

Application for Gaming Activity Review: Section III: Question & Answer

1. **Name of Proposed Gaming Activity:**

Fixed Bad Beat Jackpot.

2. **Name each controlled game that is associated with this gaming activity:**

All poker games.

3. **Describe any Jackpot or any other type of prize awarded:**

A Jackpot Prize will be awarded when one player in a game obtains a designated qualifying hand (“Qualifying Hand”) which is beaten by a second designated hand. To be eligible for the Jackpot Prize, players must participate in the Bureau approved game. Possible Qualifying Hands are as follows:

Option A

Bad Beat Hand (Losing Hand)	Winning Hand	Prize Amount
Aces Full of Jacks or Better	Higher Ranked Full House or Better	\$50-\$50,000

Option B

Bad Beat Hand (Losing Hand)	Winning Hand	Prize Amount
Four of a Kind or Better	Higher Ranked Four of a Kind or Better	\$50-\$50,000

Option C

Bad Beat Hand (Losing Hand)	Winning Hand	Prize Amount
Aces Full of Twos or Better	Higher Ranked Full House or Better	\$50-\$50,000

****Only one of these options may be offered at any one time per jackpot for each eligible game, as listed above.***

When players obtain the Qualifying Hand and claim the Jackpot Prize, the qualifying hands will be verified by the Casino. In games that utilize hole cards, in order to qualify for the jackpot, both the winning and losing hands must use two hole cards and three board cards. After a winning hand is confirmed, the player with the Qualifying Hand will receive the posted percentage of the posted Jackpot Prize for that game and the remaining posted percentage of the Jackpot Prize, if any, will be evenly distributed among all other players at the table who have participated in the qualifying table for that

particular hand. In all instances, patrons will be provided with ample advance notice of the percentage division of the posted Jackpot Prize for the game in which they are playing. Possible payouts and percentages are as follows:

Option A:

Losing Hand = 50%

Winning Hand = 25%

Table Share = 25%

Option B:

Losing Hand = 50%

Winning Hand = 50%

Option C;

Losing Hand = 40%

Winning Hand = 30%

Table Share = 30%

****Only one of these options may be offered at any one time per jackpot for each eligible game, as listed above.***

4. If a cash prize is involved, is the amount progressive or a fixed amount?

The Jackpot prize amounts are fixed in an amount ranging between \$50 and \$50,000.

5. Explain if the gaming activity is House funded or player funded:

Player funded.

6. Describe any special fee collection involved in this gaming activity, for example, a Jackpot collection fee.

A \$1.00 collection will be taken from the total collection fees paid to the House during each round of play. The Jackpot collection will be added to the Jackpot fund.

7. Describe how the Jackpot will be seeded and how prizes will be awarded.

The Jackpot is seeded from the jackpot collection fund. The prizes are awarded as described in #3 above.

8. Explain any prize distribution including prizes given to the winner, loser, or any other player or patron.

Please see #3 above.

9. Explain any re-seeding of the fund once the prize is won.

The Garlic City Club will initially seed the jackpot with an amount ranging between \$50 and \$50,000. Once there are sufficient funds in the jackpot reserve, the initial amount

that the Garlic City Club used to seed the jackpot will be repaid to the casino from the jackpot reserve. The jackpot collection fees will then be used to fund the jackpot fund. Additionally, whenever the Casino is required to seed the jackpot or cover the shortfall due to in-adequate funds in the reserve account, the Casino will be repaid from the jackpot reserve account once the reserve is sufficient and the funds become available. When a qualifying jackpot hand is made, it will be re-seeded by the Garlic City Club in an amount ranging between \$50 and \$50,000. Additionally, jackpot collection fees may be used to fund other Bureau approved gaming activities.

- 10. Explain any minimum or maximum number of players required to be dealt into the game for the table to be eligible for the gaming and activity prize.**

A minimum of five players.

- 11. Explain if the house is retaining any administrative or any other type of fee operating the game activity.**

The house will retain an administrative fee of between \$4.00-6.00 based on the number of table hours that the promotion is offered. The administrative fee may be adjusted based on market factors and cost of operating the Jackpot activity. The amount of the administrative fee will depend upon a number of factors including additional recordkeeping requirements and additional training of personnel concerning the rules and other requirements applicable to the Jackpot activity and administration of the Jackpot activity.

- 12. Describe any opportunity(s) for the person to play for the prize without placing any live wagers or paying any table fees.**

A no purchase necessary (NPN) option is available to any person who requests it. Any person wishing to participate without a purchase or live chips will have the same opportunity to play for the Jackpot Prize as the player participating in the live game. Advertisements will advise all patrons that there is a general and indiscriminate opportunity to participate in an NPN game to qualify for the Jackpot prize.

- 13. Provide copies of any published/proposed promotion or advertisement literature.**

None.

- 14. Identify any entity or person other than those licensed as the house involved in the gaming activity.**

None.

- 15. Describe the type of table and equipment utilized for the gaming activity.**

No special table or equipment is used for the promotion. The regular tables and equipment are utilized.

Eligibility

This gaming activity will be open to all players who are seated and playing at an above listed game during the pre-determined and specified hours designated for the gaming activity.

- A minimum of five players are required to be dealt in during a qualifying game in order for players to be eligible and the table to qualify for the jackpot.
- Tournament games do not qualify for the jackpot.
- Casino employees are eligible to participate in the jackpot as long as they are playing while they are off-duty. However, they are eligible to participate if they are in uniform.
- When a qualifying hand is announced, a floor person will verify that both hands qualify. Any deviation from a standard deck will nullify the jackpot.
- Players with qualifying winning and losing hands must play through the final betting round in order to qualify for the jackpot.
- In the event that during a round of play, two or more players have qualifying losing or winning hands, all players with qualifying losing and winning poker hands shall split the posted prize percentage of the jackpot for the losing and winning hand equally. The remaining players, which does not include players that received a qualifying losing or winning hand, shall receive the posted prize percentage of the table share if applicable.
- All procedures, times, qualifying hands, and prize amounts must be displayed prominently via any form of advertising that the Garlic City Club wishes to use, including but not limited to printed flyers, digital display, the Casino's website, etc.

Garlic City Casino

Match Play Promotion

Advertisement Requirements

Garlic City Casino may advertise various names for this gaming activity. Should the Garlic City Casino advertise a different name, the BGC ID listed below shall be referenced on all advertisements relating to the Match Play Promotion.

Furthermore, all rules and procedures for this promotion, including but not limited to the following, shall be prominently displayed in the Garlic City Casino at all times the promotion is being offered:

- Eligible games and time periods.
- Coupon and/or free play chip value(s).
- Procedures to redeem coupons or free play chips.
- Any other applicable restrictions.

Controlled Game

The Match Play Coupon Promotion may be attached to all limits and versions of the currently Bureau approved California games offered at the Garlic City Casino. All base game rules will be played as previously approved by the Bureau of Gambling Control.

Rules of Play

Patrons are awarded match play or free play coupons via advertisements in magazines, websites, mailing advertisements, winning a Bureau approved promotion, winning or signing up for a Bureau approved tournament, etc. Players who receive a match play coupon will be eligible to win the specific amount printed on the coupon if he/she places a wager on an eligible game equal to the amount listed on the match play coupon.

Prize

The match play coupons and/or free play chips shall have a value ranging from \$5 to \$500 for each coupon or free play chip. Players shall not exchange match play coupons or free play chips for live chips. Additionally, players shall not give match play coupons or free play chips to another player. The coupons and chips shall only be redeemed after having been played and verified by a key employee.

Match Play Coupon

The Casino will offer match play coupons having a face value from \$5 to \$500 per coupon. The amount will be clearly stated on the coupon. Each coupon will state the specific qualifying game(s) that the voucher may be used on. The wager must be equal to the amount of the match play coupon and a player's winning hand will be paid his/her wager as well as the listed amount on the match play coupon. When the player uses a match play coupon and the hand loses, the player will only lose his/her original wager and the match play coupon is collected and voided. The player-dealer will then have a key employee sign the voucher verifying that it has been won. All winning vouchers are verified and signed by a key employee. Winning vouchers are taken to the cage by the key employee, logged, and exchanged for the value listed on the coupon(s). If a player loses, the money part of the wager is collected by the player-dealer, and the voucher is

Garlic City Casino

Match Play Promotion

voided and collected as well. If the player pushes (receives no action), the voucher may be played again until the player wins or loses a hand.

EXAMPLE: *A person receives a match play voucher with a value of \$10.00. The person would place the voucher on the gaming table; place a bet that matches the amount on the voucher and pay the posted collection for a single hand of play. If the player wins the hand he or she will receive \$20, \$10 for the original wager and \$10 for the Match Play Coupon. The player-dealer pays the winning wager the amount listed on the Match Play Coupon. Once the wager and coupon have been paid, the player-dealer will contact the coupon.*

Eligibility

The promotion will be open to all players who are seated and playing at the above listed games during the pre-determined and specified hours designated for the promotion.

- A minimum of one (1) player and one player-dealer, is required to be playing in any of the games, as listed above, in order for the game to qualify.
- Players shall not exchange the coupons for live chips or give them to another player.
- Players who receive a Match Play Coupon will be eligible to win the specific amount printed on the coupon when they place a wager equal to what is listed on the Match Play Coupon.
- A player using a Match Play Coupon must have placed a base game wager
- A player may place a Match Play Coupon on any spot on which the player has placed a wager.
- The collection fee is taken on the base game wager only. The coupon does not count as part of the collection fee.
- A Match Play Coupon must be placed with the base game wager, before any card in the round of play is dealt.
- Only one Match Play Coupon may be used on the table at any one time. The player who presents the first coupon is the player who is permitted to use the coupon for that hand. Additional players at the table must wait until subsequent rounds are played to use their Match Play Coupons.
- A Match Play Coupon wins if the player's hand wins.
- A Match Play Coupon loses if the player's hand loses.
- A Match Play Coupon may be used until a win/loss occurs.
- The losing Match Play Coupons are kept by the house dealer and the winning Match Play Coupons are kept by the player-dealer of that round.
- The house dealer will then reconcile any winning/losing Match Play Coupon wagers
- The player-dealer will pay all winning wagers and collect all losing wagers in the base game and for the Match Play Coupon
- A Match Play Coupon may only be redeemed by a player-dealer, with the house, once it has been verified and signed by a Casino floor person
- All procedures, times and cash amounts will be displayed prominently via printed flyers, digital display and any other forms of advertisements.
- Casino Employees, on and off duty and in and out of uniform, are not eligible for the promotion.

Garlic City Casino

Match Play Promotion

- Third-Party Providers of Proposition Player Services (TPPPPS) are not eligible for the promotion.

Funding

The Match Play Coupon Promotion shall be fully funded by the Garlic City Casino. There shall be no additional promotion fees, jackpot fees, or collection fees taken in order to fund this gaming activity or for players to participate.

No Purchase Necessary

The Match Play Coupon Promotion does not contain the element of chance. Therefore, it does not constitute an illegal lottery and does not require a No Purchase Necessary table to be offered while conducting this gaming activity.



November 28, 2011

Ms Rebecca Huey
Game Review/Licensing Analyst
Department of Justice/Division of Gambling Control
1425 River Park Drive
Sacramento, CA 95815

RE: Modification for Gaming Activity Review- Poker Tournaments

Dear Rebecca:

Garlic City Casino (GCC) is submitting the following modification of the Poker Tournaments GEGA-000460 for approval.

Controlled Game

The tournament games that may be played during Poker Tournaments at the Garlic City Casino shall only be those games approved for play by the Bureau of Gambling Control. All base game rules will be played as previously approved by the Bureau of Gambling Control.

Tournament Entry

- **Tournament entry is open to all customers.**
- The specific structure will be on any and all advertisements and must be made available to patrons prior to the start of the tournament. The structure of a tournament will not change once sign-ups begin.
- **Promotional materials will not advertise gender-based discounts nor imply a gender-based entrance policy.**
- Patrons may enter a tournament by paying the buy-in and entry fee. **All fees, prices charged, and the amount of tournament chips provided will be equal and posted for all players.**
- Entry may be earned by winning a previous tournament or contributing to an approved gaming activity. **All gaming activities and/or promotions must be approved by the Bureau prior to being offered for play.**
- More than one method of entry for a specific tournament may be utilized.

Tournament Structure

Buy-In	\$0 - \$100,000
Re-Buy	\$1 - \$100,000
Number of Re-Buys	0 – Unlimited Times
Add-On	\$1 - \$100,000

Number of Add-Ons	0 – Unlimited Times
Entry Fee*	\$0 - \$1,000
Service Fee**	\$1 - \$1,000
Dealer Appreciation Fee***	\$1 - \$5

*The entry fee shall be retained by the Garlic City Club for hosting the tournament. This fee shall not be included in the tournament prize pool.

**The service fee shall be retained by Garlic City Club and used exclusively to pay tournament staff, make upgrades to equipment, advertisements, etc. that directly benefit the tournament area and/or its presentation. This is an optional fee that tournament entrants may pay in exchange for additional tournament chips. This fee shall not be included in the tournament prize pool.

***The dealer appreciation fee shall be retained by Garlic City Club and used exclusively to pay tournament dealers. This shall be an optional fee that tournament entrants may pay in exchange for additional tournament chips. This fee shall not be included in the tournament prize pool.

Tournament Prize Amounts & Source of Funds

Regular Prize Pool

- The tournament prize pool will consist of the sum of all buy-ins, re-buys, and add-ons for each tournament event, and paid in cash to the winner(s).

Guaranteed Prize Pool

- The Garlic City Casino may guarantee a buy-in tournament prize pool amount, ranging in value from \$1 to \$1,000,000 in the form of cash. In this case, the tournament prize pool will be paid to the player(s) from the buy-ins, re-buys, and add-ons in the form of cash. If the total of the buy-ins plus the re-buys and add-ons (if applicable) does not equal the amount guaranteed for the tournament prize pool, the Garlic City Casino will cover the shortfall. If the total of the buy-ins plus re-buys and add-ons (if applicable) is greater than the amount guaranteed, the tournament prize pool will be increased by the excess funds.

Free Roll Tournaments

- Garlic City Club is approved to offer free roll tournaments so long as all free roll tournament rules fall within the approved guidelines outlined in this approval letter. The Garlic City Club may guarantee a free roll tournament prize pool amount, ranging in value from \$1 to \$100,000 in the form of cash.

Tournament Prize Structure

When the prize is not guaranteed, the prize structure will be broken down by the number of paid entries and percentage paid, as shown below. Patrons will be given ample notice of which option is being offered and it will be displayed prominently via printed flyers, digital display, and any other forms of advertisements that the club uses to promote the tournament(s).

Option 1

Places Paid	5 - 20	21 - 50	50 - 60	61 - 80	81 or More
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1st	50%	45%	40%	40%	35%
2nd	30%	28%	25%	20%	20%
3rd	20%	17%	15%	12%	15%
4th		10%	10%	8%	10%
5th			5%	7%	5%
6th			5%	6%	4%
7th				4%	4%
8th				3%	3%
9th					2%
10th					2%

Option 2

Places Paid	5 - 50	51 or More
1st	33%	27%
2nd	17%	18%
3rd	12%	10%
4th	10%	8%
5th	7%	5%
6th	5%	5%
7th	4%	4%
8th	3%	3%
9th	2%	2%
10th	1.5%	2%
11th	1.5%	2%
12th	1%	2%
13th	1%	2%
14th	1%	2%
15th	1%	1%
16th		1%
17th		1%
18th		1%
19th		1%
20th		1%

These are the only modifications to be made to the already approved jackpot. Also enclosed is our modification check in the amount of \$450.00, payable to the Department of Justice/Bureau of Gambling Control.

For additional information and/or questions please feel free to contact me at 916 531 1551.

Thank you,

Bob Lytle
Designated Agent

GARLIC CITY CASINO

SUPPLEMENTAL INFORMATION

1.	Name of proposed activity. Royal Flush Bonus Promotion
2.	Name each controlled game that is associated with this gaming activity. All poker games already approved by the Bureau for play.
3.	Describe any Jackpot or any other type of prize awarded. The cash and merchandise prizes given away will range from \$1.00 to \$50,000 in the form of cash, casino chips or other promotional items such as vehicles, electronic devices, tips, etc.
4.	If a cash prize is involved, is the amount of the prize progressive (increases) or a fixed amount? Fixed amount. The amount of each cash and/or merchandise prize will be advertised in advance and it will be within the prize range listed above.
5.	Explain if the gaming activity is house funded or player funded. The Royal Flush Bonus Promotion will be fully funded by the Garlic City Casino.
6.	Describe the jackpot fee collection involved in this gaming activity. There will be no additional promotion fees taken for this gaming activity.
7.	Describe how the jackpot will be seeded and how any prizes will be awarded. There is no seeding because this is not a jackpot. Prizes will be paid in form of playing chips, cash and/or merchandise. Pre-determined amounts will be given to the patron who wins as described in the prize distribution method below.
8.	Explain any prize distribution given to the winner, loser, or any other player or patron. A Royal Flush Bonus is awarded to a player participating in a game when they win a hand with a Royal Flush at the showdown. Both hole cards must play in the winning hand to qualify. Prizes may differ depending on the suit of the royal flush.
9.	Explain any re-seeding of the fund once the prize is won. None
10.	Explain any minimum or maximum number of players required to be dealt into the game for the table to be eligible for the gaming activity and prize. The number of players in the game will have no effect on this promotion. Pre-determined and advertised prizes will be rewarded regardless of the number of players present at the table.
11.	Explain if the house is retaining any administrative or any other type of fee for operating the gaming activity. Not applicable

GARLIC CITY CASINO

SUPPLEMENTAL INFORMATION

12. Describe any opportunity(s) for a person to play for the prize without placing any live wagers or paying any table fees.

All promotional programs at Garlic City Casino will be offered for free, on a “general and indiscriminate” basis, to patrons who wish to participate in a No Purchase Necessary game. Garlic City Casino will provide instructional tables for all patrons who request to participate in these Promotional Prizes without paying a table fee. There will not be live wagers at these tables. Each No Purchase Necessary player will adhere to all rules as the live player. All advertisements, brochures and flyers will state “No Purchase Necessary” for the Royal Flush Bonus.

13. Provide copies of any published/proposed promotion or advertisement literature.

Garlic City Casino has not produced any advertisement or promotional material.

14. Identify any entity or person other than those licensed as the house involved in the gaming activity.

No other entity or person(s) will be involved in this activity.

15. Describe the type of table and equipment utilized for the gaming activity.

No new equipment will be required or added. Gaming tables and collection boxes will remain exactly the same.

ELIGIBILITY

- Players must be seated and playing at a designated table in order to qualify for the promotion.
- Players must be present to win a prize.
- Players have up to 5 minutes to present a valid ID and claim their prize.
- There is no minimum or maximum amount of players required to be playing in a designated game in order for the table to be eligible for the promotion.
- On and off-duty employees shall not be eligible to participate in this promotion.
- Third Party Proposition Players shall not be eligible to participate in this promotion.
- All procedures, promotion times, and prize amounts must be displayed prominently at all times that the Royal Flush Bonus Promotion is being offered for play via any form of advertising that the Garlic City Casino wishes to use, including but not limited to posters, printed flyers, digital display, the Casino’s website, etc.
- When a qualifying hand is announced, a floor person will verify that the hand qualifies. Any deviation from a standard deck will nullify the promotion.
- In order to qualify for the promotion, the player dealt the qualifying hand must use both hole cards.
- In order to qualify for the promotion, the player must complete play on all four rounds of the hand, which includes the pre-flop, the flop, the turn, and the river, and not fold their hand.
- In order to qualify for the promotion, the player must complete the applicable bets on each round. If the player goes all-in, this is considered to have completed all bets.
- In order to qualify for the promotion, the player must win the hand on the showdown, after the final round of betting.
- In the event that during a round of play, two or more players have qualifying hands of the same suit the prize will be split.
- The promotion will not be valid during tournament play and is only valid during live game play.

GARLIC CITY CASINO
SUPPLEMENTAL INFORMATION

1. Name of proposed activity. Spin The Wheel Promotion
2. Name each controlled game that is associated with this gaming activity. All poker games approved by the Bureau for play.
3. Describe any Jackpot or any other type of prize awarded. The cash and merchandise prizes given away will range from \$1.00 to \$50,000 in the form of cash, casino chips or other promotional items such as vehicles, electronic devices, tips, etc.
4. If a cash prize is involved, is the amount of the prize progressive (increases) or a fixed amount? The amount of each cash and/or merchandise prize will be advertised in advance and it will be within the prize range listed above.
5. Explain if the gaming activity is house funded or player funded. The Spin the Wheel Promotion will be fully funded by the Garlic City Casino.
6. Describe the jackpot fee collection involved in this gaming activity. There will be no additional promotion fees taken for this gaming activity.
7. Describe how the jackpot will be seeded and how any prizes will be awarded. There is no seeding because this is not a jackpot. Prizes will be paid in form of playing chips, chips and/or merchandise. Pre-determined amounts will be given to the patron who wins as described in the prize distribution method below.
8. Explain any prize distribution given to the winner, loser, or any other player or patron. An opportunity to spin the wheel for a prize is awarded to a player participating in a game when a hand containing a set of ten (three tens) or better is beaten by a better hand at the showdown. Both hole cards must play in both the losing hand and the winning hand to qualify.
9. Explain any re-seeding of the fund once the prize is won. None
10. Explain any minimum or maximum number of players required to be dealt into the game for the table to be eligible for the gaming activity and prize. The number of players in the game will have no effect on this promotion. Pre-determined and advertised prizes will be rewarded regardless of the number of players present at the table.
11. Explain if the house is retaining any administrative or any other type of fee for operating the gaming activity. Not applicable

GARLIC CITY CASINO

SUPPLEMENTAL INFORMATION

12. Describe any opportunity(s) for a person to play for the prize without placing any live wagers or paying any table fees.

All promotional programs at Garlic City Casino will be offered for free, on a “general and indiscriminate” basis, to patrons who wish to participate in a No Purchase Necessary game. Garlic City Casino will provide instructional tables for all patrons who request to participate in these Promotional Prizes without paying a table fee. There will not be live wagers at these tables. Each No Purchase Necessary player will adhere to all rules as the live player. All advertisements, brochures and flyers will state “No Purchase Necessary” for the Spin the Wheel Promotion.

13. Provide copies of any published/proposed promotion or advertisement literature.

Garlic City Casino has not produced any advertisement or promotional material.

14. Identify any entity or person other than those licensed as the house involved in the gaming activity.

No other entity or person(s) will be involved in this activity.

15. Describe the type of table and equipment utilized for the gaming activity.

The wheel has a stand and is large enough for players to view. The wheel is balanced and has rods on the face protruding forward. An elastic pointer falls between the rods. Each space is designated with a prize or number to the advertised prizes.

ELIGIBILITY

- Players must be seated and playing at a designated table in order to qualify for the promotion.
- Players must be present to win a prize.
- Players have up to 5 minutes to present a valid ID and claim their prize.
- There is no minimum or maximum amount of players required to be playing in a designated game in order for the table to be eligible for the promotion.
- On and off-duty employees shall not be eligible to participate in this promotion.
- Third Party Proposition Players shall not be eligible to participate in this promotion.
- The wheel must make two complete rotations for the spin to be valid.
- Once the wheel has been spun and is in motion, no one may interfere with the rotation of the wheel. Any interference with the rotation of the wheel shall invalidate the spin, and the wheel shall be re-spun.
- The wheel must come to a complete stop before a determination is made as to amount won. For a spin to be valid, the pointer must come to rest between two of the pegs. If the pointer gets stuck or rests upon one of the pegs, the spin shall be invalid and the wheel shall be re-spun. All spins that are declared invalid by the supervising floor-person shall be re-spun as per these rules.
- All procedures, promotion times, and prize amounts must be displayed prominently at all times that the Spin the Wheel Promotion is being offered for play via any form of advertising that the Garlic City Casino wishes to use, including but not limited to posters, printed flyers, digital display, the Casino’s website, etc.
- When a qualifying hand is announced, a floor person will verify that both hands qualify. Any deviation from a standard deck will nullify the promotion.

GARLIC CITY CASINO

SUPPLEMENTAL INFORMATION

- In order to qualify for the promotion, in games utilizing hold cards, the player dealt the qualifying hand must use both hole cards.
- In order to qualify for the promotion, the player must complete the applicable bets on each round and play through the final betting round. If the player goes all-in, this is considered to have completed all bets.
- In order to qualify for the promotion, the player must lose the hand on the showdown, after the final round of betting.
- In the event that during a round of play, two or more players have qualifying hands, both players will have an opportunity to spin the wheel. The players will split the largest prize amount.
- The promotion will not be valid during tournament play and is only valid during live game play.