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**STATE OF WASHINGTON GAMBLING COMMISSION**

In the Matter of:

NO. CR 2019-00096

FOE 02218.  
License Nos. 01-01114  
60-00495  
02-00508  
05-01101

**STIPULATED SETTLEMENT  
AGREEMENT**

Licensee.

The Washington State Gambling Commission represented by its attorneys, ROBERT W. FERGUSON, Attorney General, KELLEN WRIGHT, Assistant Attorney General, and its Director, DAVID TRUJILLO, and the Licensee, FOE 02218, represented by attorney RICHARD MONTOYA, hereby enter into this stipulation and settlement agreement for Case Number CR 2019-00096.

**I. INTRODUCTION**

In the above-referenced case, the Washington State Gambling Commission issued a Notice of Administrative Charges dated April 9, 2019 alleging that the Licensee conducted bingo without first obtaining the license required under RCW 9.46.0311 and RCW 9.46.160, failed to provide adequate records verifying that the funds from the unlicensed bingo activity were deposited or used for their stated purpose as required by WAC 230-07-060(2)(a)-(d), and failed to deposit its net receipts within two business days as required by WAC 230-07-090(1)(f). The

1 Gambling Commission Staff determined that this conduct warranted suspension of the  
2 Licensee's gambling licenses, Nos. 01-01114, 60-00495, 02-00508, and 05-01101, under  
3 RCW 9.46.075(1); and WAC 230-03-085(1), (3), and (9).

## 4 II. AGREEMENT OF THE PARTIES

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

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

8 2. The Licensee explicitly waives the right of further administrative review of all  
9 matters related to the above-referenced Administrative Charges.

10 3. The Licensee admits to the violations alleged in the above-referenced  
11 Administrative Charges.

12 4. In light of the Licensee's willingness to accept responsibility for this violation,  
13 the Washington State Gambling Commission agrees to impose a penalty of a five (5) day license  
14 suspension and a five thousand dollar (\$5,000) fine.

15 5. The Licensee's gambling licenses, Nos. 01-01114, 60-00495, 02-00508, and  
16 05-01101, will be suspended for a period of five (5) days from August 21, 2019 at 8:00am to  
17 August 26, 2019 at 8:00am.

18 6. The Licensee agrees to pay the monetary penalty within thirty (30) days of the  
19 signing of this agreement.

20 7. The Licensee acknowledges and agrees that it will have no involvement in any  
21 gambling activities, unless and until its gambling license is reinstated.

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

STIPULATED AND AGREED TO BY:

*David Trujillo*  
DAVID TRUJILLO, Director  
Washington State Gambling Commission

8-16-19  
DATE

*Darrell Richards*  
DARRELL RICHARDS FOE PRESIDENT  
FOE Trustee Chairman

8/15/2019  
DATE

*Richard Montoya*  
RICHARD MONTOYA  
Attorney for Licensee E10881

8/15/19  
DATE