WASHINGTON STATE
GAMBLING COMMISSION

Field Operation Rule Interpretation

Question: What are the restrictions on Match Play coupons, or similar "coupon" promotions?

CITE: WAC 230-12-045 Gambling Promotions

SUMMARY

Issue/Reasoning:

Match play coupons are a typical coupon offered as a promotion. WAC 230-12-045 states licensees may conduct gambling promotions to encourage players to participate in a gambling activity under the following conditions:

1) All players must have an equal opportunity to participate;
2) Licensees must establish criteria to determine how promotional items will be distributed and the criteria must not include distribution based on an element of chance such as a drawing or spinning wheel;
3) All rules or restrictions must be conspicuously displayed in the gaming area and included on the promotional materials or advertisements.

Decision:

1. A "match play" coupon does not have any monetary value and therefore, a player cannot "double down" on that portion of the wager. However, the player can still double down on the portion in chips wagered, not to exceed the maximum wagering limits allowed by the WSGC.

2. Since it has no monetary value, a "match play" coupon is not considered part of the player's wagering in determining the amount wagered by the player. The "match play" offers the player the opportunity to be paid more for a winning wager, but does not required them to wager more than the maximum bet allowed. If a card room wants to offer this special bonus to a player who wagers the maximum allowed, this is acceptable.

3. A "match play" coupon is itself a gambling promotion and cannot be awarded as a prize in a PCOC or as a prize on a card game.

4. Any restrictions placed on the use of the coupons must be disclosed on the coupon. Examples of restrictions would be if the licensee won't allow players to add a second "match play" coupon when a hand is split or a double down wager is made in Blackjack. Any expiration date must also be included on the coupon.

5. In addition, "match play" and other similar type coupon promotions (Lucky Bucks, Free Ace, etc) may be given to participants in a card tournament as long as they are given to all participants and are not awarded based on the outcome of the tournament.

Cally Cass

Cally Cass, Assistant Director

2/8/06

Date