



STATE OF WASHINGTON
GAMBLING COMMISSION

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

December 4, 2009

Ronald LaDuca
IN BET, LLC
PO Box 181
White Sulphur Springs, WV 24986

RE: IN BETWEEN

Dear Mr. LaDuca:

Thank you for requesting approval to market the card game "In Between" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received, 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 "In Between – 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.
- 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 "In Between – Rules of Play" you provided.
- 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.

Please be advised that until you receive your gambling license, this game cannot be distributed in Washington. If you have any licensing questions, please contact Collene Engle at (360) 486-3539.

Furthermore, 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 Keith Wittmers at (253) 671-6289. 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
Acting Assistant Director
Licensing Operations Division

cc: Mark Harris, Assistant Director Field Operations
Julie Lies, Assistant Director Tribal Gaming Division
Keith Wittmers, Special Agent Field Operations
Kelly Main, Special Agent Supervisor Tribal Gaming
File

IN BETWEEN Rules of Play and Pay Tables

(a) In Between is standard blackjack with an optional bonus wager. All rules pertaining to blackjack as posted on the WSGC website will remain the same and are not altered in this game except as noted in these rules of play.

(b) Card room operators must not allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.

(c) A casino licensee may, at its discretion, offer players at a blackjack table the option to make an additional IN BETWEEN wager. The IN BETWEEN wager of a player shall win if the dealer's upcard falls between the player's initial two cards according to the rank order (2-3-4-5-6-7-8-9-10-J-Q-K-A) and will lose if the dealer's upcard falls outside the player's initial two cards according to the rank order. However, if the dealer's upcard and the player's initial two cards are the same rank the player wins

1. A winning IN BETWEEN wager shall be paid in accordance with (g) below.

(d) An IN BETWEEN wager shall have no bearing on any other wager made by a player at the game of blackjack and applies only to the player's first two cards.

(e) Prior to the first card being dealt for each round of play, a player who has placed the minimum Blackjack wager required in accordance with the rules of the Blackjack game set forth by the casino licensee may make an IN BETWEEN wager. The minimum and maximum IN BETWEEN wager permitted by a casino licensee shall be posted.

(f) An IN BETWEEN wager shall be made by placing gaming chips on the appropriate area of the blackjack layout.

(g) Immediately after the second card is dealt to each player, and prior to any additional cards being dealt to any player at the table or the dealer and before any card reader device is utilized, the dealer shall, starting with the player farthest to his or her right and continuing around the table in a counter-clockwise direction, settle in succession all IN BETWEEN wagers by collecting all losing wagers and paying all winning wagers in accordance with (f) below.

(h) Winning IN BETWEEN wagers are paid according to the respective card spread. Examples of card spreads are as follows:

1. One card spread (dealer's upcard is a 5, player's cards are 4 and 6)
2. Two card spread (dealer's upcard is a 5 or 6, player's cards are 4 and 7)
3. Three card spread (dealer's upcard is a 5, 6, or 7, player's cards are 4 and 8)

(g) All winning IN BETWEEN wagers shall be paid at the odds in the following pay tables selected by the casino licensee and posted at the table.

SPREAD	PAYTABLES			
	A	B	C	D
Triple match (the dealer's upcard and player's initial two cards are the same)	30 to 1	30 to 1	30 to 1	40 to 1
One card spread	12 to 1	10 to 1	10 to 1	10 to 1
Two card spread	6 to 1	6 to 1	5 to 1	5 to 1
Three card spread	4 to 1	4 to 1	3 to 1	3 to 1
All other spreads	1 to 1	1 to 1	1 to 1	1 to 1
DECKS	HOUSE ADVANTAGE			
	A	B	C	D
One Deck Blackjack	8.338%	10.461%	14.999%	12.646%
Two Deck Blackjack	5.696%	7.758%	12.163%	8.165%
Four Deck Blackjack	4.010%	6.042%	10.383%	5.458%
Six Deck Blackjack	3.396%	5.418%	9.738%	4.490%
Eight Deck Blackjack	3.080%	5.097%	9.410%	3.994%



Tri State Racetrack

In Bet 3 to 2

Version # 16054 • Date 08-26-09

Artist: Tony

IN BET PAYOFFS

Triple Match	30-1
One Card Spread	12-1
Two Card Spread	6-1
Three Card Spread	4-1
Any In-Between	1-1

Card Ranking Low to High
2.3.4.5.6.7.8.9.10.J.Q.K.A

Table Dimensions

Actual Fabric	Bumper to Bumper	Bottom of Chip Tray to Bumper
Width _____	Width _____	Height _____
Height _____	Height _____	

Date _____

OK Make changes & Re-Proof

Signature



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