answer 'yes' if any of the above have occurred, even if charges were dismissed, deferred or changed. Explain each charge fully below and attach additional sheets as needed. False or incomplete information may result in denial, suspension, or revocation of a license. You must include information as a juvenile if you are applying for a Gambling License." Exhibit 9, page 17.
- 4.36. In response to the question about his criminal history, Mr. Saechao checked the box "NO." Exhibit 9, page 17.

- 4.37. The Commission investigated Mr. Saechao's background using the Judicial Information System (JIS). JIS, however, provides information only about cases in the State of Washington municipal, district, and superior courts. Finding no criminal convictions in JIS, the Commission issued Mr. Saechao a gambling license. Exhibit 9, page 4.
- 4.38. That license was set to expire on its own terms on September 18, 2014. Exhibit 9, page 1.
- 4.39. However, on September 26, 2013, the Commission learned that Mr. Saechao had been convicted of bank embezzlement in 2004
- 4.40. Special Agent Kevin Maxwell, a Commission employee, prepared Case Report No. 2013-01919, in which he recommended revocation of Mr. Saechao's license. Exhibit 9.
- 4.41. Relying on Special Agent Maxwell's case report, the Commission issued a Notice of Administrative Charges and Opportunity for an Adjudicative Proceeding to Mr. Saechao on November 8, 2013. The Commission served the NAC by placing two copies in the United States mail to Mr. Saechao on November 8, 2013, one by regular mail and the other by certified mail. Exhibit 10.
- 4.42. When Mr. Saechao did not timely respond to the Notice of Administrative Charges and Opportunity for an Adjudicative Proceeding in Finding of Fact No. 4.42, the Commission revoked Mr. Saechao's gambling license on January 16, 2014 "(Findings, Conclusions, Decision, and Final Order in Default)". Exhibit 11.
- 4.43. After the license revocation in 2013, the next event was Mr. Saechao's license application in 2015, discussed in Findings of Fact No. 4.3 through 4.7.

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 Mr. Saechao's request for an administrative hearing twenty-three days after the Commission served Mr. Saechao with the Notice of Administrative Charges. Twenty-three days is the time allowed if service is made by regular United States mail. WAC 230-17-010(2)(a). Mr. Saechao timely filed his request for an administrative hearing.

Statutes, Rules, and Analysis

- 5.2. The Commission bases its proposed revocation of Mr. Saechao's gambling license on the provisions of RCW 9.46.075(1), (4), and (8); RCW 9.46.153(1); WAC 230-03-085(1), (3), and (8)(a) and (b). See, Commission's Memorandum of Legal Authorities, pp. 7- 8. Conclusions of Law No. 5.3 through 5.6 contain the applicable language of these statutes and administrative rules.
- 5.3. 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:
- 5.3.1. (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;
- 5.3.2. (4) Has been convicted of, or forfeited bond upon a charge of, or pleaded guilty to, forgery, larceny, extortion, conspiracy to defraud, wilful failure to make required payments or reports to a governmental agency at any level, or filing false reports therewith, or of any similar offense or offenses, or of bribing or otherwise unlawfully influencing a public official or employee of any state or the United States, or of any crime, whether a felony or misdemeanor involving any gambling activity or physical harm to individuals or involving moral turpitude;

5.3.3. (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][.]

5.4. 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[.]”

5.5. “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).

5.6. 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:

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

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

5.6.3. (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:
(a) Prior activities or (b) Criminal record[.]”

5.7. Turning to the evidence in the case, Mr. Saechao tried to explain that the events at the bank in 2003 were not really his fault and that he was not guilty of embezzlement. In doing so, he contradicts one of the terms of his

guilty plea discussed in Finding of Fact No. 4.10; specifically, he has tried to collaterally attack his conviction. When he entered his guilty plea, he waived "the right to plead not guilty and to persist in a plea of not guilty." Exhibit 9, page 21. Yet, in this administrative hearing, Mr. Saechao persists in trying to assert that he was not guilty of bank embezzlement. His explanation is unacceptable.

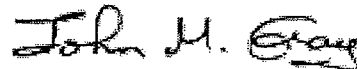
- 5.8. Despite being ordered by the Court not to gamble and not to enter gambling establishments, the Court found probation violations by Mr. Saechao in 2007 and 2008 for violating the terms of his probation by gambling. The violations in 2007 were particularly egregious, numbering hundreds of recorded violations.
- 5.9. Mr. Saechao has tried to explain away his failure to pay the restitution ordered by the District Court. The Court made clear in the original sentencing and in both of the subsequent convictions for probation violations, that the amount was due immediately and how to pay the amount – through the Court. (See, Finding of Fact No. 4.28). He told special Agent Sullivan on December 21, 2015, that he owed the restitution to the bank and not to the Court. Exhibit 15. Mr. Saechao argued that the restitution requirement was modified to mean he only had to pay if he won the lottery. Mr. Saechao's arguments are contrary to the orders admitted as evidence. Further, Mr. Saechao did not produce any orders to show that the Court modified the restitution requirement.
- 5.10. Contrary to Mr. Saechao's arguments, the exhibits also show that he was represented by counsel at all critical states in the United States District Court proceeds, both in 2004 and in the subsequent probation violation proceedings.
- 5.11. Mr. Saechao's explanation as to why he did not disclose his conviction to the Commission in his 2013 license application does not withstand a simple analysis. Question No. 6 on the license application asks "Have you ever" and goes on from there to list the possibilities described in Finding of Fact No. 4.35. "Have you ever" means "at any time." The question does not limit the inquiry to a ten year period preceding the date of application.

- 5.12. Question No. 3 on the license application asks the applicant if the applicant has lived outside the State of Washington for a total of six months during the past ten years. It is clear, though, that the ten year period is referring to time the applicant has spent outside of Washington and has nothing to do with criminal history.
- 5.13. The claimant speaks and reads English. He did not seek, nor did he need, an interpreter during the administrative hearing. The ALJ concludes that the claimant intentionally did not disclose his conviction for bank embezzlement when he applied for a license in 2013.
- 5.14. The ALJ concludes that the Commission proved by a preponderance of the evidence that Mr. Saechao violated RCW 9.46.075(1) and (4) and WAC 230-03-085(1), (3) and (8)(a) and (b); i.e., it proved that Mr. Saechao violated 18 U.S.C. §656 and has violated the Court's orders at sentencing, and upon both the first and second probation violation sentencings.
- 5.15. RCW 9.46.075(8) and 9.46.153(1) require a licensee to prove by clear and convincing evidence that it is qualified to continue to hold a gambling license. Mr. Saechao completely failed to do so. His explanations are contrary to his guilty plea and are unconvincing.
- 5.16. Mr. Saechao's behavior poses a risk to the effective regulation of gambling. The ALJ concludes that the Commission properly denied a license to Mr. Saechao on March 8, 2016.

6. INITIAL ORDER

IT IS HEREBY ORDERED THAT the Commission's Decision to deny a public card room employee license to Kao Saechao 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. 04-2016-GMB-00004

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

<p>Kao Saechao 17210 109th PI SE Renton, WA 98055 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 Po Box 40100 MS: 40100 Olympia, WA 98504 Assistant Attorney General</p>	<p><input type="checkbox"/> First Class Mail, Postage Prepaid <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input checked="" type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> E-mail</p>

Date: Wednesday, July 13, 2016

OFFICE OF ADMINISTRATIVE HEARINGS



Holly Vest
Legal Assistant

ATTORNEY GENERAL
OF WASHINGTON

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