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STATE OF WASHINGTON
GAMBLING COMMISSION

In the Matter of: STANLEY J. JOHNSON License No. 68-33423, Licensee.	Docket No. 10-2020-GMB-00160 NO. CR 2020-01092 STIPULATED SETTLEMENT AGREEMENT

The Washington State Gambling Commission represented by its attorneys, ROBERT W. FERGUSON, Attorney General, DOUGLAS VAN DE BRAKE, Assistant Attorney General, and its Acting Director, TINA GRIFFIN, and the Licensee, STANLEY J. JOHNSON, represented by attorney DAVE MALONE, hereby enter into this stipulation and settlement agreement for Case Number CR 2020-01092.

I. INTRODUCTION

1. The Washington State Gambling Commission issued Licensee Stanley Johnson Washington a gambling license, License No. 68-33423, authorizing Card Room Employee Activity at Iron Horse Casino in Auburn, Washington. This license expired on March 20, 2021.

2. Former Director David Trujillo issued a Notice of Administrative Charges under cause number 2020-01092 a signed copy of those Charges is attached to this Agreement. The Commission alleges Mr. Johnson committed certain acts or omissions in violation of Washington Administrative Code Section 230-06-081, and Revised Code of Washington 9.46.160, 9.46.075(1), and 9.46.153(1).

II. AGREEMENT OF THE PARTIES

The Gambling Commission and the Licensee agree to the following:

Washington State Gambling Commission
4565 7th Avenue S.E., Lacey, WA 98503
P.O. Box 42400
Olympia, WA 98504

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

2. The Licensee explicitly waives the right of further administrative review of all matters related to the above-referenced Administrative Charges. The Licensee hereby voluntarily withdraws his request for a hearing on this matter and requests that the Office of Administrative Hearings dismiss with prejudice OAH Docket No. 10-2020-GMB-00160.

3. The Licensee does not admit to the facts or violations alleged in the above-referenced Administrative Charges. However, the Licensee agrees there may be sufficient evidence for a trier of fact to conclude the Licensee committed the violations if the facts alleged were proven at hearing. Further, were this matter to proceed to hearing, there is a substantial likelihood that the Washington State Gambling Commission would be able to prove that it had the authority to revoke the Licensee's PCRE gambling license under RCW 9.46.153(1) and WAC 230-03-085(1).

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

5. The parties agree the Commission would have the authority to revoke the license of Stanley Johnson if the above-referenced violations were proven at hearing.

6. The Licensee acknowledges that the Washington State Gambling Commission will consider his license revoked effective on the date of signing of this agreement. Upon signing this settlement agreement, the parties agree that the Licensee will not be authorized to engage in any PCRE or Class III gambling activities unless he applies for and receives a new gambling license.

7. The Washington State Gambling Commission acknowledges the Licensee may reapply for a certification or gambling license at any point. In the event the Licensee subsequently applies for certification or a gambling license, he will be subject to all the

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Washington State Gambling Commission's investigative procedures for processing such application. Furthermore, no promises or assurances have been made to the Licensee that he will receive a license or certification from the Washington State Gambling Commission should he apply.

8. The Licensee agrees that he shall have no involvement whether paid or unpaid, in the ownership, operation, or financing of any activity regulated by the Washington State Gambling Commission without either first acquiring a valid gambling license or written authorization from the WSGC to do so. This does not prevent the Licensee from working in non-gambling related employment at an establishment engaged in authorized gambling activities or in Class III tribal gaming activities.

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

Tina Griffin	4/30/2021
TINA GRIFFIN Acting Director Washington State Gambling Commission	DATE
Dave Malone	4/26/2021
DAVE MALONE, WSBA #23435 Attorney for Licensee	DATE
STANLEY J. JOHNSON Licensee	DATE

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7. The Washington State Gambling Commission acknowledges the Licensee may reapply for a certification or gambling license at any point. In the event the Licensee subsequently applies for certification or a gambling license, he will be subject to all the Washington State Gambling Commission's investigative procedures for processing such application. Furthermore, no promises or assurances have been made to the Licensee that he will receive a license or certification from the Washington State Gambling Commission should he apply.

8. The Licensee agrees that he shall have no involvement whether paid or unpaid, in the ownership, operation, or financing of any activity regulated by the Washington State Gambling Commission without either first acquiring a valid gambling license or written authorization from the WSGC to do so. This does not prevent the Licensee from working in non-gambling related employment at an establishment engaged in authorized gambling activities or in Class III tribal gaming activities.

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

_____ _____

TINA GRIFFIN DATE
Acting Director
Washington State Gambling
Commission

_____

DAVE MALONE, WSBA #23435 DATE
Attorney for Licensee

4/24/2021

STANLEY J. JOHNSON DATE
Licensee

Washington State Gambling Commission
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Olympia, WA 98504