

Oaks Card Room **Aces Cracked Bonus**

Advertisement Requirements

The Oaks Card Room may advertise various names for this promotion. Should The Oaks Card Room advertise a different name, the BGC ID listed above shall be referenced on all advertisements relating to the Aces Cracked Bonus promotion.

Furthermore, all rules and procedures for this promotion, including but not limited to the following, shall be prominently displayed in The Oaks Card Room at all times that the promotion is being offered:

- Eligible games and time periods.
- Qualifying winning and losing hands.
- Prize amount.
- Availability of No Purchase Necessary.
- Any other applicable restrictions.

Controlled Game

The Aces Cracked promotion will be attached to Texas Hold'em (GEGA-001687).

Rules of Play

This bonus is paid to a player in a Texas Hold'em poker game if that player;

- Receives two aces as his/her first two cards that are dealt face down.
- Completes play on all four rounds of the hand, pre-flop, flop, turn and river, and does not fold the hand.
- Completes the applicable bets on each round. If the player goes "all-in" this is considered to have completed all bets.
- Loses the hand on the "showdown", after the final round of betting.

Qualifying Hand

Players that make the following advertised hands shall be eligible to win the Aces Cracked Promotion prize amount, as shown below. Players shall make a hand using two of the cards dealt face down to them, "hole" cards, to qualify. Patrons shall be provided with ample advance notice of the qualifying promotional time periods. Furthermore, the qualifying hands shall be displayed prominently within the Card Room at all times the Aces Cracked promotion is being offered for play.

Winning Hand	Payout
Pocket Aces (Same Color) beat by a better hand.	Range between \$10 to \$500,000
Pocket Aces (Any Color) beat by a better hand.	Range between \$10 to \$500,000

Prize

Players that have their Aces Cracked will win the promotion and will receive a prize of \$10 to \$500,000 of cash or chips. The amount of the cash prize will be fixed and not progressive. The amount of prize will be posted in advance of the promotion start date.

Oaks Card Room **Aces Cracked Bonus**

Eligibility

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

- There is no minimum or maximum number of players required to be dealt in during a qualifying game in order for players to be eligible and the table to qualify for the promotional prize.
- 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 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 lose the hand at the showdown, after the final round of betting.
- In the event that during a round of play, two or more players have qualifying losing hands, each player will split the posted prize amount.
- The promotion shall not be valid during tournament play and is only valid during live game play.
- The player holding “pocket aces” can make no sign or gesture, whether verbal, visual, or otherwise to any other player that he/she holds the qualifying hand. Any signs or gestures will invalidate that hand for the Aces Cracked Bonus promotion.
- Players must be seated and playing at a designated table in order to qualify for the promotion and receive the prize. Players have up to 5 minutes to present a valid ID and claim their prize
- On and off-duty employees as well as Third Party Proposition Players are eligible to participate in this promotion.
- All procedures, times, qualifying hands, and prize amounts must be displayed prominently via any form of advertising that The Oaks Card Room wishes to use, including but not limited to printed flyers, digital display and the Casino’s website.

Funding

The Aces Cracked Bonus promotion is fully funded by The Oaks Card Room. At no time will any fees be collected from players for the purpose of funding the promotion.

No Purchase Necessary

No Purchase Necessary: The Aces Cracked Bonus will be offered for free, on a general and indiscriminate basis, with no restrictions to patrons who wish to participate in a No Purchase Necessary (NPN) game. The Oaks Card Room will provide NPN tables for all patrons who request to participate in the promotion without paying a table fee or placing a wager. The NPN player must adhere to all rules as the live player. All advertisements shall state “No purchase Necessary” for the Aces Cracked Promotion. The prize distribution method will apply as normal.

OAKS CARD CLUB

September 24, 2002

4097 SAN PABLO AVENUE
EMERYVILLE, CALIFORNIA 94608
TELEPHONE (510) 653-7093

TO: STATE OF CALIFORNIA
DEPARTMENT OF JUSTICE
DIVISION OF GAMBLING CONTROL
1435 RIVER PARK DRIVE, SUITE 200
SACRAMENTO, CA. 95815

ATT'N: CATHERINE TASTOR

RE: SECTION 2071:
LICENSEE REQUEST FOR APPROVAL OF GAMES OR MANNER OF PLAY

In compliance with the Division of Gambling Control's regulations, Section 2071, Licensee Request for Approval of Games or Manner of Play, the Oaks Card Club is submitting a request for approval of a Jackpot promotion which will be played in conjunction with our approved games.

The Jackpot promotion will be played in conjunction with the play of Double Hand Poker and Pai Gow. The Division of Gambling Control and the City of Emeryville have approved for play, all of the games currently played in our facility, including the games of Double Hand Poker and Pai Gow. The Oaks hereby submits to the Division this request for approval for the play of a Jackpot promotion in conjunction with the play of Double Hand Poker and Pai Gow.

OVERVIEW

On June 12, 2002, the Division of Gambling Control approved the Oaks Card Club request to play Jackpot Poker in conjunction with the play of the games of Hold'em, Seven Card Stud, Omaha Hi-Lo Split, and Lowball. At this time the Oaks Card Club would like to implement a Jackpot promotion in conjunction with the play of Double Hand Poker and Pai Gow. This promotion will be very similar in policy and implementation to the already approved Jackpot Poker promotion and will apply to specifically designated games.

PLAY OF THE GAME

A Jackpot prize pool will be generated in specifically designated games. The pool will be generated by designated participants contributing a fixed amount, \$1.00, from each hand played in a Jackpot game. The Jackpot revenue will be taken from the player(s) occupying the Player-Dealer position at the start of the hand and placed on the drop box slot for Jackpot revenue. At the conclusion of the hand the chip(s) will be dropped. Jackpot revenue will be dropped in a specially designated Jackpot Drop box which will be changed daily. Jackpot revenue will always be segregated from all other forms of cardroom income and strict control and auditing procedures will be established to guarantee the integrity of Jackpot revenues.

The Jackpot promotion for Double Hand Poker and Pai Gow will feature a "Bad Beat" format. Players participating in Jackpot games will be awarded the posted Jackpot award at the time a designated qualifying hand is achieved. In the case of a "Bad Beat" Jackpot, in order to win, a participant must have a predetermined qualifying hand beaten by a better hand. All qualified participants at the table at the time a Jackpot event occurs will win a portion of the prize money. The payout schedule will consist of a 50% payout to the player(s) who possesses the second best hand, the player(s) with the winning hand will receive 20%, and the other qualified player(s) at the table will split the remaining 30%.

A Jackpot fee will not be collected if there are not at least three participants with playing hands, who have made a wager, involved in the play of the hand. In the event there were fewer than three participants, the game would not be recognized as an official Jackpot game, a Jackpot fee would not be collected, and the participants would not be eligible for the Jackpot prize.

The amount of all Jackpots will be posted at 12 noon each day and in the event of any Jackpots being awarded, the amount paid to the winners will be determined by the designated game and the posted amounts for that time and date.

Any player winning \$600 or more in any Jackpot Poker promotion must provide valid government issued identification, and complete a Jackpot Winner's Form, which will require their full name, address, and social security number. The Jackpot Winner's Form must be signed by the winning player and the Supervisor awarding the prize. No prize will be awarded until the documentation is complete and the required information disclosed. Any and all Jackpot winnings are non-transferable.

JACKPOT UTILIZED IN DESIGNATED GAMES

Jackpot games will be offered 24 hours a day, seven days a week within the following games and limits of play.

A Jackpot fee of \$1.00 will be collected from all Double Hand Poker games designated as Jackpot games at the Oaks Card Club, including all approved levels of play which are currently available. The fee will be collected from the Player-Dealer position from the player who has placed a wager in the first Player-Dealer position.

A Jackpot fee of \$1.00 will be collected from all Pai Gow games designated as Jackpot games at the Oaks Card Club, including all approved levels of play which are currently available. The fee will be collected from the Player-Dealer position from any player who has placed a separate wager as a Player-Dealer.

All Double Hand Poker and Pai Gow Jackpots will feature minimum and maximum prizes within the designated games. It should be noted that all money collected for any player funded Jackpot promotion would be returned to the participants, less the administrative fee.



<u>GAME</u>	<u>MINIMUM</u>	<u>MAXIMUM</u>
DOUBLE HAND POKER	\$3,000	\$100,000
PAI GOW	\$3,000	\$100,000

NO PURCHASE NECESSARY

We believe this game is permissible by law because the play of the game is in no way tied to the collection of a fee or any other means of consideration in order to have an opportunity to win any of the Jackpot(s). Additionally this play will be offered to all comers on a general and indiscriminate basis, with the same terms and conditions, and does not require a participant to pay for a chance to win.

A Jackpot table will be set up for any customer who desires to play for the Jackpot and does not wish to play in any game where the House collects a fee. Customers at "No Purchase Necessary" Jackpot tables will not be required to purchase chips or pay any fee. The House will provide a dealer and all Jackpot rules will apply.

EXAMPLE OF "NO PURCHASE NECESSARY" PLAY

All Jackpot promotion rules will be applicable to customers who desire to play at the "No Purchase Necessary" special Jackpot table(s). Using the Double Hand Poker Jackpot promotion as an example, the game rules require that a minimum of three participants with playing hands must make a wager in order to satisfy the Jackpot rule which states that Jackpot games that are short-handed are not official Jackpot games. Therefore, three individual hands would be delivered for every hand dealt. One hand would be dealt to the customer and the other two hands to open seats. The hands would be played to completion, turned face-up, and reviewed to see if any qualifying Jackpot hands were present. In the event of a qualifying Jackpot hand scenario, the customer would be awarded the specified amount of the designated prize in question. In the case of the proposed "Bad Beat" Jackpot, if the customer had the second best hand at the table, the customer would win 50% of the designated Jackpot prize. If the customer possessed the best hand, the customer would win 20% of the designated prize. Play would continue in this manner.

QUALIFYING HANDS

"Bad Beat" Jackpot: A player has a high-ranking hand beaten by a better hand. This player, along with the other qualifying participants at the table, will win the Jackpot for the designated game in question. One of the players in possession of a Jackpot hand must occupy the Player-Dealer position in order for a Jackpot to be valid.

Following is a list of qualifying hands that would establish Jackpot winners. All information regarding qualifying hands will be clearly posted at all times.

GAME

DOUBLE HAND POKER:

QUALIFYING HAND

Player or Player-Dealer beaten with a hand that consists of a pair in the front (two card hand) and Ace high Flush or better in the back (five card hand) to a hand with a higher pair in the front and a full house or better in the back (with or without the Joker).

PAI GOW:

Player or Player-Dealer beaten by any valid hand consisting of any pair in the front two tiles and any better pair in the back two tiles, beaten by a higher pair in the front and a better pair in the back.

Jackpot amounts increase daily. Increases posted daily at 12 noon.

Jackpot distribution: 50% (2nd Best Hand) + 20% (Winning Hand) + 30% to remaining players in the hand.

JACKPOT DISTRIBUTION

The awarding and distribution of a qualifying Jackpot will be as follows: The individual(s) with the losing hand will receive 50% of the Jackpot amount, the individual(s) with the winning hand will receive 20% of the Jackpot amount and all player(s) in the player position who have placed a separate wager will receive the remaining 30% of the Jackpot award, which will be split amongst all the player(s) with one share distributed per betting circle regardless of the amount wagered.

JACKPOT ELIGIBILITY AND PRIZE POOL DISTRIBUTION

1. Player-Dealer Position

Double Hand Poker: Any player occupying the first Player-Dealer position are eligible to participate in any Jackpot pay-off in the event of a Jackpot situation.

Pai Gow: Any player(s) occupying the Player-Dealer position who place a separate wager and contribute to the Jackpot drop are eligible to participate in any Jackpot pay-off in the event of a Jackpot situation.

2. Player Positions All player(s) in the player position who have placed a separate wager will receive one share per betting circle regardless of the amount wagered.

JACKPOT MINIMUMS AND MAXIMUMS

Jackpots for designated games will be maintained with minimum amounts established for each designated game type. In the event that there were not enough funds in any individual Jackpot because of circumstances--such as a pool being won an excessive number of times in a short time span--the House would deposit the necessary funds into the specific Jackpot pool and the pool would pay back the funds when the funds on deposit for the specific pool were sufficient enough to warrant such action. Such a loan would be in the form of an interest-free negotiable instrument that would be deposited in the specified Jackpot House Account until the time it could be redeemed by the Jackpot fund.

Jackpots for designated games will also be maintained with maximum prize awards for each specific Jackpot pool. Therefore, when the maximum amount of revenue was achieved for the primary pool, additional revenues would be deposited in a backup pool(s) for the designated game.

Additionally, if issues of too few or too many Jackpots being generated became significant, the House reserves the right to make adjustments to the posted qualifying hands/awards, thereby maintaining pool levels at reasonable amounts, as long as any and all changes were clearly posted ahead of time.

JACKPOT POKER BACKUP ACCOUNTS

In order to prevent a dramatic drop in an individual Jackpot account and prevent a Jackpot from dropping to the minimum posted amount, a backup or secondary account will be established for the Double Hand Jackpot account and the Pai Gow Jackpot account. Jackpot revenue from each day will be deposited into the specified accounts as follows: 80% of the Jackpot revenues for a specific account will be deposited in a primary account and the remaining 20% of the Jackpot revenue will be deposited in a secondary account.

In the event of a Jackpot pay-off, the funds in the primary account would be paid to the winning participants, and the secondary account would then be activated to primary account status. Jackpot revenues would continue to be deposited into the primary account and the secondary account on an 80%-20% basis.

The amount of prize money available in all Jackpot accounts, including primary and secondary (backup) accounts, would be posted at 12 Noon each day.

MINIMUM PLAYER STANDARDS

Specific games will be designated as Jackpot games. Jackpot games will offer payouts to winners whenever a qualifying event occurs, as well as maintain the funding process for such games. However, Jackpot games that do not fulfill minimum player requirements will not be considered an official Jackpot game. In order to fulfill the requirements of a Jackpot game, there must be a minimum of three participants with playing hands, who have made a wager, involved in the play of the hand. In the event that there are less than three playing hands, the participants would not be eligible for any Jackpot prize, as the game would not be recognized as an official Jackpot game. In the event that a game was not recognized as an official Jackpot game, the play for the Jackpot would be discontinued as well as the funding process for the Jackpot.

EXCLUSION OF THE THIRD PARTY PROVIDER OF PROPOSITION PLAYER SERVICE

Third Party Provider of Proposition Player Services are not eligible to win the Jackpot or any portion thereof. If an employee of a Third Party Provider of Proposition Player Services is involved in a Jackpot event, their pay-off is void and any potential winnings will remain in the Jackpot fund.

High Hand Promotion

Bureau Requirements

Advertising

The Oaks Card Club may advertise various names for this gaming activity. Should The Casino advertise a different name, the BGC ID (GEAR-001081) shall be referenced on all advertisements relating to this gaming activity.

Furthermore, all rules and procedures for this gaming activity, including but not limited to the following, shall be displayed conspicuously and prominently in the Oaks Card Club at all times the gaming activity is being offered for play:

- Eligible controlled games and time periods.
- Minimum qualifying hand restrictions.
- Prize amount and funding source.
 - Hold'em Bad Beat Jackpot (GEGA-003102) reserve fund.
 - Omaha Hi Lo Split Bad Beat Jackpot (GEGA-003100) reserve fund.
 - Seven Card Stud Bad Beat Jackpot (GEGA-003099) reserve fund.
- All procedures, times and prize amounts shall be displayed prominently via any form of advertisement Oaks Card Club wishes to use, including but not limited to printed flyers, digital display, the Casino website, or any other form of advertisement.
- Availability of No Purchase Necessary.
- Any other restrictions that apply to this gaming activity.

Eligible Controlled Games

The High Hand Promotion shall be attached to the following Bureau approved controlled games offered at the Oaks Card Club, as shown below, at all times that the gaming activity is being offered for play. All controlled game rules shall be played as approved by the Bureau.

- Texas Hold'em (GEGA-001687)
- Seven Card Stud (GEGA-001661)
- Omaha High-Low Split (GEGA-001680)

Object and Summary

The player who obtains the highest ranking poker hand in an eligible game during a pre-determined and posted time period shall win a pre-determined and posted prize amount.

Qualifying Hands

A player who makes the highest ranking five card poker hand during a pre-determined and posted time period shall be awarded a prize. The hand made shall be at least the advertised minimum qualifying hand. In order to qualify for the promotion, Omaha Hi-Lo Split players must use two of their four hole cards in the winning hand. However, Texas Hold'em and Seven Card Stud players must use at least one hole card in the winning hand. If a minimum qualifying hand is not achieved within the promotional period, no prize(s) will be awarded.

High Hand Promotion

Option 1

Minimum Qualifying High Hand
High Card or Better

Option 2

Minimum Qualifying High Hand
Aces Full of Jacks or Better

Option 3

Minimum Qualifying High Hand
Four Aces or Better

The High Hand Promotion may be offered in only one, or all, of the above games during a promotional period. If run concurrently, each game, Texas Hold'em, Seven Card Stud, and Omaha High-Low Split may have separate prizes and distinct qualifying hands (either Options 1, 2, or 3). The qualifying hands and qualifying games shall be displayed and tracked on a display board in a prominent area of the Casino.

Eligibility Requirements

This gaming activity shall be open to all players who are seated and playing at any of the above listed controlled games during the pre-determined specified hours designated and posted for the gaming activity.

- A player is eligible to win this promotion by making the highest ranking hand during the posted times of this promotion. There is no limit on how many times a player may win this promotion.
- A minimum of four players must be dealt into the game.
- Casino employees are eligible to participate in the promotion on or off duty, in or out of uniform.
- All qualifying high hands must be verified by the house dealer or a casino floor person in order for the hand to be eligible. Any deviation from a standard deck shall nullify the hand.
- Tournament games do not qualify for the promotion.
- The winning player must be present to win. A log shall be kept containing a winning player's information. The winning player may claim their prize upon presentation of valid I.D. if necessary for reporting requirements.
- In the event two or more players achieve the same qualifying high hand, the prize value will be split equally among the eligible players.
- Poker propositional players are eligible for this promotion.

Prize

The prize shall be in the amount ranging from \$10 to \$100,000. All prizes for this promotion shall be pre-determined and posted in advance, throughout the gaming floor and in all literature promoting such an event.

High Hand Promotion

Funding

All collection fees and table limits are for the designated base games and are Bureau approved, pre-determined and posted at each table.

- The Texas Hold'em winning high hand will be fully funded from the Hold'em Bad Beat Jackpot (GEGA-003102) reserve account. Hold'em jackpot collections will only be used to fund Hold'em Jackpot payouts and Hold'em High Hand Promotion.
- The Omaha Hi Lo Split winning high hand will be fully funded from the Omaha Hi Lo Split Bad Beat Jackpot (GEGA-003100) reserve account. Omaha Hi Lo Split jackpot collections will only be used to fund Omaha Hi Lo Split Jackpot payouts and Omaha Hi Lo Split High Hand Promotion.
- The Seven Card Stud winning high hand will be fully funded from the Seven Card Stud Bad Beat Jackpot (GEGA-003099) reserve account. Seven Card Stud jackpot collections will only be used to fund Seven Card Stud Jackpot payouts and Seven Card Stud High Hand Promotion.

Administrative Fees

There will be no administrative fees taken, other than what is already taken for Hold'em Bad Beat Jackpot (GEGA-003102), Omaha Hi Lo Split Bad Beat Jackpot (GEGA-003100) and Seven Card Stud Bad Beat Jackpot (GEGA-003099).

No Purchase Necessary

The High Hand Promotion shall be offered to customers who wish to participate for free, on a general and indiscriminate basis, with **no restrictions**, to patrons who wish to participate in a No Purchase Necessary game. The Casino shall provide No Purchase Necessary tables for all patrons who request to participate in the gaming activity without paying a table fee or placing a live wager. All advertisement material shall state "No Purchase Necessary" when referencing the High Hand Promotion. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

High Hand with Tickets

Bureau Requirements

Advertising

Oaks Card Club may advertise various names for this gaming activity. Should The Casino advertise a different name, the BGC ID (GEGA-004051) shall be referenced on all advertisements relating to this gaming activity.

Furthermore, all rules and procedures for this gaming activity, including but not limited to the following, shall be displayed conspicuously and prominently in Oaks Card Club at all times the gaming activity is being offered for play:

- Eligible controlled games and time periods
- Minimum qualifying hand restrictions
- Amount of time to claim prize
- Number of winning keys
- If a consolation prize will be awarded
- Date and time of ticket drawings
- Prize amount and funding source
 - Hold'em Bad Beat Jackpot (GEGA-003102)
 - Omaha Hi/Lo Split Bad Beat Jackpot (GEGA-003100)
 - Seven Card Stud Bad Beat Jackpot (GEGA-003099)
- Availability of No Purchase Necessary
- Any other restrictions that apply to this gaming activity

Eligible Controlled Games

The High Hand with Tickets Promotion shall be attached to the following Bureau approved controlled games offered at Oaks Card Club, as shown below, at all times that the gaming activity is being offered for play. All controlled game rules shall be played as approved by the Bureau.

- Texas Hold'em (GEGA-001687)
- Seven Card Stud (GEGA-001661)
- Omaha Hi/Lo Split (GEGA-001680)

Object and Summary

The player who obtains the highest ranking poker hand in an eligible game during a predetermined and posted time period shall be awarded a ticket(s) to a drawing to be held at a later predetermined and posted date and time. The drawing itself will consist of one of the below options. If any unclaimed prizes remain after the advertised drawing timeframe(s), the drawing will resume as normal during the next advertised drawing period.

For example, if during the advertised drawing on Friday from 10:00 am to 8:00 pm, if any unclaimed prizes remain, the drawing will resume where it was left off on Saturday from 10:00 am to 8:00 pm.

High Hand with Tickets

Option 1

A drawing in which a player receives a ticket with a date and time for a drawing through the High Hand with Tickets Promotion satisfied by achieving one of the qualifying hands listed below. The ticket has a matching half with an identical number and will be kept by the Casino for the drawing, and filled out by the player and dropped into the bin. At the predetermined and posted time, a casino representative will draw a ticket from the collection of Casino halves and announce the ticket number. The player with the announced ticket will have between five and sixty minutes from the time the ticket number being announced and the winning player making their whereabouts known. The amount of time a patron has to claim their prize will be predetermined and clearly stated in all advertisements for this promotion. If there is no response after the ticket has been announced, the casino representative will proceed to draw the next ticket number until a matching ticket is claimed. The Casino may award multiple predetermined prizes within a single drawing. Any prizes not claimed will be kept in the appropriate fund. The predetermined prize will be awarded after the ticket is collected and checked by the casino representative.

Option 2

A drawing in which a player receives a ticket with a date and time for a drawing through the High Hand with Tickets Promotion satisfied by achieving one of the qualifying hands listed below. The ticket has a matching half with an identical number and will be kept by the Casino for the drawing and filled out by the player and dropped into the bin. At the predetermined and posted time, a casino representative will draw a ticket from the collection of Casino halves and announce the winning ticket number.

After the winning ticket is drawn by a casino representative, the winning player will proceed to a predetermined site inside the Casino where they will find an employee waiting for them with a large glass jar filled with between two and one hundred keys (at the start of the promotion) and a displayed padlock. All of the keys look identical and only one will unlock the padlock while the rest will not. A casino representative will verify the winning ticket and the player will reach into the glass jar and pull out one key, and attempt to open the padlock. The player that unlocks the padlock wins the prize. A key that does not open the padlock is taken out of circulation and the total number of keys decreases. This process will occur each time until a winning key unlocks the padlock. The player with the announced ticket will have between five and sixty minutes from the time the ticket number being announced and the winning player making their whereabouts known. The amount of time a patron has to claim their prize will be predetermined and clearly stated in all advertisements for this promotion. If there is no response after the ticket has been announced, the casino representative will proceed to draw the next ticket number until a matching ticket is claimed. Any prizes not claimed will be kept in the appropriate fund.

Option 3

A drawing in which a player receives a ticket with a date and time for a drawing through the High Hand with Tickets Promotion satisfied by achieving one of the qualifying hands listed below. The ticket has a matching half with an identical number and will be kept by the Casino for the drawing and filled out by the player and dropped into the bin. At the predetermined and posted time, a casino representative will draw a ticket from the collection of Casino halves and announce the winning ticket number.

High Hand with Tickets

After the winning ticket is drawn by a casino representative, the winning player will proceed to a predetermined site inside the Casino where they will find an employee waiting for them with a large glass jar filled with between two and one hundred keys (at the start of the promotion) and a displayed padlock. All of the keys look identical and only some will unlock the padlock while the rest will not. All winning keys will unlock the same padlock. A casino representative will verify the winning ticket and the player will reach into the glass jar and pull out one key, and attempt to open the padlock. A player that unlocks the padlock wins a prize. A key that does not open the padlock is taken out of circulation and the total number of keys decreases. This process will occur each time until all winning keys that unlock the padlock have been pulled. The maximum number of winning keys that may be present during any promotional period would be 50% of the total number of keys at the start of the promotion. All winning keys must be drawn before the conclusion of the promotional period. The player with the announced ticket will have between five and sixty minutes from the time the ticket number being announced and the winning player making their whereabouts known. The amount of time a patron has to claim their prize will be predetermined and clearly stated in all advertisements for this promotion. If there is no response after the ticket has been announced, the casino representative will proceed to draw the next ticket number until a matching ticket is claimed. Any prizes not claimed will be kept in the appropriate fund.

Qualifying Hands

A player who makes the highest five-card poker hand during a predetermined and posted time period shall be awarded a ticket to be used in a drawing. The hand achieved must be at least the advertised minimum qualifying hand. If no minimum qualifying hand is achieved within the posted time period, no tickets will be awarded. The qualifying hands shall be predetermined and posted, and shall be tracked on a display board in a prominent area of the Casino. Only one qualifying hand per game may be utilized at any one time. The qualifying hands for each eligible game are shown below.

Texas Hold'em Qualifying Hands

Option	Minimum Qualifying High Hand
1	High Card or Better
2	Aces Full of Jacks or Better
3	Four Aces or Better

Seven Card Stud Qualifying Hands

Option	Minimum Qualifying High Hand
1	High Card or Better
2	Aces Full of Jacks or Better
3	Four Aces or Better

Omaha Hi/Lo Split Qualifying Hands

Option	Minimum Qualifying High Hand
1	High Card or Better
2	Aces Full of Jacks or Better
3	Four Aces or Better

High Hand with Tickets

Eligibility Requirements

This gaming activity shall be open to all players who are seated and playing at any of the above listed controlled games during the predetermined specified hours designated and posted for the gaming activity.

- A player is eligible to win this promotion by making the highest ranking hand during the posted times of this promotion. There is no limit on how many times a player may be awarded a ticket, or win a prize or consolation prize.
- A minimum of four players must be dealt into the game in order for the table to qualify for the promotion.
- Casino employees are eligible to participate in the promotion on or off duty, in or out of uniform.
- In order to qualify for the promotion, Omaha Hi/Lo Split players must use two hole cards in the winning hand. Texas Hold'em and Seven Card Stud players must use at least one hole card in the winning hand.
- All qualifying high hands must be verified by the house dealer or a casino floor person in order for the hand to be eligible. Any deviation from a standard deck shall nullify the hand.
- Tournament games do not qualify for the promotion.
- During a drawing, the player will have between five and sixty minutes from the time of the ticket number being announced to make their whereabouts known so they can collect a prize or have a chance to pick a key and unlock the padlock for a prize. The amount of time a patron has to claim their prize shall be predetermined and posted prior to the beginning of the promotion.
- Ticket halves owned by the Casino awaiting a drawing will be kept in a secure place and will be drawn from a clear tumbler.
- Tickets will be destroyed and disposed of after the promotional period ends.

Prize

The prize achieved through one of the drawing options above shall be an amount ranging in value from \$10 to \$100,000. Prizes shall be in the form of cash, chips, jewelry, electronics, clothing, vehicles, watercraft, gift certificates, sporting and concert tickets, food comps, entries into tournaments (GEGA-000428), and travel. All prizes for this promotion shall be predetermined and posted in advance, throughout the gaming floor and in all literature promoting such an event.

The Casino may offer a consolation prize to patrons that did not win the advertised prize. The consolation prize shall be awarded either immediately following an unsuccessful drawing (i.e., the player did not select a winning key), or the player will be given the opportunity to draw a ticket from a second tumbler with a predetermined prize, and shall be awarded the prize on the ticket. The method for awarding players a consolation prize shall be predetermined and posted prior to the start of the promotion. The consolation prize shall range in value from \$5 to \$95,000 and shall never exceed 50% of the advertised prize. Prizes shall be in the form of cash, chips, jewelry, electronics, clothing, vehicles, watercraft, gift certificates, sporting and concert tickets, food comps, entries into tournaments (GEGA-000428), and travel. All consolation prizes for this promotion shall be predetermined and posted in advance, throughout the gaming floor and in all literature promoting such an event.

High Hand with Tickets

Funding

All collection fees and table limits are for the designated base games and are Bureau approved, predetermined and posted at each table.

- The Texas Hold'em winning high hand will be fully funded by the Hold'em Bad Beat Jackpot (GEGA-003102) reserve account. Hold'em jackpot collections will only be used to fund Hold'em Jackpot payouts and Hold'em High Hand with Tickets Promotion.
- The Omaha Hi/Lo Split winning high hand will be fully funded by the Omaha Hi/Lo Split Bad Beat Jackpot (GEGA-003100) reserve account. Omaha Hi/Lo Split jackpot collections will only be used to fund Omaha Hi/Lo Split Jackpot payouts and Omaha Hi/Lo Split High Hand with Tickets Promotion.
- The Seven Card Stud winning high hand will be fully funded by the Seven Card Stud Bad Beat Jackpot (GEGA-003099) reserve account. Seven Card Stud jackpot collections will only be used to fund Seven Card Stud Jackpot payouts and Seven Card Stud High Hand with Tickets Promotion.

Administrative Fees

The administrative fees are collected from the above mentioned Hold'em Bad Beat Jackpot (GEGA-003102), Omaha Hi/Lo Split Bad Beat Jackpot (GEGA-003100) and Seven Card Stud Bad Beat Jackpot (GEGA-003099) reserve accounts, therefore no additional administrative fees will be collected for this promotion.

No Purchase Necessary

The High Hand with Tickets Promotion shall be offered to customers who wish to participate for free, on a general and indiscriminate basis, with **no restrictions**. The Casino shall provide No Purchase Necessary tables for all patrons who request to participate in the gaming activity without paying a table fee or placing a live wager. All advertisement material shall state "No Purchase Necessary" when referencing the High Hand with Tickets Promotion. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

Hold'em Bad Beat Jackpot

Advertisement Requirements

The Oaks Card Club may advertise various names for this gaming activity. Should the Oaks Card Club advertise a different name, the BGC ID listed below shall be referenced on all advertisements relating to the Hold'em Bad Beat Jackpot Poker.

Furthermore, all rules and procedures for this jackpot, including but not limited to the following, shall be displayed conspicuously and prominently in the Oaks Card Club at all times that the promotion is offered.

- Eligible games and time periods.
- Qualifying winning and losing hands and corresponding prize amount.
- Prize payout structure.
- All other restrictions as applicable.

Controlled Game

The Hold'em Bad Beat Jackpot Poker may be attached to all limits and versions of the currently approved games offered at the Oaks Card Club, as listed below.

- Texas Hold'em (GEGA-001687)

All base game rules shall be played as previously approved by the Bureau.

Rules of Play

The Hold'em Bad Beat Jackpot Poker features a progressive jackpot prize element. A prize is awarded to players participating in a jackpot game when a designated qualifying hand is beaten by a better qualifying hand at the showdown. When the winning and losing hands are confirmed, those players with the qualifying hands shall receive the posted percentage of the jackpot prize. The posted percentage of the jackpot prize, known as the table share, shall be evenly distributed among all other players at the qualifying table who have participated in the designated games, as shown below. In all instances, patrons shall be provided with ample advance notice of the percentage division of the posted jackpot prize. Both jackpot prize pools shall have the same percentage division of their posted jackpot prizes.

Qualifying Hands

Players that make the following advertised hands shall be eligible to win their share of each of the Hold'em Bad Beat Jackpot Poker prize amounts, as shown below. Only winning and losing hands that have been Bureau approved and pre-determined and designated by the Oaks Card Club are eligible. Patrons shall be given ample notice of the hands that are being offered. Only one option, as listed below, shall be used at any one time. Both qualifying hands listed in each option shall be offered together at all times. Furthermore, they shall be displayed prominently via printed flyers, digital display, or any other form of advertisements.

Hold'em Bad Beat Jackpot

	Bad Beat Hand	Winning Hand	Prize Amount
Option 1	Aces Full of Jacks or better	Higher ranking hand	\$3,000 - \$30,000
Option 2	Aces Full of Queens or Better	Higher ranking hand	\$3,000 - \$30,000
Option 3	Aces Full of Kings or Better	Higher ranking hand	\$3,000 - \$30,000

Prize Payout Structure

Players that make the designated qualifying hands shall be eligible to win their share of each Hold'em Bad Beat Jackpot Poker prize amount, as shown below. Only one prize payout structure option shall be used at any one time for this jackpot. The prize payout structure shall be displayed prominently via printed flyers, digital display, and any other forms of advertisements.

Payout Structure	Bad Beat Hand	Winning Hand	Table Share
Option 1	50%	25%	25%
Option 2	40%	20%	40%
Option 3	60%	20%	20%

Prize

The Hold'em Bad Beat Jackpot prize amount shall range in value from \$3,000 to \$30,000. All jackpots shall be paid in the form of chips. The actual prize amounts shall depend on the amount the jackpot was originally seeded at and how much time has accumulated in order for the jackpot to increase progressively each day. In all instances, the jackpot prize amount shall be conspicuously posted in the Oaks Card Club at all times.

Eligibility

This gaming activity shall 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.

- Hold'em Bad Beat Jackpot Poker games will offer payouts to winners whenever a qualifying event occurs. However, Hold'em Bad Beat Jackpot Poker games that become "short-handed" will not be considered official games. For the purpose of Hold'em Bad Beat Jackpot Poker, short-handed games are any games that have fewer than four (4) players dealt into the play of the hand. Therefore, in a Hold'em Bad Beat Jackpot Poker game, whenever there are between 1-3 players dealt into the hand, the play for the Jackpot will be discontinued. When the game is no longer short-handed and 4 or more players are dealt into the hand, the Jackpot process will be restored. Players must be seated in order to qualify for the jackpot. Lobbying players do not qualify for the jackpot.
- Tournament games do not qualify for the jackpot.
- Card Club employees are eligible to participate and win the jackpot prize whether they are on or off-duty.
- When a qualifying hand is announced, a floor person shall verify that both hands qualify. Any deviation from a standard deck shall nullify the jackpot.

Hold'em Bad Beat Jackpot

- In order to qualify for the jackpots, both the winning and losing hands must use two hole cards and three board cards.
- Players with qualifying winning and losing hands must both 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 identical qualifying losing or winning hands, the percentage of the prize designated for that share of the total jackpot prize amount would be equally distributed among those players.
- All procedures, times, qualifying hands, and prize amounts shall be displayed prominently via any form of advertising that the Oaks Card Club wishes to use, including but not limited to printed flyers, digital display, the Card Club's website, etc.

Funding

The Hold'em Bad Beat Jackpot utilizes a progressive prize pool which shall be player funded via a \$1.00 jackpot collection fee. The jackpot collection fee shall be taken at the start of each hand played, as long as there is at least one bet and one call. The Oaks Card Club shall initially seed the Hold'em Bad Beat Jackpot with an amount of \$3,000. Once there are sufficient funds in the jackpot reserve, the initial amount that the Oaks Card Club used to seed the jackpot shall be repaid to the Card Club from the jackpot reserve. The jackpot collection fees shall then be used to fund the jackpot fund. Additionally, whenever the Card Club is required to seed the jackpot or cover the shortfall due to in-adequate funds in the reserve account, the Card Club shall be repaid from the jackpot reserve account once the reserve is sufficient and the funds become available. When a qualifying jackpot hand is made on the Hold'em Bad Beat Jackpot, if the Hold'em Bad Beat Jackpot prize pool was at the maximum prize amount and the money in the Hold'em Bad Beat Jackpot promotion account reserve was in excess of double the amount of the maximum prize amount, then the Hold'em Bad Beat Jackpot would be reseeded at 100% of the maximum prize amount, which is \$15,000. If the Hold'em Bad Beat Jackpot Poker promotion account reserve was at less than double the amount of the maximum prize amount, then the Hold'em Bad Beat Jackpot would be reseeded at the daily contribution rate of \$5,000. The Hold'em Bad Beat Jackpot shall increase daily in the amount of \$5,000. In the event there was not enough revenue collected in a particular 24 hour period to satisfy the monies designated for distribution into the individual Jackpots, then 70% of the collected revenues would be designated for the Hold'em Bad Beat Jackpot, and 15% of the collected revenues would be designated for the Hold'em Super Bad Beat Jackpot (GEGA-004110). The remaining 15% of the collected revenues would be held in the Hold'em Jackpot promotion account reserve. If an amount of jackpot collection fees are collected which is in excess of the amount for the pre-determined daily increase, that excess amount of jackpot collection fees shall be placed in the jackpot reserve account. The Hold'em Bad Beat Jackpot has a cap of \$15,000. If the jackpot reaches its cap amount, all other jackpot collection fees collected shall be placed in the jackpot reserve account. As the Oaks Card Club deems necessary, certain hours may be established where the posted Hold'em Bad Beat Jackpot Poker prize amount(s) would be doubled. In the event that the Oaks initiates the use of doubling the jackpots, the dates, days and times for such awards would be clearly identified in all advertising and promotional materials. In such an event the jackpot(s) shall not exceed the maximum prize amounts, as listed above. The jackpot drop chip will be deposited in the same box as the house drop, but will be of special design to differentiate it from the table collection fees. This will enable the Oaks Card Club to account for jackpot fees separately from house fees. In all instances, patrons shall be provided with ample advance notice of the prize amount.

Hold'em Bad Beat Jackpot

Administrative Fees

The Oaks Card Club shall retain an administrative fee of \$0.15 for each jackpot fee collected. This fee is established to cover the costs of materials, security and surveillance, verification and documentation, cage and count room services for jackpot collection and accounting, administration, advertising, and any and all other costs relative to the operation of player-funded jackpots.

No Purchase Necessary

The Hold'em Bad Beat Jackpot Poker shall be offered for free, on a general and indiscriminant basis, with no restrictions, to patrons who wish to participate in a No Purchase Necessary (NPN) game. The Oaks Card Club shall provide No Purchase Necessary tables for patrons who request to participate in the jackpot without paying a table fee or placing a live wager. The NPN player must adhere to all rules as the live player. All advertisements must state "No Purchase Necessary" when referencing the Hold'em Bad Beat Jackpot Poker.

Hold'em Super Bad Beat Jackpot

Advertisement Requirements

The Oaks Card Club may advertise various names for this gaming activity. Should the Oaks Card Club advertise a different name, the BGC ID listed below shall be referenced on all advertisements relating to the Hold'em Super Bad Beat Jackpot Poker.

Furthermore, all rules and procedures for this jackpot, including but not limited to the following, shall be displayed conspicuously and prominently in the Oaks Card Club at all times that the promotion is offered.

- Eligible games and time periods.
- Qualifying winning and losing hands and corresponding prize amount.
- Prize payout structure.
- All other restrictions as applicable.

Controlled Game

The Hold'em Super Bad Beat Jackpot Poker may be attached to all limits and versions of the currently approved games offered at the Oaks Card Club, as listed below.

- Texas Hold'em (GEGA-001687)

All base game rules shall be played as previously approved by the Bureau.

Rules of Play

The Hold'em Super Bad Beat Jackpot Poker features a progressive jackpot prize element. A prize is awarded to players participating in a jackpot game when a designated qualifying hand is beaten by a better qualifying hand at the showdown. When the winning and losing hands are confirmed, those players with the qualifying hands shall receive the posted percentage of the jackpot prize. The posted percentage of the jackpot prize, known as the table share, shall be evenly distributed among all other players at the qualifying table who have participated in the designated games, as shown below. In all instances, patrons shall be provided with ample advance notice of the percentage division of the posted jackpot prize. Both jackpot prize pools shall have the same percentage division of their posted jackpot prizes.

Qualifying Hands

Players that make the following advertised hands shall be eligible to win their share of each of the Hold'em Super Bad Beat Jackpot Poker prize amounts, as shown below. Only winning and losing hands that have been Bureau approved and pre-determined and designated by the Oaks Card Club are eligible. Patrons shall be given ample notice of the hands that are being offered. Only one option, as listed below, shall be used at any one time. Both qualifying hands listed in each option shall be offered together at all times. Furthermore, they shall be displayed prominently via printed flyers, digital display, or any other form of advertisements.

	Bad Beat Hand	Winning Hand	Prize Amount
Option 1	Four 6s or better	Higher ranking hand	\$15,000-\$200,000
Option 2	Four 8s or better	Higher ranking hand	\$15,000-\$200,000
Option 3	Four 10s or better	Higher ranking hand	\$15,000 - \$200,000

Hold'em Super Bad Beat Jackpot

Prize Payout Structure

Players that make the designated qualifying hands shall be eligible to win their share of each Hold'em Super Bad Beat Jackpot Poker prize amount, as shown below. Only one prize payout structure option shall be used at any one time for this jackpot. The prize payout structure shall be displayed prominently via printed flyers, digital display, and any other forms of advertisements.

Payout Structure	Bad Beat Hand	Winning Hand	Table Share
Option 1	50%	25%	25%
Option 2	40%	20%	40%
Option 3	60%	20%	20%

Prize

The Hold'em Super Bad Beat Jackpot prize amount shall range in value from \$15,000 to \$200,000. All jackpots shall be paid in the form of chips. The actual prize amounts shall depend on the amount the jackpot was originally seeded at and how much time has accumulated in order for the jackpot to increase progressively each day. In all instances, the jackpot prize amount shall be conspicuously posted in the Oaks Card Club at all times.

Eligibility

This gaming activity shall 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.

- Hold'em Super Bad Beat Jackpot Poker games will offer payouts to winners whenever a qualifying event occurs. However, Hold'em Super Bad Beat Jackpot Poker games that become "short-handed" will not be considered official games. For the purpose of Hold'em Super Bad Beat Jackpot Poker, short-handed games are any games that have fewer than four (4) players dealt into the play of the hand. Therefore, in a Hold'em Super Bad Beat Jackpot Poker game, whenever there are between 1-3 players dealt into the hand, the play for the Jackpot will be discontinued. When the game is no longer short-handed and 4 or more players are dealt into the hand, the Jackpot process will be restored. Players must be seated in order to qualify for the jackpot. Lobbying players do not qualify for the jackpot.
- Tournament games do not qualify for the jackpot.
- Card Club employees are eligible to participate and win the jackpot prize whether they are on or off-duty.
- When a qualifying hand is announced, a floor person shall verify that both hands qualify. Any deviation from a standard deck shall nullify the jackpot.
- In order to qualify for the jackpots, both the winning and losing hands must use two hole cards and three board cards.
- Players with qualifying winning and losing hands must both 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 identical qualifying losing or winning hands, the percentage of the prize designated for that share of the total jackpot prize amount would be equally distributed among those players.
- All procedures, times, qualifying hands, and prize amounts shall be displayed prominently via any form of advertising that the Oaks Card Club wishes to use, including but not limited to printed flyers, digital display, the Card Club's website, etc.

Hold'em Super Bad Beat Jackpot

Funding

The Hold'em Super Bad Beat Jackpot utilizes a progressive prize pool which shall be player funded via a \$1.00 jackpot collection fee. The jackpot collection fee shall be taken at the start of each hand played, as long as there is at least one bet and one call. The Oaks Card Club shall initially seed the Hold'em Super Bad Beat Jackpot with an amount of \$15,000. Once there are sufficient funds in the jackpot reserve, the initial amount that the Oaks Card Club used to seed the jackpot shall be repaid to the Card Club from the jackpot reserve. The jackpot collection fees shall then be used to fund the jackpot fund. Additionally, whenever the Card Club is required to seed the jackpot or cover the shortfall due to in-adequate funds in the reserve account, the Card Club shall be repaid from the jackpot reserve account once the reserve is sufficient and the funds become available. When a qualifying jackpot hand is made on the Hold'em Super Bad Beat Jackpot, if the money in the Hold'em Super Bad Beat Jackpot Poker account reserve was in excess of double the amount of the jackpot cap, then the Hold'em Super Bad Beat Jackpot would be reseeded at 50% of the maximum prize amount, which would be \$50,000. If the Hold'em Super Bad Beat Jackpot promotion account reserve was at less than double the amount of the jackpot cap, then the Hold'em Super Bad Beat Jackpot would be reseeded at the minimum starting amount, which is \$15,000. The Hold'em Super Bad Beat Jackpot shall increase daily in the amount of \$1,000. In the event there was not enough revenue collected in a particular 24 hour period to satisfy the monies designated for distribution into the individual Jackpots, then 70% of the collected revenues would be designated for the Hold'em Bad Beat Jackpot (GEGA-003102), and 15% of the collected revenues would be designated for the Hold'em Super Bad Beat Jackpot. The remaining 15% of the collected revenues would be held in the Hold'em Jackpot promotion account reserve. If an amount of jackpot collection fees are collected which is in excess of the amount for the pre-determined daily increase, that excess amount of jackpot collection fees shall be placed in the jackpot reserve account. The Hold'em Super Bad Beat Jackpot has a cap of \$100,000. If the jackpot reaches its cap amount, all other jackpot collection fees collected shall be placed in the jackpot reserve account. As the Oaks Card Club deems necessary, certain hours may be established where the posted Hold'em Bad Beat Jackpot Poker prize amount(s) would be doubled. In the event that the Oaks initiates the use of doubling the jackpots, the dates, days and times for such awards would be clearly identified in all advertising and promotional materials. In such an event the jackpot(s) shall not exceed the maximum prize amounts, as listed above. The jackpot drop chip will be deposited in the same box as the house drop, but will be of special design to differentiate it from the table collection fees. This will enable the Oaks Card Club to account for jackpot fees separately from house fees. In all instances, patrons shall be provided with ample advance notice of the prize amount.

Administrative Fees

The Oaks Card Club shall retain an administrative fee of \$0.15 for each jackpot fee collected. This fee is established to cover the costs of materials, security and surveillance, verification and documentation, cage and count room services for jackpot collection and accounting, administration, advertising, and any and all other costs relative to the operation of player-funded jackpots.

No Purchase Necessary

The Hold'em Super Bad Beat Jackpot Poker shall be offered for free, on a general and indiscriminant basis, with no restrictions, to patrons who wish to participate in a No Purchase Necessary (NPN) game. The Oaks Card Club shall provide No Purchase Necessary tables for patrons who request to participate in the jackpot without paying a table fee or placing a live wager. The NPN player must adhere to all rules as the live player. All advertisements must state "No Purchase Necessary" when referencing the Hold'em Super Bad Beat Jackpot Poker.

Nine High Promotion

Bureau Requirements

Advertising

The Oaks Card Club may advertise various names for this gaming activity. Should the Casino advertise a different name, the BGC ID (GEGA-004459) shall be referenced on all advertisements relating to this gaming activity.

Furthermore, all rules and procedures for the gaming activity, including but not limited to the following, shall be prominently displayed in the Oaks Card Club at all times the gaming activity is being offered for play:

- Eligible games and time periods.
- Qualifying hand.
- Prize amount/prize description.
- Availability of No Purchase Necessary.
- Any other restrictions that apply to this gaming activity.

Eligible Controlled Games

The Nine High Promotion shall be attached to the following Bureau approved controlled games offered at the Oaks Card Club, as shown below, at all times that this gaming activity is being offered for play. All controlled game rules shall be played as previously approved by the Bureau.

- Pai Gow Poker (GEGA-001681)

Rules of Play

Any player who obtains a nine as the highest ranking hand on a given hand shall win the predetermined and posted prize. The nine high must be on the hand in the back. Any player who obtains the qualifying hand shall have their hand verified by the Oaks Card Club floor person.

Qualifying Hands

Any player who obtains one of the qualifying hands listed below will be eligible to win the posted prize according to the chart listed below:

Qualifying Hand	Prize Amount
Nine High	\$1-\$100,000

Eligibility Requirements

This gaming activity shall be open to all players who are playing at any of the above listed controlled games during the pre-determined specified hours designated and posted for the gaming activity.

- Any player who receives a qualifying hand will be eligible for the posted prize
- Players are eligible multiple times for this promotion within the pre-determined time period
- A minimum of two players (player and player-dealer) must be dealt into the game in order for the player(s) to be eligible for the prize
- Casino employees are eligible to participate in the promotion on or off duty, in or out of uniform.
- Third-party providers of proposition player services are not eligible for this promotion.

Nine High Promotion

- All qualifying hands must be verified by a floor person in order for the eligible player to claim their prize.
- In the event that more than one player is playing on the same seat, the prize will be equally split amongst the different players.
- Tournament games are not eligible for this promotion.
- Players can win, push, or lose the hand and also be eligible for this promotion.

Prize

The prize shall be an amount ranging in value from \$1 to \$100,000 in the form of cash, chips or prizes such as merchandise including jewelry, electronics, clothing, vehicles, watercraft, gift certificates, sporting and concert tickets, food comps, entry into tournaments, and travel.

Funding

The Nine High Promotion is fully funded by the Oaks Card Club. At no time will any fees be collected from players for the purpose of funding this promotion. All fee collections and table limits are for the designated base game and are Bureau approved, pre-determined and posted at each table.

Administrative Fees

The Oaks Card Club shall not retain an administrative fee for this promotion, as it is house funded.

No Purchase Necessary

The Nine High Promotion shall be offered to customers who wish to participate for free, on a general and indiscriminate basis, with **no restrictions**, in a No Purchase Necessary game. The Casino shall provide No Purchase Necessary tables for all patrons who request to participate in the gaming activity without paying a table fee or placing a live wager. All advertisement material shall state "No Purchase Necessary" when referencing the Nine High Promotion. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

OAKS CARD CLUB

4097 SAN PABLO AVENUE
EMERYVILLE, CALIFORNIA 94608
TELEPHONE (510) 653-7093

September 24, 2002

TO: STATE OF CALIFORNIA
DEPARTMENT OF JUSTICE
DIVISION OF GAMBLING CONTROL
1435 RIVER PARK DRIVE, SUITE 200
SACRAMENTO, CA. 95815

ATT'N: CATHERINE TASTOR, LICENSING ANALYST

RE: SECTION 2071:
LICENSEE REQUEST FOR APPROVAL OF GAMES OR MANNER OF PLAY

In compliance with the Division of Gambling Control's regulations, Section 2071, Licensee Request for Approval of Games or Manner of Play, the Oaks Card Club is submitting a request for approval of a Jackpot promotion which will be played in conjunction with our approved games.

The Jackpot promotion will be played in conjunction with the play of "No Bust" 21st Century Blackjack. The Division of Gambling Control and the City of Emeryville have approved for play all of the games currently played in our facility, including the game of "No Bust" 21st Century Blackjack. The Oaks hereby submits to the Division this request for approval for the play of a Jackpot promotion in conjunction with the play of "No Bust" 21st Century Blackjack.

OVERVIEW

The Oaks Card Club would like to implement a Jackpot promotion within the play of "No Bust" 21st Century Blackjack. The promotion would be in the form of a "Cash Bonus" Jackpot award. Any player achieving the designated qualifying hand during the play of "No Bust" 21st Century Blackjack would win the designated cash award.

PLAY OF THE GAME

The Jackpot promotion within the play of "No Bust" 21st Century Blackjack, will feature a "Cash Bonus" format. Players participating in "No Bust" 21st Century Blackjack Jackpot games will be awarded the posted Jackpot award at the time a designated qualifying hand is achieved. In the case of "No Bust" 21st Century Blackjack, in order to win, participants must have a predetermined qualifying hand dealt to them on the first three cards that they receive. The qualifying hand must be three (3) sevens of the same suit. In the instance of a qualifying event occurring, the winner would receive a cash award of \$500.00.

JACKPOT UTILIZED IN DESIGNATED GAMES

"Cash Bonus" Jackpots will be offered 24 hours a day, seven days a week within the play of all "No Bust" 21st Century Blackjack games.

No additional Jackpot or Administrative fees will be collected for the play of the Jackpot promotion within the framework of "No Bust" 21st Century Blackjack

QUALIFYING HANDS

This promotion will be offered in conjunction with the play of "No Bust" 21st Century Blackjack. The promotion will consist of awarding any player who in the course of play receives a playing hand that consists of three 7's of the same suit on their initial three (3) cards. The award for such a hand will be in the amount of \$500.00.

All information regarding qualifying hands will be clearly posted at all times.

NO PURCHASE NECESSARY

We believe this game is permissible by law because the play of the game is in no way tied to the collection of a fee or any other means of consideration in order to have an opportunity to win the "Cash Bonus" Jackpot. Additionally this play will be offered to all comers on a general and indiscriminate basis, with the same terms and conditions, and does not require a participant to pay for a chance to win.

A Jackpot table will be set up for any customer who desires to play for the "No Bust" 21st Century Blackjack Jackpot and does not wish to play in any game where the House collects a fee. Customers at "No Purchase Necessary" Jackpot tables will not be required to purchase chips or pay any fee. The House will provide a dealer and all Jackpot promotion rules will apply.

EXAMPLE OF "NO PURCHASE NECESSARY" PLAY

All Jackpot promotion rules will be applicable to customers who desire to play at the "No Purchase Necessary" special Jackpot table(s). A House Dealer would use the same deck that is utilized in a "No Bust" 21st Century Blackjack Jackpot game. All hands would be dealt face-up. One hand would be dealt to the customer and an additional hand dealt to an open seat. The hands would be played to completion and reviewed to see if any qualifying Jackpot promotion hands were present. In the event the customer had a qualifying Jackpot Poker hand, the customer would win the "Cash Bonus" Jackpot prize of \$500.00

JACKPOT ACCOUNT

All "No Bust" 21st Century Jackpot "Cash Bonus" winners will be paid from a specially designated House Account. The House Account will be designated as the "No Bust" 21 Century Jackpot Account, and all markers for "Cash Bonus" Jackpots will be taken from this specific account.

Additionally, if issues of too few or too many Jackpots being generated became significant, the House reserves the right to make adjustments to the posted qualifying hands, and/or adjust the amount of the "Cash Bonus" as long as all such changes are clearly noted on all advertising and in-house postings.

EXCLUSION OF THE THIRD PARTY PROVIDER OF PROPOSITION PLAYER SERVICE

Third Party Provider of Proposition Player Services are not eligible to win the Jackpot or any portion thereof. If an employee of a Third Party Provider of Proposition Player Services is involved in a Jackpot event, their pay-off is void and any potential winnings will remain in the Jackpot fund.

If an employee the Third Party Provider of Proposition Player Services is involved as part of another party, they will not be recognized as part of that party and their percentage of winnings will remain in the Jackpot fund

JACKPOTS NULL AND VOID

An Oaks Card Club Supervisor must verify the validity of every qualifying Jackpot promotion event before any Jackpot prize money will be paid.

The Oaks Card Club reserves the right to review any and all videotapes relative to the play of this Jackpot promotion in order to validate all Jackpot promotion pay-offs. Prize money may be withheld for up to twenty-four hours, and in the event of the discovery of foul play, the Jackpot will be considered null and void.

ACCOUNTING AND CONTROL PROCEDURES

WINNER'S FORM

All Jackpot winners will be required to fill out a Winner's Form upon payment of any Jackpot winnings. The Supervisor who provides payment to the winner will also sign the Winner's Form, which will provide the winner's name, the date of the payment and the amount of money won. Additionally, any Jackpot promotion participant who wins \$600 or more will be required to provide the following information: Name, address, and social security number, amount of winnings, the date, the signature of the winner, along with the signature of the Floor Supervisor authorizing the award. Any person winning \$600 or more must provide government issued I.D. The information must be provided at the time the prize money is awarded.

JACKPOT DATABASE

An individual House Account will be established for the "No Bust" 21st Century Blackjack Jackpot. The account will reflect all the debits to the account. Anytime a "No Bust" 21st Century Blackjack Jackpot Poker account is debited, a Withdrawal Slip will be generated. All Withdrawal Slips must be signed by the Head Cashier and the Shift

Manager. No access will be granted to these accounts without the Shift Manager's authorization.

At 8:00 A.M. each day a day's end report will reflect all the transactions that occurred during the previous 24 hours in all Jackpot promotion House Accounts. The day end report will reflect all withdrawals from the "No Bust" 21st Century Blackjack Jackpot. All "No Bust" 21st Century Blackjack Jackpot pay-outs must be matched to withdrawal slips. Such information will be scrutinized and archived by the Administrative Manager or his appointee. All Player's House Accounts including all Jackpot promotion Accounts are held in insured non-interest bearing accounts at Union Bank of California.

JACKPOT POKER ADVERTISING

As with all advertising that promotes the activities of the Oaks Card Club, including the hours of operation, the types of games offered, the various tournaments and modes of entertainment available, the Oaks would fully expect to advertise the various types of Jackpot promotions that it offers.

All such advertisements which reference or promote the Jackpot "Cash Bonus" promotion would note that there is "No Purchase Necessary" in order to participate in the Jackpot "Cash Bonus" promotion.

GAMING ACTIVITY COMPLIANCE WITH APPLICABLE LAWS

Any and all games played at the Oaks Card Club are specifically listed as legal games in the City of Emeryville Ordinance and do not conflict with State law in any manner. The list of approved games has been previously submitted in our original disclosure to your Office.

The Oaks Card Club believes that no legal grounds exist to deny the play of the Jackpot "Cash Bonus" promotion, as this promotion does not violate any existing laws as previously elaborated in this disclosure.

Additionally, this play will be offered to all comers on a general and indiscriminate basis, with the same terms and conditions, and does not require a participant to pay for a chance to win.

Management reserves the right to cancel or modify this promotion at any time as long as any modification is in compliance with all applicable laws and regulations.
(End)

If the Division requires any additional information in order to process this request, please advise.

We await approval from the Division for the play of this specific promotion within the play of "No Bust" 21 Century Blackjack.

Omaha Hi-Lo Split Bad Beat Jackpot

Advertisement Requirements

The Oaks Card Club may advertise various names for this gaming activity. Should the Oaks Card Club advertise a different name, the BGC ID listed above shall be referenced on all advertisements relating to the Omaha Hi-Lo Split Bad Beat Jackpot Poker.

Furthermore, all rules and procedures for this jackpot, including but not limited to the following, shall be displayed conspicuously and prominently in the Oaks Card Club at all times that the promotion is offered.

- Eligible games and time periods.
- Qualifying winning and losing hands and corresponding prize amount.
- Prize payout structure.
- All other restrictions as applicable.

Controlled Game

The Omaha Hi-Lo Split Bad Beat Jackpot Poker may be attached to all limits and versions of the currently approved games offered at the Oaks Card Club, as listed below:

- Omaha Hi-Lo Split (GEGA-001680)

All base game rules shall be played as previously approved by the Bureau.

Rules of Play

The Omaha Hi-Lo Split Bad Beat Jackpot Poker features a progressive jackpot prize element. A prize is awarded to players participating in a jackpot game when a designated qualifying hand is beaten by a better qualifying hand at the showdown. When the winning and losing hands are confirmed, those players with the qualifying hands shall receive the posted percentage of the jackpot prize. The posted percentage of the jackpot prize, known as the table share, shall be evenly distributed among all other players at the qualifying table who have participated in the designated games, as shown below. In all instances, patrons shall be provided with ample advance notice of the percentage division of the posted jackpot prize.

Qualifying Hands

Players that make the following advertised hands shall be eligible to win their share of the Omaha Hi-Lo Split Bad Beat Jackpot Poker prize amount, as shown below. Only winning and losing hands that have been Bureau approved and pre-determined and designated by the Oaks Card Club are eligible. Patrons shall be given ample notice of the hands that are being offered. Only one option, as listed below, shall be used at any one time. Furthermore, they shall be displayed prominently via printed flyers, digital display, or any other form of advertisements.

	Bad Beat Hand	Winning Hand	Prize Amount
Option 1	Four 6s or better	Higher ranking hand	\$3,000 - \$200,000
Option 2	Four 8s or better	Higher ranking hand	\$3,000 - \$200,000
Option 3	Four 10s or better	Higher ranking hand	\$3,000 - \$200,000

Omaha Hi-Lo Split Bad Beat Jackpot

Prize Payout Structure

Players that make the designated qualifying hands shall be eligible to win their share of each Omaha Hi-Lo Split Bad Beat Jackpot Poker prize amount, as shown below. Only one prize payout structure option shall be used at any one time for this jackpot. The prize payout structure shall be displayed prominently via printed flyers, digital display, and any other forms of advertisements.

Payout Structure	Bad Beat Hand	Winning Hand	Table Share
Option 1	50%	25%	25%
Option 2	40%	20%	40%
Option 3	60%	20%	20%

Prize

The Omaha Hi-Lo Split Bad Beat Jackpot prize amount shall be progressive ranging in value from \$3,000 to \$200,000. The jackpot shall be paid in the form of chips. The actual prize amount shall depend on the amount the jackpot was originally seeded at and how much time has accumulated in order for the jackpot to increase progressively each day. In all instances, the jackpot prize amount shall be conspicuously posted in the Oaks Card Club at all times.

Eligibility

This gaming activity shall 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.

- Omaha Hi-Lo Split Bad Beat Jackpot Poker games will offer payouts to winners whenever a qualifying event occurs. However, Bad Beat Jackpot Poker games that become "short-handed" will not be considered official games. For the purpose of Omaha Hi-Lo Split Bad Beat Jackpot Poker, short-handed games are any games that have fewer than four (4) players dealt into the play of the hand. Therefore, in a Omaha Hi-Lo Split Bad Beat Jackpot Poker game, whenever there are between 1-3 players dealt into the hand, the play for the Jackpot will be discontinued. When the game is no longer short-handed and 4 or more players are dealt into the hand, the Jackpot process will be restored. Players must be seated in order to qualify for the jackpot. Lobbying players do not qualify for the jackpot.
- Tournament games do not qualify for the jackpot.
- Card Club employees are eligible to participate and win the jackpot prize whether they are on or off-duty.
- When a qualifying hand is announced, a floor person shall verify that both hands qualify. Any deviation from a standard deck shall nullify the jackpot.
- In order to qualify for the jackpots, both the winning and losing hands must use two hole cards and three board cards.
- Players with qualifying winning and losing hands must both 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 identical qualifying losing or winning hands, the percentage of the prize designated for that share of the total jackpot prize amount would be equally distributed among those players.
- All procedures, times, qualifying hands, and prize amounts shall be displayed prominently via any form of advertising that the Oaks Card Club wishes to use, including but not limited to printed flyers, digital display, the Card Club's website, etc.

Omaha Hi-Lo Split Bad Beat Jackpot

Funding

The Omaha Hi-Lo Split Bad Beat Jackpot utilizes a progressive prize pool which shall be player funded via a \$1.00 jackpot collection fee. The jackpot collection fee shall be taken at the start of each hand played, as long as there is at least one bet and one call. The Oaks Card Club shall initially seed the Omaha Hi-Lo Split Bad Beat Jackpot with an amount of \$3,000. Once there are sufficient funds in the jackpot reserve, the initial amount that the Oaks Card Club used to seed the jackpot shall be repaid to the Card Club from the jackpot reserve. The jackpot collection fees shall then be used to fund the jackpot fund. Additionally, whenever the Card Club is required to seed the jackpot or cover the shortfall due to in-adequate funds in the reserve account, the Card Club shall be repaid from the jackpot reserve account once the reserve is sufficient and the funds become available. When a qualifying jackpot hand is made on the Omaha Hi-Lo Split Bad Beat Jackpot, if the Omaha Hi-Lo Split Bad Beat Jackpot prize pool was at the maximum prize amount and the money in the Omaha Hi-Lo Split Bad Beat Jackpot promotion account reserve was in excess of double the amount of the maximum prize amount, then the Omaha Hi-Lo Split Bad Beat Jackpot would be reseeded at 100% of the jackpot cap amount, which is a range to be set by the Oaks Card Club in the range of \$3,000-\$200,000. If the Omaha Hi-Lo Split Bad Beat Jackpot promotion account reserve was at less than double the amount of the maximum prize amount, then the Omaha Hi-Lo Bad Beat Split Jackpot would be reseeded at the minimum starting amount. The Omaha Hi-Lo Split Bad Beat Jackpot shall increase daily in an amount dependent upon what was collected that day; after the administrative fee is taken out, 80% of the amount collected daily shall be added to the jackpot prize amount, and 20% shall be added to the reserve account. The Omaha Hi-Lo Split Bad Beat Jackpot has a cap to be set by the Oaks Card Club in the range of \$3,000-\$200,000. If the jackpots reach their cap amounts, all other jackpot collection fees collected shall be placed in the jackpot reserve account. As the Oaks Card Club deems necessary, certain hours may be established where the posted Omaha Hi-Lo Split Bad Beat Jackpot Poker prize amount would be doubled. In the event that the Oaks initiates the use of doubling the jackpots, the dates, days and times for such awards would be clearly identified in all advertising and promotional material. In such an event the jackpot(s) shall not exceed the maximum prize amounts, as listed above. The jackpot drop chip will be deposited in the same box as the house drop, but will be of special design to differentiate it from the table collection fees. This will enable the Oaks Card Club to account for jackpot fees separately from house fees. In all instances, patrons shall be provided with ample advance notice of the prize amount.

Omaha Hi-Lo Split Bad Beat Jackpot

Administrative Fees

The Oaks Card Club shall retain an administrative fee of \$0.15 for each jackpot fee collected. This fee is established to cover the costs of materials, security and surveillance, verification and documentation, cage and count room services for jackpot collection and accounting, administration, advertising, and any and all other costs relative to the operation of player-funded jackpots.

No Purchase Necessary

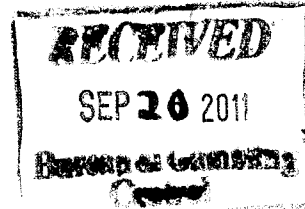
The Omaha Hi-Lo Split Bad Beat Jackpot Poker shall be offered for free, on a general and indiscriminant basis, with no restrictions, to patrons who wish to participate in a No Purchase Necessary (NPN) game. The Oaks Card Club shall provide No Purchase Necessary tables for patrons who request to participate in the jackpot without paying a table fee or placing a live wager. The NPN player must adhere to all rules as the live player. All advertisements must state "No Purchase Necessary" when referencing the Omaha Hi-Lo Split Bad Beat Jackpot Poker.

OAKS CARD CLUB

4097 SAN PABLO AVENUE
EMERYVILLE, CALIFORNIA 94608
TELEPHONE (510) 653-7093

September 13, 2011

TO: CALIFORNIA DEPARTMENT OF JUSTICE
BUREAU OF GAMBLING CONTROL
P.O. BOX 168024
SACRAMENTO, CA. 95816-8024



ATT'N: Amanda Shoppman

RE: POKER TOURNAMENTS AMENDMENT – OAKS CARD CLUB / GEGA-000428

In a submission dated September 13, 2007, the Oaks Card Club submitted an Application for Gaming Activity Review, for the play of Poker Tournaments. The application addressed all of the topics in Section II, Tournaments or Special Events, as specified in the Application. On October 26, 2007, the Bureau of Gambling Control approved for play our Poker Tournaments submission. Later, on February 11, 2008, we received a “corrected copy” of the approval which “superseded the previous approval for Poker Tournaments.” (Please see Attachment #1.)

On December 9, 2009, the Oaks Card Club submitted a request to modify certain parts of the previously approved Poker Tournaments submission. On December 15, 2009, the Bureau approved our requested modifications. (Please see Attachment #2.)

At this time the Oaks Card Club would like to submit the following three (3) modifications to our approved Poker Tournaments policies and procedures:

1. Amend the Prize Structure for Tournament Payouts.

As previously noted the Oaks establishes the number of persons paid and the percentages awarded to those people based on the amount of the total prize pool and the particular controlled game designated for tournament play. We have modified the previously approved **Tournament Percentage Payouts** to a small degree and also added a pay structure that pays 5 places when the prize pool is less than \$5,000. (Please see Attachment #3.)

2. Offer Tournament Re-entry to tournament participants.

Allow tournament participants the opportunity to participate in specifically designated tournament event more than one time. If a participant is eliminated during any of the initial rounds of tournament play before the first tournament break, they will be allowed to re-enter the tournament by paying the Buy-In and Entry Fees, as well as the Service Charge fee, if applicable. Any tournament allowing participants to re-enter would be designated as re-entry tournaments on any and all advertising promoting the event(s).

3. Provide additional Tournament chips to participants in exchange for the previously approved Service Charge fee.

Previously approved Service Charge fees can range from \$1.00 to \$100. All such fees will be divided among tournament dealers and Floor staff for the specific event. At this time the Oaks would like to make the Service Charge fee an optional fee available to players. A tournament participant can enter a tournament for the amount of the Buy-In+ Entry Fee. The participant can also pay the additional Service Charge fee and in return receive an additional sum of starting

Page 2
Poker Tournaments Amendment
September 13, 2011

chips for the tournament. For example, the starting number of chips for a particular tournament is 10,000. In exchange for the payment of the Service Charge fee, they will receive an additional 2,000 in tournament chips as an example.

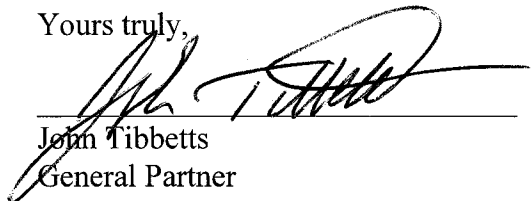
All other aspects of the Oaks Card Club Poker Tournaments policies and procedures **(GEGA-000428)** remain unchanged.

A check in the amount of Four Hundred and Fifty dollars and no cents (\$450.00) has been included to cover the cost of the Poker Tournaments amendment.

If the Bureau requires any additional information in order to process this request, please advise.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to read "John Tibbetts", is written over a horizontal line. The signature is fluid and cursive.

John Tibbetts
General Partner
Oaks Card Club

Attachments

Tournament Percentage Payouts

1-7 Players

Pay 1 Place

1. 100%

8-19 Players

Pay 2 Places

1. 60%

2. 40%

20-39 Players

Pay 5 Places

1. 40%

2. 25%

3. 17%

4. 11%

5. 7%

40-59 Players

Pay 7 Places

1. 34%

2. 21%

3. 15%

4. 12%

5. 9%

6. 6%

7. 3%

60-99 Players

Pay 10 Places

1. 33%

2. 19%

3. 12%

4. 8%

5. 7%

6. 6%

7. 5%

8. 4%

9.-10. 3%

100-125 Players

Pay 16 Places

1. 32%

2. 17%

3. 9.5%

4. 7.5%

5. 6%

6. 5%

7. 4%

8. 3%

9-10. 2.5%

11-12. 2.00%

13-16. 1.75%

126-200 Players

Pay 20 Places

1. 31%

2. 16%

3. 9%

4. 6.5%

5. 5%

6. 4%

7. 3.5%

8. 3%

9-10. 2.5%

11-12. 2.00%

13-16. 1.75%

17-20. 1.50%

201-Unlimited

Pay 27 Places

1. 27%

2. 14%

3. 7%

4. 6%

5. 5%

6-7. 4%

8-9. 3%

10-12. 2%

13-15. 1.8%

16-18. 1.6%

19-21. 1.4%

22.-24. 1.2%

25-27. 1%

Oaks Card Club Royal Flush Bonus Promotion

Advertisement Requirements

The Oaks Card Club may advertise various names for this gaming activity. Should the Casino advertise a different name, the BGC ID listed below shall be referenced on all advertisements relating to the Royal Flush Bonus Promotion.

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

- Qualifying games.
- Eligible dates and time periods.
- Qualifying hand.
- Prize Amount.
- Availability of No Purchase Necessary.
- Any other restrictions that apply.

Controlled Game

The Royal Flush Bonus Hand shall be attached to all limits and versions of the currently approved games offered at The Oaks Card Club, as shown below.

- Texas Hold'em (GEGA-001687)
- Omaha Hi-Lo Split (GEGA-001680)
- Seven Card Stud (GEGA-001661)

All controlled game rules will be played as previously approved by the Bureau.

Rules of Play

Players that receive the qualifying hand of a Royal Flush, during a pre-determined and posted time period, will win a pre-determined and posted prize ranging in value of \$10 to \$50,000.

Qualifying Hands

The qualifying hand will be a Royal Flush with both hole cards used in the five-card hand.

Qualifying Hand	Prize Range
Royal Flush using two hole cards	\$10 - \$50,000

Prize

When players make the qualifying hand of a Royal Flush the prize shall be a fixed amount ranging from \$10-\$50,000 in the form of cash, chips or prizes such as merchandise including: jewelry, electronics, clothing, vehicles, watercraft, gift certificates, sporting and concert tickets, food comps, entry into tournaments and travel. All prizes for this gaming activity shall be pre-determined and posted in advance, throughout the gaming floor and in all literature promoting such an event.

Oaks Card Club Royal Flush Bonus Promotion

Eligibility

The gaming activity shall be open to all players who are seated and playing at any poker table during the pre-determined and specified hours designated for this gaming activity.

- 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 are eligible to participate in this promotion.
- 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 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 Oaks Card Club wishes to use, including but not limited to posters, printed flyers, digital display and the Casino's website.

Funding

The Royal Flush Bonus Hand Promotion utilizes a fixed prize pool which will be funded by the Oaks Card Club. There will be no additional gaming activity fees, jackpot fees, or collection fees taken in order to fund this gaming activity or for players to participate. In all instances, patrons will be provided with ample advance notice of the prize amount.

Administrative Fees

The Oaks Card Club shall not retain any additional fees as this promotion is house-funded.

No Purchase Necessary

The Royal Flush Bonus Hand shall be offered for free, on a general and indiscriminate basis, with no restrictions, to patrons who wish to participate in a no purchase necessary (NPN) game. The Oaks Card Club will provide no purchase necessary tables for all patrons who request to participate in the gaming activity without paying a table fee or placing a live wager. The NPN table will be treated in the same manner as a "live" table. The NPN player shall adhere to the same rules as the live player. All advertisement material shall state "No Purchase Necessary" when referencing the Royal Flush Bonus Hand. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

Seven Card Stud Bad Beat Jackpot

Advertisement Requirements

The Oaks Card Club may advertise various names for this gaming activity. Should the Oaks Card Club advertise a different name, the BGC ID listed below shall be referenced on all advertisements relating to the Seven Card Stud Bad Beat Jackpot Poker.

Furthermore, all rules and procedures for this jackpot, including but not limited to the following, shall be displayed conspicuously and prominently in the Oaks Card Club at all times that the promotion is offered.

- Eligible games and time periods.
- Qualifying winning and losing hands and corresponding prize amount.
- Prize payout structure.
- All other restrictions as applicable.

Controlled Game

The Seven Card Stud Bad Beat Jackpot Poker may be attached to all limits of the currently approved game offered at the Oaks Card Club, as listed below.

- Seven Card Stud (GEGA-001661)

All base game rules shall be played as previously approved by the Bureau.

Rules of Play

The Seven Card Stud Bad Beat Jackpot Poker features a progressive jackpot prize element. A prize is awarded to players participating in a jackpot game when a designated qualifying hand is beaten by a better qualifying hand at the showdown. When the winning and losing hands are confirmed, those players with the qualifying hands shall receive the posted percentage of the jackpot prize. The posted percentage of the jackpot prize, known as the table share, shall be evenly distributed among all other players at the qualifying table who have participated in the designated games, as shown below. In all instances, patrons shall be provided with ample advance notice of the percentage division of the posted jackpot prize.

Qualifying Hands

Players that make the following advertised hands shall be eligible to win their share of the Seven Card Stud Bad Beat Jackpot Poker prize amount, as shown below. Only winning and losing hands that have been Bureau approved and pre-determined and designated by the Oaks Card Club are eligible. Patrons shall be given ample notice of the hands that are being offered. Only one option, as listed below, shall be used at any one time. Furthermore, they shall be displayed prominently via printed flyers, digital display, or any other form of advertisements.

	Bad Beat Hand	Winning Hand	Prize Amount
Option 1	Aces Full of Jacks or better	Higher ranking hand	\$3,000- \$200,000
Option 2	Four 2s or better	Higher ranking hand	\$3,000- \$200,000
Option 3	Four 6s or better	Higher ranking hand	\$3,000 - \$200,000

Seven Card Stud Bad Beat Jackpot

Prize Payout Structure

Players that make the designated qualifying hands shall be eligible to win their share of each Seven Card Stud Bad Beat Jackpot Poker prize amount, as shown below. Only one prize payout structure option shall be used at any one time for this jackpot. The prize payout structure shall be displayed prominently via printed flyers, digital display, and any other forms of advertisements.

Payout Structure	Bad Beat Hand	Winning Hand	Table Share
Option 1	50%	25%	25%
Option 2	40%	20%	40%
Option 3	60%	20%	20%

Prize

The Seven Card Stud Bad Beat Jackpot prize amount shall range in value from \$3000 to \$200,000. While The Oaks Card Club reserves the right to set the maximum amount of the jackpot within the range listed above, the maximum amount may not be changed by the Oaks Card Club until the jackpot has been hit. The jackpot shall be paid in the form of chips. The actual prize amount shall depend on the amount the jackpot was originally seeded at and how much time has accumulated in order for the jackpot to increase progressively each day. In all instances, the jackpot prize amount shall be conspicuously posted in the Oaks Card Club at all times.

Eligibility

This gaming activity shall 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.

- Seven Card Stud Bad Beat Jackpot Poker games will offer payouts to winners whenever a qualifying event occurs. However, Bad Beat Jackpot Poker games that become "short-handed" will not be considered official games, in terms of qualifying for this jackpot. For the purpose of Seven Card Stud Bad Beat Jackpot Poker, short-handed games are any games that have fewer than four (4) players dealt into the play of the hand. Therefore, in a Seven Card Stud Bad Beat Jackpot Poker game, whenever there are 3 or less players dealt into the hand, the play for the Jackpot will be discontinued. When the game is no longer short-handed and four or more players are dealt into the hand, the Jackpot process will be restored. Players must be seated in order to qualify for the jackpot. Lobbying players do not qualify for the jackpot.
- Tournament games do not qualify for the jackpot.
- Card Club employees are eligible to participate and win the jackpot prize whether they are on or off-duty.
- When a qualifying hand is announced, a floor person shall verify that both hands qualify. Any deviation from a standard deck shall nullify the jackpot.
- A qualifying hand can consist of any combination of hole cards and up cards in both the winning and losing hands.
- Players with qualifying winning and losing hands must both play through the final betting round in order to qualify for the jackpot.

Seven Card Stud Bad Beat Jackpot

- In the event that during a round of play, two or more players have identical qualifying losing or winning hands, the percentage of the prize designated for that share of the total jackpot prize amount would be equally distributed among those players.
- All procedures, times, qualifying hands, and prize amounts shall be displayed prominently via any form of advertising that the Oaks Card Club wishes to use, including but not limited to printed flyers, digital display, the Card Club's website, etc.

Funding

The Seven Card Stud Bad Beat Jackpot utilizes a progressive prize pool which shall be player funded via a \$1.00 jackpot collection fee. The jackpot collection fee shall be taken at the start of each hand played, as long as there is at least one bet and one call. The Oaks Card Club shall initially seed the Seven Card Stud Bad Beat Jackpot with an amount of \$3,000. Once there are sufficient funds in the jackpot reserve, the initial amount that the Oaks Card Club used to seed the jackpot shall be repaid to the Card Club from the jackpot reserve. The jackpot collection fees shall then be used to fund the jackpot fund. Additionally, whenever the Card Club is required to seed the jackpot or cover the shortfall due to in-adequate funds in the reserve account, the Card Club shall be repaid from the jackpot reserve account once the reserve is sufficient and the funds become available. When a qualifying jackpot hand is made on the Seven Card Stud Bad Beat Jackpot, if the Seven Card Stud Bad Beat Jackpot prize pool was at the maximum prize amount and the money in the Seven Card Stud Bad Beat Jackpot promotion account reserve was in excess of double the amount of the maximum prize amount, then the Seven Card Stud Bad Beat Jackpot would be reseeded at 100% of the jackpot cap amount, which is an amount to be set by the Oaks Card Club in the range of \$3000-\$200,000. If the Seven Card Stud Jackpot promotion account reserve was at less than double the amount of the maximum prize amount, then the Seven Card Stud Bad Beat Jackpot would be reseeded at the minimum starting amount. The Seven Card Stud Bad Beat Jackpot shall increase daily in an amount dependent upon what was collected that day; after the administrative fee is taken out, 80% of the amount collected daily shall be added to the jackpot prize amount, and 20% shall be added to the reserve account. The Seven Card Stud Bad Beat Jackpot has a cap of an amount to be set by the Oaks Card Club in the range of \$3000-\$200,000. If the jackpots reach their cap amounts, all other jackpot collection fees collected shall be placed in the jackpot reserve account. As the Oaks Card Club deems necessary, certain hours may be established where the posted Seven Card Stud Bad Beat Jackpot Poker prize amount would be doubled. In the event that the Oaks initiates the use of doubling the jackpots, the dates, days and times for such awards would be clearly identified in all advertising and promotional material. In such an event the jackpot(s) shall not exceed the maximum prize amounts, as listed above. The jackpot drop chip will be deposited in the same box as the house drop, but will be of special design to differentiate it from the table collection fees. This will enable the Oaks Card Club to account for jackpot fees separately from house fees. In all instances, patrons shall be provided with ample advance notice of the prize amount.

Seven Card Stud Bad Beat Jackpot

Administrative Fees

The Oaks Card Club shall retain an administrative fee of \$0.15 for each jackpot fee collected. This fee is established to cover the costs of materials, security and surveillance, verification and documentation, cage and count room services for jackpot collection and accounting, administration, advertising, and any and all other costs relative to the operation of player-funded jackpots.

No Purchase Necessary

The Seven Card Stud Bad Beat Jackpot Poker shall be offered for free, on a general and indiscriminant basis, with no restrictions, to patrons who wish to participate in a No Purchase Necessary (NPN) game. The Oaks Card Club shall provide No Purchase Necessary tables for patrons who request to participate in the jackpot without paying a table fee or placing a live wager. The NPN player must adhere to all rules as the live player. All advertisements must state "No Purchase Necessary" when referencing the Seven Card Stud Bad Beat Jackpot Poker.

Suited Sevens Promotion

Bureau Requirements

Advertising

The Oaks Card Club may advertise various names for this gaming activity. Should the Casino advertise a different name, the BGC ID (GEGA-004451) shall be referenced on all advertisements relating to this gaming activity.

Furthermore, all rules and procedures for the gaming activity, including but not limited to the following, shall be prominently displayed in the Oaks Card Club at all times the gaming activity is being offered for play:

- Eligible games and time periods.
- Qualifying hand.
- Prize amount/prize description.
- Availability of No Purchase Necessary.
- Any other restrictions that apply to this gaming activity.

Eligible Controlled Game

The Suited Sevens Promotion shall be attached to the following Bureau approved controlled game offered at the Oaks Card Club, as shown below, at all times that this gaming activity is being offered for play. All controlled game rules shall be played as previously approved by the Bureau.

- Pure 21.5 Blackjack (GEGA-001183)

Rules of Play

Any player who obtains three sevens of the same suit (hearts, spades, diamonds, clubs) on a given hand shall win the predetermined and posted prize. All three sevens must be on the same hand, and the first and second sevens must be dealt on the initial deal. Any player who obtains the qualifying hand shall have their hand verified by the Oaks Card Club floor person.

Qualifying Hands

Any player who obtains the qualifying hand listed below will be eligible to win the posted prize according to the chart listed below:

Qualifying Hand	Prize Amount
Suited Sevens	\$1-\$100,000

Eligibility Requirements

This gaming activity shall be open to all players who are playing at any of the above listed controlled games during the pre-determined specified hours designated and posted for the gaming activity.

- Any player who receives a qualifying hand will be eligible for the posted prize
- Players are eligible multiple times for this promotion within the pre-determined time period
- A minimum of two players (player and player-dealer) must be dealt into the game in order for the player(s) to be eligible for the prize
- Casino employees are eligible to participate in the promotion on or off duty, in or out of uniform.

Suited Sevens Promotion

- Third party providers of proposition player services are not eligible for this promotion.
- All qualifying hands must be verified by a floor person in order for the eligible player to claim their prize.
- In the event that more than one player is playing on the same seat, the prize will be equally split amongst the different players.
- Tournament games are not eligible for this promotion

Prize

The prize shall be an amount ranging in value from \$1 to \$100,000 in the form of cash, chips or prizes such as merchandise including jewelry, electronics, clothing, vehicles, watercraft, gift certificates, sporting and concert tickets, food comps, entry into tournaments, and travel.

Funding

The Suited Sevens Promotion is fully funded by the Oaks Card Club. At no time will any fees be collected from players for the purpose of funding this promotion. All fee collections and table limits are for the designated base game and are Bureau approved, pre-determined and posted at each table.

Administrative Fees

The Oaks Card Club shall not retain an administrative fee for this promotion, as it is house funded.

No Purchase Necessary

The Suited Sevens Promotion shall be offered to customers who wish to participate for free, on a general and indiscriminate basis, with **no restrictions**, in a No Purchase Necessary game. The Casino shall provide No Purchase Necessary tables for all patrons who request to participate in the gaming activity without paying a table fee or placing a live wager. All advertisement material shall state "No Purchase Necessary" when referencing the Suited Sevens Promotion. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

OAKS CARD CLUB

4097 SAN PABLO AVENUE
EMERYVILLE, CALIFORNIA 94608
TELEPHONE (510) 653-7093

September 19, 2008

TO: CALIFORNIA DEPARTMENT OF JUSTICE
BUREAU OF GAMBLING CONTROL
P.O. Box 168024
SACRAMENTO, CA. 95816-8024

ATT'N: Greg Crettol

RE: GAMING ACTIVITY AUTHORIZATION

In compliance with the Division of Gambling Control Regulations, Title 11, Division 3, Chapter 1, Article 7, Section 2071, Gaming Activity Authorization, the Oaks Card Club previously submitted a request for approval of a new promotion to be played in conjunction with our approved games. The promotion named Jackpot Poker was approved for play by the Division on June 7, 2007 in conjunction with the play of the previously approved games of Texas Hold'em, Seven Card Stud, and Omaha Hi-Lo Split.

The purpose of this request is to amend our current approved version of Jackpot Poker and implement for play a new version of Bad Beat Jackpot Poker upon approval by the Bureau.

Section III of the Application For Gaming Activity Review has been incorporated into this disclosure with answers to the individual questions and any other pertinent information that the Division might require for approval of this request.

Section III - JACKPOTS, CASHPOTS, BONUSES, PROMOTIONS, etc.

1. Name of Proposed Gaming Activity:

Answer: Bad Beat Jackpot Poker

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

Answer: All designated Texas Hold'em, Seven Card Stud, and Omaha Hi-Lo Split games.

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

Answer: Jackpots will be awarded in designated games when one player obtains a designated qualifying hand ("Qualifying Hand"), which is beaten by a second designated hand held by another player. When a Bad Beat Jackpot Poker hand is announced, the Floor Person will verify that both hands qualify for the Jackpot and the cards will be suited and ranked. Any deviation from a standard deck will nullify the Jackpot. Possible qualifying hands are as follows:

GAME

QUALIFYING HANDS

HOLD'EM SUPER BAD BEAT JACKPOT:	Any House designated Four of a Kind or better, beaten by a better hand.*
HOLD'EM BAD BEAT JACKPOT:	Any House designated Full House or better, beaten by a better hand.*
SEVEN CARD STUD BAD BEAT JACKPOT:	Any House designated Four of a Kind or better, beaten by a better hand.*
OMAHA HI-LO SPLIT BAD BEAT JACKPOT:	Any House designated Four of a Kind or better, beaten by a better hand.**

*In Hold'em, both hole cards must be used in both the winning and losing hand.

**In Omaha Hi-Lo Split, the Jackpot only applies to the high hand and two down cards must be used in both the winning and losing hand.

Jackpot amounts increase daily. Increases posted daily at 12 noon.

All information regarding qualifying hands will be clearly posted in advance at all times. All Oaks Card Club Bad Beat Jackpots will be paid with House funds distributed to designated Jackpot accounts per an approved funding process. The Bad Beat hand will always be the second best hand.

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

Option A:

Losing Hand (Bad Beat: 50%	Winning Hand: 25%	Table Share: 25%;
----------------------------	-------------------	-------------------

Option B:

Losing Hand (Bad Beat: 40%	Winning Hand: 30%	Table Share: 30%;
----------------------------	-------------------	-------------------

Option C:

Losing Hand (Bad Beat: 40%	Winning Hand: 20%	Table Share: 40%.
----------------------------	-------------------	-------------------

The amount of all Bad Beat Jackpots will be posted at 12 noon each day and in the event of any Jackpots being awarded, the amount paid to the winners will be determined by the designated game and the posted amounts for that time and date.

JACKPOT ELIGIBILITY

Qualifying Bad Beat Jackpot Poker hands will be paid off per established House policy with the following exceptions: Any participant under 21 years of age or any participant whose name appears on any Division sanctioned Self Exclusion or Self Restriction list will be deemed ineligible to receive any portion of any qualifying Jackpot. Additionally, the House reserves the right to deem any Jackpot participant ineligible to receive any portion of any qualifying Jackpot for any provable act of cheating, or in the event of any type of equipment malfunction that might cause a Jackpot event to be rendered null and void.

Any Jackpot awards not paid to participants will remain in the Jackpot account.

4. If a cash prize is involved, is the amount of the prize progressive (increases) or a fixed amount?

Answer: Bad Beat Jackpot Poker prize amounts are fixed. The range of the fixed prize amount is between \$25-\$200,000.

5. Explain if the gaming activity is house funded or player funded.

Answer: House funded.

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

Answer: There will be no Jackpot fee collection process. The House will provide the funding for any type of Jackpot award activity.

7. Describe how the jackpot will be seeded and how any prizes will be awarded.

Answer: Jackpots will be seeded by the House at the minimum up to the maximum levels for each game:

	<u>Minimum</u>	<u>Maximum</u>
HOLD'EM SUPER BAD BEAT JACKPOT:	\$25-\$50,000.	\$50,000.-\$200,000.
HOLD'EM BAD BEAT JACKPOT:	\$25.-\$5,000.	\$10,000.-\$50,000.
SEVEN CARD STUD BAD BEAT JACKPOT:	\$25.-\$5,000.	\$10,000.-\$50,000.
OMAHA HI-LO SPLIT BAD BEAT JACKPOT:	\$25.-\$5,000.	\$10,000.-\$50,000.

Double Jackpots: As the House deems necessary, certain hours may be established whereas the posted Bad Beat Jackpot award would be doubled. In the event that the Oaks initiates the use of Double Bad Beat Jackpots, the dates, days and times for such awards would be clearly identified in all advertising and promotional materials.

The House will add a set amount of funds to each Jackpot account on a daily basis. The funds that will be added to each Bad Beat Poker Jackpot account are as follows:

HOLD'EM SUPER BAD BEAT JACKPOT:	\$25-\$5,000.
HOLD'EM BAD BEAT JACKPOT:	\$25-\$5,000.
SEVEN CARD STUD BAD BEAT JACKPOT:	\$25-\$1,000.
OMAHA HI-LO SPLIT BAD BEAT JACKPOT:	\$25-\$1,000.

When a Bad Beat Jackpot has been hit at a particular table, the Shift Manager or his designee will go to the table and validate the Jackpot. The Shift Manager will retrieve the Jackpot award from the specific Jackpot account and award the prize money to the participants based on the payouts previously referenced.

Jackpots for designated games will be maintained with minimum amounts established for each designated game type. If a Jackpot is hit in Seven Card Stud, whatever money is present in the Seven Card Stud Bad Beat Jackpot House account, up to the maximum stated award, will be awarded to the Jackpot winners. Immediately thereafter, the Jackpot would return to its minimum established prize amount. In the event that the daily seeding did not reach the required

minimum, the Jackpot would remain at the minimum amount until the seed money surpassed the minimum established prize. If a Bad Beat Jackpot has not been hit for an extended period of time, the daily House contribution may exceed the maximum Jackpot award. In such circumstances, the additional revenue will serve as a reserve for the designated Bad Beat Jackpot.

When the designated prize is won, the money being held in the account over and above the maximum prize will serve the purpose of re-seeding the specific account. In the event there was not enough money in the primary account to meet the minimum established prize amount, the House would deposit the necessary funds into the specific Jackpot pool and the account would pay back the funds when the funds on deposit for the specific pool were sufficient enough to satisfy the minimum established prize amount.

Any Bad Beat Jackpot Poker participant who wins \$600 or more in any Jackpot Poker promotion must provide valid government issued identification and complete a Jackpot Poker Winner's form. No prize will be awarded until the documentation is complete and the required information disclosed. Any and all Jackpot winnings are non-transferable.

Any changes to qualifying hands and/or current Bad Beat Jackpot Poker prizes will be clearly posted for customers at all times.

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

Answer: Please see #3 above.

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

Answer: Please see #7 above.

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.

Answer: Bad Beat Jackpot Poker games will offer payouts to winners whenever a qualifying event occurs. However, Bad Beat Jackpot Poker games that become short-handed will not be considered official games. Short-handed games are any games that have an occupancy rate of 50% or less. Therefore, in a 10 handed Bad Beat Jackpot Poker Hold'em or Omaha Hi-Lo Split game, whenever there are 5 or less players, the play for the Jackpot would be discontinued. When the game was no longer short-handed and the occupancy rate was greater than 50%, by having 6 or more players, the Jackpot process would be restored. In an 8 handed Bad Beat Jackpot Poker Seven Card Stud game, 4 or less players would be considered a short-handed game.

It should be noted that even though a Bad Beat Jackpot Poker Hold'em game may be 7 handed, if 3 players are lobbying and are not dealt into the hand, there can be no play for the Jackpot, until at least 6 or more players are dealt into the hand. All Bad Beat Jackpot Poker games must have an occupancy rate greater than 50% in order to qualify for a Bad Beat Jackpot Poker prize.

11. Explain if the house is retaining any administrative or any other type of fee for operating the gaming activity.

Answer: No administrative fee will be retained by the House.

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

Answer: 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 a NPN game to qualify for the Bad Beat Jackpot Poker prize.

We believe this game is permissible by law because the play of the game is in no way tied to the collection of a fee or any other means of consideration in order to have an opportunity to win any of the Jackpot(s). Additionally this play will be offered to all comers on a general and indiscriminate basis, with the same terms and conditions, and does not require a participant to pay for a chance to win.

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

Answer: N/A

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

Answer: N/A

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

Answer: No special table or equipment is used for the promotion. The regular Texas Hold'em, Omaha Hi-Lo Split and Seven Card Stud tables and equipment are utilized. Most of the poker tables have a card shuffling device built into the table.

GAMING ACTIVITY COMPLIANCE WITH APPLICABLE LAWS

Any and all games played at the Oaks Card Club are specifically listed as legal games in the City of Emeryville Ordinance and are not in conflict with State law in any manner. Additionally, any and all games played on the premises have been previously submitted and approved by the Bureau.

The Oaks Card Club believes that no legal grounds exist to deny the play of the Bad Beat Jackpot Poker promotion as it does not violate any existing laws as previously elaborated in this disclosure. Additionally, the play of Bad Beat Jackpot Poker will be offered to all comers on a general and indiscriminate basis, with the same terms and conditions, and does not require a participant to pay for a chance to win.

Management reserves the right to cancel or modify this promotion at any time as long as any modification is in compliance with all applicable laws and regulations.