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STATE OF WASHINGTON  
GAMBLING COMMISSION

In the Matter of:

NO. CR 2017-00634

QING M. ZHEN  
License No. 68-23842,

STIPULATION AND ORDER FOR  
DISMISSAL

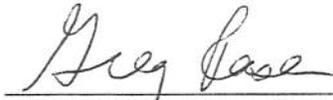
Licensee.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between the Licensee, QING M. ZHEN, appearing by and through her attorney JACOB DOWNS, and WASHINGTON STATE GAMBLING COMMISSION, by and through its attorneys of record, ROBERT W. FERGUSON, Attorney General, GREG ROSEN, Assistant Attorney General, and its Director, DAVE TRUJILLO, that the parties in this case seek dismissal of this administrative case, with prejudice, in accordance with the Settlement Agreement entered in the above-entitled action.

DATED this 24<sup>th</sup> day of August, 2017.

DATED this 24<sup>th</sup> day of August, 2017.



GREG ROSEN, WSBA #15870  
Assistant Attorney General  
Attorneys for Washington State Gambling  
Commission



JACOB DOWNS, WSBA #37982  
Attorney for Licensee

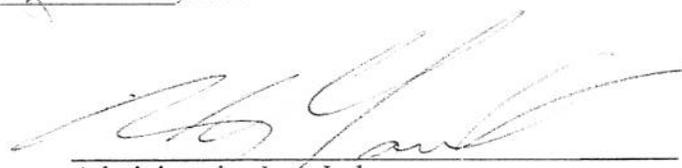
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ORDER

THIS MATTER having come before the Office of Administrative Hearings on the stipulation of the parties, and requesting a dismissal, with prejudice, of this administrative case, the Licensee and Washington State Gambling Commission having come to an agreement settlement, and the Office of Administrative Hearings having been fully advised, now, therefore,

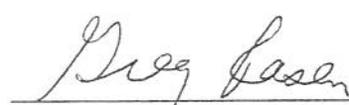
**IT IS HEREBY ORDERED**, that the above-referenced administrative case is hereby dismissed with prejudice.

DATED this 29 day of August, 2017.

  
\_\_\_\_\_  
Administrative Law Judge

Presented by:  
ROBERT W. <sup>ER</sup>FREGUSON  
Attorney General

Approved as to Form

  
\_\_\_\_\_  
GREG ROSEN, WSBA #15870  
Assistant Attorney General  
Attorneys for Washington State  
Gambling Commission

  
\_\_\_\_\_  
JACOB DOWNS, WSBA # 37982  
Attorney for Licensee

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**STATE OF WASHINGTON  
GAMBLING COMMISSION**

In the Matter of:  
  
QING M. ZHEN  
License No. 68-23842,

NO. CR 2017-00634

STIPULATED SETTLEMENT  
AGREEMENT

Licensee.

The Washington State Gambling Commission represented by its attorneys, ROBERT W. FERGUSON, Attorney General, GREG ROSEN, Assistant Attorney General, and its Director, DAVE TRUJILLO, and the Licensee, QING M. ZHEN, represented by attorney JACOB DOWNS, hereby enter into this stipulation and settlement agreement for Case Number CR 2017-00634.

**I. INTRODUCTION**

In the above-referenced case, the Washington State Gambling Commission issued a First Amended Notice of Administrative Charges dated July 27, 2017, alleging that Ms. Zhen's actions resulting in criminal convictions, and her failure to report being charged criminally warranted revocation of her Public Card Room Employee gambling license, License Number 68-23842, under WAC 230-06-085(1), RCW 9.46.153(1); RCW 9.46.075(1), (4), (7), and (8); and WAC 230-03-085(1), (5), (7) and (8)(a) and (b).

**II. AGREEMENT OF THE PARTIES**

The Gambling Commission and the Licensee agree to the following:

1. The Washington State Gambling Commission and the Licensee enter into this agreement to avoid the time and expense of further litigation.

1           2.     The Licensee explicitly waives the right of further administrative review of all  
2 matters related to the above-referenced Administrative Charges. The Licensee hereby  
3 voluntarily withdraws her request for a hearing on this matter.

4           3.     The Licensee does not dispute the truth of the allegations contained in the  
5 Complaint, and Licensee agrees that, were this matter to proceed to hearing, there is a substantial  
6 likelihood that the Washington State Gambling Commission would be able to prove that it had  
7 the authority to revoke the licensee's PCRE gambling license under WAC 230-06-085(1), RCW  
8 9.46.153(1); RCW 9.46.075(1), (4), (7), and (8); and WAC 230-03-085(1), (5), (7) and (8)(a)  
9 and (b).

10          4.     The parties agree that the Washington State Gambling Commission will consider  
11 that the violations set forth in the First Amended Notice of Administrative Charges, as specified  
12 in this paragraph, have been sustained and will become a part of the Licensee's licensing record.

13          5.     Pursuant to this settlement, the Licensee agrees to withdraw her hearing request  
14 and have the Office of Administrative Hearings dismiss with prejudice Case Number 2017-  
15 00634.

16          6.     The Licensee understands and agrees that her license will be surrendered effective  
17 on the date of signing this agreement. Upon signing this settlement agreement, the parties agree  
18 that the Licensee will not be authorized to engage in any PCRE or Class III gambling activities  
19 unless she applies for and receives a new gambling license.

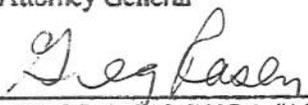
20          7.     In the event the Licensee subsequently applies for certification or a gambling  
21 license, she will be subject to all the Washington State Gambling Commission's investigative  
22 procedures for processing such application. Furthermore, no promises or assurances have been  
23 made to the Licensee that she will receive a license or certification from the Washington State  
24 Gambling Commission should she apply.

25          8.     The Licensee agrees that she shall have no involvement whether paid or unpaid,  
26 in the ownership, operation, or financing of any activity regulated by the Washington State

1 Gambling Commission. This does not prevent the Licensee from working in non-gambling  
2 related employment at an establishment engaged in authorized gambling activities or in Class II  
3 tribal gaming activities.

4 9. This agreement constitutes the final written expression of all the terms of this  
5 agreement and is a complete and exclusive statement of these terms.

7 ROBERT W. FERGUSON  
8 Attorney General

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10 \_\_\_\_\_  
11 GREG ROSEN, WSBA #15870  
12 Assistant Attorney General  
13 Attorneys for Washington State  
14 Gambling Commission

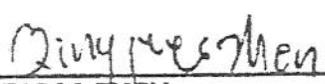
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15 DAVID TRUJILLO  
16 Director  
17 Washington State Gambling  
18 Commission

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18 JACOB DOWNS, WSBA # 37982  
19 Attorney for Licensee

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21 QING M. ZHEN  
22 Licensee

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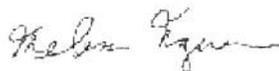
**CERTIFICATE OF SERVICE FOR OAH DOCKET NO. 07-2017-GMB-00025**

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

|  |  |
|--|--|
| <p>Qing M. Zhen<br/>12888 SE 225<sup>th</sup> Court<br/>Kent, WA 98031<br/><b>Appellant</b></p>  | <p><input checked="" type="checkbox"/> First Class Mail<br/><input type="checkbox"/> Certified Mail, Return Receipt<br/><input type="checkbox"/> Hand Delivery via Messenger<br/><input type="checkbox"/> Campus Mail<br/><input type="checkbox"/> Facsimile<br/><input type="checkbox"/> E-mail</p> |
| <p>Jacob M. Downs<br/>Jacob Downs Corr Downs PLLC<br/>100 West Harrison Street, Suite N440<br/>Seattle, WA 98119<br/><b>Appellant Representative</b></p> | <p><input checked="" type="checkbox"/> First Class Mail<br/><input type="checkbox"/> Certified Mail, Return Receipt<br/><input type="checkbox"/> Hand Delivery via Messenger<br/><input type="checkbox"/> Campus Mail<br/><input type="checkbox"/> Facsimile<br/><input type="checkbox"/> E-mail</p> |
| <p>Gregory J. Rosen, AAG<br/>Office of the Attorney General<br/>MS 40100<br/>PO Box 40100<br/>Olympia, WA 98504<br/><b>Agency Representative</b></p>     | <p><input type="checkbox"/> First Class Mail<br/><input type="checkbox"/> Certified Mail, Return Receipt<br/><input type="checkbox"/> Hand Delivery via Messenger<br/><input checked="" type="checkbox"/> Campus Mail<br/><input type="checkbox"/> Facsimile<br/><input type="checkbox"/> E-mail</p> |
| <p>Haylee Mills<br/>Washington State Gambling<br/>Commission<br/>MS 42400<br/>PO Box 42400<br/>Olympia, WA 98504<br/><b>Agency Contact</b></p>           | <p><input type="checkbox"/> First Class Mail<br/><input type="checkbox"/> Certified Mail, Return Receipt<br/><input type="checkbox"/> Hand Delivery via Messenger<br/><input checked="" type="checkbox"/> Campus Mail<br/><input type="checkbox"/> Facsimile<br/><input type="checkbox"/> E-mail</p> |

Date: Tuesday, September 05, 2017

OFFICE OF ADMINISTRATIVE HEARINGS



Melesa Noguera  
Legal Assistant 2