



Memo

Date:	August 23, 2024
To:	Oregon Lottery Commission
From:	Michael Wells, Director
Subject:	Request for approval of alternative disclosure process for APRO, LLC
Oregon Administrative Rule	OAR 177-040-0001(4)

In 2015, Lottery adopted OAR 177-040-0001(4) which authorizes an alternative disclosure process for large public companies or multi-state retail chains seeking traditional contracts with Oregon Lottery. To qualify for this alternative disclosure process, the applicant must have at least 30 individual retail locations, \$10 million in gross annual revenues and over 300 employees.

The alternative disclosure process focuses the security background investigation on the business entity vs. the entire corporate structure.

As of August 2024, APRO, LLC operates in five states, has 512 retail locations and has approximately 3600 employees. The total gross revenue for year 2023 was approximately \$4.1 billion dollars. APRO, LLC currently holds gaming licenses in California, Colorado, Washington, and 15 Oregon Lottery contracts. The parent company of APRO, LLC is CF United, LLC. APRO, LLC clearly meets the qualifications for the alternative disclosure process.

If approved by the Commission, it is recommended that the organization change process is continued using supplied disclosure information provided by APRO, LLC. Oregon Lottery Security will investigate on the business entity. At any time, additional disclosure may be required to ensure the fairness, integrity, security, and honesty of the Lottery.

I met with the Assistant Director for Security and Retail Contracts Manager to discuss the framework of the alternative disclosure rule and concluded it would be prudent to request the commission waive the personal disclosure requirements for APRO, LLC, which qualifies for the alternative disclosure process.

Since 2015 the Oregon Lottery Commission has approved the use of an alternative disclosure process for five current traditional retailers, four tribally owned entities, and one entity that is in the application process.

Current Traditional Retailers: Chevron, Walmart, Circle K, BP Products North America, Pilot Travel Centers

Tribally Owned Entities: Chinook Winds Bar & Restaurants, Roxy Ann Lane at Bear Creek, The Golf Course at Birch Creek, Hamley's Steakhouse

Entities in Application Process: WinCo



Memo



United Pacific Entity Structure 2024

