



Memo

Date:	April 19, 2024
To:	Oregon Lottery Commission
From:	Michael Wells, Director
Subject:	Request for approval of alternative disclosure process for BP Products North America, Inc.
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's immediate corporate structure vs. the entire corporate structure.

As of April 2024, *BP Products North America, Inc. (BPPNAI)* operates in 61 countries, including thirteen U.S. states and has 87,800 employees worldwide. The total revenue for fiscal year 2023 was over \$15.2 billion. BPPNAI currently holds a gaming license in California. BPPNAI clearly meets the qualifications for the alternative disclosure process.

If approved by the Commission, it is recommended that the retailer application process is continued using supplied disclosure information provided by *BPPNAI*. Oregon Lottery Security will investigate the business. At any time, additional disclosure may be required to ensure the fairness, integrity, security, and honesty of the Lottery.

The Assistant Director for Security, the Retail Contracts Senior Manager and I have discussed the framework of the alternative disclosure rule and concluded it would be prudent to request the commission waive the personal disclosure requirements for *BPPNAI*, which by rule, qualifies for the alternative disclosure process.

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

- Traditional Retailers: Chevron, Walmart, Circle K
- Tribally Owned Entities: Chinook Winds Bar & Restaurants, Roxy Ann Lane at Bear Creek, The Golf Course at Birch Creek, Hamley's Steakhouse



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BP Products North America, Inc. Org Chart

4/5/2024

