



STATE OF WASHINGTON
GAMBLING COMMISSION

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

May 31, 2012

Helene Gilbert
DEQ Systems Corp.
1840 1st Street Ste. 103-A
Levis, QC G6W5M
Canada

RE: Lucky Lucky Blackjack

Dear Ms. Gilbert,

Thank you for requesting approval to market the card game "Lucky Lucky Blackjack" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from DEQ Systems Corp., 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 "Lucky Lucky Blackjack – Rules of Play", which are enclosed.
- 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 "Lucky Lucky Blackjack – 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.



Ms. Gilbert
May 24, 2012
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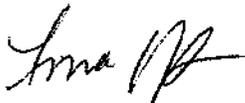
- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and 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. Contact the Commission should you contemplate modifications. If you have any questions on commercial implementation, please contact Jess Lohse at (425) 277-7017. 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

Enclosure

cc: Mark Harris, Assistant Director Field Operations
Julie Lies, Assistant Director Tribal Gaming Division
Jess Lohse, Special Agent Field Operations
Kelly Main, Special Agent Supervisor Tribal Gaming
File



LUCKY LUCKY BLACKJACK BONUS WAGER: RULES OF PLAY

Lucky Lucky is a bonus wager for blackjack that uses the player's first two cards combined with the dealer's up-card (or community card), to form a three card hand. Winning hands use the ranks of 6-7-8, 7-7-7, or a three card total of 19, 20, or 21. There is no player skill required for this bet. The Lucky Lucky bonus wager is placed on a blackjack game with any number of decks used in standard blackjack (a single deck through an eight-deck shoe), or with a continuous shuffler machine. *Please refer to the pay table.*

The general rules of blackjack have not changed and can be found on the WSGC website.

1. Player **must** place a main blackjack bet in order to play the Lucky Lucky bonus wager.
2. If a Player chooses to participate, the additional Lucky Lucky bet is to be placed in the designated area on the layout near the player's main blackjack bet.
3. Each Casino house may apply their betting limits for this bonus wager.
4. Only the player controlling the main blackjack betting spot may participate in the Lucky Lucky bonus wager option.
5. All bets must be placed prior to the dealer starting a round of play.
6. The cards are dealt clockwise, starting at the player's position that is leftmost to the dealer.
7. Once the initial cards have been dealt for a round, the dealer will start from their right to resolve the Lucky Lucky bet. Players who placed a Lucky Lucky bet and win must be paid immediately, and all payouts along with their corresponding original Lucky Lucky bet, must be removed from the Lucky Lucky betting spot and

pushed back towards the player before the regular round of Blackjack play begins. Players who did not receive a Lucky Lucky win will have their bonus wagers removed.

8. The Lucky Lucky standard pay table is as stated below for 3 or more decks. A single or double deck would be paid out using the same pay table but removing the Suited 777 as this is not possible with less than 3 decks.

Table 1: Lucky Lucky Standard Pay Table

Player's Hand + Dealer Up Card (or Community Card)	Pays
Suited 777	200 to 1
Suited 678	100 to 1
777	50 to 1
678	30 to 1
Suited 21	15 to 1
21 Total	3 to 1
20 Total	2 to 1
19 Total	2 to 1
18 Total or less	Loss

9. In the event the player qualifies for more than one win only the highest win is payable.
10. House edge: the house edge varies from 2.61% to 2.82% based the number of decks used. Below is the house edge based on the number of decks used with the Lucky Lucky bonus wager.

Table 2: House Edge based on the number of decks used:

Decks	Table 1
1	2.61%**
2	2.82%**
3	2.77%
4	2.72%
5	2.68%
6	2.66%
7	2.63%
8	2.62%

***The rows for one and two decks are based on removing the pay for the suited 777 from the pay table.*

11. The house edge for a continuous shuffling machine using six decks will closely correspond to the house edge performance of the 8-deck house edge, as a continuous shuffler machine mimics the performance of the highest number of decks, due to the infinite deck effect.

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

