



**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

May 25, 2021

Sent via email to charlie@acesupgaming.com

Charles Drennan
Aces Up Gaming Inc.
PO Box 11332
Denver, CO 80211

RE: Fu Bacc - Submission #3049

Dear Mr. Drennan:

Thank you for requesting approval to market the card game Fu Bacc to Washington State commercial card rooms and Tribal casinos. 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 Flush Poker rules of play you provided 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.

During our review, we noted that the owner of the game, S.A. Daines US Holdings, is not currently licensed. S.A. Daines US Holdings cannot receive any proceeds from the placement of the game in Washington unless properly licensed.

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 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
Licensing, Regulation, and Enforcement Division

Enclosure

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



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.

Fu Bacc Game Rules

Introduction

Fu Bacc uses a standard 52-card deck. There are three ways to play: The Player can play against the Dealer or by placing an optional wager on the “Lucky Monkey” or by placing a wager on the “Tie”.

Ranking of Hands

The ranking of the hands in Fu Bacc are 1 through 9, 9 being the highest hand and 10 is ranked as zero.

The hands can be made up of 2 or 3 cards.

For example, if a Player has a 10 and a 5, the hand will have a total of 5. If there is a 3rd card drawn and it is a 10 the hand will not change and will have a total of 5. If the 3rd card drawn is a 2, the hand would have a total of 7.

Dealer’s hit rules

The Dealer will stand on a 2 card 6 or higher, the Dealer will take a 3rd card on hands with 5 or less.

Three Ways to Play

1. Playing Against the Dealer

The object when playing against the Dealer is to get a Fu Bacc hand closest to 9. Players place an Ante wager. After looking at their first 2 cards they can decide to play or fold. If the player decides to play, they must make a Play wager of 2x the original Ante. At this time the Player may decide to take a 3rd card or stay.

Playing Against the Dealer

- | | |
|--|--|
| • Player folds | Ante – Lose |
| • Player has a hand higher than the Dealer. | Ante - wins 1 to 1
Play - wins 1 to 1 |
| • Dealer has a higher hand than the Player. | Ante - Lose
Play – Lose |
| • Player and Dealer Tie | Ante – Lose
Play - Push |

Natural 8 and 9 Pay or Play Ante Bonus

If the player receives a 2 card 8, or a 2 card 9 this is referred to as a “Natural”. If the Player receives a Natural 8 or 9, they have the option of taking an automatic bonus pay or playing the hand. If the player decides to play out the hand, they do not qualify for the “Ante” Bonus.

The “Ante” Bonus is,

Natural 9 – 2 to 1

Natural 8 – 3 to 2

Monkey Monkey Rescue Bonus

If the player receives two face cards, (also referred to as monkey cards) and the Dealer’s up card is a 9, the Player has the option of taking a 1 to 1 bonus on the Ante and ending the hand. If the player decides to play out the hand, they do not qualify for the “Rescue Bonus”.

- (2) Lucky Monkey - Is an optional wager where the Player is wagering on the outcome of their original 2 card hand against the Dealer’s up card.**

The object of betting the “Lucky Monkey” wager is to receive two face cards (10-K) or “Monkey” Card’s. If the Player’s first two card hand contains two face cards, the Player wins the “Lucky Monkey” wager. Depending on what the Dealer’s up card is will determine the payout. The payouts are as follows,

- Monkey Monkey vs Dealer’s 9 – 30 to 1
- Monkey Monkey vs Dealer’s 8 – 20 to 1
- Monkey Monkey vs Dealer’s 7 – 15 to 1
- Monkey Monkey vs Dealer’s 6 – 10 to 1
- Monkey Monkey vs Dealer’s 0-5- 5 to 1

- (3) **The “Tie” - Is an optional wager, where the player is wagering that the outcome of the Player’s and Dealer’s hand will tie.**

If the Player and Dealer’s hand tie the bet is paid 7 to 1

All other outcomes this wager will lose.

Note- When playing against the dealer the Ante wager will lose and the Play wager will push in the event of a tie.

The Following is an example of a Fu Bacc layout.



Fu Bacc Dealing Procedures

1. Each player makes a wager as indicated below, according to posted table limits:
 - To play against the Dealer, by placing an Ante wager on the Ante spot.
 - To play the optional “Lucky Monkey” wager, by placing a wager on the “Lucky Monkey” spot.
 - To play the optional “Tie” wager, by placing a wager on the “Tie” spot.
 - At the casino’s discretion, a player may play just the “Lucky Monkey” wager, and or just the “Tie” wager. If the Player only plays the “Tie” they are not eligible to receive a 3rd card and must play the hand on the original 2 cards.
 - At the casino’s discretion, a Player may place wagers at 2 adjacent betting positions during a round of play. The Player must compete the first hand before playing the second hand if this option is available to the Player.
2. The Dealer shall announce “No more bets” prior to the Dealer dispensing any cards.
3. At this time the Dealer shall place 3 cards in front of each live betting spot and 3 cards for the Dealer. This can be done using an automatic shuffler or by a handheld dealing method.
4. The Dealer will then pass out 2 out of the 3 cards to each Player leaving the 3rd card face down in front of the Player’s betting position. (this card will be used as the Player’s final hit card or be burned).
5. The Dealer will then position the top card of their hand to the right of the Dealer’s hand to be used as the Dealer’s 3rd hit card and then expose the bottom card as the Dealer’s up card. The remaining card will stay face down.
6. After examining their cards, the Player has the option to either make a Play wager or fold. At this time the Player will show any “Lucky Monkey” winners, they will do this by notifying the Dealer of the winning hand and exposing the cards.
7. If the Player decides to fold the Dealer shall settle the “Lucky Monkey” wager and collect the Ante wager. If the player has a “Tie” wager the original 2 cards shall be tucked under the “Tie” wager and remain active for the bonus (the player will not have an option to receive a 3rd card if this takes place and the “Tie” will be settled based on the original 2 cards).

8. If the Player decides to stay in, they must place a wager of 2x the Ante in the Play position. At this time the Player must decide to stay with the original 2 card hand or take a 3rd card. If the Player wishes to stay on 2 cards, they will simply tuck the 2 cards under the Play wager and the Dealer shall burn the hit card. If the Player wishes to receive a 3rd card, they shall place 2x the Ante wager in the Play position and signal to the Dealer they wish to take the 3rd card, this is done by scratching the cards on the table. Once the 3rd card is received the Player shall tuck the 3-card hand under the Play wager.
9. After each Player has either placed a Play wager or folded, and the Dealer collects all forfeited wagers and cards. The Dealer will then expose their second card, if the Dealer has a 6 or higher, they will not take a 3rd card and will burn the remaining hit card. If the Dealer has 5 or less after the second card is exposed, the Dealer shall take the 3rd remaining card and use the 3-card total. The Dealer will then announce the total value of the hand and begin to settle the remaining bets.
10. Starting with the Player on the Dealer's right, the Dealer will expose the Players hand pay winning hands 1 to 1 on the Ante and Play and collect any losing hands.
11. In the event of a tie the Players Ante bet will lose, and the Play will push. All "Tie" bets will be paid 7 to 1.
12. Natural 8 and 9 pay or play bonus; Any two card 8, or two card 9 are referred to as "Natural" hands and are eligible for an automatic pay on the Ante.
13. If the Player receives a 9 on their first to cards, the Player has an option of taking a 2 to 1 bonus pay on the Ante and ending the hand. Should the Player decide to play the hand, they must place a Play wager of 2x the Ante and are no longer eligible for the "Ante" Bonus. The hand shall be played out following all standard rules for Fu Bacc. If the Player has a Tie wager and chooses to take the optional "Ante" bonus, the Dealer will tuck the original 2 cards under the Tie wager and burn the remaining hit card. This bet will be eligible if the hand ties the Dealer and will be paid 7 to 1.
14. If the Player receives an 8 on their first to cards, the Player has an option of taking a 3 to 2 bonus pay on the Ante and ending the hand. Should the player decide to play the hand they must place a Play wager of 2x the Ante and are no longer eligible for the "Ante" Bonus. The hand shall be played out following all standard rules for Fu Bacc. If the Player has a "Tie" wager and chooses to take the optional "Ante" bonus, the Dealer will tuck the original 2 cards under the Tie wager and burn the remaining hit card. This bet will be eligible if the hand ties the Dealer and will be paid 7 to 1.
15. If the Player receives two face cards and the Dealer's up card is a 9 the Player has an option of taking a 1 to 1 bonus and ending the hand. This hand is also eligible for the "Lucky Monkey" bonus, if the player has a "Lucky Monkey" bonus it should be paid accordingly at this time. Should the Player decide to play the hand, they must place a Play wager of 2x the Ante and are no longer eligible for the "Ante" bonus. The hand shall be played out following all standard rules for Fu Bacc.



FU BACC™

Dealer stands on two card 6 or higher

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