

1
2
3
4
5
**STATE OF WASHINGTON
GAMBLING COMMISSION**

6 In the Matter of:

7 HAO L. LY
8 License No. 68-29351,

Docket No. 06-2018-GMB-00053
NO. CR 2017-01199

9
10
**STIPULATED SETTLEMENT
AGREEMENT**

11 Licensee.

12 The Washington State Gambling Commission represented by its attorneys, ROBERT W.
13 FERGUSON, Attorney General, GREGORY J. ROSEN, Senior Counsel, and its Director,
14 DAVID TRUJILLO, and the Licensee, HAO L. LY, represented by attorney TERENCE K.
15 WONG, hereby enter into this stipulation and settlement agreement for Case Number CR 2017-
16 01199.

17
18
I. INTRODUCTION

19 In the above-referenced case, the Washington State Gambling Commission issued a
20 Notice of Administrative Charges dated March 6, 2018, alleging that Ms. Ly's unlawful taking
21 of another patron's chips warranted revocation of her Public Card Room Employee (PCRE)
22 gambling license, License Number 68-29351, under RCW 9.46.153(1); RCW 9.46.075(2), (4),
23 (8), (9) and (10); and WAC 230-03-085(1), (3) and (9)(previously WAC 230-03-085(8) (2017)).

24
25
II. AGREEMENT OF THE PARTIES

26 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 and requests that the Office of
4 Administrative Hearings dismiss with prejudice OAH Docket No. 06-2018-GMB-00053.

5 3. The Licensee does not admit to the facts or violations alleged in the above-
6 referenced Administrative Charges. However, the Licensee agrees that, were this matter to
7 proceed to hearing, there is a substantial likelihood that the Washington State Gambling
8 Commission would be able to prove that it had the authority to revoke the Licensee's PCRE
9 gambling license under RCW 9.46.153(1); RCW 9.46.075(2), (4), (8), (9), and (10); and WAC
10 230-03-085(1), (3) and (9) (previously WAC 230-03-085(8) (2017)).

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

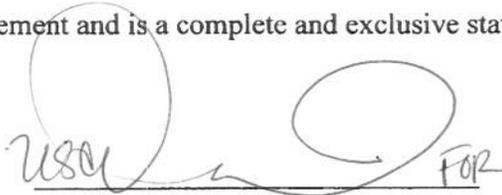
14 5. The Licensee agrees to surrender her license as of October 12, 2018, and
15 acknowledges the Washington State Gambling Commission will consider her license is revoked
16 effective on the October 12, 2018. Upon signing this settlement agreement, the parties agree
17 that the Licensee will not be authorized to engage in any PCRE or Class III gambling activities
18 unless she applies for and receives a new gambling license.

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

24 7. The Licensee agrees that she shall have no involvement whether paid or unpaid,
25 in the ownership, operation, or financing of any activity regulated by the Washington State
26 Gambling Commission. This does not prevent the Licensee from working in non-gambling

1 related employment at an establishment engaged in authorized gambling activities or in Class II
2 tribal gaming activities.

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

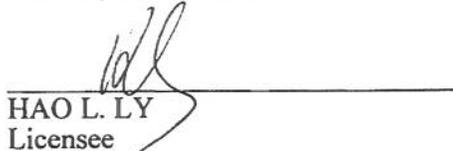
5
6  FOR

7 DAVID TRUJILLO
8 Director
9 Washington State Gambling
Commission

Oct. 11, 2018
DATE

10 
11 TERENCE K. WONG, WSBA #24502
Attorney for Licensee

10/11/18
DATE

12 
13 HAO L. LY
14 Licensee

10-11-2018
DATE