



Memo

Date:	August 21, 2025
To:	Oregon Lottery Commission
From:	Mike Wells, director
Subject:	Request for approval of alternative disclosure process for Albertsons Safeway 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 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 February 2025, Albertsons Safeway LLC, through its network of operating affiliates operates more than 2,200 retail stores across 24 states (including D.C.). Albertsons Safeway LLC employs approximately 285,000 employees in the United States. The total gross revenue for year 2024 was approximately \$80.4 Billion dollars. Albertsons Safeway LLC, 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 Albertsons Safeway LLC. 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 Albertsons Safeway LLC, which qualifies for the alternative disclosure process.

Since 2015, the Oregon Lottery Commission has approved the use of an alternative disclosure process for 13 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, The Kroger Co, and 7-Eleven Inc.

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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Albertsons Safeway LLC with Officers Info 2025

