STATE OF WASHINGTON
GAMBLING COMMISSION
*PO Box 42400 • Olympia, WA 98504-2400 • (360) 486-3440 • TDD (360) 486-3637 • FAX (360) 486-3624*

September 20, 2002

Mr. Thomas Staley
LTB, L.L.C.
60 Trumbull Street
New Haven, CT 06510

Dear Mr. Staley:

Thank you for requesting approval to market the card game "***Wild Eleven***" in Washington State. Based on our review of the documentation you provided, the Washington State Gambling Commission will approve your game for sale to Tribal casinos under the conditions listed below:

- The game shall be played and operated under the terms and conditions set forth under the game rules you provided.

- Under the terms of the various Tribal-State Compacts, Tribal operators must request and obtain approval from their Tribal Gaming Agencies and from our Tribal Gaming Unit before being allowed to operate this game. In addition to your approved rules, Tribes must also submit supplemental information required by Appendix A, Section 18.

Please be advised any modifications to this game may affect this approval. Please contact our agency should you contemplate modifications to your original submission.

If you have any further questions on Tribal implementation, contact Robert Zaher at (206) 391-2125. Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,

Julie L. Lies
Program Manager, Tribal Gaming Unit

JL:rz

cc: Robert Zaher, Electronic Games Coordinator – TGU
Keith Wittmers, Card Room Coordinator
Michelle Mack, Special Agent – FIU
file

# *WILD ELEVEN*

Wild Eleven is a game of chance played between the dealer and players numbering one to any number which would comfortably sit around a table to play. The aim of the game is to end up with a hand of cards, the face value of which comes to eleven or as close to eleven without going over as one can. Each player plays their hand against the dealer, not against other players. The game is played with a deck of cards totaling 52 cards. Fifty-two cards are made up of six cards with a value of one, six cards with a value of two, six cards with a value of three, six cards with a value of four, six cards with a value of five, six cards with a value of six, six cards with a value of seven, six cards with a value of eight and an additional four cards which are entitled Wild Eleven. (The game may be played with the use of one to four cards per deck entitled Wild Eleven. Whatever reduction there is in the number of cards called Wild Eleven below 4 will reduce the total number of cards in the deck accordingly.) During the playing of the game, each of the face cards with a value are worth the value set forth thereon whereas the card marked Wild Eleven can be used by the dealer or the players as an 11 or as any value which when added to the other cards in their hand would total 11. An example: If Player One was dealt a card with a face value of 3 and then received a second card which was a Wild Eleven, he could use that Wild Eleven card for a face value of 8 therefore giving him a total of 11 points. The dealer would be able to do the same as a player. If, in fact, the dealer or the player receives a Wild Eleven as their first card, they then would have 11 points.

The game may be played by using one deck of cards or any number of decks of cards chosen by the dealer. This game is played by the dealer dealing one card face up to each of the number of players playing in the game and dealing one card to the dealer face down. Thereafter, the players, each in turn, may request an additional card be dealt to the player and may continue requesting cards be dealt until the player decides to stop asking for cards and then rests his hand as then constituted. (Of course, a player cannot request a card after the face value of the cards in the player's hand exceed the total of 11.) If the cards in a player's hand reaches a face value that exceeds 11, this means that the player's hand loses to the dealer. Each player has an opportunity to request the number of cards they desire until all have done so. After that, the dealer turns the dealer's card over and, if the face value of that card is 6 or less, the dealer shall receive an additional card or cards until the total of the face value of the cards reaches 7 or more. If, in fact, the total of the face value of the cards in the dealer's hand exceed 11, the dealer can request no further cards. At that point, the dealer hand would lose to any player's hand which has not exceeded the face value of 11. When the face value of the cards in the dealer's hand have reached 7, the dealer can no longer request an additional card. At that point, the dealer's hand would lose to any hand held by a player in which the face value of the cards held by the player exceed the number of the face value of 7. In the event the face value of the cards in the dealer's hand and the player's hand both equate to 7 or to any number from 7 to 11, there is a tie and neither party wins. If, in fact, the dealer has been dealt a Wild Eleven card as his first card and if a player has been dealt a Wild Eleven card in the player's first card, the dealer and that player tie and there is no winner between the two. If, in fact, the dealer has a Wild Eleven for his first card and a player has not received a

Wild Eleven as the player's first card, the player's hand shall lose to the dealer. If a player receives a Wild Eleven as player's first card and the dealer has not received a Wild Eleven as dealer's first card, the dealer's hand shall lose to the player. If any player's hand has a face value exceeding 11, the cards in their hand are collected immediately. If a player is dealt a second card that matches the first card the player received, the player may divide his cards and play two hands. Each hand is played as a separate and distinct hand. The player must request all cards desired on the first hand before they can go to the second or other hands being played as a result of the division of cards. The player is entitled to divide his cards up to 5 times as long as the additional cards are the same face value as each of the first 2 cards the player received.

If played by the dealer and the players as a form of gambling or a game of chance, the following rules apply:

1) The player must indicate prior to any cards being dealt the amount of money the player is risking on that particular hand. The money or chips are placed in a designated area for the player's bet.

2) No hand is paid until the dealer's hand is complete.

3) Each player is competing against the dealer and not against the individual players.

4) If a player receives a Wild Eleven card for the player's first card and the dealer does not receive a Wild Eleven card for the dealer's first card, the player wins and the dealer must pay to the player an amount equal to twice the amount wagered by the player.

5) In the event a player divides his hand, the player may wager on each hand an amount equal the original bet placed by the player at the commencement of the hand, each division of the cards by the player gives him the opportunity to increase his bet on each division of cards to an amount equal to the original amount wager.

6) After receiving their first card, if the first card is not a Wild Eleven, the player's bet may be increased up to the amount of the player's original bet and the player may request only one additional card and the player's hand would be complete and rested or the player's hand may be complete and rested without requesting an additional card and only keeping the player's single original card.

7) Anytime the player beats the dealer's hand, the player is paid an amount equal to the amount the player originally bet. Each time the player's hand and the dealer's hand are the same in value (both have received Wild Eleven cards as their first card or the face value of the dealer's hand and the player's hand equals one another whether through face value of the cards or face value of the cards plus the use of a Wild Eleven card which was not the first card, neither party wins and the player therefore retains the wager that he originally made on the hand).

# DECK OF CARDS FOR WILD ELEVEN

A deck of cards has 52 cards

6 - 1
6 - 2
6 - 3
6 - 4
6 - 5
6 - 6
6 - 7
6 - 8
4 - Wild 11*
52

11 wins or closes to 11 without going over. Tie = push. A Wild 11 card is automatic winner. Player can double down at any time and after any card as long as he did not brake. Game is played with 6 decks of cards. Dealer plus 7 players can play.

*(The game may be played with the use of one to four cards per deck entitled Wild Eleven. Whatever reduction there is in the number of cards called Wild Eleven below 4 will reduce the total number of cards in the deck accordingly.)