

**WASHINGTON STATE
OFFICE OF ADMINISTRATIVE HEARINGS**

In the matter of:

Robbi Rubio,
Appellant/Licensee.
License No. 61-04601

Docket No. 12-2019-GMB-00145

INITIAL ORDER

Agency: Washington State Gambling Commission
Agency No. 2019-01875

1. ISSUES:

- 1.1. Whether Robbi Rubio, failed to keep proper records of gambling activity, as required by Washington Administrative Code (WAC) 230-07-115?
- 1.2. Whether Robbi Rubio engaged in activity in violation Revised Code of Washington (RCW) 9.46.0335, RCW 9.46.075(1),(2),(7)&(8), RCW 9.46.153(1)&(4) and WAC 230-03-085(1),(3)&(9)?
- 1.3. Whether Robbi Rubio can establish by 'clear and convincing evidence' qualification for licensure, based on RCW 9.46.153(1)?
- 1.4. Whether the Gambling Commission's 'Notice of Administrative Charges', dated December 9, 2019, should be affirmed, modified or set aside?
- 1.5. Whether revocation of Robbi Rubio's Nonprofit Gambling Manager License is appropriate?

2. ORDER SUMMARY:

- 2.1. Robbi Rubio failed to keep proper records of gambling activity, as required by WAC 230-07-115. **AFFIRMED.**
- 2.2. Robbi Rubio engaged in activity in violation of RCW 9.46.0335, RCW 9.46.075(1),(2),(7)&(8), RCW 9.46.153(1)&(4) and WAC 230-03-085(1),(3)&(9). **AFFIRMED.**
- 2.3. Robbi Rubio did not prove by 'clear and convincing evidence' she is qualified for licensure, in accordance with RCW 9.46.153(1). **AFFIRMED.**
- 2.4. The Gambling Commission's 'Notice of Administrative Charges', dated December 9, 2019, are **AFFIRMED.**
- 2.5. The revocation of Robbi Rubio's Nonprofit Gambling Manager License is **APPROPRIATE.**

[Continued]

3. EVIDENTIARY HEARING:

- 3.1. Hearing Date: Thursday, May 27, 2021
- 3.2. Admin. Law Judge: TJ Martin
- 3.3. Appellant: Robbi Rubio, (Appellant/Licensee)
- 3.3.1. Representative: Sean Esworthy, Attorney
- 3.3.2. Witnesses: Robbi Rubio, Appellant/Licensee
Don Smith, Current LOOM Administrator
Brandon Schaapman, Past LOOM Governor
Megan Benedict, LOOM bartender
- 3.4. Agency: Washington State Gambling Commission Staff
(Gambling Commission Staff)
- 3.4.1. Representative: Doug Van de Brake, Assistant Attorney General
- 3.4.2. Witnesses: Egon Dezihan, Commission Staff Special Agent
Brian Lane, Commission Staff Special Agent
- 3.5. Exhibits: Commission Staff's Exhibits 1 through 15 were admitted.
Appellant's Exhibits 1 & 2 were admitted.

4. FINDINGS OF FACT:

The following facts are established by a 'preponderance of the evidence':

Jurisdiction-

- 4.1. On December 9, 2019, the Washington State Gambling Commission Staff (Gambling Commission Staff) issued a 'Notice of Administrative Charges' to Robbi Rubio (Rubio).
- 4.2. On December 19, 2019, Sean Esworthy, Attorney, on behalf of Rubio, appealed the Gambling Commission Staff's 'Notice of Administrative Charges'.

Illegal \$20,000 Sport Board Investigation-

- 4.3. On October 29, 2019, Gambling Commission began an investigation regarding a possible \$200 per square illegal sports board operated by Ricardo 'Ric' Garces, Club Administrator at the Loyal Order of the Moose (LOOM) Chapter 01925 Lodge in Quincy, Washington. *Gambling Commission (GMC) Exhibit (Ex.) 13.*
- 4.4. LOOM is a private, non-profit, social organization, consisting of over 500 members. *Testimony of Don Smith (Testimony of Smith) and GMC Ex. 13.*

January 30, 2019 First Rubio Interview-

- 4.5. On January 30, 2019, Washington State Gambling Commission Special Agents Egan Dezihan (Agent Dezihan) and Brian Lane (Agent Lane) went to the LOOM Lodge, in Quincy, Washington, to investigate the illegal, \$200 per square sports board. *Testimony of Egan Dezihan (Testimony of Dezihan) and Testimony of Brian Lane (Testimony of Lane).*
- 4.6. It is illegal to operate any sports board charging in excess of \$1.00 per square. *Testimony of Dezihan and GMC Ex. 13.*
- 4.7. Robbi Rubio, LOOM's licensed Gambling Manager since at least 2013, is responsible for all gaming operations at LOOM. *Testimony of Smith and Testimony of Robbi Rubio (Testimony of Rubio).*
- 4.8. On January 30, 2019, while at LOOM, Gambling Specials Agent Dezihan and Lane contacted Rubio, the sole person working at the time. *Testimony of Dezihan, Testimony of Lane and GMC Ex. 13.*
- 4.9. Special Agent Dezihan observed a two-sided sports board for the upcoming Super Bowl, located in plain view behind the bar. *Testimony of Dezihan and GMC Exs. 2, 3 & 13.*
- 4.10. Upon questioning, Rubio admitted the two sports boards were for the upcoming Super Bowl between the Los Angeles Rams and New England Patriots. Rubio was unaware a licensee could not have two sports boards for the same sporting event. *Testimony of Lane.*
- 4.11. Rubio produced \$100 for the front-facing sports board. However, she could only produce \$40.00 of the 54 squares taken on the backside board. Gambling Commission agents asked Rubio to return the money collected from the backside sports board to its participants. *Testimony of Lane.*
- 4.12. The Gambling Commission agents searched the LOOM lodge, but did not find any \$200 per square (\$20,000 total) sports board. *Testimony of Dezihan.*
- 4.13. Rubio denied knowledge of any \$200 per square sports board or participating in any such sports board. *Testimony of Dezihan, Testimony of Lane and GMC Ex. 13.*
- 4.14. On January 30, 2019, Specials Agents Dezihan and Lane directed Rubio not to discuss the Gambling Commission's criminal investigation with anyone. Rubio acknowledged the Gambling Commission's request. *Testimony of Dezihan, Testimony of Lane, GMC Ex. 13 and Testimony of Rubio.*

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February 26, 2019 Second Rubio Interview-

- 4.15. On February 4, 2019, Gambling Commission Specials Agents Dezihan and Lane interviewed Ric Garces, who admitted Rubio had called him on January 30, 2019, about the Gambling Commission's on-going investigation. *Testimony of Lane and GMC Exs. 4 & 13.*
- 4.16. On February 26, 2019, Gambling Commission Agents' interviewed Rubio again. Rubio denied calling anyone regarding the Gambling Commission's investigation. However, she recanted her story after the special agents told her Garces admitted Rubio had called him on January 30, 20219. *Testimony of Lane and GMC Exs. 5 & 13.*
- 4.17. Rubio said she 'didn't recall speaking with Garces' and that if she did, it 'wasn't a big deal', since she talked with Garces, LOOM's Administrator daily. *Testimony of Rubio.*
- 4.18. A search warrant, executed in April 2019, of Garces' cellphone records, confirmed Rubio called Garces, on January 30, 2019, immediately after the Gambling Commission Special Agents left the LOOM Lodge after interviewing Rubio. *Testimony of Dezihan and GMC Ex. 6.*
- 4.19. Rubio confirmed she had returned all money to participants from the second Super Bowl sports board, as requested by the Gambling Commission Specials Agents. *Testimony of Lane and Testimony of Rubio.*
- 4.20. Rubio, for a second time, denied any knowledge of or participating in any illegal \$200 per spot Super Bowl sports board. *Testimony of Lane and GMC Ex. 5.*

May 6, 2019 Third Rubio Interview-

- 4.21. On May 6, 2019, after executing a search warrant of Garces' residence in April 2019, Gambling Commission Specials Agents Dezihan and Lane met with Rubio for a third time. *Testimony of Lane and GMC Ex. 11.*
- 4.22. During the April 2019 search warrant executed on Garces' residence, Gambling Commission Special Agent also found LOOM blank checks, signed by Rubio. *Testimony of Lane and GMC Exs. 7 & 13.*
- 4.23. According to LOOM former Governor Brandon Schaapman, it is not uncommon for Rubio to sign blank checks which would be taken to the LOOM convention. *Testimony of Brandon Schaapman (Testimony of Schaapman).*
- 4.24. Gambling Commission Specials Agents Dezihan and Lane presented Rubio with a photograph from Garces' cellphone, showing the \$200 per spot 2018 Super Bowl sports board. *Testimony of Lane, GMC Exs. 1 & 11.*

- 4.25. For a third time, Rubio denied any knowledge of or participating in any illegal, \$200 per spot, Super Bowl sports board, including 'Robbi', listed on square '23', and 'Rob & Juls' being listed on square '44'. Rubio's spouse is named Julian, who often goes by 'Juls'. *Testimony of Lane and GMC Ex. 11.*
- 4.26. Gambling Commission Special Agents Dezihan and Lane compared Rubio's signature to those on the 2018 illegal Super Bowl board, listed as 'Robbi' and 'Rob' and found the handwriting nearly identical. *Testimony of Dezihan and GMC Ex. 1.*
- 4.27. Rubio denied neither she nor her spouse or anyone in her family won the grand prize of \$20,000 Super Bowl board in 2018. *Testimony of Lane and GMC Exs. 11 & 13.*

July 15, 2019 Fourth Rubio Interview-

- 4.28. On July 15, 2019, Gambling Commission Specials Agents Dezihan and Lane met Rubio at LOOM Lodge for a fourth time. *Testimony of Lane and GMC Ex. 12.*
- 4.29. During their visit, the Specials Agents provided Rubio with a written records request in order to identify possible LOOM members on the illegal Super Bowl sports board. LOOM took over one month to provide the member names due to LOOM's Legal counsel becoming involved in order to ensure the privacy of its members. *Testimony of Lane and GMC Ex. 12.*

Evidentiary Hearing-

- 4.30. At the hearing, Rubio admitted contacting Garces after the Gambling Commission agent visit on January 30, 2019. She admitted to talking with Garces about the two sports boards and the Gambling Commission's investigation of the illegal \$200 per spot Super Bowl sports board. *Testimony of Rubio.*
- 4.31. Rubio also admitted she had participated in Garces' 2018 \$200 per square Super Bowl sports board. *Testimony of Rubio.*

Rubio's Failure to Maintain a Current Gambling License-

- 4.32. In 2016, Rubio obtained her Gambling License. It expired the following year, on May 25, 2017. *Testimony of Lane. GMC Exs. 8; Pg. 1 & 14.*
- 4.33. On June 2, 2017, the Gambling Commission sent a courtesy notice to Rubio regarding the expiration of her Gambling License, which occurred on May 25, 2017. The letter was sent to a Coulee City, Washington address. *GMC Ex. 14.*
- 4.34. Rubio has never lived in Coulee and likely the reason Rubio did not receive the courtesy notice of her license expiration. *Testimony of Lane.*
- 4.35. A licensee has the burden to ensure his/her license is current. The renewal notice, sent out by the Gambling Commission, is only a courtesy notice. *Testimony of Lane.*

- 4.36. Rubio was not aware her Gambling License had expired until Agent Lane informed her of its expiration on June 14, 2019. *Testimony of Rubio.*
- 4.37. Upon learning of the expiration of her Gambling License from May 25, 2017 to June 14, 2019, Rubio immediately renewed her License. *Testimony of Rubio Testimony of Lane and GMC Ex. 8; Pg. 2.*
- 4.38. From May 25, 2017 to June 14, 2017, Rubio failed to have a valid gambling license. *Testimony of Lane.*

LOOM's Pull-Tab License-

- 4.39. In 2019, LOOM maintained a Class C Pull-Tab License, which allows it to collect \$200,000 in pull-tab profits. *Testimony of Lane and GMC Ex. 9.*
- 4.40. In 2019, LOOM exceeded its allowable class license by taking in over \$210,121 in pull-tab profits. *Testimony of Lane and Ex. 9.*
- 4.41. During its investigation of LOOM's pull-tab 'receivables', LOOM's records did not match up with the money received. *Testimony of Lane and GMC Ex. 10.*
- 4.42. An organization's Gambling License Manager, in this case, Robbi Rubio, is responsible for the pull-tab license, ensuring all monies are accounted for and recorded and ensuring the license is not exceeded. *Testimony of Lane.*
- 4.43. Rubio admitted LOOM's pull-tab license had been exceeded by \$10,000. Once notified, Rubio took the necessary steps so LOOM obtained a Class D pull-tab license to reflect the additional money received. *Testimony of Rubio.*
- 4.44. In January 2019, Rubio took time off for the trial of her sister's murder. As a result, she missed much of the day-to-day operations at LOOM. *Testimony of Rubio and Appellant's Exhibits (App. Exs.) 1-3.*
- 4.45. The Gambling Commission provides licensees with training regarding pull-tabs. However, Rubio, as LOOM's Gambling Manager, never requested such training. *Testimony of Lane.*

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5. CONCLUSIONS OF LAW:

Based upon the above 'Findings of Fact', the following 'Conclusions of Law' are made:

Jurisdiction-

5.1. The Office of Administrative Hearings (OAH) has jurisdiction over the persons and subject matter of this case under RCW 9.46.140(2)&(4), WAC 230-17-025 and Chapters 34.05 and 34.12 RCW.

Gambling Commission's Enforcement of Gaming Rules & Regulations-

5.2. RCW 9.46.010 establishes:

The public policy of the State of Washington on gambling is to keep the criminal element out of gambling and to promote the social welfare of the people by limiting the nature and scope of gambling activities and by strict regulation and control.

RCW 9.46.010.

5.3. RCW 9.46.040 authorizes the Washington State Gambling Commission to enforce the rules and regulations relating to gambling activities in the State of Washington.

Burden of Proof-

5.4. The burden of proof is on the Gambling Commission Staff to prove the administrative charges by a 'preponderance of the evidence'. However, this burden shifts to the Appellant/Licensee when required to establish by 'clear and convincing evidence', he/she is qualified for licensure, consistent with RCW 9.46.153(1).

5.5. A 'preponderance of the evidence' is evidence which, when fairly considered, produces the stronger impression, has the greater weight, and is more convincing as to its truth when weighed against the evidence in opposition thereto. *Yamamoto v. Puget Sound Lbr. Co.*, 84 Wash. 411, 146 Pac. 861 (1915).

Failure to Keep Proper Records (Exceeding Pull-tab Limit & Expiration of License)-

5.6. WAC 230-07-115 'Duties of charitable or nonprofit gambling managers' requires gambling managers to be knowledgeable of the law and rules governing gambling activities as well as properly supervise gambling activities.

5.7. In the present case, Rubio does not dispute she, as LOOM's Gambling Manager, allowed LOOM to exceed its pull-tab license limits in 2019. When the matter was brought to her attention, Rubio immediately cured the issue by purchasing a Class-D pull-tab license on behalf of the LOOM Lodge.

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- 5.8. In addition, Rubio failed to ensure her Gambling License remained active, since she allowed it to lapse for two years, from May 25, 2017 to June 14, 2019. When notified of its expiration, Rubio immediately renewed her license.
- 5.9. While Rubio resolved the pull-tab license and the expiration of her Gambling License after the fact, she does not dispute she violated WAC 230-07-115 by failing to be knowledgeable of LOOM exceeding its pull-tab limits and allowing her Gambling License to expire.
- 5.10. Therefore, the Gambling Commission has established by a 'preponderance of the evidence', which Rubio does not dispute, she violated WAC 230-07-115. Therefore this violation is **AFFIRMED**.

Operation of Multiple Sport Boards for the Same Sporting Event-

- 5.11. WAC 230-07-115 'Duties of charitable or nonprofit gambling managers' requires gambling managers to be knowledgeable of the law and rules governing gambling activities as well as properly supervise gambling activities.
- 5.12. RCW 9.46.0335(7) prohibits conducting more than one sports pool on the same athletic event.
- 5.13. RCW 9.46.075 authorizes the Gambling Commission to suspend or revoke a gambling license for the following reasons, in relevant part:
- (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;
 - (2) Knowingly causes, aids, abets, or conspires with another to cause, any person to violate any of the laws of this state or the rules of the commission;...
 - (7) Makes a misrepresentation of, or fails to disclose, a material fact to the commission;
 - (8) Fails to prove, by clear and convincing evidence, that he, she or it is qualified in accordance with the provisions of this chapter;

RCW 9.46.075(1),(2),(7)&(8).

- 5.14. In the present case, on January 30, 2019, Gambling Commission Special Agents Dezihan and Lane observed a two-sided, \$1.00 per square Super Bowl sports board in plain view at the LOOM Lodge. Rubio acknowledged the two sports boards were for the upcoming 2019 Super Bowl. She admitted she was not aware the two-sided sports board was a violation of RCW 9.46.0335(7).
- 5.15. However, Rubio, as LOOM's Gambling Manager, for at least the past six years, should have known of the prohibition on two sports boards for the same event.

5.16. While Rubio cured the situation by returning the money to the second board's participants, she did not dispute she had two sports boards for the same sporting event, in violation of WAC 230-07-115, RCW 9.46.0335, RCW 9.46.075(1),(2),(7)&(8), RCW 9.46.153(1)&(4) and WAC 230-03-085(1),(3)&(9). Therefore, the violation is **AFFIRMED**.

Appellant Poses a Threat to the Effective Regulation of Gambling-

5.17. RCW 9.46.075 authorizes the Gambling Commission to suspend or revoke a gambling license for the following reasons, in relevant part:

- (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;
- (2) Knowingly causes, aids, abets, or conspires with another to cause, any person to violate any of the laws of this state or the rules of the commission;...
- (7) Makes a misrepresentation of, or fails to disclose, a material fact to the commission;
- (8) Fails to prove, by clear and convincing evidence, that he, she or it is qualified in accordance with the provisions of this chapter;

RCW 9.46.075(1),(2),(7)&(8).

5.18. RCW 9.46.153(1)&(4) mandates:

- (1) 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;.....
- (4) All applicants, licensees, persons who are operators or directors thereof and persons who otherwise have a substantial interest therein shall have the continuing duty to provide any assistance or information required by the commission and to investigations conducted by the commission. If, upon issuance of a formal request to answer or produce information, evidence or testimony, any applicant, licensee or officer or director thereof or person with a substantial interest therein, refuses to comply, the applicant or licensee may be denied or revoked by the commission.

RCW 9.46.153(4).

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5.19. WAC 230-03-085(1),(3)&(9) authorizes the Gambling Commission to suspend or revoke a gambling license for, in relevant part:

- (1) Commits any act that constitutes grounds for denying, suspending, or revoking licenses or permits under RCW 9.46.075; or...
- (3) Has demonstrated willful disregard for complying with ordinances, statutes, administrative rules, or court orders, whether at the local, state, or federal level; or..
- (9) 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.

WAC 230-03-085(1),(3)&(9).

5.20. In the present case, on January 30, 2019, Gambling Commission Specials Agents Dezihan and Lane directed Rubio not to discuss the Gambling Commission's on-going, criminal investigation with anyone. Not only did Rubio immediately contact Ric Garces, LOOM's Administrator, after the Special Agents left LOOM, she also repeatedly denied violating the Specials Agent's order. Only after being presented with Garces' cellphone records showing she had called Garces, did Rubio truthfully admit to violating the Specials Agents' directive.

5.21. In addition, the Gambling Commission demonstrated Rubio, three times denied knowledge of and/or participating in a \$200 per square (\$20,000) Super Bowl sport board in 2018. However, she later admitted to such participation.

5.22. Based on the evidence, the Gambling Commission has established, by a 'preponderance of the evidence', the Appellant, Robbi Rubio, poses a threat to the effective regulation of gambling by her repeated unwillingness to be truthful to Gambling Commission Specials Agents as well as obstructing its investigation by contacting possible suspects (Ric Garces), despite being told not to.

5.23. Based on Rubio's blatant disregard of the Gambling Commission's laws and regulations, Rubio engaged in repeated dishonest and untruthful actions with Gambling Commission Special Agents during their investigation, in violation of RCW 9.46.0335, RCW 9.46.075(1),(2),(7)&(8), RCW 9.46.153(1)&(4) and WAC 230-03-085(1),(3)&(9). Therefore, the violation is **AFFIRMED**.

Failure to Prove by 'Clear and Convincing Evidence' Qualification of Licensure-

5.24. RCW 9.46.153(1) establishes:

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.

RCW 9.46.153(1).

- 5.25. Based on the above-cited 'Findings of Fact' and 'Conclusions of Law', Rubio, who has the affirmative responsibility to establish, by 'clear and convincing evidence', qualifications for licensure, has failed to demonstrate such qualifications by her repeated untruthfulness with Gambling Commission Specials Agents during their investigation.
- 5.26. In addition, Rubio, disregarded Gambling Commission Specials Agents' order not to discuss their investigation. However on January 30, 2019, after being directed not to discuss Gambling Commission's investigation, she immediately contacted Ric Garces, in violation of the order.
- 5.27. Based on these facts, Rubio has failed to establish, by 'clear and convincing evidence' qualification for licensure, based on RCW 9.46.153(1). **AFFIRMED.**
- 5.28. The Gambling Commission's 'Notice of Administrative Charges', dated December 9, 2019, are **AFFIRMED.**
- 5.29. Therefore, revocation of Robbi Rubio's Nonprofit Gambling Manager License is **APPROPRIATE.**

6. INITIAL ORDER:

THIS ADMINISTRATIVE COURT ORDERS:

- 6.1. Robbi Rubio failed to keep proper records of gambling activity, as required by WAC 230-07-115. **AFFIRMED.**
- 6.2. Robbi Rubio engaged in activity in violation of RCW 9.46.0335, RCW 9.46.075(1),(2),(7)&(8), RCW 9.46.153(1)&(4) and WAC 230-03-085(1),(3)&(9). **AFFIRMED.**
- 6.3. Robbi Rubio did not prove by 'clear and convincing evidence' she is qualified for licensure, in accordance with RCW 9.46.153(1). **AFFIRMED.**
- 6.4. The Gambling Commission's 'Notice of Administrative Charges', dated December 9, 2019, are **AFFIRMED.**
- 6.5. The revocation of Robbi Rubio's Nonprofit Gambling Manager License is **APPROPRIATE.**

Issued from Tacoma, Washington on the date of mailing.



TJ Martin
Administrative Law Judge
Office of Administrative Hearings

PETITION FOR REVIEW

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. **(Emphasis Added)**.

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 SERVICE FOR OAH DOCKET NO. 12-2019-GMB-00145

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

Robbi Rubio c/o Sean Esworthy Kottkamp, Yedinak & Esworthy, PLLC 435 Orondo Ave Wenatchee, WA 98801 <i>Appellant</i>	<input checked="" type="checkbox"/> First Class Mail <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
Sean Esworthy Kottkamp, Yedinak & Esworthy, PLLC 435 Orondo Ave Wenatchee, WA 98801 <i>Appellant Representative</i>	<input checked="" type="checkbox"/> First Class Mail <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: sean@wenatcheelaw.com
Doug Van de Brake, AAG Office of the Attorney General MS: 40100 PO Box 40100 Olympia, WA 98504 <i>Agency Representative</i>	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-mail: Doug.VandeBrake@atg.wa.gov Heather.Wulf@atg.wa.gov GCEEF@atg.wa.gov
Ashlie Laydon Washington State Gambling Commission MS: 42400 PO Box 42400 Olympia, WA 98504 <i>Agency Contact</i>	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail, Return Receipt <input type="checkbox"/> Hand Delivery via Messenger <input type="checkbox"/> Campus Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> E-mail ashlie.laydon@wsqc.wa.gov

Date: Tuesday, July 27, 2021

OFFICE OF ADMINISTRATIVE HEARINGS



Shawntá Williams
 Legal Assistant 2