

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino
Name of Gaming Activity: Baccarat Mini Bad Beat Jackpot

1. Name of Proposed Gaming Activity:
 - Baccarat Mini Bad Beat Jackpot
2. Name each controlled game that is associated with this gaming activity.
 - All Baccarat approved games
3. Describe any jackpot or any other type of prize awarded.
 - Players that make the qualifying hands that are advertised, pre-determined and designated will be qualified to win the jackpot amount ranging from \$10 to \$50,000. Baccarat Mini Bad Beat jackpot will initially be seeded at \$1,000.
 - Qualifying hands:
 - Losing Hand: First two cards are both the same (Jacks, Queens, or Kings) face cards (value of 0) of the same suit and the draw card has a value of 8 of the same suit (as the two original cards).
 - Winning Hands: First two cards are both the same (Jacks, Queens, and Kings) face cards (value of 0) of the same suit and the draw card has a value of 9 of the same suit (as the two original cards).
4. If a cash prize is involved, is the amount of the prize progressive (increases) or a fixed amount?
 - The Baccarat Mini Bad Beat jackpot utilizes a progressive prize pool which will be player funded. Jackpots may be paid in the form of cash, casino chips, merchandise, trips, poker tournaments entries, electronics, or other prizes. The actual prize amount will depend on the amount the jackpot was originally seeded at and how much time was accumulated in order for the jackpot to increase progressively each day. In all instances, the jackpot prize amount shall be conspicuously posted in the casino at all times.
5. Explain if the gaming activity is house funded or player funded.
 - Player funded.
6. Describe any special fee collection involved in this gaming activity, for example, a jackpot fee collection.
 - The house will collect up to \$20.00 per table hour per table from all approved Baccarat games as an administrative fee.
 - A \$1 Jackpot fee will be collected from Player-Dealer position.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino
Name of Gaming Activity: Baccarat Mini Bad Beat Jackpot

7. Describe how the jackpots will be seeded and how any prizes will be awarded.
- The Baccarat Mini Bad Beat jackpot will initially seed at a minimum of 1,000 with a cap at \$50,000.
 - The Baccarat Mini Bad Beat jackpot will be awarded as follows:
 - 40% - Bad Beat Hand
 - 20% - Winning Hand
 - 40% - Room Share
8. Explain any prize distribution including prizes given to the winner, loser, or any other player or patron.

- The jackpot will be awarded as follows:
 - 40% - Bad Beat Hand
 - 20% - Winning Hand
 - 40% - Room Share

All players who placed wager and did not win on the base game on the table of the pre-determined and posted jackpot hand will evenly split the losing portion of the jackpot (40%).

All players who placed wager on the base game and won on the Pre-Determined and posted jackpot hand will evenly split the winning portion of the jackpot (20%).

All players on other live or instructional tables who placed a wager on the base game on the current or previous hand when the jackpot was hit will evenly split the Room Share Portion of the Jackpot (40%)

9. Explain any re-seeding of the fund once the prize is won.
- The jackpots will re-seed in an amount ranging from \$10 to \$50,000.
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.
- In order for the table to qualify for the jackpot, there must be a minimum of three (3) players or more.
 - Casino employees are eligible to participate in this jackpot.
 - Backline bettors that wagered on a winning or losing hand will receive an equal portion of the posted prize percentage for the hand.
 - Third party players are eligible to participate in the jackpot.
11. Explain if the house is retaining any administrative or any other type of fee for operating the gaming activity.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino
Name of Gaming Activity: Baccarat Mini Bad Beat Jackpot

- The house will collect up to \$20.00 per table hour per table from all approved Baccarat games as an administrative fee.
 - A \$1 Jackpot fee will be collected from Player-Dealer position.
12. Describe any opportunity(s) for a person to play for the prize without placing any live wagers or paying any table fees.
- The Baccarat Mini Bad Beat Jackpot 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 Casino will provide no purchase necessary tables for all 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 state "No Purchase Necessary" when referencing the Baccarat Mini Bad Beat Jackpot.
13. Provide copies of any published/proposed promotion or advertisement literature.
- Advertisements will be created upon approval of this jackpot.
14. Identify any entity or person other than those licensed as the house involved in the gaming activity.
- Not applicable
15. Describe the type of table and equipment utilized for the gaming activity.
- All state approved standardized tables and equipment will be utilized.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus
Name of Gaming Activity: Baccarat Super Bad Beat Jackpot

1. Name of Proposed Gaming Activity:
 - Baccarat Super Bad Beat Jackpot
2. Name each controlled game that is associated with this gaming activity.
 - All Baccarat approved games
3. Describe any jackpot or any other type of prize awarded.
 - Players that make the qualifying hands that are advertised, pre-determined and designated will be qualified to win the jackpot amount ranging from \$10 to \$150,000. Baccarat Super Bad Beat jackpot will initially be seeded at \$5,000.
 - Qualifying hands:
 - Losing Hand: First two cards are the same face cards (value of 0) of the same suit and the draw card has a value of 8 of the same suit (as the two original cards). The first two face cards and suits have to match the winning hand.
 - Winning Hands: First two cards are the same face cards (value of 0) of the same suit and the draw card has a value of 9 of the same suit (as the two original cards). The first two face cards and suits have to match the losing hand.
4. If a cash prize is involved, is the amount of the prize progressive (increases) or a fixed amount?
 - The Baccarat Super Bad Beat jackpot utilizes a progressive prize pool which will be player funded. Jackpots may be paid in the form of cash, casino chips, merchandise, trips, poker tournaments entries, electronics, or other prizes. The actual prize amount will depend on the amount the jackpot was originally seeded at and how much time was accumulated in order for the jackpot to increase progressively each day. In all instances, the jackpot prize amount shall be conspicuously posted in the casino at all times.
5. Explain if the gaming activity is house funded or player funded.
 - Player funded.

IMAGED
OCT 03 2012

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus
Name of Gaming Activity: Baccarat Super Bad Beat Jackpot

6. Describe any special fee collection involved in this gaming activity, for example, a jackpot fee collection.
- The house will collect \$20.00 per table hour per table from all approved Baccarat games as an administrative fee.
 - A \$1 Jackpot fee will be collected from Player-Dealer position.
7. Describe how the jackpots will be seeded and how any prizes will be awarded.
- The Baccarat Super Bad Beat jackpot will initially seed at a minimum of \$5,000 with the cap at \$150,000.
 - Lotus Casino will be refunded the original seed amount once the reserve is sufficient and the funds become available.
 - The Baccarat Super Bad Beat jackpot will be awarded as follows:
 - 40% - Bad Beat Hand
 - 20% - Winning Hand
 - 40% - Room Share
8. Explain any prize distribution including prizes given to the winner, loser, or any other player or patron.
- The jackpot will be awarded as follows:
 - 40% - Bad Beat Hand
 - 20% - Winning Hand
 - 40% - Room Share

All players who placed wager and did not win on the base game on the table of the pre-determined and posted jackpot hand will evenly split the losing portion of the jackpot (40%).

All players who placed wager on the base game and won on the Pre-Determined and posted jackpot hand will evenly split the winning portion of the jackpot (20%).

All players on other live or instructional tables who placed a wager on the base game on the current or previous hand when the jackpot was hit will evenly split the Room Share Portion of the Jackpot (40%)

9. Explain any re-seeding of the fund once the prize is won.
- The jackpots will re-seed in an amount ranging from \$10 to \$50,000.
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.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus
Name of Gaming Activity: Baccarat Super Bad Beat Jackpot

- In order for the table to qualify for the jackpot, there must be a minimum of three (3) players or more.
 - Casino employees are eligible to participate in this jackpot.
 - Backline bettors that wagered on a winning or losing hand will receive an equal portion of the posted prize percentage for the hand.
 - Third Party Players are eligible to participate in the jackpot.
11. Explain if the house is retaining any administrative or any other type of fee for operating the gaming activity.
- The house will collect up to \$20.00 per table hour per table from all approved Baccarat games as an administrative fee.
 - A \$1 Jackpot fee will be collected from Player-Dealer position.
12. Describe any opportunity(s) for a person to play for the prize without placing any live wagers or paying any table fees.
- The Baccarat Super Bad Beat Jackpot 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 Casino will provide no purchase necessary tables for all 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 state "No Purchase Necessary" when referencing the Baccarat Super Bad Beat Jackpot.
13. Provide copies of any published/proposed promotion or advertisement literature.
- Advertisements will be created upon approval of this jackpot.
14. Identify any entity or person other than those licensed as the house involved in the gaming activity.
- Not applicable
15. Describe the type of table and equipment utilized for the gaming activity.
- All state approved standardized tables and equipment will be utilized.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino
Name of Gaming Activity: Blackjack Jackpot

1. Name of Proposed Gaming Activity:
 - Blackjack Jackpot
2. Name each controlled game that is associated with this gaming activity.
 - All Blackjack approved games
3. Describe any jackpot or any other type of prize awarded.
 - Players that make the qualifying hands that are advertised, pre-determined and designated will be qualified to win the jackpot amount ranging from \$10 to \$100,000. Blackjack Jackpot will initially be seeded at \$5,000.
 - Qualifying Hands Option 1:
 - Losing Hand has three (3) Eights of Spades for a total of 24. The losing hand must be the player's hand.
 - Winning Hand has three (3) Seven of Hearts for a total of 21. The winning hand must be the banker's hand.
4. If a cash prize is involved, is the amount of the prize progressive (increases) or a fixed amount?
 - The Blackjack Jackpot utilizes a progressive prize pool which will be player funded. Jackpots may be paid in the form of cash, casino chips, merchandise, trips, poker tournaments entries, electronics, or other prizes. The actual prize amount will depend on the amount the jackpot was originally seeded at and how much time was accumulated in order for the jackpot to increase progressively each day. In all instances, the jackpot prize amount shall be conspicuously posted in the casino at all times.
5. Explain if the gaming activity is house funded or player funded.
 - Player funded.
6. Describe any special fee collection involved in this gaming activity, for example, a jackpot fee collection.
 - The house will collect up to \$20.00 per table hour per table from all approved Blackjack games as an administrative fee.
 - A \$1 Jackpot fee will be collected from Player-Dealer position.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino
Name of Gaming Activity: Blackjack Jackpot

7. Describe how the jackpots will be seeded and how any prizes will be awarded.
- The Blackjack Jackpot will initially seed at a minimum of 1,000 with the cap at \$100,000.
 - The Baccarat Mini Bad Beat jackpot will be awarded as follows:
 - 40% - Losing Hand
 - 20% - Winning Hand
 - 40% - Room Share
8. Explain any prize distribution including prizes given to the winner, loser, or any other player or patron.
- The jackpot will be awarded as follows:
 - 40% - Losing Hand
 - 20% - Winning Hand
 - 40% - Room Share
9. Explain any re-seeding of the fund once the prize is won.
- The jackpots will re-seed in an amount ranging from \$10 to \$50,000.
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.
- In order for the table to qualify for the jackpot, there must be a minimum of three (3) players or more.
11. Explain if the house is retaining any administrative or any other type of fee for operating the gaming activity.
- The house will collect up to \$20.00 per table hour per table from all approved Blackjack games as an administrative fee.
 - A \$1 Jackpot fee will be collected from Player-Dealer position.
12. Describe any opportunity(s) for a person to play for the prize without placing any live wagers or paying any table fees.
- The Blackjack Jackpot 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 Casino will provide no purchase necessary tables for all 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 state "No Purchase Necessary" when referencing the Blackjack Jackpot.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino
Name of Gaming Activity: Blackjack Jackpot

13. Provide copies of any published/proposed promotion or advertisement literature.
 - Advertisements will be created upon approval of this jackpot.
14. Identify any entity or person other than those licensed as the house involved in the gaming activity.
 - Not applicable
15. Describe the type of table and equipment utilized for the gaming activity.
 - All state approved standardized tables and equipment will be utilized.

Bonus Chip Promotion

APPROVED

Bureau Requirements

Advertising

The Lotus Casino may advertise various names for this gaming activity. Should the Lotus Casino advertise a different name, the BGC ID (GEGA-004345) shall be referenced on all advertisements relating to the Bonus Chip Promotion.



JAN 29 2015

Bureau of Gambling
Control

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

- Eligible games and time periods.
- Bonus chip values.
- Procedures to redeem Bonus chips.
- Any other applicable restrictions and/or information.

Controlled Games

The Bonus Chip Promotion shall be attached to the following Bureau approved controlled games offered at the Lotus Casino, 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.

- EZ Baccarat Panda 8 (GEGA-002784)
- Pai Gow Poker (GEGA-002775)
- Three Card Poker (GEGA-002773)
- Blackjack X (GEGA-003056)
- Commission Free Baccarat (GEGA-003359)
- Pai Gow Poker with Triple Bonus Bets (GEGA-004031)
- Pai Gow Tiles (GEGA-002777)
- Texas Holdem (GEGA-002772)

Rules of Play

The Bonus Chip Promotion will be open to all patrons who buy-in to a pre-determined game for a pre-determined amount ranging from \$10 to \$100,000. Participants will receive a specific amount of Bonus Chips in any controlled game listed above.

Purchasing Bonus Chips

Players may purchase bonus chips at the cage at pre-determined and posted times. When patrons buy-in to a pre-determined game for a pre-determined and posted amount ranging from \$10 to \$100,000, they will receive an amount ranging from \$1 to \$10,000 in bonus chips for buying into a predetermined game.

Bonus Chips:

The prize shall be awarded to a player when he/she redeems one of the aforementioned advertisements. The player will receive the advertised amount of bonus chips. The bonus chips are of a different style and design from the standard casino chip. The bonus chips can not be exchanged for cash and must be played on the gaming table. Once the bonus chip has been placed as a wager the following applies:

- If the wager wins, the player will receive live chips for his/her bet from the player-dealer. The player retains the bonus chip and can reuse the bonus chips on another wager.

Bonus Chip Promotion

APPROVED

- If the player pushes, the bonus chips will remain with the player until the hand loses.
- If the bet loses, the bonus chips are given to the player-dealer. The losing bonus chips are verified by the casino's Floor Service Representative and redeemed at the cage by the casino cage staff members for the player-dealer. The casino's Floor Service Representative will exchange the Bonus Chips with live casino chips for the player-dealer.
- Players may wager the Bonus Chips on Bonus Bets.
- Bonus chips shall not be used to pay collections.

Eligibility

The Bonus Chip Promotion will be open to players who buy into a pre-determined game and who will receive a specific amount of Bonus Chips.

- The required buy in will range from \$10 to \$100,000.
- Players shall not exchange Bonus Chips for live chips.
- The Bonus Chips are non-transferable between players.
- The Players can take home the Bonus Chips and use them at a later date.
- The Bonus chips do not expire.
- The Bonus Chips have no cash value and can not be redeemed for cash at anytime.
- There is no minimum or maximum number of players required to play in order to be eligible for the promotion.
- The bonus chips shall only be redeemed by the player-dealer after having been played and verified by the Casino's Floor Service Representative.
- Casino Employees off duty and out of uniform are eligible for the promotion.
- Third Party Provider or Proposition Player Services, TPPPPS, are not eligible to participate in the promotion.
- Tournaments games are not eligible to participate in the promotion.

Prize

The prize will be a fixed amount ranging from \$10 to \$100,000 in the form of bonus chips

Funding

The Bonus Chip Promotion will be fully funded by Lotus Casino. There will be no additional fees or collections taken for this gaming activity. The funding of the promotion will come directly from the initial buy-in.

Administrative Fee

There will be no administrative fee(s) collected by the Lotus Casino for this promotion.

No Purchase Necessary

The Bonus Chip Promotion does not contain the element of chance. Therefore, it does not constitute an illegal lottery and does not require No Purchase Necessary tables to be offered while conducting this gaming activity.

California Games Jackpot

APPROVED

Bureau Requirements

Advertising

The Lotus Casino may advertise various names for this gaming activity. Should Lotus Casino advertise a different name, the BGC ID (GEGA-004361) shall be referenced on all advertisements relating to the CA Games Jackpot.



FEB 12 2015

Bureau of Gambling
Control

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

- Eligible games and time periods.
- Qualifying hands and corresponding prizes.
- Jackpot fee required.
- The prize amount that shall be awarded and how it shall be distributed between all eligible players.
- Any No Purchase Necessary opportunity.
- Any other restrictions that apply to this gaming activity.

Eligible Controlled Games

The California Games Jackpot gaming activity shall be attached to the following Bureau approved controlled games offered at the Lotus Casino, 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.

- EZ Baccarat Panda 8 (GEGA-002784)
- Blackjack X (GEGA-003056)
- Pai Gow Poker with Triple Bonus Bets (GEGA-004031)
- Pai Gow Poker (GEGA-002775)

Rules of Play

The California Games Jackpot gaming activity features a fixed and progressive jackpot prize. A prize is awarded to players, who have paid the \$1 jackpot fee, in any designated California game, when the player-dealer has been dealt a qualifying hand. After the hand is confirmed, those players who paid the jackpot fee shall receive the posted prize from the progressive jackpot.

Qualifying Hands and Prize Payout

When the player-dealer makes one of the following advertised qualifying hands during the play of an eligible California game, all players who paid the jackpot fee shall be eligible to win their share of the posted California Games Jackpot progressive prize amount, as shown below. The payout shall be split evenly for the posted progressive amount among the players who placed a jackpot bet and the posted fixed amount will be given to each player who placed a jackpot bet. Only the following hands that have been Bureau approved, pre-determined, and designated by the Casino are eligible.

Example: Prior to the play of the hand, five players placed a jackpot wager. The jackpot hand was made by the player-dealer and the posted prize is \$42,000. Each of the five players would then receive \$8,400.

California Games Jackpot

APPROVED

Game	Player-Dealer Hand	Payout
EZ Baccarat Blackjack X Pai Gow Poker	Dragon – All Cards Diamond 8-8-8 – All Cards Diamond Seven Card Diamond Flush (Without Joker)	100% of Jackpot
Blackjack X	8-8-8	\$500
EZ Baccarat	Dragon – All Cards Red	\$1,000
Blackjack X	8-8-8 – All Cards Red	\$5,000
Pai Gow Poker	Seven Card Diamond Flush (With Joker)	\$5,000

FEB 12 2015
Bureau of Gambling Control

Eligibility

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

- When a qualifying hand is announced, a floor person shall verify that the hand qualifies. Any deviation from a standard deck will nullify the jackpot.
- There is no minimum or maximum number of players required to be dealt in during an eligible game in order for players to be eligible and the tables to qualify for the CA Games Jackpots prize amount.
- Players are eligible to win this promotion more than once.
- Only off duty Casino employees shall be eligible to participate in the CA Games Jackpots promotion.
- Third Party Provider of Proposition Player Services, on and off duty, shall not be eligible to participate in the CA Games Jackpots promotion.
- Tournament Games are not eligible to participate in the promotion.

Prize

The jackpot prize is fixed and progressive with a minimum value of \$500 and a maximum of \$500,000. The jackpot prize shall be paid in the form of cash, casino chips, merchandise, trips, poker tournament entries, electronics, or other prizes. The actual progressive jackpot prize amount shall depend on the amount the jackpot was originally seeded at, as well as how much time was accumulated in order for the jackpot to increase progressively each day.

Funding

The CA Games Jackpots gaming activity utilizes one Jackpot account which shall be funded by a \$1 jackpot collection which shall be dropped in a separate drop box marked as "Jackpot." The prize pool shall be initially seeded at a minimum of \$10,000 from the following dormant jackpot accounts: Super Bad Beat Jackpot (GEGA-002794), Baccarat Super Bad Beat Jackpot (GEGA-003461), and Baccarat Mini Bad Beat Jackpot (GEGA-003460). Once the dormant accounts have run out, the jackpot will be funded by the \$1 jackpot collection. The jackpot has a \$500,000 cap. If the jackpot reaches the cap amount, all other jackpot collection fees collected shall be placed in the jackpot reserve account. The fixed prize will be taken from the reserve account. The prize pool will be increased daily at predetermined and designated times with an amount ranging from \$50 to \$10,000 based on the amount collected. When a qualifying jackpot hand is made, it will be re-seeded by Lotus Casino from one of the dormant accounts listed above, with an amount ranging from \$10,000 to \$50,000. Once the dormant accounts have been used up, it will then be re-seeded by the reserve account in an amount ranging from \$10,000 to \$50,000. The Lotus Casino shall cover any shortfall and shall be refunded by the reserve.

California Games Jackpot

APPROVED

Administrative Fees

The Lotus Casino shall retain an administrative fee of \$6-\$10 per table per hour from all approved California games. This fee will be used to cover advertising for the jackpot prize, security to pull and count the boxes, accounting, equipment, surveillance, and the cost of the gambling establishment personnel that administer the jackpot.

FEB 12 2015
Bureau of Gambling
Control

No Purchase Necessary

The CA Games Jackpots Promotion gaming activity 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 Lotus 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. Within a reasonable amount of time of a No Purchase Necessary player requesting to play one of the specific games within the gaming activity, a No Purchase Necessary table will be made available. The casino dealer will deal a hand to the No Purchase Necessary player and to all other seated positions, including what would be the player-dealer position. The casino dealer will play/monitor all of the hands dealt except for the No Purchase Necessary player's. If the No Purchase Necessary player makes one of the qualifying hand(s), listed above, they will be awarded that associated prize or their portion thereof. There shall be no time restriction placed on the No Purchase Necessary player regarding the number of hands dealt. There shall be no live wagering or cash/casino chips used at this table. All advertisement material shall state "No Purchase Necessary" when referencing the California Games Jackpots gaming activity. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

Cash and Prize Drawings

Bureau Requirements

Advertising

The Parkwest Casino Lotus may advertise various names for this gaming activity. Should the Casino advertise a different name, the BGC ID (GEGA-002791) 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 Parkwest Casino Lotus at all times the gaming activity is being offered for play:

- Eligible games.
- Qualifying hands corresponding with qualifying games required to earn a ticket.
- Qualifying times and games required to earn a ticket.
- Prizes:
 - Bonus Chips (GEGA-004345)
 - Match Play Coupons/Chips (GEGA-003022)
 - Free Play Chips (GEGA-003022)
- Drawing dates and time periods.
- Any other restrictions that apply to this gaming activity.

Eligible Controlled Games

The Cash and Prize Drawings Promotion shall be attached to the following Bureau approved controlled games offered at Parkwest Casino Lotus, as shown below, at all times this gaming activity is being offered for play. All controlled game rules shall be played as previously approved by the Bureau.

- Blackjack X (GEGA-003056)
- Commission Free Baccarat (GEGA-003032)
- EZ Baccarat Panda 8 (GEGA-002748)
- Fortune Pai Gow Poker (GEGA-002775)
- Mini Pai Gow (GEGA-003657)
- Pai Gow Poker with Triple Bonus Bets (GEGA-004031)
- Royal Pai Gow Poker (GEGA-003804)
- Ultimate Pai Gow Poker (GEGA-004016)
- Mah Jong Pai Gow (GEGA-003094)
- Pai Gow Tiles (GEGA-002777)
- Three Card Poker (GEGA-002773)

Object and Summary

The Cash and Prize Drawings Promotion features a promotional element attached to the Bureau approved California games as listed above, offered at Parkwest Casino Lotus. The promotion will reward players with a ticket(s) based on the pre-determined and designated qualifying hand at designated table games during pre-determined and eligible periods.

Players may also earn a ticket(s) by playing certain table games based on pre-determined and designated time periods; 1–20 tickets can be earned per hour of play. A player's time will be tracked through the Player Loyalty Rewards Program (GEGA-002789) or manually on a log controlled by a Casino employee.

Cash and Prize Drawings

The Casino may offer bonus tickets, 1 to 20, during off-peak hours or in specific games; this applies to both qualifying hands and based on time played. Patrons will be given ample notice for the amount of time and how many tickets will be awarded. A patron can earn tickets by achieving a below listed qualifying hand and on time played.

The drawing ticket is a standard raffle ticket divided into two sections, one section for the player and one section for the Casino. The player must retain their portion of the ticket to claim the prize. Furthermore, the player fills out the Casino section of the ticket with their first and last name, game, table number and date, gives the Casino portion of the ticket to a Casino employee to deposit in the secure container. The ticket will then be used for drawings for the Cash and Prize Drawings Promotion.

The section with the player information will be retained by the Casino and deposited in a secure container. The container will be maintained on the Casino floor and monitored by the surveillance system and Casino personnel. The tickets will be mixed up using a clear rotating plastic bin. The winning ticket will be drawn by a casino floor person. The tickets are only valid for the current promotional period and expire at the end of the promotional period. The plastic bin will be emptied and the remaining tickets destroyed at the end of the promotional period.

Qualifying Hands

A player who achieves one of the qualifying hands listed below shall earn one ticket to be entered into a Cash and Prize Drawing for a predetermined and posted prize. All qualifying hands within a chart must be offered concurrently. Parkwest Casino Lotus may only offer one qualifying hand option during a promotional period.

Option 1

Game Played	Qualifying Hand	Amount of Ticket(s)
Blackjack X	Ace King Suited Natural	1-20
Commission Free Baccarat EZ Baccarat Panda 8	Three Card Seven Winning Banker Hand	1-20
	Three Card Eight Winning Player Hand	1-20
Fortune Pai Gow Poker Mini Pai Gow Poker Pai Gow Poker with Triple Bonus Bets Royal Pai Gow Poker Ultimate Pai Gow Poker	Five Card Flush or Better	1-20
Mah Jong Pai Gow Pai Gow Tiles	Nine Gong or Better	1-20
Three Card Poker	Straight or Better	1-20

Option 2

Game Played	Qualifying Hand	Amount of Ticket(s)
Blackjack X	Five or More Cards Totaling 21	1-20
Commission Free Baccarat EZ Baccarat Panda 8	Three Card Seven Winning Banker Hand	1-20

Cash and Prize Drawings

Fortune Pai Gow Poker Mini Pai Gow Poker Pai Gow Poker with Triple Bonus Bets Royal Pai Gow Poker Ultimate Pai Gow Poker	Full House or Better	1-20
Mah Jong Pai Gow Pai Gow Tiles	Pair or Better	1-20
Three Card Poker	Flush or Better	1-20

Option 3

Game Played	Game Played	Game Played
Blackjack X	Same Color Natural	1-20
Commission Free Baccarat EZ Baccarat Panda 8	Natural or Tie	1-20
Fortune Pai Gow Poker Mini Pai Gow Poker Pai Gow Poker with Triple Bonus Bets Royal Pai Gow Poker Ultimate Pai Gow Poker	Five Card Flush or Better	1-20
Mah Jong Pai Gow Pai Gow Tiles	Nine Gong or Better	1-20
Three Card Poker	Straight or Better	1-20

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.

- There is no restriction on the amount of tickets a player can earn to be entered in the drawing.
- A patron can earn tickets by achieving an above listed qualifying hand and on time played.
- Players can earn 1–20 tickets per hour of play.
- When a qualifying hand is announced, a Casino floor person will verify the hand qualifies. Any deviation from a standard deck will nullify the hand.
- In the event two or more players achieve qualifying hands, each player will receive a ticket for the drawing. This includes players and backline bettors.
- There must be at least a player and a player-dealer actively playing in a game.
- Once a winning ticket is drawn, the player must bring the other winning half of the ticket to the drawing location within two minutes of their name being called to claim the prize.
 - If the winning player does not claim the prize within the two minute time period, the Casino may draw another ticket until there is a winner, or the Casino may choose to wait until the next scheduled drawing time to draw another ticket.
- A player can only win one prize per drawing per day.
 - If a player's has more than one winning ticket drawn per day, the Casino may draw another ticket until there is a winner, or the Casino may choose to wait until the next scheduled drawing time to draw another ticket.

Cash and Prize Drawings

- Both sections of winning tickets will be retained by the Casino for 90 days.
- Backline bettors are eligible to participate.
- All players are eligible to earn a drawing ticket regardless whether their hand wins, loses, or ties (pushes) with the player-dealers hand.
- Tournament games do not qualify for the gaming activity.
- Third Party Providers of Proposition Services are not eligible to receive a drawing ticket even if they achieve a qualifying hand.
- Casino employees are not eligible to participate in this gaming activity.

Prize

The prize amount will be a fixed amount ranging from \$1 to \$500,000 in the form of cash, live casino chips, Bonus Chips (GEGA-004345), Free Play Chips (GEGA-003022), Match Play Chips (GEGA-003022), electronics, trips, tickets to attractions and movies, promotional merchandise, food vouchers, gift cards, vehicles, entry into a tournament, et cetera. In all instances, prizes for this promotion will be pre-determined and posted on the pre-printed ticket plus all advertisements related to this promotion.

Funding

The Cash and Prize Drawings Promotion will be fully funded by Parkwest Casino Lotus. There shall be no additional promotion fees, jackpot fees, or collection fees taken in order to fund this gaming activity or for players to participate.

Administrative Fees

Parkwest Casino Lotus will not take any administrative fees for this promotion.

No Purchase Necessary

The Cash and Prize Drawings 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 Cash and Prize Drawings Promotion. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

Customer Incentive Program

APPROVED

Bureau Requirements

Advertising

The Lotus Casino may advertise various names for this gaming activity. Should the Casino advertise a different name, the BGC ID (GEGA-004485) shall be referenced on all advertisements relating to this gaming activity.



FEB 24 2015

Bureau of Gambling
Control

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

- Corresponding time played and points earned or awarded.
- The date(s) and time(s) the gaming activity shall be offered.
- The number of points earned corresponding to the prize amount.
- The time frame in which the points earned are valid.
- The possible prize(s) offered for meeting the requirements of the gaming activity.
- When the bonus prize(s) will be offered throughout the promotion.
- Availability of No Purchase Necessary.
- Any other applicable restrictions.

Eligible Controlled Games

The Customer Incentive Program shall be attached to all Bureau approved California and Poker controlled games offered at The Lotus Casino at all times this gaming activity is being offered for play. All controlled game rules shall be played as approved by the Bureau.

Rules of Play

The Customer Incentive Program features a promotional element attached to the games listed above. This gaming activity is a loyalty reward program open to all Lotus Casino patrons. This promotion will reward players with points based on time of play at designated table games during pre-determined and eligible periods ranging from 10 minutes to 90 days.

Player's Card and Computer System Description

The Player's Card shall include the Casino name on the card, some descriptive language regarding restrictions for the card, and the problem gambling phone number. It shall also include a bar-code. This card will look different from the card used for the Player Loyalty Rewards Program (GEGA-002789).

- The card shall be non-transferable and can only be used by the player who the card is assigned.
- If a player's card has been lost or stolen, they can ask a Floor Service Representative for a new one at no cost to the player.
- Player information shall be maintained in a secure database accessed only by casino management. Access to the database shall also be tracked by casino management.
- Player's time played is tracked by having their card scanned. They will receive a player's card once they sign up for the Customer Incentive Program at the cashier. An iTouch, iPad, or similar tablet computer device, with a bar code reader, will be affixed to the gaming table and a gambling establishment employee will scan the player's card. The gambling establishment employee will then input the player's average wager and time played into the computer tablet device.

Customer Incentive Program

APPROVED

- Player information shall be maintained in a secure database accessed only by casino management. Access to the database shall also be tracked by casino management. 2015 one except the network administrator(s) has access to the back-end systems where the data is stored. Access to the data is by user level with multiple levels based on what the user will be doing. Marketing managers will have access to customer data for marketing purposes (i.e., emails, texts, mass mailing, etc.)
- A printable record of the amount of time a player has accumulated during the period of time that the gaming activity is being offered, shall be available at anytime at their request.

How Player Rewards Points are Earned Based on Time Played

Points shall be earned based on the amount of time played. Each player that plays a certain table game during live play will, at certain times, receive points, which will gain them eligibility to win pre-determined and designated prizes. The range of points will be 1 to 200,000 points for each hour of play. The Lotus Casino may offer bonus rates (for example, double points) on play during off-peak hours or in specific games, within the range as shown above. Patrons will be given ample notice of how many points will be awarded, as well as, the amount of time required to earn points for each eligible game.

Example: A player signs up for the Customer Incentive Program at the cashier and receives a player's card. The player presents the card to the gambling establishment employee at the gaming table. The gambling establishment employee scans the player's card using a bar code reader on the computer tablet device and will then input the average wager per hand of the player in fifteen minute increments. At the end of the gaming session, the player will be logged out by the gambling establishment employee. The program tabulates the amount of points the player has earned and records it in the player's account. The player may check their point balance and redeem points with a gambling establishment employee at any time during the promotion.

How Player Rewards Points are Redeemed

Players may either redeem their points at any time during the promotion or at the end of the promotional period. The redemption period will be displayed in The Lotus Casino to give players ample notice. Points not redeemed by the end of the promotional period will expire within 30 days of the promotional period. All prizes shall have a pre-determined and designated value. The point to dollars ratio for the rewards program is 1 point is worth \$0.10 - \$100. After a player has accumulated a pre-determined and specific amount of points, based on time of play, a player may redeem the accrued points for a pre-determined and designated prize.

- After a player has been awarded a prize, they may also be eligible for second and subsequent prize(s) until the end of the promotion.
- Players may redeem their points for multiple prizes as long as the total amount of points required for the prizes are within the player's point balance.
- Once the points are redeemed, these points will be subtracted from their point balance.
- Upon request, a player may check their point balance with a Casino Floor Services Representative at any time during the promotion.
- Points are non-transferrable, and can only be used by the player who earned them.
- Points are eligible for redemption at anytime during the promotion or at the end of the promotional period. Points not redeemed at the end of that period will expire.

Customer Incentive Program

APPROVED

- All reward points are subject to review and verification. The Casino reserves the right to adjust balances or void any points due to error or fraud.

FEB 24 2015

Prize

The prize amount shall be a fixed amount ranging from \$1 to \$100,000 in the form of cash, casino chips, free play chips (GEGA-003022), bonus chips (GEGA-004345), coupons, vehicles, promotional merchandise, food, entries into tournaments, entries into a Bureau approval gaming activity, etc. In addition to the fixed amount, during pre-determined and posted times throughout the promotion, there will be bonus prizes awarded when players reach a certain point level. The bonus prize will range from \$1 - \$100,000. In all instances, the actual prize(s) that players are eligible to redeem their points for shall be pre-determined and conspicuously posted in The Lotus Casino at all times that this gaming activity is being offered.

Eligibility

This gaming activity shall be open to all players 21 years of age and older with valid I.D. who sign up for a Player Reward Card and participate in an eligible game for a designated period of time to earn points. When the player chooses to exchange their accrued points, they shall win a corresponding prize.

- Players must be seated and playing at a designated table in order to qualify for the promotion.
- In order for the table to qualify for the promotion, there is a minimum of two players for poker and California games and up to the maximum allowable in the controlled game.
- On and off duty, in or out of uniform casino employees shall not be eligible to participate in this promotion.
- Third Party Proposition Players, on or off duty, shall not be eligible to participate in this promotion.
- Tournament games do not qualify for this promotion.

Funding

The Customer Incentive Program gaming activity is fully funded by The Lotus Casino. There will be no additional fees collected in order to fund this gaming activity or for players to participate. 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 Lotus Casino shall not retain an administrative fee for operating the Customer Incentive Program gaming activity.

No Purchase Necessary

The Customer Incentive Program does not contain the element of chance. Therefore, it does not constitute an illegal lottery and does not require No Purchase Necessary tables to be offered while conducting this gaming activity.

Lotus Casino Food Reward Program



JAN 28 2014

Bureau of Gambling
Control

Advertising Requirements:

The Lotus Casino may advertise various names for this program. Should the Casino advertise a different name, the BGC ID (GEGA-004105) 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 Lotus Casino at all times the gaming activity is being offered:

- The date(s) and time(s) the gaming activity shall be offered.
- The prize(s) offered for meeting the requirements of the gaming activity.
- Time required to earn food.
- How time will be tracked.
- Procedures for players having their card stamped.
- Any other applicable restrictions.

Summary:

Based on customer demand and industry trends, The Lotus Casino proposes to add a gaming activity for all currently approved controlled games. The promotion will allow a player to eat for free/or at a substantially discounted rate from a selected menu when they play for a qualifying period of time, which is tracked through their Player Rewards Card or on a log if they do not have a players' rewards card. In all instances, patrons shall be provided with ample advance notice of the amount of time that a player must play in order to be eligible for the "Player's Menu." Furthermore, the time requirements and "Player's Menu" shall be displayed prominently within The Lotus Casino at all times this gaming activity is being offered for play.

Controlled Game:

The Food Reward Program shall be associated with all currently approved BGC games offered at The Lotus Casino.

Prize:

The prize will be allowing a player to eat a menu item for free/or at a substantially discounted rate from a selected "Player's Menu." For players that complete the time requirement, certain items on the "Player's Menu" with a value of \$1 - \$25 will be offered for free.

Funding:

This promotion will be solely funded by the Lotus Casino. There will be no extra collection or fees of any kind assessed to the players.

Eligibility to Win:

All players who wish to participate will be tracked by a casino employee. Once a player has played a pre-designated and posted time period ranging from 10 minutes to 4 hours, their time will be verified and then they will be awarded by eating for free/or at a substantially discounted rate from the "Player's Menu." A player may qualify for this promotion a maximum of three times within a 24 hour period.

Lotus Casino Food Reward Program



JAN 28 2014

Bureau of Gambling
Control

- The time that a player must play at a table or game will range from 10 minutes up to 4 hours, as pre-determined and designated by the Lotus Casino. This time requirement shall be the same for all players.
- A player may qualify for this promotion a maximum of three times within a 24-hour period.
- Time will be tracked by each minute of play and may be added together as a running total through the 24-hour period. However, all time accrued during a 24-hour period will expire after that period and may not be carried over from one 24-hour period to another 24-hour period.
- Player's time will be tracked by the Casino through a log if the player does not have a player's rewards card.
- Player's time may also be tracked through the Players Reward Program (GEGA-002789).
- A player does not have to have a players' rewards card to be eligible for this promotion.
- Time accrued may only be used by the player that earned it; it is non-transferrable.
- Tournament players are not eligible to receive discounted and/or free items from the "Player's Menu."
- Casino employees are eligible while off duty, but are ineligible during the time they are on duty and working.
- There are no restrictions on the number of players required to be playing in a Poker and/or California game in order for players to be eligible to accrue time.
- Backline bettors are not eligible for this promotion.
- Third Party Provider of Proposition Player Services, as defined in Section 19984 of the California Business and Professions Code, are not eligible for this promotion.

No Purchase Necessary:

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

Lotus Casino Leaderboards Promotion

Advertisement Requirements

The Casino may advertise various names for this gaming activity. Should the Casino advertise a different name, the BGC ID shall be referenced on all advertisements relating to the Leaderboards Promotion.

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

- Eligible games and time periods.
- Qualifying hands.
- Prize amount.
- No purchase necessary information.
- Any other applicable restrictions.

Controlled Games

The Leaderboards Promotion is attached to the following Bureau approved games currently offered at the Casino.

- Texas Hold'em
- Three Card Poker
- Pai Gow Poker
- Commission Free Baccarat
- EZ Baccarat Panda 8
- 21st Century Baccarat 8.0
- Pure 21.5 Blackjack
- Blackjack X
- No Bust 21st Century Blackjack 5.2
- No Bust 21st Century Blackjack 5.2a
- Pure 21.5 Blackjack 1.0

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

Rules of Play

Leaderboards of pre-determined and designated qualifying hands, as shown below, will be tracked for a length of time ranging between one day and one year. The player who is the last to obtain the pre-determined and posted qualifying hand during a pre-determined and posted time period shall win a prize. The hands shall be tracked on a display board in a prominent area of the casino. The player with the qualifying hand that meets all of the eligibility requirements must have their hand verified by a Casino representative.

Qualifying Hands

A player who is the last to make a qualifying hand during a pre-determined and posted time period shall be awarded with the posted prize amount. Only one of the qualifying hand chart options below shall be offered at any one time that the Leaderboards Promotion is being offered for play. They shall not be offered together at any time nor shall any combination of the qualifying hands in each chart option be offered together at any time that this gaming activity is being offered for play. Patrons shall be provided with ample advance notice of which qualifying hand chart option is being offered for play, as well as the requirement for the qualifying hand. If a qualifying hand is not achieved within the promotional period, no prize will be awarded. Furthermore, the qualifying hands shall be displayed prominently within the Casino at all times the Leaderboards Promotion is being offered for play. In order to qualify for the promotion, in games utilizing hole cards, the player dealt the winning high hand must use both hole cards.

Lotus Casino Leaderboards Promotion

Option 1

Game	Qualifying Hand
Pure 21.5 Blackjack and 1.0, No Bust 21st Century Blackjack 5.2 and 5.2a, Blackjack X	Ace-King Suited
Commission Free Baccarat, EZ Baccarat Panda 8, 21st Century Blackjack 8.0	3 Aces to the Player Line, 3 Aces to the Banker Line
Pai Gow Poker	5 Aces and 2 Two's
Three Card Poker	Pair of Aces beaten by a better hand
Texas Hold'em	Aces Cracked

Option 2

Game	Qualifying Hand
Pure 21.5 Blackjack and 1.0, No Bust 21st Century Blackjack 5.2 and 5.2a, Blackjack X	7 Aces in one hand
Commission Free Baccarat, EZ Baccarat Panda 8, 21st Century Blackjack 8.0	3 Aces to the Player Line, 3 Aces to the Banker Line
Pai Gow Poker	Full House beaten by a better hand
Three Card Poker	Straight beaten by a better hand
Texas Hold'em	Player's hole cards are 7 and 2 and they win the hand

Option 3

Game	Qualifying Hand
Pure 21.5 Blackjack and 1.0, No Bust 21st Century Blackjack 5.2 and 5.2a, Blackjack X	7 Aces in one hand
Commission Free Baccarat, EZ Baccarat Panda 8, 21st Century Blackjack 8.0	Natural 9 vs Natural 8 – the player who wagered on the hand that equals Natural 9 wins
Pai Gow Poker	Ace High Flush
Three Card Poker	King High Straight Flush beaten by a better hand
Texas Hold'em	4 Aces on board (community) with Pocket Kings

Lotus Casino Leaderboards Promotion

**Bureau of Gambling
Control**

Prize

The prize shall be a pre-determined and posted prize ranging in value from \$5 to \$100,000 in the form of cash, casino chips, check, merchandise, electronics, etc. 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.

Eligibility

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

- A player is eligible to win this promotion by being the last player to make one of the qualifying hands listed above during the posted times of this promotion.
- A minimum of four players must be dealt into the game of Texas Hold'em in order for the table to qualify for the promotion.
- A minimum of three players must be dealt into all other eligible games, as stated above, 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.
- When a player is the last to make a qualifying hand for the pre-determined and designated time period, that player shall receive 100% of the posted prize amount.
- All qualifying hands must be verified by a floor person in order to be eligible. Any deviation from a standard deck shall nullify the hand.
- In the event that two or more players make the same qualifying hand, obtain that qualifying hand at the exact time, and remain the last players to make the hand during the promotional period, the prize will be split equally among the players. If the prize is a non-cash prize then the cash value of the prize will be split among those players.
- Tournament games do not qualify for the promotion.
- There is no restriction to the number of times a player is eligible for this promotion. All players shall be eligible for this promotion as often as it is offered.
- The winning player must be present to win. In the event that the winning player is not present, there will be no prize awarded during that time period.
- Winning qualifying hands are not transferrable between players.
- A player is eligible to win multiple promotions with one qualifying hand.
- All procedures, times and prize amounts shall be displayed prominently via any form of advertisement that the Casino wishes to use, including but not limited to printed flyers, digital display, the Casino website, or any other form of advertisement.

Funding

The Leaderboards Promotion is fully funded by the Casino. Therefore, there shall be no additional jackpot fees or collection fees taken for this promotion. All fee collections and table limits are for the designated base games and are Bureau approved, pre-determined and posted at each table.

Administrative Fees

The Casino shall not retain an administrative fee as this promotion is house funded.

No Purchase Necessary

Lotus Casino Leaderboards Promotion

The Leaderboards Promotion 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 Casino shall provide no purchase necessary tables for all patrons who request to participate in the promotion without paying a table fee or placing a live wager. The NPN table shall 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 Leaderboards Promotion. This requirement extends to all forms of advertising including electronic message boards, computer monitors, posters, and flyers.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

1. Name of Proposed Gaming Activity:

Match Play Coupon Promotion
Free Play Chip(s)

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

All Bureau approved California Games.

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

The Silver Fox Casino will offer match play coupons and/or free play chips which will have a value ranging from \$5 to \$500 for each coupon or chip.

Players may not exchange match play coupons for live chips or give them to another player. They will only be redeemed after having been played and verified by Casino personnel.

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

The prize is a fixed amount.

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

This gaming activity is house funded.

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

No additional fees will be collected.

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

“Match Play Coupon”

The Casino will offer match play coupons having a face value from \$5 to \$500 per coupon. This will be clearly stated on the coupon. Patrons are awarded match play coupons via advertisements in magazines, websites, mailing advertisements, winning a Bureau approved promotion, winning or signing up for a Bureau approved tournament, etc. When a patron receives a coupon he/she may use it in any of the controlled games listed above. Each coupon will state the specific qualifying game(s) that the voucher may be used on.

EXAMPLE: A person receives a match play voucher with a value of \$5.00 that specifically states it may be used to place a wager on the Pai Gow Poker table. The person would place the voucher on the gaming table; place a bet that matches the amount on the voucher, and pay the posted collection (if applicable) for a single hand of play. If the player wins the hand, he/she will receive \$10.00 just as if they had placed a \$10.00 bet and the player/dealer will collect the voucher. The player/dealer will then have a key employee sign the voucher verifying that it has been won. All winning vouchers are verified and signed by a key employee. Winning vouchers are taken to the cage by the key employee, logged, and exchanged for the value listed on the coupon(s). If a player loses, the money part of the

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

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

“Free Play Chip(s)”

The Casino will offer free play chips having a face value from \$5.00 to \$500.00 per chip. The chips are used in live games exactly like regular chips, the difference being that they cannot be exchanged for cash.

The free play chips are initially in the form of a coupon which will be offered to all patrons that wish to come into the Casino and use them to play. Patrons may be awarded free play coupons via advertisements in magazines, websites, mailing advertisements, winning a Bureau approved promotion, winning or signing up for a Bureau approved tournament, etc. When a patron receives a free play coupon he/she shall take the coupon to the cage for verification, logging, and redemption of the free play chip(s) to be used in a live game. Each coupon will state the specific qualifying game(s) that the free play chip(s) may be used on.

Promotional chips are used as the player’s bet and placed on the betting circle. Promotional chips are never taken into the dealer’s tray, nor are they ever paid from the dealer’s tray.

EXAMPLE: A person receives a free play chip coupon for \$10.00 that specifically states it can be used to place a wager on the No Bust Blackjack table. The player would take the coupon to the cage. Cage personnel would log the redemption code of the coupon and exchange the coupon for a promotional free play chip. The player would then place the free play chip on the gaming table, pay the posted collection (if applicable), and the game would play. If the player wins the hand, he/she would be paid \$10.00 by the person in the player/dealer position just as if he/she had placed a \$10 bet. The free play chip will be collected by the person in the player/dealer position. The player/dealer will then have a key employee verify that the chip has been played. All played free play chips are verified by a key employee. The free play chip is taken to the cage by a key employee, logged, and exchanged for the value listed on the chip. If the player loses the hand, the free play chip is forfeited and will be collected by the casino dealer and dropped in the drop box for accounting purposes. If the player pushes (receives no action), the chip may be played again until the player wins or loses a hand.

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

If a player wins a hand on a base game where they have played a match play coupon or free play chip, he/she will be awarded 100% of the face value on the coupon or chip.

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

Once the original seeded amount is depleted the funds may be re-seeded by the Casino. Appropriate records will be kept and available for inspection as required by law.

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.

One minimum player and no maximum players.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

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

No additional fees will be taken.

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

The match play coupon promotion does not contain the element of chance. Therefore, it does not constitute an illegal lottery and does not require No Purchase Necessary tables to be offered while conducting this gaming activity.

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

Advertisements will be created upon approval of this promotion.

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

N/A

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

N/A

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino (Formerly Silver Fox Casino)
Name of Gaming Activity: Mini Bad Beat Jackpot

- 1. Name of the Proposed Gaming Activity.**
 - Mini Bad Beat Jackpot
- 2. Name each controlled game that is associated with this gaming activity.**
 - Any approved Texas Hold'em, Limit or No-Limit
- 3. Describe any jackpot or any other type of prize awarded.**
 - The Mini Bad Beat Jackpot will seed initially at \$1,000.00
- 4. If a cash prize is involved, is the amount of the prize progressive (increases) or a fixed amount?**
 - The Mini Bad Beat Jackpot will cap at \$5,000.
 - The Jackpot will increase daily at a range of \$0 to \$500 until the cap is reached.
- 5. Explain if the gaming activity is house funded or player funded.**
 - The Jackpot is house funded.
- 6. Describe any special fee collection involved in this gaming activity, for example, a jackpot fee collection.**

n/a
- 7. Describe how the jackpot will be seeded and how any prizes will be awarded.**
 - Mini Bad Beat Jackpot will re-seed at a range of \$1,000 to \$5,000 if the Jackpot is won. The payout percentages are as follows:
 - 40% to the losing hand
 - 25% to the winning hand
 - 35% split amongst the balance of eligible players at the table
 - Each player that participates in the Jackpot hand will be awarded up to \$2,000 in cash and the balance of their payment in the form of a Casino issued check.
- 8. Explain any prize distribution including prizes given to the winner, loser, or any other player or patron.**
 - The Mini Bad Beat Jackpot The payout percentages are as follows:
 - 40% to the losing hand
 - 25% to the winning hand
 - 35% split amongst the balance of eligible players at the table
 - Each player that participates in the Jackpot hand will be awarded up to \$2,000 in cash and the balance of their payment in the form of a Casino issued check.
- 9. Explain any re-seeding of the fund once the prize is won.**
 - Mini Bad Beat Jackpot will re-seed at a range of \$1,000 to \$5,000 if the Jackpot is won.
 - The Jackpot will increase daily at a range of \$0 to \$500 until the cap is reached.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino (Formerly Silver Fox Casino)
Name of Gaming Activity: Mini Bad Beat Jackpot

- 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.**
- For a Jackpot hand to be valid a minimum of five (5) live players must be dealt in at the start of the hand.
- 11. Explain if the house is retaining any administrative or any other type of fee for operating the gaming activity.**
- n/a
- 12. Describe any opportunity(s) for a person to play for the prize without placing any live wagers or paying any table fees.**
- A person may participate for free in this promotion via our demonstration table. The demonstration table is part of our "No Purchase Necessary" policy.
 - The jackpot will be offered to customers who wish to participate for free, on a general and indiscriminate basis. The Casino will offer a demonstration table for all customers requesting to participate in the jackpot game without requiring them to pay a table fee or collection of any type. There will not be any live wagering at this table. Participants in the demonstration or "No Purchase Necessary" table will be eligible to win their portion of the bad beat jackpot if they receive the qualifying hand. They will receive the portion of the jackpot they have qualified for and any balance of the jackpot will remain in the jackpot fund.
- 13. Provide copies of any published/proposed promotion or advertisement literature.**
- Advertisements will be created upon approval of this promotion.
- 14. Identify any entity or person other than those licensed as the house involved in the gaming activity.**
- The gaming activity involves no other entity other than the house. There is no copyright, patent, or license involved with this activity.
- 15. Describe the type of table and equipment utilized for the gaming activity.**
- Standard poker tables will be utilized for this activity. A standard 52 card poker deck will also be utilized as well as licensed, professional dealers. Our tables are equipped with Shuffle Master in table shuffling machines.
- **Mini Bad Beat Jackpot(s) are attached to any approved forms of Texas Hold'em, Limit and No-Limit.**
 - **For a Jackpot hand to be valid a minimum of five (5) live players must be dealt in at the start of the hand.**
 - **For a player to be included in the payout of a Jackpot he must be an active player at the table; an active player is defined as a player who does not have a missed blind button. Players with hold buttons will be included as long as they have not been gone over the 15 minute allotted time period.**

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino (Formerly Silver Fox Casino)
Name of Gaming Activity: Mini Bad Beat Jackpot

- The Jackpot will not be valid in any Tournament games.
- Casino employees are eligible to participate in the Jackpot as long as they are playing on off-duty hours.
- All winners must have one of the following forms of valid identification: Current Drivers License; Current I. D. Card; Current Military I.D. or Current Passport.
- All winnings in excess of \$600 will require the completion of IRS form W2G. Winnings in excess of \$5,002 will be subject to 25% IRS withholdings. W2G form requires current, valid I.D. and S.S. Number
- Players must refrain from conversations regarding a possible jackpot while a potential jackpot hand is in progress.
- Only one jackpot will be awarded per hand.

Mini Bad Beat Jackpot Funding:

- The Jackpot is house funded. It will initially start at \$1,000 and will be seeded by the Casino.
- The Jackpot(s) will increase daily at 8:00AM at a range of \$0 to \$500 until the cap is reached.
- The Jackpot(s) will cap at;
 - Mini Bad Beat \$5,000.

Mini Bad Beat Jackpot;

AAALZ

- The initial qualifying hands for the beginning jackpot of \$5,000 are Full House or higher beaten by a higher hand will qualify for the initial Mini Bad Beat Jackpot of \$5,000.
- Subsequent to the initial jackpot being awarded, players that make the following advertised hands will be eligible to win the Jackpot. Only a winning and losing hand that has been pre-determined and designated by The Casino will be eligible.
- Once a winning and losing qualified jackpot hand is designated by the Casino, neither hand may be adjusted or changed until the jackpot has been hit and awarded.
- The two qualifying hands must include the winning hand and the best losing hand.
- As stated above, there must be a minimum of five (5) qualifying players at the start of the hand
- All eligible players at the table when the Jackpot is awarded will participate in the Jackpot payout.

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino (Formerly Silver Fox Casino)
Name of Gaming Activity: Mini Bad Beat Jackpot

(Mini Bad Beat Jackpot)

- **The payout percentages are as follows:**
 - **40% to the losing hand**
 - **25% to the winning hand**
 - **35% split amongst the balance of eligible players at the table**
- **Each player that participates in the Jackpot hand will be awarded up to \$2,000 in cash and the balance of their payment in the form of a Casino issued check.**
- **Checks issued may not be cashed at the Casino.**
- **Payments of the Jackpot proceeds are also subject to the completion of the necessary IRS forms and the providing of acceptable identification.**

The Silver Fox Casino

“Pai Gow Poker Bad Beat Jackpot”

Controlled Gaming Activity

IMAGED
OCT 26 2010

SUMMARY

Based on customer demand and industry trends, Silver Fox Casino (SFC) proposes to add a gaming activity for all currently approved controlled games. The promotion will offer a Pai Gow Poker Bad Beat Jackpot.

PRIZE

The type of prize may be a cash and or casino chips ranging from \$10.00 to \$100,000.00. The actual prize amount will 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 addition to or in lieu of a cash prize, merchandise may also be awarded. This includes but is not limited to; free play chips, clothing, electronics, merchandise, trips, Poker Tournament entries, and various other prizes.

To win the prize a Player or Player/Dealer beaten by any valid hand consisting 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 and higher Flush or better in the back (with or without the Joker). One of the qualifying hands must be in the Player/Dealer position for the jackpot to be valid.

FUNDING

This promotion will be player funded. The funding will go as follows; There will be a \$1.00 charge on the player/dealer position per hand that will be collected for the Jackpot .

ELIGIBILITY TO WIN

All persons wishing to participate in the promotion may do so while it is being offered.

Casino employees are eligible to participate in the jackpot as long as they are playing while they are off-duty.

NO PURCHASE NECESSARY

All persons wishing to participate on a No Purchase Necessary (NPN) basis will be accommodated by asking a Casino Floor Manager for a NPN table to be set up. This will be accomplished within a reasonable period of time and the participant will be dealt hands as if in a live game. All opportunities to win the Jackpot will be provided to a person participating at a NPN table in the same procedure and manner as that of a live game. No cash, collection or Casino Gaming chips will be used at the NPN table. The Casino dealer or Floor Manager will play the hands of the unoccupied seats to simulate a full game.

BASE GAME RULES

All base game rules that have been approved by the Bureau of Gambling Control for the below listed games will be followed. There are no changes whatsoever. The following games will fall under this gaming activity: Pai Gow Poker.

QUESTIONS #1-15 of DGC-APP.027

1. Name of proposed gaming activity.

Pai Gow Poker Bad Beat Jackpot - The name is subject to change. In any event, SFC will always attach the GEGA number assigned by the Bureau in any advertisement and in-house signage.

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

Pai Gow Poker

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

The type of prize may be a cash and or casino chips ranging from \$10.00 to \$100,000.00. In addition to or in lieu of a cash prize, merchandise may also be awarded. This includes but is not limited to; free play chips, clothing, electronics, merchandise, trips, Poker Tournament entries, and various other prizes. The jackpot will increase daily at 8:00 a.m. based on the total amount collected the day before. This jackpot has a cap of \$100,000. If the jackpot reaches the cap amount, all other jackpot collection fees collected will be placed in the jackpot reserve account.

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

Progressive

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

The activity is player funded.

6. Describe any special fee collection involved in this gaming activity. For example: jackpot fee collection.

There will be a \$1.00 charge on the player/dealer position per hand that will be collected for the Jackpot

7. Describe how the jackpot will be awarded.

Player or Player/Dealer beaten by any valid hand consisting 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 and higher Flush or better in the back (with or without the Joker). One of the qualifying hands must be in the Player/Dealer position for the jackpot to be valid.

Any player occupying the Player/Dealer position is eligible to participate in any Jackpot pay-off.

All players in the player position who have placed a separate wager will receive one share per betting circle regardless of the amount wagered. In the event that during a round of play, two (2) or more players have qualifying losing or winning hands, only the hand with the highest ranked losing and highest ranked winning Pai Gow hands will receive the posted prize percentage of the jackpot for the losing and winning hand. The remaining player(s), including those who had lower ranked qualifying hands, will receive the posted prize percentage of the table share.

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

Jackpot prize money will be divided as follows: 40% to losing hand, 40% to qualified players*, 20% to winning hand.

* qualified players are any player on a Pai Gow Poker table that meets at least the minimum requirements described in this application.

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

Silver Fox Casino will seed the jackpot up to \$5,000 and re rest will be funded progressively from the players based on the daily amount collected. Additionally, whenever the Casino is required to seed the jackpot or cover the shortfall due to in-adequate funds in the reserve account, the Casino will be repaid from the jackpot reserve account once the reserve is sufficient and the funds become available.

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.

Jackpot rules require all Jackpot games to have a minimum of three Participants with playing hands and who have made a wager in order to be recognized as an official Jackpot Game.

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

The administrative fee will be \$10.00 per table hour.

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

All persons wishing to participate on a No Purchase Necessary (NPN) basis will be accommodated by asking a Casino Floor Manager for a NPN table to be set up. This will be accomplished within a reasonable period of time and the participant will be dealt hands as if in a live game. All opportunities to win the Jackpot will be provided to a person participating at a NPN table in the same procedure and manner as that of a live game. No cash, collection or Casino Gaming chips will be used at the NPN table. The Casino dealer or Floor Manager will play the hands of the unoccupied seats to simulate a full game.

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

There is no advertisement or literature at this time.

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

There are no other entities or persons involved in this promotion.

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

All previously approved table will be utilized to play the base game.

Lotus Casino
"Pai Gow Poker Bonus Hands"
Controlled Gaming Activity

SUMMARY

Based on customer demand and industry trends, Lotus Casino (LC) proposes to add a gaming modification to the Pai Gow Poker Jackpot. The promotion will offer specific bonus hands in conjunction with the player-funded jackpot.

PRIZE

Once a 9 high or 10 high (seven cards, the highest of which is a "9" or "10", with no straights, flushes, pairs or aces) is received and verified by the Floor the posted prize amount will be awarded.

9 High = \$200 cash or casino chips, or it's equivalent in free play chips.

10 high= \$100 cash or casino chips or it's equivalent in free play chips.

FUNDING

This promotion will be funded by the drop collected from the previously approved Pai Gow Poker Jackpot GEGA 003008

ELIGIBILITY TO WIN

All persons wishing to participate in the promotion may do so while it is being offered. For the promotion to be valid there must be a jackpot drop collected as described in the GEGA003008

NO PURCHASE NECESSARY

The Lotus Casino shall provide a no purchase necessary (NPN) table for patrons who request to participate in bonus hands without paying a table fee or placing a live wager. The NPN player will adhere to all rules as a live player.

THIRD PARTY PROVIDER OF PROPOSITION PLAYER SERVICES

Third Party Provider of Proposition Player Services, as defined in Section 19984 of the California Business and Professions Code, are not eligible for this promotion.

BASE GAME RULES

All base game rules that have been approved by the Bureau of Gambling Control for the below listed games will be followed. There are no changes whatsoever. The following games will fall under this gaming activity: Pai Gow Poker.

QUESTIONS #1-15 of DGC-APP.027

1. Name of proposed gaming activity.

Pai Gow Poker Bonus Hands -The name is subject to change. In any event, Lotus Casino will always attach the GEGA number assigned by the Bureau in any advertisement and in-house signage.

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

Pai Gow Poker.

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

Once a 9 high or 10 high (seven cards, the highest of which is a "9" or "10", with no straights, flushes, pairs or aces) is received and verified by the Floor the posted prize amount will be awarded.

(9 High = \$200 cash or casino chips, or it's equivalent in free play chips.)

10 high= \$100 cash or casino chips or it's equivalent in free play chips.)

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

Fixed

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

The activity is player funded.

6. Describe any special fee collection involved in this gaming activity. For example: jackpot fee collection.

The funding for this game will come out of the jackpot collection as described in GEGA003008

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

A player on a jackpot eligible game receives a Pai Gow Poker Bonus Hand will be awarded the posted prize after a Floor verifying the hand.

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

The qualifying players will receive the posted prize after receiving the hand in a qualified game and it is verified by the floor.

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

The prize will be re-seeded in full as described in the application.

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.

3 players minimum and at least one of those hands has to be dealt to a player/dealer.

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

Mirror of GEGA 003008

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

The Pai Gow Poker Bonus Hand 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 Casino will provide no purchase necessary tables for all 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 will state "No Purchase Necessary" when referencing the Pai Gow Poker Bonus Hand.

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

There is no advertisement or literature at this time.

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

There are no other entities or persons involved in this promotion.

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

N/A

Eligibility

The prize shall be awarded to a player when he or she has made, and such has been recorded by Casino personnel, the pre-determined and designated winning qualifying hand(s).

- Seated players as well as backline bettors are eligible to win this promotion. If two or more players wager on the same qualifying hand, the fixed prize shall be split equally between them.
- There is a minimum of three players that must be dealt into the game in order for the table to qualify for the jackpot.
- In order to qualifying for the jackpot, all cards dealt to a player that placed a jackpot collection fee are taken into account. In the event that the cards dealt to a player make a pre-determined and designated qualifying hand, that player shall be eligible to win a jackpot prize payout according to the tables above.
- In the event that during a round of play, two or more players have qualifying fixed hands, each player shall receive the amount that is posted.
- When a player is dealt a designated qualifying hand, that player will receive 100% of the prize amount.
- A Third Party Provider of Proposition Player Services (TPPPS) is not eligible to win the jackpot.
- Casino employees are eligible to participate in the gaming activity if they are off duty and out of uniform.
- In the event that a player's qualifying hand is eligible for multiple prize payouts, that player shall only win the prize with the largest payout.
- All procedures, times, and prize amounts shall be displayed prominently via any form of advertising that the Lotus Casino wishes to utilize, including but not limited to printed flyers, digital display, the Casino's website, etc.

Lotus Casino

"Pai Gow Tiles Bad Beat Jackpot"

Controlled Gaming Activity

SUMMARY

Based on customer demand and industry trends, Lotus Casino proposes to add a gaming activity for all currently approved controlled games. The promotion will offer a Pai Gow Tiles Bad Beat Jackpot.

PRIZE

The type of prize may be a cash and or casino chips ranging from \$10.00 to \$100,000.00. In addition to or in lieu of a cash prize, merchandise may also be awarded. This includes but is not limited to; free play chips, clothing, electronics, merchandise, trips, Poker Tournament entries, and various other prizes.

To win the prize a Player or Player/Dealer beaten by any valid hand consisting of a pair: pair based on previously approved Tiles playing procedures. One of the qualifying hands must be in the Player/Dealer position for the jackpot to be valid.

FUNDING

This promotion will be player funded. The funding will go as follows; there will be a \$1.00 charge on the player/dealer position per hand that will be collected for the Jackpot.

ELIGIBILITY TO WIN

All persons wishing to participate in the promotion may do so while it is being offered. A minimum of three players are required to be dealt in during a qualifying game in order for players to be eligible and the table to qualify for the jackpot. One hand must be held by the player-dealer and one hand must be held by the player in order to qualify for this jackpot. Casino employees are eligible to participate in the jackpot as long as they are playing while they are 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 the event that during a round of play, two or more players have qualifying losing or winning hands, only the hand with the highest ranked losing and highest ranked winning Pai Gow Tiles hands shall receive the posted prize percentage of the jackpot for the losing and winning hand. The remaining player(s), including those who had lower ranked qualifying hands, shall receive the posted prize percentage of the table share. Any backline bettors that wager on a winning or losing hand shall receive an equal portion of the posted prize percentage for that hand.

NO PURCHASE NECESSARY

All persons wishing to participate on a No Purchase Necessary (NPN) basis will be accommodated by asking a Casino Floor Manager for a NPN table to be set up. This will be accomplished within a reasonable period of time and the participant will be dealt hands as if in a live game. All opportunities to win the Jackpot will be provided to a person participating at a NPN table in the same procedure and manner as that of a live game. No cash, collection or

Casino Gaming chips will be used at the NPN table. The Casino dealer or ~~Bank Manager~~ will play the hands of the unoccupied seats to simulate a full game.

BASE GAME RULES

All base game rules that have been approved by the Bureau of Gambling Control for the below listed games will be followed. There are no changes whatsoever. The following games will fall under this gaming activity: Pai Gow Tiles.

QUESTIONS #1-15 of DGC-APP.027

1. Name of proposed gaming activity.

Pai Gow Tiles Bad Beat Jackpot - The name is subject to change. In any event, LOTUS CASINO will always attach the GEGA number assigned by the Bureau in any advertisement and in-house signage.

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

Pai Gow Tiles

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

The type of prize may be a cash and or casino chips ranging from \$10.00 to \$100,000.00. In addition to or in lieu of a cash prize, merchandise may also be awarded. This includes but is not limited to; free play chips, clothing, electronics, merchandise, trips, Poker Tournament entries, and various other prizes.

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

Progressive

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

The activity is player funded.

6. Describe any special fee collection involved in this gaming activity. For example: jackpot fee collection.

There will be a \$1.00 charge on the player/dealer position per hand that will be collected for the Jackpot

7. Describe how the jackpot will be awarded.

Player or Player/Dealer beaten by any valid hand consisting of a pair: pair to a hand with a higher pair:pair. One of the qualifying hands must be in the Player/Dealer position for the jackpot to be valid.

Any player occupying the player/Dealer position is eligible to participate in any Jackpot pay-off.

All players in the player position who have placed a separate wager will receive one share per betting circle regardless of the amount wagered.

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

Jackpot prize money will be divided as follows: 40% to losing hand, 40% to qualified players*, 20% to winning hand.

* qualified players are any player on a Pai Gow Tiles table that meets at least the minimum requirements described in this application.

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

LOTUS CASINO will seed the jackpot with \$5,000 and the rest will be funded progressively from the players. The Lotus Casino shall not be refunded the seeded jackpot amount from the jackpot reserve account once the reserve is sufficient and the funds become available. The jackpot collection fees shall then be used to fund the jackpot fund. When a qualifying jackpot hand is made, it shall be re-seeded by the Lotus Casino or by the excess accumulation of jackpot collection fees, in an amount ranging between \$10 and \$5,000. The jackpot shall increase daily by a set amount from \$50 - \$300 based on the average amount collected daily. This jackpot has a cap of \$100,000. If the jackpot reaches the cap amount, all other jackpot collection fees collected shall be placed in the jackpot reserve account.

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.

Jackpot rules require all Jackpot games to have a minimum of three Participants with playing hands and who have made a wager in order to be recognized as an official Jackpot Game.

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

The administrative fee will be up to \$10.00 per table hour.

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

All persons wishing to participate on a No Purchase Necessary (NPN) basis will be accommodated by asking a Casino Floor Manager for a NPN table to be set up. This will be accomplished within a reasonable period of time and the participant will be dealt hands as if in a live game. All opportunities to win the Jackpot will be provided to a person participating at a NPN table in the same procedure and manner as that of a live game. No cash, collection or Casino Gaming chips will be used at the NPN table. The Casino dealer or Floor Manager will play the hands of the unoccupied seats to simulate a full game.

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

There is no advertisement or literature at this time.

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

There are no other entities or persons involved in this promotion.

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

All previously approved table will be utilized to play the base game.

Lotus Casino
"Pai Gow Tiles Bonus Hands"
Controlled Gaming Activity

SUMMARY

Based on customer demand and industry trends, Lotus Casino (LC) proposes to add a gaming modification to the Pai Gow Tiles Jackpot. The promotion will offer specific bonus hands in conjunction with the player-funded jackpot.

PRIZE

Once the hand is achieved, and can be verified by the Floor, the prize will be in cash or casino chips;

For getting 4 (four);

- 4's, 6's, 7's, 8's or 10's will win the posted amount for that time. These hands will seed at \$200, cap at \$1,000 and go up \$50 a week until capped.

For getting (Pair: Pair);

Teen OR Dey: Gee Joon - Will seed at \$1,000, cap at \$5,000 and will go up \$200 per week until capped.

Dey: Teen- Will seed at \$500, cap at \$2,500 and will go up \$100 per week until capped.

FUNDING

This promotion will be funded by the drop collected from the previously approved Pai Gow Tiles Jackpot GEGA 003169

ELIGIBILITY TO WIN

All persons wishing to participate in the promotion may do so while it is being offered.

For the promotion to be valid there must be a jackpot drop collected as described in the GEGA 003169

NO PURCHASE NECESSARY

The Lotus Casino shall provide a no purchase necessary (NPN) table for patrons who request to participate in bonus hands without paying a table fee or placing a live wager. The NPN player will adhere to all rules as a live player.

THIRD PARTY PROVIDER OF PROPOSITION PLAYER SERVICES

Third Party Provider of Proposition Player Services, as defined in Section 19984 of the California Business and Professions Code, are not eligible for this promotion.

BASE GAME RULES

All base game rules that have been approved by the Bureau of Gambling Control for the below listed games will be followed. There are no changes whatsoever. The following games will fall under this gaming activity: Pai Gow Tiles.

QUESTIONS #1-15 of DGC-APP.027

1. Name of proposed gaming activity.

Pai Gow Tiles Bonus Hands - The name is subject to change. In any event, Lotus Casino will always attach the GEGA number assigned by the Bureau in any advertisement and in house signage.

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

Pai Gow Tiles.

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

For getting 4 (four);

4's, 6's, 7's, 8's or 10's will win the posted amount for that time. These hands will seed at \$200, cap at \$1,000 and go up \$50 a week until capped.

For getting (Pair: Pair);

Teen OR Dey: Gee Joon- Will seed at \$1,000, cap at \$5,000 and will go up \$200 per week until capped.

Dey: Teen- Will seed at \$500, cap at \$2,500 and will go up \$100 per week until capped.

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

Progressive.

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

The activity is player funded.

6. Describe any special fee collection involved in this gaming activity. For example: jackpot fee collection.

The funding for this game will come out of the jackpot collection as described in GEGA 003169

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

A player on a jackpot eligible game receives a Tiles Bonus Hand will be awarded the posted prize after a Floor verifying the hand.

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

The qualifying players will receive the posted prize after receiving the hand in a qualified game and it is verified by the floor.

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

For getting 4 (four);

4's, 6's, 7's, 8's or 10's will win the posted amount for that time. These hands will seed at \$200, cap at \$1,000 and go up \$50 a week until capped.

For getting (Pair: Pair);

Teen OR Dey: Gee Joon- Will seed at \$1,000, cap at \$5,000 and will go up \$200 per week until capped.

Dey: Teen- Will seed at \$500, cap at \$2,500 and will go up \$100 per week until capped.

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.

3 players minimum and at least one of those hands has to be dealt to a player/dealer.

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

Mirror of GEGA 003169

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

The Pai Gow Tiles Bonus Hand 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 Casino will provide no purchase necessary tables for all 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 will state "No Purchase Necessary" when referencing the Pai Gow Tiles.

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

There is no advertisement or literature at this time.

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

There are no other entities or persons involved in this promotion.

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

N/A

Eligibility

The prize shall be awarded to a player when he or she has made, and such has been recorded by Casino personnel, the pre-determined and designated winning qualifying hand(s).

- Seated players as well as backline bettors are eligible to win this promotion. If two or more players wager on the same qualifying hand, the fixed prize shall be split equally between them.
- There is a minimum of three players that must be dealt into the game in order for the table to qualify for the jackpot.
- In order to qualifying for the jackpot, all cards dealt to a player that placed a jackpot collection fee are taken into account. In the event that the cards dealt to a player make a pre-determined and designated qualifying hand, that player shall be eligible to win a jackpot prize payout according to the tables above.
- In the event that during a round of play, two or more players have qualifying fixed hands, each player shall receive the amount that is posted.
- When a player is dealt a designated qualifying hand, that player will receive 100% of the prize amount.
- A Third Party Provider of Proposition Player Services (TPPPS) is not eligible to win the jackpot.
- Casino employees are eligible to participate in the gaming activity if they are off duty and out of uniform.
- In the event that a player's qualifying hand is eligible for multiple prize payouts, that player shall only win the prize with the largest payout.
- All procedures, times, and prize amounts shall be displayed prominently via any form of advertising that the Lotus Casino wishes to utilize, including but not limited to printed flyers, digital display, the Casino's website, etc.

The Silver Fox Casino

“Player Loyalty Rewards Program”

Controlled Gaming Activity

SUMMARY

Based on customer demand and industry trends, the Silver Fox Casino (SFC) proposes to add a gaming activity to the following games:

- Texas Hold'em
- Pai Gow Tiles
- 21st Century Baccarat 8.0
- Pai Gow Poker
- No Bust 21st Century Blackjack
- Three Card Poker

The promotion will award players who play a predetermined amount of time at SFC in a particular game.

PRIZE

This promotion will reward players with points based on the amount of time played at designated table games during pre-determined and posted eligible periods or based on pre-determined and posted designated qualifying hands. Players that make any of the following pre-determined and posted hands will be awarded points. Please see attached chart of qualifying hands. The range of points will be from one (1) to one hundred (100) points per hour of play.

The casino may offer pre-determined and posted bonus earn rates, schedules (double, triple, etc.) on play during off-peak hours or in specific games, within the range, as shown above.

Players will be given ample notice of how many points will be awarded, as well as the amount of time required to earn points of which pre-determined and posted qualifying hands will be eligible to earn points for each eligible game.

Prize amounts may be fixed amounts ranging from \$1 to \$100,000 or up to the allowable amount based on the local ordinance in the form of cash or non-cash items, casino chips, coupons, vehicles, promotional merchandises, food, entries into tournaments, or raffle tickets for various prizes or merchandises. Cash prizes are fixed amount and are not progressive.

FUNDING

This promotion will be solely funded by SFC. There will be no extra collection or fees of any kind assessed to the poker players.

NO PURCHASE NECESSARY

Since there is not a "chance" element attached to this promotion there is not a requirement for the "no purchase necessary" procedure.

ELIGIBILITY

The promotion will be open to all players who play in a game where SFC management has determined and announced that they will track a player's play time or qualifying hand. At specific and pre-determined periods of time, a designated SFC employee will record the player's time or by hand made by manually recording the player's information when they qualify for earning points in the promotion.

All hours or qualifying hands that are tracked shall be made available when a player requests to see their status. SFC may also post the top point earners at their discretion. All recording of time or hands may be verified by a designated SFC employee.

The following details are offered:

- SFC will post prior to any promotion the qualifying games, hours and/or hands prominently within the Casino and on all literature and advertisements
- In order for the table to qualify for the promotion, there must be two (2) players or more for all California games and four (4) players or more for all Poker games.
- After a player has attained a predetermined and specific amount of time in a game and/or made a qualifying hand, they will be awarded a prize.
- After a player has been awarded a prize they will be eligible for a second and subsequent prizes until the end of the promotion.
- Players may request to verify how many points they have earned during the promotional period. Upon request, a floor person will notify that player of how many points they have earned.
- Points are eligible for redemption during the posted and pre-determined promotional period only. Points not re-deemed during that period will expire and be erased.
- Points are non-transferrable, and are for use by the patron who earned them only.
- Players may redeem their points anytime during the promotional period or at the end of the promotional period. All prizes will have a pre-determined and posted designated point value.
- Players may redeem their points for multiple prizes as long as the total of the points required for the prizes are within the players' point balance.
- All reward points are subject to review and verification. The casino reserves the right to adjust balances or void any points due to error or fraud.

QUALIFYING HANDS FOR POINTS

No Bust Blackjack

	Qualifying Hand	Point Value
1.	Same Color Blackjack	1 - 20
2.	Suited Blackjack	1 - 30
3.	7 Card No Bust Hand	1 - 50
4.	Royal Match	1 - 75
5.	Suited Pair	1 - 20

Pai Gow Poker

	Qualifying Hand	Point Value
1.	Front Hand: Pair Back Hand: Straight (No Joker)	1 - 100
2.	Front Hand: Pair Back Hand: Flush (No Joker)	1 - 75
3.	Hand Combination: 7 Card Straight (No Joker)	1 - 50
4.	Front Hand: Pair Back Hand: Full House	1 - 50
5.	Hand Combination: 9 High	1 - 20

Pai Gow Tiles

	Qualifying Hand	Point Value
1.	Front Hand: 9 Back Hand: Gong	1 - 100
2.	Front Hand: 9 Back Hand: Wong	1 - 75
3.	Hand Combination: Gong Pair	1 - 50
4.	Front Hand: 1 Back Hand: 2	1 - 30
5.	Hand Combination: Wong Pair	1 - 20

Texas Hold'em

	Qualifying Hand	Point Value
1.	Full House	1 - 20
2.	Straight Flush	1 - 30
3.	Four of a Kind	1 - 50
4.	Three of a Kind	1 - 75
5.	Royal Flush	1 - 100

Three Card Poker

	Qualifying Hand	Point Value
1.	Ace High Straight Flush	1 - 100
2.	Three Kings	1 - 50

3.	Three Queens	1 – 50
4.	Three Jacks	1 – 50
5.	2, 3, 5	1 – 50

Baccarat

	Qualifying Hand	Point Value
1.	Suited Natural 9	1 – 100
2.	Natural 9 Tie	1 – 50
3.	Three Kings	1 – 25
4.	Three Queens	1 – 25
5.	Three Jacks	1 – 25

THIRD PARTY PROVIDER OF PROPOSITION PLAYER SERVICES

Third Party Provider of Proposition Player Services, as defined in Section 19984 of the California Business and Professions Code, will not participate in this promotion.

BASE GAME RULES

All base game rules that have been approved by the Bureau of Gambling Control for the casino games will be followed. There are no changes whatsoever.

Silver Fox Poker Tournaments

IMAGED
SEP 14 2010

1. Name of Tournament or Special Event:

Poker tournaments; various names will be used.

2. Name of controlled game to be offered during the Tournament or Special Event:

Texas Hold'em

3. Fees for temporary tables:

N/A.

4. Location of event within the gambling establishment:

Casino floor.

5. Gaming activities to be offered during the Tournament or Special Event:

The following are options that may or may not be used implemented during the play of poker tournaments. If any of these options are used it will be clearly posted prior to the tournament registration and start of play.

BOUNTY(S)

During some tournaments, there will be one person called the Bounty. When this person is eliminated from the tournament, the person who eliminated them will receive their buy-in back. The Bounty will be selected at random by the seat cards prior to the start of the tournament. When a tournament is offered weekly or bi-weekly, the winner of the previous tournament will be the Bounty. In the event of two or more people eliminating the Bounty, they will split the amount of one buy-in. The Bounty will not be offered to all tournaments because some tournaments will be too small.

6. Tournament Structure:

METHOD OF ENTRY

- A patron may pay a buy-in, entry fee, earn points via tournament play or live poker play, and partial of full entry via an approved promotion.
- More than one method of entry for a specific tournament will be allowed.

BUY-IN

- The buy-in amount will range from \$0.00 to \$1,000.00. This includes what is commonly called "freerolls".

RE-BUY/ADD-ON

- The re-buy amount will range from \$0.00 to \$1,000.00. Re-buys will be restricted from 0 – 15.
- The add-on amount will range from \$0.00 to \$1,000.00. Add-ons will be restricted from 0 – 15.

7. Prize amounts; source of funds:

The prize amounts will be derived from the total of the buy-ins minus any administrative or other type of fees retained by the house for operating the tournament or special event. If a guaranteed pay-out is advertised and the total of the buy-ins does not meet the guarantee, the casino will make up the difference. The casino may offer an add-on, which means the prize pool will have all the buy-ins plus the amount of the add-on. If the event is a charity tournament the amount dedicated to the prize pool, and the amount dedicated to the charity will be posted.

The entire prize amount may partially or completely be a result of house contributions.

8. Prize Structure:

The prize pool will be awarded via a flat amount or percentage. Whether a flat amount or percentage, the casino will clearly and prominently display such method prior to offering the tournament. An example of the percentage is attached below.

Any prize amount may be cash and or products or items and or services, and or other tournament entries. In the event that something other than cash is being awarded this will be clearly advertised prior to the start of the event.

9. Amount of any administrative or other type of fee retained by the house for operating the Tournament or Special Event:

The entry fee and/or service charge will be income for the casino. It will be used to pay expenses and tips for the dealers and staff. The entry fee and/or administrative fee will range from \$0 - \$300.00 and will be clearly advertised prior to and during tournament registration.

10. Provide copies of any published/proposed promotions or advertisement literature related to this Tournament or Special Event:

N/A

11. Identify any entity or person, other than those licensed as the house, involved in the Tournament or Special Event:

None.

Places Paid	Number of Tournament Players					
	1 +	1 +	1+	35+	50+	100+
1st	100% Purse/Prize	50%	40%	25%	21%	21%
2nd		35%	25%	17.5%	15%	15%
3rd		15%	20%	15%	13%	13%
4th			10%	12.5%	11%	11%
5th			5%	10%	9%	9%
6th				8%	6%	6%
7th				6%	5%	5%
8th				3%	4%	4%
9th				3%	3.5%	3%
10th					2.5%	2%
11th					2.5%	2%
12th					2.5%	2%
13th					2.5%	2%
14th					2.5%	1%
15th						1%
16th						1%
17th						1%
18th						1%

IMAGED
JUN 24 2011

LOTUS CASINO
SUPER BAD BEAT and BAD BEAT JACKPOTS
General Rules

General Guidelines:

- The Super Bad Beat and Bad Beat Jackpots are attached to any approved forms of Texas Hold'em, Limit and No-Limit.
- For a Jackpot hand to be valid a minimum of five (5) live players must be dealt in at the start of the hand.
- For a player to be included in the payout of a Jackpot he must be an active player at the table; an active player is defined as a player who does not have a missed blind button. Players with hold buttons will be included as long as they have not been gone over the 15 minute allotted time period.
- The Jackpot will not be valid in any Tournament games.
- Casino employees are eligible to participate in the Jackpot as long as they are playing on off-duty hours.
- All winners must have one of the following forms of valid identification: Current Drivers License; Current I. D. Card; Current Military I.D. or Current Passport.
- All winnings in excess of \$600 will require the completion of IRS form W2G. Winnings in excess of \$5,002 will be subject to 25% IRS withholdings. W2G form requires current, valid I.D. and S.S. Number
- Players must refrain from conversations regarding a possible jackpot while a potential jackpot hand is in progress.
- Only one jackpot will be awarded per hand.

Super Bad Beat Jackpot Funding:

- The Jackpot is house funded. It will initially start at \$10,000 and will be seeded by the Casino.

Bad Beat Jackpot Funding:

- The Jackpot is house funded. It will initially start at \$5,000 and will be seeded by the Casino.

The jackpot will increase daily at 8 a.m. in an amount ranging between \$25 and \$1000. When a daily increase amount is selected within that range, as stated previously, the jackpot must increase by that amount daily and may not be changed until the jackpot has been hit, at which point a new seed and daily increase amount may be selected.

- The Jackpot(s) will cap at;
 - Super Bad Beat \$150,000.
 - Bad Beat \$15,000.

The bad beat will re-seed at \$1,000 to \$10,000 and the super will re-seed at \$10,000 to \$100,000.

Qualifying Hand(s):

Super Bad Beat Jackpot;

- The initial qualifying hands for the beginning jackpot of \$10,000 are Four 8's or higher beaten by a higher hand will qualify for the initial Super Bad Beat Jackpot of \$10,000.

LOTUS CASINO
SUPER BAD BEAT and BAD BEAT JACKPOTS
General Rules

- Four 8's beaten by a higher hand, both players using both hole cards will qualify for the Super Bad Beat Jackpot. (Hole cards are defined as the first two cards dealt to the player)

Bad Beat Jackpot;

- The initial qualifying hands for the beginning jackpot of \$5,000 are Aces Full of Kings or higher beaten by a higher hand will qualify for the initial Bad Beat Jackpot.
- Aces Full of Kings beaten by a higher hand, both players using both hole cards will qualify for the Bad Beat Jackpot. (Hole cards are defined as the first two cards dealt to the player)

- Subsequent to the initial jackpot being awarded, players that make the following advertised hands will be eligible to win the Jackpot. Only a winning and losing hand that has been pre-determined and designated by The Casino will be eligible.
- Once a winning and losing qualified jackpot hand is designated by the Casino, neither hand may be adjusted or changed until the jackpot has been hit and awarded.
- The two qualifying hands must include the winning hand and the best losing hand.
- As stated above, there must be a minimum of five (5) qualifying players at the start of the hand
- All eligible players at the table when the Jackpot is awarded will participate in the Jackpot payout.

Payout of the Jackpot:

(Super Bad Beat and Bad Beat Jackpots)

- The payout percentages are as follows:
 - 45% to the losing hand
 - 25% to the winning hand
 - 20% split amongst the balance of eligible players at the table
 - 10% to all qualified players in approved Hold'em games being played in the casino at the time the jackpot is awarded
- Each player that participates in the Jackpot hand will be awarded up to \$2,000 in cash and the balance of their payment in the form of a Casino issued check.
- Checks issued may not be cashed at the Casino.
- Payments of the Jackpot proceeds are also subject to the completion of the necessary IRS forms and the providing of acceptable identification.

The Casino reserves the right to photograph the hands in question, inspect all qualifying hands, and to refuse payment of a Jackpot prize in the event that it is determined the proper rules and procedures were not followed and/or cheating has occurred. The deck involved in the Jackpot hand will be counted, suited, and inspected at the table. If no irregularities are found, the Jackpot will be awarded.

LOTUS CASINO
SUPER BAD BEAT and BAD BEAT JACKPOTS
General Rules

The Casino's "No Purchase Necessary" Policy is in affect for this promotion. Please see a Floor Supervisor for further details.

Lotus Casino, Super Bad Beat and Bad Beat Jackpot Rules, 11/2010, 03/2011

Application for Gaming Activity Review (BGC-APP.027)
Section III – Jackpots, Cashpots Bonuses, Promotions, etc.
Answers to Questions 1 – 15

Name of Gambling Establishment: Lotus Casino (Formerly Silver Fox Casino)
Name of Gaming Activity: Super Bad Beat and Bad Beat Jackpots

1. Name of the Proposed Gaming Activity.

Super Bad Beat and Bad Beat Jackpot Modification (GEGA-002794)

The Super Bad Beat Jackpot will also incorporate the Bad Beat Jackpot. (This modification to the previously Bureau approved Gold, Silver, and Bronze Jackpot)

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

Any approved Texas Hold'em, Limit or No-Limit

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

The Super Bad Beat Jackpot will seed initially at \$10,000.00

The Bad Beat Jackpot will seed initially at \$5,000.00

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

The Super Bad Beat Jackpot will cap at \$150,000.

The Bad Beat Jackpot will cap at \$15,000.

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

The Jackpots are house funded.

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

N/a

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

Super Bad Beat Jackpot will re-seed at a range of \$10,000 to \$150,000 if the Jackpot is won.

The payout percentages are as follows:

- o 45% to the losing hand
- o 25% to the winning hand
- o 20% split amongst the balance of eligible players at the table
- o 10% to all qualified players in approved Hold'em games being played in the casino at the time the jackpot is awarded

Each player that participates in the Jackpot hand will be awarded up to \$2,000 in cash and the balance of their payment in the form of a Casino issued check.

Bad Beat Jackpot will re-seed at a range of \$1,000 to \$10,000 if the Jackpot is won.

The payout percentages are as follows:

LOTUS CASINO
SUPER BAD BEAT and BAD BEAT JACKPOTS
General Rules

- 45% to the losing hand
- 25% to the winning hand
- 20% split amongst the balance of eligible players at the table
- 10% to all qualified players in approved Hold'em games being played in the casino at the time the jackpot is awarded

Each player that participates in the Jackpot hand will be awarded up to \$2,000 in cash and the balance of their payment in the form of a Casino issued check.

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

The Super Bad Beat and Bad Beat Poker Jackpots

The payout percentages are as follows:

- 45% to the losing hand
- 25% to the winning hand
- 20% split amongst the balance of eligible players at the table
- 10% to all qualified players in approved Hold'em games being played in the casino at the time the jackpot is awarded

Each player that participates in the Jackpot hand will be awarded up to \$2,000 in cash and the balance of their payment in the form of a Casino issued check.

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

Super Bad Beat Jackpot will re-seed at a range of \$10,000 to \$150,000 if the Jackpot is won.

Bad Beat Jackpot will re-seed at a range of \$1,000 to \$10,000 if the Jackpot is won.

The jackpots will both increase daily at 8 am in an amount ranging between \$25 and \$1,000.

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.

For a Jackpot hand to be valid a minimum of five (5) live players must be dealt in at the start of the hand.

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

N/A

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

A person may participate for free in this promotion via our demonstration table. The demonstration table is part of our "No Purchase Necessary" policy.

The jackpot will be offered to customers who wish to participate for free, on a general and indiscriminate basis. The Casino will offer a demonstration table for all customers requesting to participate in the jackpot game without requiring them to pay a table fee or collection of any type. There will not be any live wagering at this table. Participants in the demonstration or "No Purchase Necessary" table will be eligible to win their portion of the bad beat jackpot if they receive the qualifying hand. They will receive the portion of the jackpot they have qualified for and any balance of the jackpot will remain in the jackpot fund.

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

Advertisements will be created upon approval of this promotion.

LOTUS CASINO
SUPER BAD BEAT and BAD BEAT JACKPOTS
General Rules

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

The gaming activity involves no other entity other than the house. There is no copyright, patent, or license involved with this activity.

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

Standard poker tables will be utilized for this activity. A standard 52 card poker deck will also be utilized as well as licensed, professional dealers. Our tables are equipped with Shuffle Master in table shuffling machines.

VIP Prime Membership Promotion

Bureau Requirements

Advertising

Parkwest Casino Lotus may advertise various names for this gaming activity. Should the Casino advertise a different name, the BGC ID (GEAR-001142) 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 Parkwest Casino Lotus at all times the gaming activity is being offered for play:

- Procedures for purchasing the VIP Prime Membership
 - Monthly price of membership
- The date(s) and time(s) the promotion shall be offered
- The games eligible for the promotion
- Eligible prizes, prize quantities, and prize values
- Restricted to Customer Incentive Program (GEGA-004485) members
- Any other restrictions that apply to this gaming activity

Eligible Controlled Games

The VIP Prime Membership Promotion shall be attached to the following Bureau approved controlled games offered at Parkwest Casino Lotus, as shown below, at all times this gaming activity is being offered for play. All controlled game rules shall be played as previously approved by the Bureau.

- Blackjack X (GEGA-003056)
- Cash-In Baccarat (GEGA-002784)
- Lucky Pai Gow Poker (GEGA-002775)
- Commission Free Baccarat (GEGA-003032)
- Mini Pai Gow (GEGA-003657)
- Pai Gow Poker with Triple Bonus Bets (GEGA-004031)
- Royal Pai Gow Poker (GEGA-003804)
- Ultimate Pai Gow Poker (GEGA-004016)
- Mah Jong Pai Gow (GEGA-003094)
- 3 Card Poker (GEGA-002773)

Object and Summary

During predetermined and posted promotional periods, patrons who are Customer Incentive Program members (GEGA-004485), and who sign-up and pay a corresponding monthly fee, are eligible to receive one or more predetermined and posted prizes throughout the promotional period.

All VIP Prime Members are subject to the same monthly fee, are eligible to receive the same prize(s), and will have the same amount of time to claim their prize(s) as all other VIP Prime Members during the posted promotional period. A VIP Prime Member Card will be given to members to represent their membership status in the Customer Incentive Program (GEGA-004485) and the VIP Prime Membership Promotion.

The eligible prizes awarded by the Casino to VIP Prime Members are grouped into two categories; Category A and Category B.

VIP Prime Membership Promotion

Category A represents prizes normally awarded in gaming activities or promotions. Category A prizes consists of California Games Tournament Entries (GEGA-003888), gift cards, electronics, limousine service, event tickets, private dining, shoe shine service, valet and preferred parking, private events, ride share service, and car wash service.

Example: During the month of July, all VIP Prime Membership participants will be eligible for Valet Parking.

Category B prizes are “additional prizes” that are awarded in addition to a prize that is awarded through a currently running gaming activity. Category B prizes consists of additional Buy-In Bonus Chips (GEGA-004345), additional Player Reward Points (GEGA-004485), additional drawing tickets (GEGA-002791), and additional Free Play Chips (GEGA-003022).

Example: During Mondays in the month of August, patrons will receive \$250 in Bonus Chips when they buy-in for \$2,000. All VIP Prime Members will receive an extra \$100 in Bonus Chips (\$350 in total) when they buy-in for \$2,000.

All prizes awarded to VIP Prime Members shall be predetermined and posted by the Casino each promotional period. Some prizes may be available in limited quantities. Any limitations to the quantities of prizes shall be predetermined and posted by the Casino.

Eligibility Requirements

This gaming activity shall be open to all players 21 years of age and older with valid I.D.

- This gaming activity is restricted to Customer Incentive Program members (GEGA-004485).
- Participants must pay the monthly fee on time.
- Participants may pay the monthly fee with credit card, cash, live casino chips, or Player Reward Points (GEGA-004485).
- Promotional periods in this gaming activity are equal to one month.
- A VIP Prime Membership card will have the player’s name and membership number. If the card is lost or stolen, a replacement will be replaced free of charge.
- The VIP Prime Membership is non-transferable.
- Casino employees are eligible to participate in this promotion while off duty and out of uniform.
- Third-Party Providers of Proposition Player Services (TPPPS), on or off duty, shall not be eligible to participate in this promotion.
- A VIP Prime Member is eligible to participate in this promotion while in the player-dealer position.
 - **Example:** During the month of September, all VIP Prime Members will receive Double Player Reward Points on Fortune Pai Gow Poker from 9PM to 11 PM.
- There is no limit to how many times a player may win a prize through the VIP Prime Membership Promotion.
- A participant in this promotion must claim any advertised prizes within the posted promotional periods. A prize will not be awarded to participants after a promotional period has ended, regardless if the monthly fee was paid.
- Tournament games are eligible for this gaming activity.

VIP Prime Membership Promotion

Prize

The prize amount shall be a fixed amount ranging from \$1 to \$500,000 in the form of cash, live casino chips, merchandise, food, additional Buy-In Bonus Chips (GEGA-004345), Free Play Chips (GEGA-003022), Player Reward Points (GEGA-004485), California Games Tournament Entries (GEGA-003888), drawing tickets (GEGA-002791), gift cards, electronics, limousine service, event tickets, private dining, shoe shine service, valet and preferred parking, private events, ride share service, and car wash service. Participants in this gaming activity must claim their prize within the posted promotional period using their VIP Prime Membership card. Some prizes may be offered in limited quantities. In the event an offered prize is unavailable or exhausted, a substitute prize or prizes will be offered to all remaining VIP Prime Members within the posted promotional period.

Funding

The VIP Prime Membership Promotion shall be fully funded by Parkwest Casino Lotus.

Membership Fees

Parkwest Casino Lotus shall charge patrons a monthly membership fee to participate in the gaming activity. The monthly fee shall be a fixed amount ranging from \$50 to \$200. The price of the monthly fee will be advertised and posted prior to the promotional period beginning. The monthly fee shall not change in price during a promotional period. Participants must pay the monthly fee on time. If a patron does not pay the monthly fee within the month's five day grace period, the membership will be cancelled. In addition, to accommodate a customer, per casino management's discretion, the monthly fee can be waived. Participants may pay the monthly fee with credit card, cash, live casino chips, or Player Reward Points (GEGA-004485).

Administrative Fees

Parkwest Casino Lotus shall not retain an administrative fee for this promotion as it is house funded

No Purchase Necessary

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