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**STATE OF WASHINGTON
GAMBLING COMMISSION**

6 In the Matter of:

NO. 11-2017-GMB-00033

7 SHERRY A. SALERNO
8 License No. 68-04345,

STIPULATED SETTLEMENT
AGREEMENT

9
10 Licensee.

11 The Washington State Gambling Commission represented by its attorneys, ROBERT W.
12 FERGUSON, Attorney General, GREG ROSEN, Assistant Attorney General, and its Director,
13 DAVE TRUJILLO, and the Licensee, SHERRY A. SALERNO, represented by attorney KRIS
14 JENSEN, hereby enter into this stipulation and settlement agreement for Case Number CR 2017-
15 00737.

16 **I. INTRODUCTION**

17 In the above-referenced case, the Washington State Gambling Commission issued a
18 Notice of Administrative Charges dated August 21, 2017, alleging that Ms. Salerno's unlawful
19 actions and her failure to report a change in her contact information warranted revocation of her
20 Public Card Room Employee gambling license, License Number 68-04345, under RCW
21 9A.56.030, RCW 9.46.190(3), WAC 230-03-055, RCW 9.46.153(1); RCW 9.46.075(2), (4), (8),
22 (9), and (10); and WAC 230-03-085(1), (3), and (8).

23 **II. AGREEMENT OF THE PARTIES**

24 The Gambling Commission and the Licensee agree to the following:

25 1. The Washington State Gambling Commission and the Licensee enter into this
26 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 continues to dispute the truth of the allegations contained in the
5 Statement of Charges, but Licensee agrees that, were this matter to proceed to hearing, there is
6 a substantial likelihood that the Washington State Gambling Commission would be able to prove
7 that it had the authority to revoke the licensee's PCRE gambling license under RCW 9A.56.030,
8 RCW 9.46.190(3), WAC 230-03-055, RCW 9.46.153(1); RCW 9.46.075(2), (4), (8), (9), and
9 (10); and WAC 230-03-085(1), (3), and (8).

10 4. The parties agree that the Washington State Gambling Commission will consider
11 that the violations set forth in the Notice of Administrative Charges, as specified in this
12 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 GMB
15 2017-00737.

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

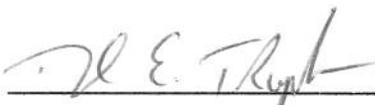
1 Gambling Commission. This does not prevent the Licensee from working in non-gambling
2 related employment at an establishment engaged in authorized gambling activities or in Class II
3 tribal gaming activities.

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.

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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

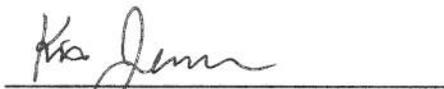
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DATE

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13 3/8/2018

14 DAVID TRUJILLO
15 Director
16 Washington State Gambling
17 Commission

14 _____
DATE

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19 KRIS JENSEN, WSBA # 19261
Attorney for Licensee

18 3/8/2018
DATE

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22 SHERRY A. SALERNO
23 Licensee

21 2/16/18
DATE