



STATE OF WASHINGTON
GAMBLING COMMISSION

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

September 24, 2010

Kerrie Kimball
Shuffle Master Inc.
1106 Palms Airport Drive
Las Vegas, NV 89119

RE: Blackjack Switch

Dear Ms. Kimball:

Thank you for requesting approval to market the card game "Blackjack Switch" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Shuffle Master Inc., 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 "Blackjack Switch – 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.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be licensed by the state prior to the sale of the equipment.

Tribal Casinos

- The game shall be played and operated under the terms and conditions set forth under the "Blackjack Switch – Rules of Play" you provided.
- Each Tribal gaming operation 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.

Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-03-045, related to this game and may be contacting you.

Furthermore, any modifications to this game may affect this approval. Please contact the Commission should you contemplate modifications. If you have any questions on commercial implementation, please contact Keith Wittmers at (253) 671-6289. If you have any 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,



Tina Griffin
Assistant Director
Licensing Operations Division

cc: Mark Harris, Assistant Director Field Operations
Julie Lies, Assistant Director Tribal Gaming Division
Jennifer Lamont, Acting Tribal Certification Manager
Keith Wittmers, Special Agent Field Operations
Kelly Main, Special Agent Tribal Gaming
File



Blackjack Switch is a standard house-banked blackjack game except for the rules listed below. All other rules pertaining to standard blackjack as posted on the WSGC's website remain the same.

Overview

In Blackjack Switch® each player plays two hands of Blackjack. The player can choose to switch the second card of each hand. The player can also make the optional Kings Bounty bet which is based on their first 2 cards.

Getting Started

1. Players make equal bets on both betting spots, and the optional King's Bounty wager. The dealer then deals out two hands of Blackjack to each player and one to himself.
2. When each player has two hands and the dealer has two starting cards, the dealer settles the King's Bounty wagers.
 - a. Exception: If a player has two Kings of Spades and the dealer has a potential blackjack, the dealer will settle that bet at the end of the round.

After seeing their two Blackjack starting hands, players have a choice: to switch the second card of each hand. Then each hand is played according to the normal house rules of Blackjack. (See *Dealing Procedures* below for resolving player blackjacks.) All doubling and splitting is allowed as in regular Blackjack.

Winning and Losing

Blackjacks pay even money. Dealer total of 22 will push all non-bust player hands (See exceptions noted below).

King's Bounty wager is paid according to posted payable.

First Two Player Cards*	Pays
2 Kings of Spades + Dealer BJ	1,000 to 1
2 Kings of Spades	100 to 1
2 Suited Kings	30 to 1
2 Suited Queens, Jacks or 10s	20 to 1
Suited 20	9 to 1
2 Kings	6 to 1
Unsuited 20	4 to 1
*Only highest winner paid	

Rules and Dealing Procedures

1. SHFL Entertainment recommends using an automatic shuffler such as an *ONE2SIX*® or a *MD-2*® batch shuffler.
2. After players have placed their wagers, the dealer, working clockwise from his left to his right, gives each player two hands of blackjack and himself one hand of Blackjack.
3. Dealer resolves all King's Bounty Wagers (based on first 4 player's cards).
4. Depending on version, Blackjacks may be paid automatically. (See appendix A.)
5. If the dealer is showing an Ace, Insurance will be offered. Player can take insurance on either or both hands.
6. As the dealer works clockwise from his left to right the player decides to "switch" (see Appendix B for switching procedure) the second cards or play each hand according to the normal rules of blackjack. Splitting, doubling, and doubling after splitting is allowed even after a "switch".
7. If the dealer draws a total of 22, all remaining base wagers will push except Blackjack. (See appendix A for definition of Blackjack.) Otherwise base wagers are resolved according to the normal rules of blackjack.

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

Appendix 'A'

Depending on the version of Blackjack Switch that is being offered, the resolution of a "Blackjack" varies. The definition of Blackjack will be explained for each version below.

Version 1

- Dealer Hits Soft 17
- A "switched" Blackjack is considered a Blackjack. Therefore, a player will be offered the opportunity to switch before the dealer checks his hole card.
- Blackjack pays 1 to 1 and would push if the dealer has a Blackjack.

Version 2

- Dealer Hits Soft 17
- A "switched" Blackjack is considered a 21, not a Blackjack.
- Blackjack pays 1 to 1 and would push if the dealer has a Blackjack.
- A switched Blackjack (considered a 21) loses against a dealer blackjack and pushes against a dealer 21 or 22.

Version 3

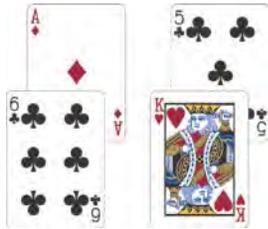
- Dealer Hits Soft 17
- A "switched" Blackjack is considered a 21, not a Blackjack.
- Blackjack pays 1 to 1 including against a dealer Blackjack.
- A switched Blackjack (considered a 21) loses against a dealer blackjack and pushes against a dealer 21 or 22.

Version 4

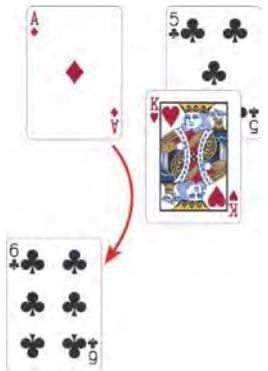
- Dealer Stands on Soft 17
- A "switched" Blackjack is considered a 21, not a Blackjack.
- Blackjack pays 1 to 1 and would push if the dealer has a Blackjack.
- A switched Blackjack (considered a 21) loses against a dealer blackjack and pushes against a dealer 21 or 22.

Appendix 'B'

Procedure for Switching the Cards



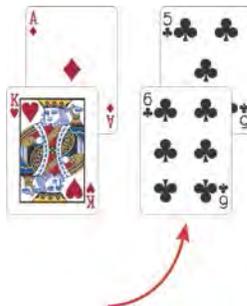
Starting position of the player's hand



Using the right hand only, the dealer will first pull the left hand card to be "switched".



Next, the dealer will move the right hand card into the position originally taken by the left card.



Finally, the dealer will move the original left card into the position left vacant by the right card.



Paytables	1	2
First 4 cards	6 decks	8 decks
4 of a Kind	40 to 1	50 to 1
Two Pair	8 to 1	7 to 1
Three of a Kind	5 to 1	5 to 1
Pair	1 to 1	1 to 1

Kings Bounty	
Hand	1
2 Kings of Spades + Dealer BJ	1,000 to 1
2 Kings of Spades	100 to 1
2 Suited Kings	30 to 1
2 Suited Queens, Jacks or 10s	20 to 1
Suited 20	9 to 1
2 Kings	6 to 1
Unsuited 20	4 to 1



Two Kings of Spades & Dealer BJ	100 to 1
Two Kings of Spades	100 to 1
Two Kings of Clubs	100 to 1
Two Kings of Hearts	100 to 1
Two Kings of Diamonds	100 to 1
Two Kings	100 to 1
Two Aces	100 to 1
Two Aces of Spades	100 to 1
Two Aces of Clubs	100 to 1
Two Aces of Hearts	100 to 1
Two Aces of Diamonds	100 to 1
Two Aces	100 to 1

Dealer must hit soft 17 and will push on a total of 22
BLACKJACK PAYS 1-1 ★ INSURANCE PAYS 2-1

Two Kings of Spades & Dealer BJ 100 to 1
 Two Kings of Spades 100 to 1
 Two Kings of Clubs 100 to 1
 Two Kings of Hearts 100 to 1
 Two Kings of Diamonds 100 to 1
 Two Kings 100 to 1
 Two Aces 100 to 1
 Two Aces of Spades 100 to 1
 Two Aces of Clubs 100 to 1
 Two Aces of Hearts 100 to 1
 Two Aces of Diamonds 100 to 1
 Two Aces 100 to 1



Two Kings of Spades & Dealer BJ 100 to 1
 Two Kings of Spades 100 to 1
 Two Kings of Clubs 100 to 1
 Two Kings of Hearts 100 to 1
 Two Kings of Diamonds 100 to 1
 Two Kings 100 to 1
 Two Aces 100 to 1
 Two Aces of Spades 100 to 1
 Two Aces of Clubs 100 to 1
 Two Aces of Hearts 100 to 1
 Two Aces of Diamonds 100 to 1
 Two Aces 100 to 1



Two Kings of Spades & Dealer BJ 100 to 1
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 Two Kings of Hearts 100 to 1
 Two Kings of Diamonds 100 to 1
 Two Kings 100 to 1
 Two Aces 100 to 1
 Two Aces of Spades 100 to 1
 Two Aces of Clubs 100 to 1
 Two Aces of Hearts 100 to 1
 Two Aces of Diamonds 100 to 1
 Two Aces 100 to 1



Two Kings of Spades & Dealer BJ 100 to 1
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 Two Kings 100 to 1
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 Two Aces of Clubs 100 to 1
 Two Aces of Hearts 100 to 1
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 Two Aces of Clubs 100 to 1
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 Two Aces of Diamonds 100 to 1
 Two Aces 100 to 1