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| Date: | Dec. 13, 2024 |
| To: | Oregon Lottery Commission |
| From: | Michael Wells, Director |
| Subject: | Request for approval of alternative disclosure process for 7-Eleven, 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 thirty individual retail locations, \$10 million in gross annual revenues and over three hundred employees.

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

As of December 2024, 7-Eleven, Inc., runs 84,500 convenience stores in twenty countries including thirty-eight states. 7-Eleven, Inc. employs approximately 39,000 employees in the United States and Canada. The total gross revenue for year 2023 was approximately \$59 Million dollars. 7-Eleven, Inc. clearly meets the qualifications for the alternative disclosure process.

If approved by the Commission, it is recommended that the organizational change process is continued using supplied disclosure information provided by 7-Eleven, Inc. Oregon Lottery Security will investigate the business entity. At any time, added disclosure may be needed 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 7-Eleven, Inc., which qualifies for the alternative disclosure process.

Since 2015 the Oregon Lottery Commission has approved the use of an alternative disclosure process for thirteen entities.

Current Traditional Retailers: Chevron Stations, Inc., Walmart, Inc., Circle K Stores, Inc., BP Products North America, Pilot Travel Centers, LLC, APRO, LLC, Plaid Pantries, Inc., WinCo Foods, LLC, and The Kroger Co.

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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7-ELEVEN, INC.

| Title | Name | Address | Percentage |
|-------------|---|--|------------|
| Shareholder | SEJ Asset Management & Investment Company | c/o Corporate Creations Network, Inc., 3411 Silverside Rd., Rodney Building #104, Wilmington, DE 19810 | 100% |

SEJ ASSET MANAGEMENT & INVESTMENT COMPANY

| Title | Name | Address | Percentage |
|-------------|---|--|------------|
| Shareholder | Seven Eleven Japan Co., Ltd. | 8-8 Nibancho, Chiyoda-Ku, Tokyo 102-8455 Japan | ~75% |
| Shareholder | Seven & i Holdings Co. Ltd. (<i>publicly traded entity</i>) | 8-8 Nibancho, Chiyoda-Ku, Tokyo 102-8455 Japan | ~25% |

SEVEN ELEVEN JAPAN CO., LTD.

| Title | Name | Address | Percentage |
|-------------|---|--|------------|
| Shareholder | Seven & i Holdings Co. Ltd. (<i>publicly traded entity</i>) | 8-8 Nibancho, Chiyoda-Ku, Tokyo 102-8455 Japan | 100% |