



STATE OF WASHINGTON
GAMBLING COMMISSION

"Protecting the Public by Ensuring that Gambling is Legal and Honest"

August 14, 2007

Warren Montney
Badabing's Big Games
404 Sanford Avenue
Richland, WA 99352

RE: Big Draw Poker

Dear Mr. Montney

Thank you for requesting approval to market the card game "Big Draw Poker" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Badabing's Big Games, the Washington State Gambling Commission will approve the game under the conditions listed below:

COMMERCIAL CARD ROOMS

- The game shall be played and operated under the terms and conditions set forth under the "Big Draw Poker – Rules of Play" you provided.
- Commercial card room operators seeking to operate this game must first submit their internal controls and receive approval from the Commission prior to implementing.

TRIBAL CASINOS

- The game shall be played and operated under the terms and conditions set forth under the "Big Draw Poker – Rules of Play" you provided.
- Each Tribal casino must request and obtain approval from their respective Tribal Gaming Agencies (TGA).
- Before TGA allows your game to operate, they will seek concurrence from our agency as well.
- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and licensed by the Tribe prior to the sale of the equipment.



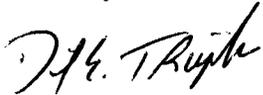
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Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-02-300, related to this game and may be contacting you.

Furthermore, any modifications to this game may affect this approval. Contact the Commission should you contemplate modifications.

If you have any further questions on Commercial implementation, please contact Keith Wittmers at (253) 671-6289. If you have any further questions on Tribal implementation, please contact Kelly Main at (206) 423-4260. Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,



David Trujillo
Assistant Director
Licensing Operations Division

cc: Keith Wittmers, Special Agent Southwest Region
Julie Lies, Assistant Director Tribal Gaming Division
File

Big Draw Poker

Featuring the over 100% payback first 5 bet*

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Rules and dealing procedures

This game is played with one standard 52 card deck . The game requires a custom felt and a custom dealer button . It can be hand shuffled and dealt out of a shoe , or a shuffle machine, if one is available that will deal it . Or shuffled by a shuffle machine and dealt out of a shoe.

The game is played on a blackjack style table, with 5 player spots available. The 5 Card Draw portion of the game is a straight draw poker game . The Deuces never Loses portion of the game is draw poker with deuces (2's) being wild.

The button reads 5 Card Draw on one side, the other side reads Deuces Never Loses. The button rotates between players, from the dealers left to right. Once the button reaches spot 5 on the dealers right. It then moves back to spot one, on the dealers left.

To start the game the dealer asks the player with the button which game they would like to play , Deuces never loses or 5 Card Draw . Which ever game the player chooses the corresponding side of the dealer button is placed face up in front of the player who made the selection. If a Player does not want to choose they may pass the button to the next player in turn .

There are two wagers to choose from the Big Draw is a wager that they will achieve a specific hand either on the deal or with a draw. The second wager is called "FIRST 5 " it is a wager that the player will achieve a specific hand in their first 5 cards. This bet is a 1\$ minimum by rule when played with the Big Draw wager. Played as a stand alone bet the house may have a higher minimum, and not allow the player to look at their cards until all draws are complete. The house may elect to allow players to play either bet by itself or require the Big Draw wager to be played as the main wager only allowing the First 5 wager to be played if the Big Draw is played. Additionally the house may have separate betting limits for each bet .the maximum wager for each bet must comply with WSGC rules.

After all bets are placed the dealer gives each player 5 cards. The cards may be dealt by giving each player one card then a second etc. until all players have 5 cards , or by giving the first player 5 cards then moving on to the next .

The player with the button gets the first card or hand depending which way the house elects to deal, one card at a time or all five at once . If spot five, on the dealers right has the button they will get the first card or hand, and then spot one on the dealers left will get then next card or hand . The house does not receive any cards.

After receiving their cards each player may discard from 0-5 cards, face down. If a player has a First 5 bet and has a winning First 5 hand, they tuck the winning first 5 cards face down under their bet, and place their discards in front of their bet face down. The player must then inform the dealer they have a winning first 5 wager.

Once all players have discarded before dealing the requested cards the dealer will pick up all losing first 5 wagers then expose winning first 5 cards and pay them leaving the cards face up behind the big draw betting circle. After paying and taking all first 5 wagers ,starting from the button the dealer deals the requested number of cards out of the shoe in front of the chip

tray . Next the dealer places them on top of the players remaining cards and picks up their discards before continuing with the next player.

Option 2 for dealing of players draw cards

The first 5 cards are delivered as described above. After paying and taking first 5 wagers the house picks up all discards. Then starting from the button they turn the remaining cards face up and give the player the appropriate number of draw cards face up. As soon as the cards are dealt the house takes or pays the big draw bet places the cards in the discard rack and moves to the next hand.

Players are not allowed to show or discuss their hands with other players.

Aggregate limits must comply with WSGC rules .The top two payouts on the First 5 bets are a fixed amount and **DO NOT COUNT TOWARDS THE AGGREGATE LIMITS!**

Players may not side bet on another players hand, and any game irregularities must be handled by the house policy ,which must comply with WSGC rules.

Pay table for 5 Card Draw Big Draw Wager

Royal Flush.....	200-1
Straight Flush.....	50-1
Four of a kind.....	25-1
Full House.....	6-1
Flush.....	5-1
Straight.....	3-1
Three of a kind.....	2-1
Two pairs	1-1
Jacks or better.....	PUSH

House edge for this pay table is 3.81 %

Pay table for 5 Card Draw First 5 Wager

Royal Flush fixed payout	1\$ or more bet	pays	\$5,000
Straight Flush fixed payout	1\$ or more bet	pays	\$1,000
Four of a kind	200-1		
Full House	60-1		
Flush		25-1	
Straight		20-1	
Three of a kind	9-1		
Two Pairs		4-1	
Jacks or better		1-1	

The house edge on this bet is negative -0.0237% based on a 1\$ bet . On bets higher than 1\$ the house edge listed below

At 2\$ the edge is 1.0537 %

At 3\$ the edge is 1.419%

At 4\$ the edge is 1.592%

At 5\$ the edge is 1.700%

Pay table for Deuces Never Loses Big Draw Wager

Four Deuces.....	222-1
Royal Flush no Deuces.....	222-1
Wild Royal (royal with deuces).....	10-1
Five of a kind.....	9-1
Straight Flush.....	7-1
Four of a Kind.....	4-1
Full House.....	2-1
Flush.....	3-2
Straight.....	1-1
Three of a Kind.....	PUSH
The house edge for this pay table is 4.0435%	

Pay table for First 5 Wager for Deuces Never Looses

Four Deuces fixed payout 1\$ or more bet	\$2222
Royal Flush ,no deuces fix payout 1\$ or more bet.....	\$2222
Wild Royal Flush	222-1
Five of a kind.....	75-1
Straight Flush.....	30-1
Four of a Kind.....	12-1
Full House.....	6-1
Flush.....	5-1
Straight.....	4-1
Three of a kind.....	3-1
The house edge for this pay table is negative -2.0162 % based on a 1\$ bet	
At 2 \$ the house edge is 0.2067%	
At 3\$ the house edge is 0.9477%	
At 4\$ the house edge is 1.3181 %	
At 5\$ the house edge is 1.5404 %	
At 10\$ the house edge is 1.9850%	

The recommended hand shuffle for this game is shuffle, shuffle, strip shuffle, shuffle, strip , shuffle, shuffle, cut by dealer onto cut card as close to the middle of the deck as possible . It is also recommended that plastic poker cards are used or if paper cards are used deck change should not be more than every 1.5-2 hrs depending on play.

Operator cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140

