



STATE OF WASHINGTON  
GAMBLING COMMISSION

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

October 19, 2018

Charlie Drennan  
Aces Up Gaming  
5855 W. 38<sup>th</sup> Ave  
Wheatridge, CO 80602

RE: Lucky Lucky Blackjack – Submission #2175

Dear Mr. Drennan,

We have reviewed the changes made to your Lucky Lucky Blackjack game. Your changes include adding several pay tables, changing the game's logo, and identifying Aces Up Gaming as the owner of the game. Based on our review of the documentation we received from Aces Up Gaming, the Washington State Gambling Commission will approve the changes made to your 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" 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 "Lucky Lucky Blackjack – 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.



- 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 this game may affect this approval. Contact the Commission should you contemplate modifications. 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: Jim Nicks, Special Agent in Charge, Regulation Unit  
Cathy Harvey, Special Agent in Charge, Tribal Gaming Unit  
Brian Lane, Special Agent, Regulation Unit  
Jess Lohse, Special Agent, Regulation Unit  
Kelly Main, Special Agent Supervisor, Tribal Gaming Unit  
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, 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-tables.

*If using a shuffle machine it must be a WSGC approved model, manufactured by a WSGC licensed manufacturer.*

The general rule 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 of the 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 begins. Players who did not receive a Lucky Lucky win will have their bonus wagers removed.
8. The Lucky Lucky standard pay-tables 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 Tables (the operator may pick one they prefer to use)

Player's Hand + Dealer Up Card (Community Card)	Pay-Table 1 Pays	Pay-Table 2 Pays	Pay-Table 3 Pays
Suited 777	200	200	200
Suited 678	100	100	100
777	50	50	50
678	30	30	30
Suited 21	10	15	10
21 Total	3	3	3
20 Total	2	2	2
19 Total	2	1	1
18 Total or less	Loses	Loses	Loses

*Note: Pay Table odds are to 1*

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 5.05% to 12.72% based upon the number of decks used and the pay-table the operator prefers. Below is the house edge based on the number of decks used with the Lucky Lucky bonus wager and the pay-table chosen.

Table 2: House edge based on the various pay-tables and the number of decks used

Decks	Pay-table 1	Pay-table 2	Pay-table 3
1**	5.05%	10.03%	12.47%
2**	5.39%	10.15%	12.72%
4	5.35%	10.00%	12.63%
6	5.31%	9.92%	12.57%
8	5.28%	9.88%	12.54%

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

