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JERRILYNN HADLEY

AUG 30 2007

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STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

LEE H. ROUSSO, an individual,

Plaintiff,

No. 07-2-22438-6 KNT

DEFENDANT'S FIRST SET OF
DISCOVERY REQUESTS

v.

STATE OF WASHINGTON, a
government entity,

Defendant.

TO: PLAINTIFF LEE H. ROUSSO, *pro se* litigant:

DIRECTIONS

A. Procedures. In accordance with CR 33, please answer the following interrogatories, separately and fully under oath, within thirty (30) days of the date of service of these interrogatories upon you. Please complete the answers within the space provided, using additional pages if necessary, and return the original to this office.

B. Production of Documents. In accordance with CR 34, Defendant requests that you produce all documents identified in response to these interrogatories. The documents are to be produced for inspection and copying at the Office of the Attorney General, Government Compliance & Enforcement Division, 1125 Washington Street SE, P.O. Box 40100, Olympia, Washington 98504-0100, with instructions specifying whether you wish them to be copied and returned or to be retained.

C. Supplemental Answers. These interrogatories are continuing and in the event you discover further information or documents that are responsive to these interrogatories and requests for production of documents, you are to supplement the answers by additional answers or the production of additional documents.

1 D. Reliance Upon Answers. Please take notice that the DEFENDANT WILL RELY
2 UPON THE ACCURACY AND COMPLETENESS OF THE ANSWERS GIVEN in response to
3 these interrogatories and will presume that they have been supplemented as required by the Rules of
4 Civil Procedure. DEFENDANT WILL OBJECT TO CLAIMS AND WITNESSES NOT
5 SUPPORTED BY YOUR ANSWERS.

6 E. Terms of Art. Terms identified below and used herein shall have the following
7 meanings:

8 1. By use of the pronoun "you" it is intended that the answers are to include all
9 information known to the following parties and persons: LEE H. ROUSSO.

10 2. "Document" means the original and any copy regardless of origin or location
11 of any book, pamphlet, periodical, letter, email, memorandum, report, record, study, handwritten-
12 note, map, drawing, working paper, chart, paper, graph, index, tape, or data, or any other written,
13 recorded, transcribed, taped, digitized, filmed, photographed or graphic matter, however produced
14 or reproduced, to which you have or have had access.

15 3. "Identify" or "identity" used in reference to an individual person or entity
16 means state that person's or entity's full name, present or last-known business and residential
17 address (if applicable) and telephone number; present or last-known business position and/or
18 affiliation; and that person's or entity's business affiliation and/or position at the time in question.

19 4. "Identify" or "identity" when used in reference to document means to state
20 the date the document bears and the date it was prepared; the identity of the author and/or
21 originator; the identity of each addressee; type of document (e.g., letter, memorandum, telegram,
22 chart, etc.) or some other means of identifying it; the present location of the document; the identity
of the present custodian thereof; and whether you will provide a copy thereof without further
request. If any such document was, but is no longer, in your possession or subject to your control,
state what disposition was made of it.

5. "Identify" or "identification" when used in reference to any other matter in
these interrogatories, including any oral communication, shall mean to identify (as defined in
paragraphs 4 and 5) all data regarding the description and substance of the matter involved; with
reference to oral communication, such description should include the identity of the speaker(s) and
the person(s) addressed, the reference to oral communication, such description should include the
identity of the speaker(s) and the person(s) addressed, the date, place and medium of the
communications, and a description in complete and full detail of the content of the communication.

F. WITH RESPECT TO ANY DOCUMENT AS TO WHICH YOU ASSERT A
CLAIM OF PRIVILEGE OR IMMUNITY, PLEASE:

1. Specifically identify the document, including its title; its author; its date; its
addressee/recipient; and a summary of the substance of the communication contained therein:

2. Specifically identify the nature of the privilege or immunity upon which you
base your objection, and identify the facts given rise to the claim of privilege or immunity.

1 **INTERROGATORIES**

2 **INTERROGATORY No. 1:** Please provide your home address and telephone number and
describe how long you have lived at that address.

3 **ANSWER:**

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7 **INTERROGATORY No. 2:** Please provide the dates and addresses for other primary residences
where you have lived for the past 10 years.

8 **ANSWER:**

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11 **INTERROGATORY No. 3:** Please list the screen names or pseudonyms you use, or have used in
the past, while engaging in Internet gambling.

12 **ANSWER:**

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16 **INTERROGATORY No. 4:** Please describe your position with Poker Players Alliance (PPA),
including a description of your duties, salary, and activities as a PPA representative over the past
five (5) years, as well as the names of any individuals you report to or work with in the PPA.

17 **ANSWER:**

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21 **INTERROGATORY No. 5:** Please describe the circumstances under which you opened an
account with Pokerstars as described in Paragraphs 3.5 through 3.7 of the Complaint, including the
location and ownership of the computer(s) or telephones used to access your Pokerstar account, the
owner of the debit card bank account used to open the Pokerstars account, the name and location of

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the bank issuing the debit card, the bank account number and the status of the bank account as of the date of filing the Complaint (July 6, 2007).

ANSWER:

INTERROGATORY No. 6: Please describe any and all Internet gambling activities you have engaged in over the past five (5) years, including the name of the website, the location and ownership of the computer(s) used for on-line gambling, the type of gambling, the names of your opponents, the amount wagered, the amount won or lost, and specify the method of payment and receipt including the name of the financial institution or other payment provider and the account number through which you made or received payments.

ANSWER:

INTERROGATORY No. 7: Please identify (including name, address and telephone number) all persons with knowledge regarding your Internet gambling activities over the past five (5) years, including a brief description of the scope of their knowledge and what they know about such activities.

ANSWER:

INTERROGATORY No. 8: Please describe the amount of money you have (1) paid to participate in Internet gambling (including date, amount, Internet website, and type of gambling), as well as amounts you have (2) wagered, (3) won and (4) lost on Internet gambling over the past five (5) years.

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INTERROGATORY No. 9: Please identify (including name, address, telephone number, and dates) any and all locations where you have engaged in non-Internet gambling in Washington State over the past five (5) years.

ANSWER:

INTERROGATORY No. 10: Please describe in detail the facts underlying your assertion that Pokerstars “acts a neutral stakeholder,” as set forth in Paragraph 3.8 of the Complaint.

ANSWER:

INTERROGATORY No. 11: Please describe in detail the facts underlying your assertion that you have played with citizens of other states, as well as citizens of United States territories and dozens of foreign countries, as asserted in Paragraph 3.9 of the Complaint, including the names and addresses of the players and the dates of play, amounts wagered, won or lost, and the method of payment and receipt including the name of the financial institution or other payment provider and the account number through which payments were received or made.

ANSWER:

INTERROGATORY No. 12: Please explain the legal and factual bases for your assertion in paragraph 3.10 of the Complaint that each of the following activities constitute “contests of chance” as defined by RCW 9.46.0225 and constitute an act of professional gambling under Washington’s Gambling Act: fantasy baseball league, March Madness bracket contest, and participating in an office pool on the results of “so-called ‘reality’” TV show.

ANSWER:

1 **INTERROGATORY No. 13:** Please describe with particularity the facts relating to your
2 participation in fantasy baseball on the Internet, as set forth in paragraphs 3.10 and .11 of the
3 Complaint, including the dates played, your location, the names and contact information of other
4 participants, amounts paid to play, amounts wagered, amounts won or lost, and identify the method
5 of payment and receipt including the name of the financial institution or other payment provider
6 and the number of the account through which payments were received or made.

7 **ANSWER:**

8 **INTERROGATORY No. 14:** Please describe with particularity the facts relating to your
9 participation in a March Madness bracket contest on the Internet, as set forth in paragraph 3.10 and
10 .11 of the Complaint, including the dates played, your location, the names and contact information
11 of other participants, amounts paid to enter, amounts wagered, and amounts won or lost, and the
12 method of payment and receipt including the name of the financial institution or other payment
13 provider and number of the account through which payments were received or made.

14 **ANSWER:**

15 **INTERROGATORY No. 15:** Please describe with particularity the facts relating to your
16 participation in a "reality TV" pool on the Internet, as set forth in paragraph 3.10 and .11 of the
17 Complaint, including the dates played, your location, the names and contact information of other
18 participants, amounts paid to enter, amounts wagered, amounts won or lost, and the method of
19 payment and receipt including the name of the financial institution or other payment provider and
20 the number of the account through which payments were received or made.

21 **ANSWER:**

22 **INTERROGATORY No. 16:** Please identify all instances when you have engaged in Internet
gambling since the passage of amendments to RCW 9.46.240 (effective date, June 7, 2006),
including the dates played, your location, the names and contact information of other participants,
amounts paid to enter, amounts wagered, amounts won or lost, and the method of payment and
receipt including the name of the financial institution or other payment provider and the number of
the account through which payments were received or made.

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ANSWER:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION No. 1: Please produce for inspection and copying all documents (including writings, drawings, graphs, charts, photographs, emails, journals, logs, and other data compilations from which information can be obtained) relating to your position as Washington State representative for the lobbying group Poker Player's Alliance (PPA's); including a copy of PPA's governing documents (by-laws, articles of incorporation, etc.); your job description; salary, wages and other compensation received; and documents reflecting your lobbying efforts on behalf of Poker Player's Alliance on a local, state, or national basis.

RESPONSE:

REQUEST FOR PRODUCTION No. 2: Please produce for inspection and copying all documents (including writings, drawings, graphs, charts, photographs, emails, journals, logs, and other data compilations from which information can be obtained) supporting factual assertions set forth in Paragraph 3.4 of your Complaint regarding membership in PPA, and PPA's estimates regarding the number of persons state- and nationwide who play internet poker.

RESPONSE:

REQUEST FOR PRODUCTION No. 3: Please produce for inspection and copying all documents in your possession or control (including writings, drawings, graphs, charts, photographs, emails, journals, logs, and other data compilations from which information can be obtained) you have received, sent, or have access to, related to communications with PPA members or leadership.

RESPONSE:

1 **REQUEST FOR PRODUCTION No. 4:** Please produce for inspection and copying all
2 documents in your possession or control (including, but not limited to, writings, drawings,
3 correspondence, graphs, charts, photographs, emails, journals, logs, and other data compilations
4 from which information can be obtained) relating to your account with Pokerstars, including any
5 documentation for any games of Internet poker you played on the Pokerstars website between July
6 15, 2003 and June 7, 2006, as described in paragraph 3.7 of the Complaint.

7 **RESPONSE:**

8 **REQUEST FOR PRODUCTION No. 5:** Please produce for inspection and copying all
9 documents in your possession or control (including, but not limited to, writings, drawings,
10 correspondence, graphs, charts, photographs, emails, journals, logs, and other data compilations
11 from which information can be obtained) relating to your response to Interrogatory No. 6, including
12 documentation regarding players, wagers, amounts lost or won, and any and all documentation
13 related to payment and receipt of money wagered, won, or transferred for purposes of facilitating to
14 your Internet gambling activities.

15 **RESPONSE:**

16 **REQUEST FOR PRODUCTION No. 6:** Please produce for inspection and copying all
17 documents in your possession or control (including, but not limited to, writings, drawings,
18 correspondence, graphs, charts, photographs, emails, journals, logs, and other data compilations
19 from which information can be obtained) relating to your response to Interrogatory No. 11,
20 including documentation regarding players, wagers, amounts lost or won, as well as all
21 documentation related to payment and receipt of money wagered, won, or transferred for purposes
22 of facilitating your Internet gambling activities.

RESPONSE:

REQUEST FOR PRODUCTION No. 7: Please produce for inspection and copying all
documents in your possession or control (including, but not limited to, writings, drawings,
correspondence, graphs, charts, photographs, emails, journals, logs, and other data compilations
from which information can be obtained) relating to your playing fantasy sports on the Internet,
including documentation regarding players, wagers, amounts lost or won, as well as all

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documentation related to payment and receipt of money wagered, won, lost or transferred for purposes of facilitating your Internet gambling activities.

RESPONSE:

REQUEST FOR PRODUCTION No. 8: Please produce for inspection and copying all documents in your possession or control (including, but not limited to, writings, drawings, correspondence, graphs, charts, photographs, emails, journals, logs, and other data compilations from which information can be obtained) relating to your playing March Madness Brackets on the Internet, including documentation regarding players, wagers, amounts lost or won, as well as all documentation related to payment and receipt of money wagered, won, lost or transferred for purposes of facilitating your Internet gambling activities.

RESPONSE:

REQUEST FOR PRODUCTION No. 9: Please produce for inspection and copying all documents in your possession or control (including, but not limited to, writings, drawings, correspondence, graphs, charts, photographs, emails, journals, logs, and other data compilations from which information can be obtained) relating to your entering office pools on "reality TV" on the Internet, including documentation regarding players, wagers, amounts lost or won, as well as all documentation related to payment and receipt of money wagered, won, lost or transferred for purposes of facilitating your Internet gambling activities.

RESPONSE:

REQUEST FOR PRODUCTION No. 10: Please produce for inspection and copying all documents in your possession or control (including, but not limited to, writings, drawings, correspondence, graphs, charts, photographs, emails, journals, logs, and other data compilations from which information can be obtained) relating to bank accounts, credit cards, Internet payment providers, or any other entity or individual, used to place any wagers or to receive any winnings

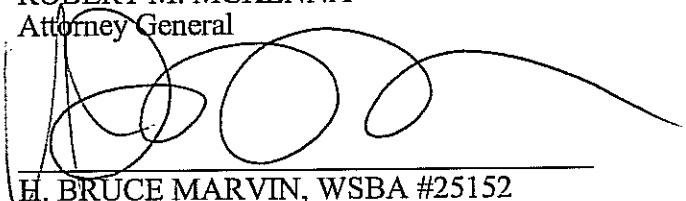
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from Internet gambling of any type or sort within the last five (5) years, including the types of Internet gambling activities discussed in Interrogatories 6, 8, 13, 14 and 15.

RESPONSE:

DATED this 28th day of August, 2007.

ROBERT M. MCKENNA
Attorney General



H. BRUCE MARVIN, WSBA #25152
Assistant Attorney General
JERRY ACKERMAN, WSBA # 6535
Senior Counsel
Attorneys for Defendant

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STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

INDIVIDUAL SIGNATURE PAGES FOR PLAINTIFF LEE H. ROUSSO.

_____, being first duly sworn on oath, deposes and says:

That _____ is a plaintiff in this action; that _____ has read the foregoing interrogatories and answers thereto, knows the contents thereof, and believes the same to be true.

SUBSCRIBED AND SWORN TO Before me this ____ day of _____, 2007.

_____, Notary
Public in and for the State of Washington
Residing at: _____
My Commission Expires: _____