



STATE OF WASHINGTON
GAMBLING COMMISSION

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

July 9, 2018

Jason Kobal
Casino Over Under LLC
12169 West Linebaugh
Tampa, FL 33626

RE: Casino Over Under

Dear Mr. Kobal

Thank you for requesting approval to market the card game "Casino Over Under" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Casino Over Under LLC, 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 "Casino Over Under – Rules of Play" you provided and 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 "Casino Over Under – Rules of Play" you provided and are enclosed.
- 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.



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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.

Any modifications to the games may affect this approval. If you have any questions on commercial implementation, please contact Brian Lane at (509) 886-6231. 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, Regulation and Enforcement Division

Enclosure

cc: Cathy Harvey, Special Agent in Charge, Tribal Gaming Unit
Jim Nicks, Special Agent in Charge, Regulation Unit
Brian Lane, Special Agent, Regulation Unit
Kelly Main, Special Agent Supervisor, Tribal Gaming Unit
File



CASINO OVER UNDER

Procedure Manual

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Casino Over Under, LLC
12169 W. Linebaugh Ave.
Tampa, Florida 33626

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OVERVIEW OF THE RULES

INTRODUCTION

Casino Over Under uses six standard 52-card decks. (Any number of decks may be used.) There are two ways to play. The game allows the player to either place a wager for the Over/Under Base Game or to place a wager on both the Over/Under Base Game as well as an additional wager on the Bonus Bet.

GAME PROCEDURE

Time and location of wagers

To bet the Over/Under Base Game, a player must first place a wager in the circle marked *ANTE* prior to the first card being dealt. After the first card is dealt face up, the player must match the value of the Ante Wager and place it in either the *OVER 23* circle or the *UNDER 18* circle to complete the bet.

The Bonus Bet is optional and must be placed in the *BONUS* circle only after an Ante Wager is previously placed, yet before the first card is dealt. The value of the Bonus Wager must equal the amount of the Ante Wager.

Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140. Players are limited to wagering on a maximum of four games and side bets between players are not allowed.

How the outcomes are determined

After the Ante Wager and Bonus Wagers (optional) are made, a single card is dealt to the player. At this point the player must decide whether to surrender or continue the Over/Under Base Game. If the player decides to surrender, the Ante Wager is forfeited. If no Bonus Wager was placed, the Over/Under Base Game is concluded by dealing the remaining two cards are

burned but face up. (The reason that is done is so no player's strategic decision ever affects the outcome of another player's hand.) However, if a Bonus Wager was previously placed, the remaining two cards are dealt face up, and the Bonus Bet is played out.

If the player chooses not to surrender, a declaration must be made by placing a wager equal to the amount of the Ante Wager on either the *OVER 23* circle or the *UNDER 18* circle. After the selection is made, the player is dealt two more cards consecutively and face up. All wagers are decided by the summation the three cards in the player's hand. Each card is evaluated as follows: cards two through ten are worth face value, face cards are worth ten and aces are worth eleven. If the player bets Over 23, then the summation must be greater than 23 to win (Summation of three cards > 23.5). If the player bets Under 18, then the summation must be less than 18 to win (Summation of three cards < 17.5). If the player wins the Over/Under Base Game, the payout is even money or one-to-one for the Ante Wager and also one to-one for the Over 23 Wager or Under 18 Wager. If the player loses, the Ante Wager is forfeited, and the Over 23 Wager or Under 18 Wager is also forfeited. Pushes for summations of 18 or 23 are losses.

To win the Bonus Bet the three card summation must equal a specific amount that is listed on the Bonus Payout Table (Figure 1), and each specific summation has a corresponding payout multiplier. The Bonus Payout Table is attached to the end of this manual for reference. The best outcome for the player is to have a summation of either six (three twos) or 33 (three aces), wherein the payout is 50 times the Bonus Wager. The winning ranges are from 6 to 12 and from 27 to 33. A summation greater than 12 and less than 27 is a loss, and the player forfeits the Bonus Wager. Also, the Bonus Bet is separate from the Over/Under Base Game, thus, you can win the Bonus Bet even if you lose the Over/Under Base Game.

DEALING PROCEDURES

Casino Over Under can be dealt with an automatic shuffler, a single deck, double deck, six deck shoe or an eight deck shoe.

If any automatic shuffle machine is used in conjunction with this game, it must be a WSGC approved model, manufactured by a WSGC licensed manufacturer

Opening Skit:

Welcome to Casino Over Under! How to play is simple- after seeing one card you must correctly wager if the three-card total will be Over 23 or Under 18. The payout is even money, and an added Bonus Bet on the total could payout as much as 50 to 1! Good Luck!

Procedures and Secondary Features:

Over/Under Game Play:

First, the player places an Ante wager here [physically indicate], and then each player is dealt a single card face-up. The player's must choose to either surrender and lose their Ante or they can finish the bet by matching the amount of their ante and placing those chips either in the Over 23 circle [physically indicate], or Under 18 circle [physically indicate]. Winners get paid even money for the Ante and Over/Under bets, there are no pushes for totals of 18 or 23, and aces are always 11.

Bonus Bet Game Play:

The Bonus Bet is independent of the Over/Under and must be placed in the Bonus circle [physically indicate] prior to any cards being dealt at the same time as the Ante. The Bonus win is also determined by the three-card total, and the payouts are listed in the Bonus Tables [physically indicate again].

Once everyone is settled in the dealer will announce: "Place your wagers."

1. Each player makes a wager as indicated below according to posted table limits: To play the Over/Under Base Game or Bonus Bet, a player must place an Ante Wager on the circle marked *ANTE* and after doing so they may also place a Bonus Wager in the circle marked *BONUS*.

2. The dealer shall announce “No more bets.” prior to the dealer dispensing each player their first card. Also, prior to dealing the card the dealer must verbally confirm with each player that did not place a Bonus Wager if they realize they did not bet the bonus by asking “No bonus wager?”
3. Each player then receives one card face up in the outlined rectangle closest to the player. Cards are delivered to the players from the dealer clockwise (left to right).
4. After the cards are dealt the dealer must ask each player from left to right the following question. “Over, under or surrender?” The players will then make their selection by placing a wager equal to the amount of the Ante Wager in either the circle marked *OVER 23* or the circle marked *UNDER 18*. If a player surrenders, the Ante Wager is taken and the Bonus Wager is left, if placed.
5. Once all declarations are made the dealer will deal the player to the dealer’s far left their second and third card consecutively, face up in the remaining two outlined rectangles starting with the rectangle closer to the player, and overlapping each previously dealt card. After dealing the second and third card the dealer resolves all of that player’s wagers as described in #6. Once the player’s wagers are completely resolved and their cards are taken then the dealer moves on to the next player moving left to right. (If the dealer gets to a player who previously surrendered with no Bonus Bet, he still burns the second and third card face up.)
6. After dealing the second and third card the dealer must resolve all wagers made by that player before moving on to the next player. The dealer must verbally announce the outcomes before either paying or taking a player’s money as follows: For a winning Over/Under Bet. “Winner on the over 23 for even money or winner on the under 18 for even money.” The dealer will first resolve the the ante and over/under wager first then

pause after taking the ante and over/under chips and then determine if the Bonus Bet won or lost. If the dealer pays a player that won an over or under wager the chips are placed on the dealer's right side of the ante circle and on the dealer's right side of the over or under circle. For a winning Bonus Bet, "The total is 31, winner on the bonus paid at 5 to 1" (Or whatever the correct odds are in accordance with the bonus pay table). For a losing Bonus Bet, "The total is 19 Bonus wager is a loss based on the total." The dealer will either pay the player for the Bonus Bet in accordance with the Bonus Payout Table, or take the Bonus Wager if the summation of the three cards fell between 13 and 26. If the player wins the Bonus Bet, the winning amount is placed next to the Bonus Wager on the dealer's left side of the player's Bonus Bet circle. r circle.

Irregularities in Dealing Procedures

1. Incorrect number of cards in a player's hand:
 - If any player is dealt an incorrect number of cards, all hands are void and the cards are reshuffled.

2. Card shuffler malfunction:
 - Follow specific procedures approved by your local regulatory body.

BONUS PAYOUT TABLE	
SUMMATION OF HAND	PAYOUT MULTIPLIER
13 through 26	-1 (Loss)
12 or 27	1
11 or 28	2
10 or 29	3
9 or 30	4
8 or 31	5
7 or 32	10
6 or 33	50

Figure 1: Bonus Payout Table.

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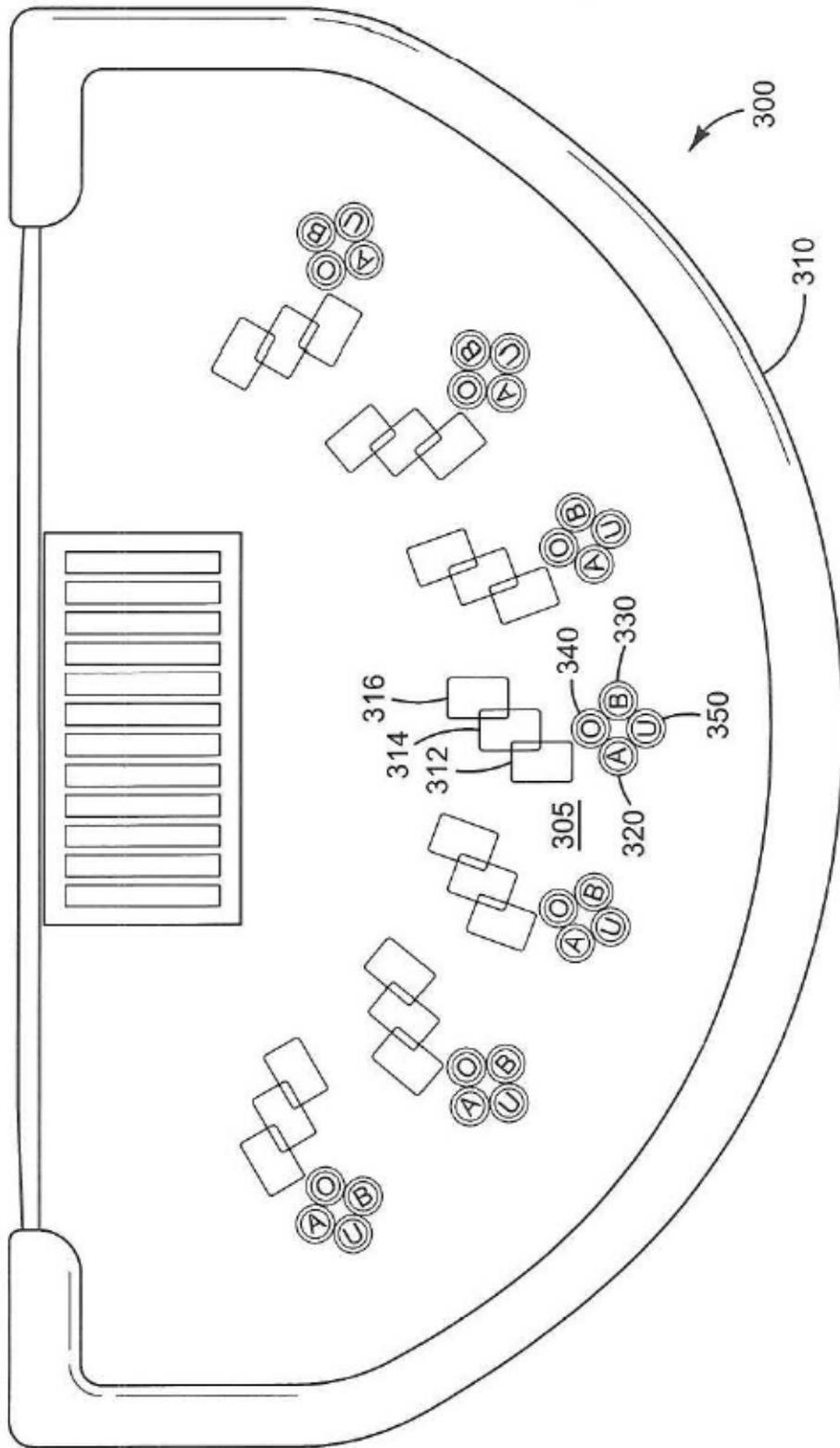


FIG. 3