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

November 4, 2021

Sent via email to charlie@acesupgaming.com

Charlie Drennan Aces Up Gaming Inc. 16125 Olive St. Brighton, CO 80602

RE: Lucky Lucky Blackjack - Submission #3062

Dear Mr. Drennan:

We have reviewed the changes made to Lucky Lucky Blackjack. Based on our review of the documentation we received from Aces Up Gaming Inc., the Washington State Gambling Commission will approve the game under the conditions listed below:

• The game shall be played and operated under the terms and conditions set forth under the Lucky Lucky Blackjack game rules you provided on November 1, 2021 and are enclosed.

Commercial Card Rooms

- 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

- 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.

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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. If you have any questions on commercial implementation, please contact Jess Lohse at (206) 786-3530. 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,

Gary Drumheller

Interim Assistant Director

Hars TMM

Licensing, Regulation, and Enforcement Division

cc: Jim Nicks, Special Agent in Charge, Regulation Unit Dan Wegenast, Special Agent in Charge, Tribal Gaming Unit Jess Lohse, Special Agent, Regulation Unit Brian Lane, 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 dealers 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 in 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	Pay-Table 2	Pay-Table 3
	Pays	Pays	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 odd 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 various from 5.05% to 12.72% based upon the number of decks used and the pay-table the operator prefers. Below are the pay-tables 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

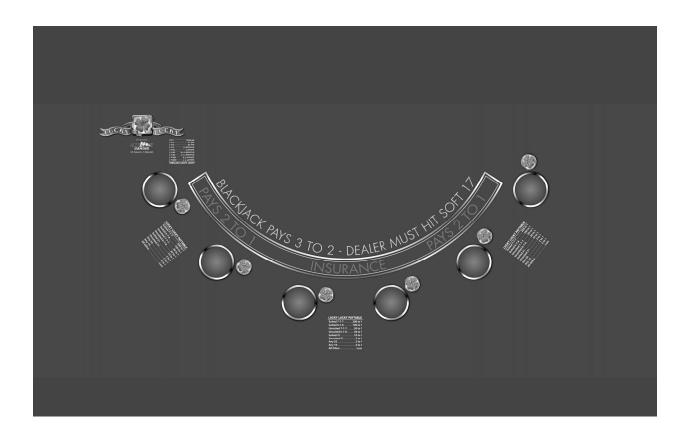
Decks	Pay-table 1	Pay-table 2	Pay-table 3
1	5.05%	10.03%	12.47%
2	5.39%	10.15%	12.72%
4	5.35%	10.00%	12.63%
6	5.31%	9.92%	12.57%
8	5.28%	9.88%	12.54%

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



11. The house edge for using continuous shuffling machine using six decks will closely correspond to the house edge performance of the 8-deck house edge, as a continuous shuffler machine mimics the performance of the highest number of decks, due to the infinite deck effect.

*Operators must not allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140





***The Lucky Break wager is an optional bet that can be used with Lucky Lucky Blackjack

Lucky Break Wagering

Lucky Break wagers must be placed within the Lucky Break wagering circle at the same time the blackjack wager is made. Players must make a blackjack wager to make a Lucky Break wager.

Players are not permitted to make a Lucky Break wager on another player's hand. If a player is playing multiple hands, they may make a Lucky Break wager for each hand they are playing.

Lucky Break wagers may not exceed the posted maximum for the Lucky Break wager.

Dealing

All Lucky Lucky bets will settle after their cards are dealt and before any decisions are made.

If the dealer's up card is an Ace or ten-value card, the dealer shall check his hole card for a blackjack. Dealers will offer insurance before checking under the Aces per standard Blackjack procedures. If the dealer has a blackjack, all Lucky Break bonus wagers lose.

If a player who made a bonus wager has a blackjack and the dealer does not have a blackjack, the dealer will pay the player's blackjack wager, tucking the player's two cards face up under the player's bonus wager to indicate that the bonus wager remains in action.

If a player who made a Lucky Break bonus wager busts, the dealer will collect the player's blackjack wager and put the player's cards together in a pile, tucking them face up under the player's bonus wager to indicate that the bonus wager remains in action.

Note: As long as there are Lucky Break bonus wagers remaining in action, the dealer must complete his hand so the outcome of the bonus wager can be determined. This is done even if all the players have busted and/or received a blackjack.

Payoffs

If the dealer's completed hand does not exceed 21, all Lucky Break wagers lose.

If the dealer's completed hand exceeds 21, and the player's point total is 26 or less, the dealer will pay all bonus wagers based on the number of cards in the dealer's hand (see pay table for odds).



Multipliers are paid based upon the base winnings for the Lucky Break wager. For example, if the player's Lucky Break wager is \$1 and the dealer's outcome is a 26 with 5 suited cards, the player will be paid \$3 for the Lucky Break wager and \$150 for the multiplier using pay table 1.

Table 1:

Dealer Outcome	Base Pay 1 (to 1)	Base Pay 2 (to 1)	Base Pay 3 (to 1)	Base Pay 4 (to 1)
26	3	3	3	3
25	3	3	2	2
24	2	2	2	2
23	2	2	2	2
22	1	1	1	1
21 or less	-1	-1	-1	-1

Dealer Outcome	Multiplier 1	Multiplier 2	Multiplier 3	Multiplier 4
5+ Suited Cards	50	100	25	50
4 Suited Cards	10	10	10	10
3 Suited Cards	2	2	5	2
Unsuited	1	1	1	1

Toke Bets

Players may make Lucky Lucky and/or Lucky Break toke bets for dealers. Payoffs for toke bets are paid using the same pay schedule used for player.

^{*}Operators must not allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140



