



STATE OF WASHINGTON
GAMBLING COMMISSION

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

December 24, 2013

Michael Templeman
Paradigm Table Games Inc.
30376 Esperanza Suite 100
Rancho Santa Marg, CA 92688

RE: Mulligan 21

Dear Mr. Templeman,

Thank you for requesting approval to market the card game "Mulligan 21" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Paradigm Table Games Inc., the Washington State Gambling Commission will approve the game under the conditions listed below:

Commercial Card Rooms

- The game shall be played and operated under the terms and conditions set forth under the "Mulligan 21 – Rules of Play" you provided and is enclosed.
- Commercial card room operators seeking to operate this game must first submit their internal controls and receive approval from the Commission prior to implementing.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be licensed by the state prior to the sale of the equipment.

Tribal Casinos

- The game shall be played and operated under the terms and conditions set forth under the "Mulligan 21 – Rules of Play" you provided and is enclosed.
- Each Tribal Gaming Operation must request and obtain approval from their respective Tribal Gaming Agencies (TGA).
- Before TGA allows your game to operate, they will seek concurrence from our agency as well.



Mr. Templeman
December 24, 2013
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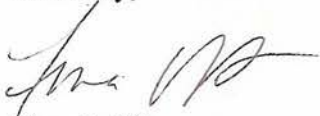
- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and licensed by the Tribe prior to the sale of the equipment.

Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-03-045, related to this game and may be contacting you.

Furthermore, any modifications to this game may affect this approval. Contact the Commission should you contemplate modifications. If you have any questions on commercial implementation, please contact Jess Lohse at (425) 277-7017. If you have any questions on Tribal implementation, please contact Kelly Main at (206) 423-4260.

Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,



Tina Griffin
Assistant Director
Licensing Operations Division

Enclosure

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



Training Manual

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Overview

Mulligan 21™ is standard house-banked blackjack with an optional bonus wager. All rules pertaining to standard blackjack as posted on the WSGC's website remain the same with the exception of three specific rule changes as follows:

- Players may replace any unwanted face card drawn after the initial deal once per hand,
- Blackjack always wins and pays even money, and
- All standing player bets push on any dealer 17 (soft or hard).

The game is played with six or eight standard 52-card decks of playing cards, and it features a customized bonus bet that is compatible with the main player advantage of the game's modified rules – fewer player busts.

Dealing Procedures/Game Rules (Main Game)

1. Players begin play by making the mandatory main wager, within standard table limits.
2. Players receive two cards, face-up, and the dealer receives one face-up card and one facedown card.
3. Before the dealer checks for a natural blackjack, any player who has a natural blackjack wins immediately and is paid at even money.
4. Next, the dealer will check for a natural blackjack in the standard fashion (including offering insurance if the upcard is an Ace), and if he has one, all remaining players lose their main wagers.
5. Otherwise, each player in turn plays their blackjack hand in standard fashion, with one exception: Once per hand dealt, if a player receives a face card (but not a ten-spot), he may choose to have it burned and replaced with the next card in the shoe.
 - a. Note: the player may not choose to burn the face card and stand; he must receive an additional replacement card. After receiving the replacement card, the player may stand or continue to hit.
 - b. Note: the player may choose to burn the face card after doubling down, but his hand will still be treated as a double down, with the replacement card serving as his one and only card.
 - c. Note: the player may Mulligan once on each new hand resulting from a pair split.
6. Next, the dealer plays the house hand and resolves player bets in standard fashion, with one exception: should the dealer have a total of 17 at any point (either hard 17 or soft 17), the hand ends and all unbusted player hands are pushed – this includes player hands that would otherwise have lost to the dealer's 17.
7. All cards are collected and a new round may begin.
8. When offering Mulligan 21, Card Room operators must not allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140

Bonus Wager

Lucky Stiff™ is an optional bonus wager for Mulligan 21. When making the Lucky Stiff wager, the player is betting (or hedging) that he will get a blackjack or stiff hand with his first two cards. A stiff hand is a two-card total of hard 12, 13, 14, 15, or 16 – a ‘bustable’ hand that falls in that space between a hit hand and a pat hand.

Dealing Procedures/Game Rules (Bonus Wager)

1. The Lucky Stiff wager is placed at the start of the round, before any cards are dealt; the Lucky Stiff wager may be of any amount within table limits.
2. The Lucky Stiff wager is resolved in the following manner:
 - a. If the player is dealt a natural blackjack, his Lucky Stiff wager wins immediately and is paid at the rate of 1:1.
 - b. If the player has a stiff pair (66, 77, 88), his Lucky Stiff wager wins immediately and is paid at a rate of 7:1.
 - c. If the player has any other stiff hand (hard 12, 13, 14, 15, 16 unpaired), his Lucky Stiff wager loses when his main wager loses, pushes when his main wager ties (including a push from any dealer total of 17), and wins at a rate of 5:1 when his main wager wins.
 - d. If the player does not have a blackjack or stiff hand on the initial deal, his Lucky Stiff wager loses and is collected immediately.

Security

Dealing Mulligan 21 raises no major security issues beyond that of regular Blackjack if dealers are properly trained to adjust for the Mulligan and Push 17 rules. These are simple rules to teach; in fact, the Push 17 rule actually makes dealing this game somewhat easier. Insofar as the Mulligan rule is concerned, the only new issues are (a) the hand signal for players to use if they choose to take a ‘non-bust’ Mulligan, and (b) the procedure to handle the burn card. These procedures are in place and will be explained during dealer training.

Additional Lucky Stiff Pay Tables

Instant Winners	Pay Table #2	Pay Table #3
Player Hand: 66, 77 or 88	6:1	8:1
Player Blackjack	1:1	1:1
Beat the Dealer		
Stiff Winner	5:1	5:1
Ties & Dealer 17	PUSH	PUSH

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BLACKJACK ALWAYS WINS MONEY
All bets Push on Any Dealer 17

DEALER'S HAND
Ace of Spades 11
King of Hearts 21
Total 22
Hit or Stand
Hit or Stand

PLAYER'S HAND
Ace of Spades 11
King of Hearts 21
Total 22
Hit or Stand
Hit or Stand

MULLIGAN
Player May Replace One Face Card Hit

DEALER'S HAND
Ace of Spades 11
King of Hearts 21
Total 22
Hit or Stand
Hit or Stand

INSURANCE BET & BANNER AT CASINO'S DISCRETION