STATE OF WASHINGTON GAMBLING COMMISSION

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

December 1, 2006

Xuming Shangguan Unax Gaming 5418 198th Place Seattle, WA 98155

Dear Mr. Shangguan:

Thank you for requesting approval to market the House Banked version of the card game "Skweezit Black Jack" to Washington State commercial card rooms. Based on our review of the documentation we received from Unax Gaming, 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 "Skweezit Black Jack – 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.

Please be advised 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) 471-5312, extension 231.



Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,

David Trujillo, Assistant Director Licensing Operations Division

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Cc:

Keith Wittmers, Special Agent, Southwest Region Field Operations Julie Lies – Agent In Charge, Tribal Gaming Unit Kelly Main, Special Agent, Tribal Gaming Unit

Tina Griffin - Special Agent Supervisor, Financial Investigations Unit

SKWEEZIT BLACKJACK

(also known as Skweeze Blackjack)

RULES OF PLAY



Galaxy Gaming, Inc. is a publically owned and traded company. OTC Ticker Symbol: GLXZ

Skweezit Blackjack

"Skweezit Blackjack" is standard house-banked blackjack but with an optional house-banked bonus wager. All rules pertaining to standard blackjack as posted on the WSGC's website under "Authorized Games" remain the same and are not altered in this game. Each bonus wager may be made at the player's option and there is no effect on the primary game and no changes in player strategy. Minimum and maximum wagering limits are established by the casino operator in accordance with the limits set in WAC 230-15-040, WAC 230-15-140 or their specific regulatory body.

"Skweezit Blackjack" can be played with 2, 4, 5, 6, 7 or 8 decks of cards. The cards used are standard 52 card decks.

The bonus wager for "Skweezit Blackjack" is summarized as follows:

Skweezit

The player wins their Skweezit wager if one of the player's first two cards is higher than the dealer's "up card" and the player's other card is lower than the dealer's up card. For the purposes of this bonus wager (not the regular Blackjack game) an Ace is the highest rank. The player is awarded a prize according to the corresponding paytable (see Appendix "A"). A player must make their Skweezit wager before any cards are dealt.

Winning combinations for the Skweezit wager are defined as follows:

- a) "Skweezer": any three card combination that meets the conditions described above for a winning Skweezit wager.
 - Example: Player's two cards, 10, +3; dealer's up-card, 8
- b) "All Black Skweezer": all three cards are black (and/or+), in addition to the conditions described in paragraph 4.
 - Example: Player's two cards, \mathbf{a} , +7; dealer's up-card, +J
- c) "All Red Skweezer": all three cards are red (• and/or •), in addition to the conditions described in paragraph 4.
 - Example: Player's two cards, A, 2; dealer's up-card, 3

- d) "Belly Skweezer": one of the player's two cards is one rank higher than the dealer's up-card, and the other of the player's two cards is one rank lower than the dealer's up-card, in addition to the conditions described in paragraph 4.

 Example: Player's two cards, ♥K, ♣J; dealer's up-card, ♠Q; Player's two cards, ♣4, ♣6; dealer's up-card, ♠5. Note: Player's A, 3 and dealer's 2 doesn't accord the condition
- e) "Suited Belly Skweezer": all three cards are the same suit, in addition to the conditions of "In the gut" described in paragraph 5c.

 Example: Player's two cards, ♦8, ♦6; dealer's up-card, ♦7

Rules of Play

- 1) Players are required to place a wager on the Blackjack wager in order to play the game.
- 2) Players have the option to place a wager on the Bonus Wager.
- 3) Once all wagers are placed, the dealer shall deal the game according to the rules of a standard Blackjack game.
- 4) After dealing the first two cards to all players and the dealer, The dealer shall pay or collect the Skweezit bonus wager accordingly from right to left.
- 5) Dealer shall finish the Blackjack game.

APPENDIX "A"

The Pay Tables in this section are applicable for the Skweezit bonus wager. The Statistics in this section are calculated using mathematical probability methods.

Payouts

Winning Combination	Payouts
Suited Belly Skweezer	100
Belly Skweezer	20
All Black/Red Skweezer	4
Skweezer	1

Note: This pay table is the same for any number of decks

Statistics

Number of Decks	House Advantage	Hit Frequency (% of winning hands)
2	4.64%	26.80%
4	6.02%	26.42%
5	6.30%	26.34%
6	6.48%	26.29%
7	6.61%	26.25%
8	6.70%	26.22%

Skweezit Blackjack Layout

