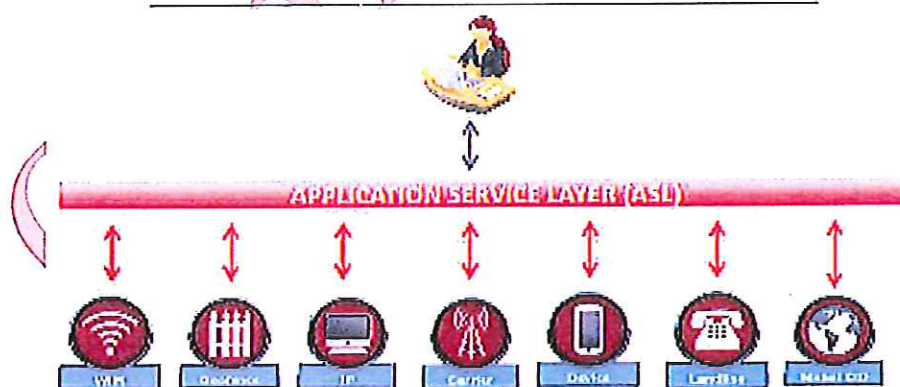


July 2013

#### 4. User Safety, Verification and Encryption:

- All passwords are encoded with the pbkdf2 with hash algorithm sha512, iterated over 4000 times. This encryption algorithm is specified by the NIST (National Institute of Standards and Technology) Publication 800-132.
  - **Know Your Customer (KYC)** - The agent makes a connection to the KYC gateway to verify the address through the last 4 digits of the SSN, as well as name and address information. Upon withdrawal of funds, the VPNAPS makes a connection to the KYC to verify that mailing, name information and social security number are all correct, in addition to ACH information.
  - This method offers a comprehensive solution, including robust fraud analytics that helps minimize risk and loss.
  - **NOTE** : The patron has a maximum of five attempts to register and verify their information correctly or the ip address will be banned for a day. If the patron wants to withdraw, they have five attempts as well. This is configurable.
- **Geolocation** - With our location based service we are able to capitalize on the power of location data across multiple sources using a secure cloud.



## Great Luck, LLC - VPNAPS (Proxy) Security Overview - v.62

July 2013

- All passwords are encoded with the pbkdf2 with hash algorithm sha512, iterated over 4000 times. This encryption algorithm is specified by the NIST (National Institute of Standards and Technology) Publication 800-132.

### 5. Access Rights:

- To access any of the servers on Alturas, the user must first log into the VPN.
- To SSH into any of the servers, each user is given an authorized private-public key pair (Generated with SSH2 RSA-2048), and must log in through the passphrase. No passwords are to be accepted.
- The Audit-Cluster administration panel and commands can only be accessed by logging in through the VPN portal (Paolo Alto Global Connect). The Audit Cluster cannot be accessed externally.
- The configuration file for both the Agent and the Audit-Cluster are set to 640. The owner ROOT has read and write access. A group specified by the chown command will have read access. Everyone else will have no access to this file, other than the webserver which will be read only.
- In the administration panel, all changes made to the database by the administrator are logged.



# What are the components?

- Client (Desktop, Laptop, iPad, iPhone, Android)
  - Patron Registration Site
  - Bingo Games
- Encryption & Security
  - Consumer Protection
  - Age Verification
  - Geo-location
  - Fraud Protection
- Server / Back-end (Proxy system)
  - Web Server
  - Master Server (Routes all queues to respective service)
  - Math Server (RNG, Bingo Math, Patterns, Payout)
  - Game Server (Creates & Processes all games)
  - Payment Server
  - Logging Server
  - Watchdog Server
  - Database Cluster
  - Customer Support Server
  - Content Management System

June 2014

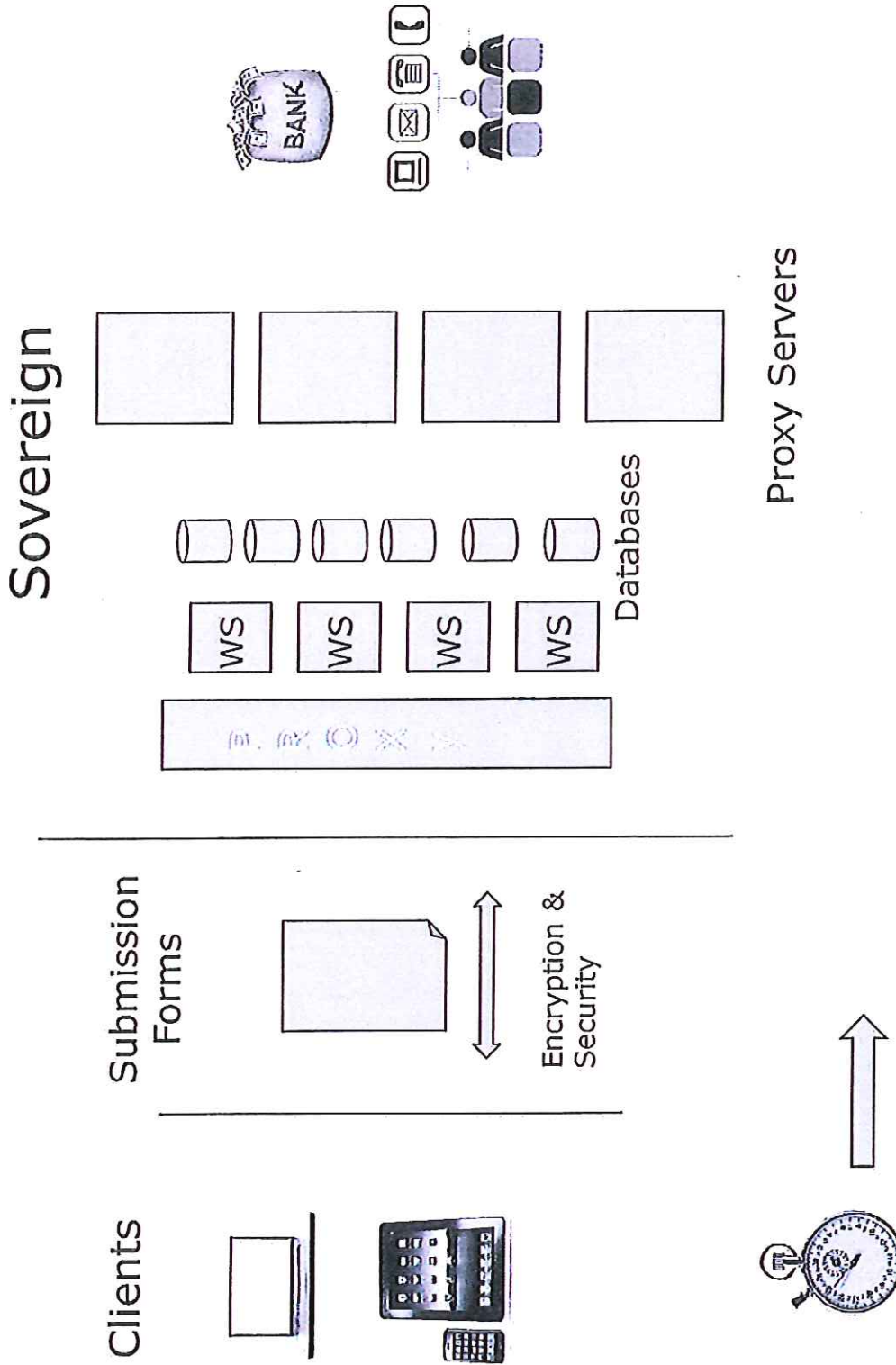
Confidential - Great Luck, LLC

18





# What are the components?

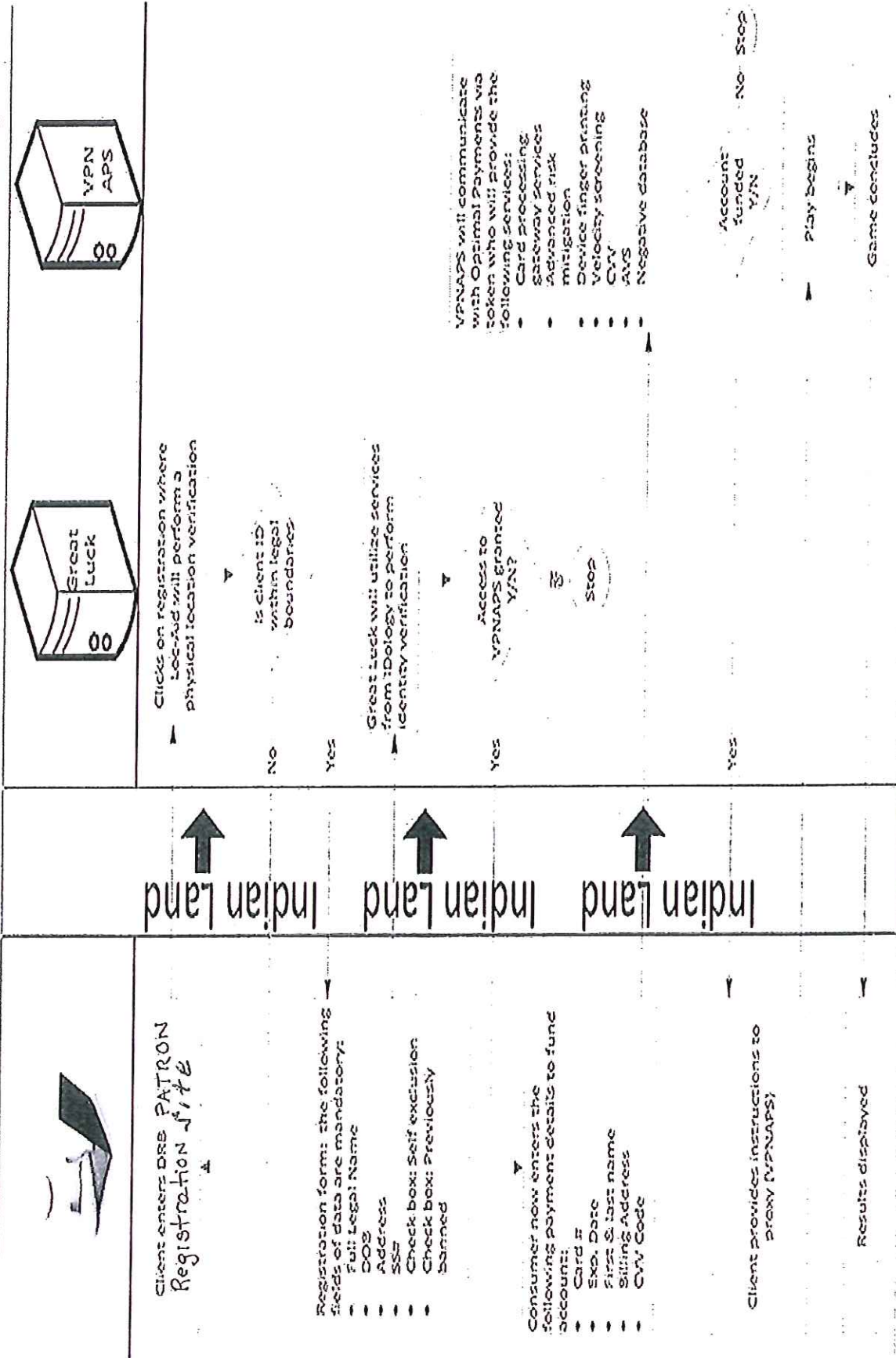


June 2014

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Security & Risk Mitigation During DRB Account Creation & Funding





## THE USER (PATRON)

- Lobby (Main Page)
- >Message notification area
- >List of available games for your agent to join
- >Leaderboards
- >Chat

## User account management

- >Registration and Billing information
- >Request form to "Blacklist Self"
- >Log In

## Billing management

- >Transaction history (547.11)
- >Request form to cancel credits

## Gameplay management

- >Submission form
- >Replay of game (read-only)



## THE PROXY (AGENT)

proxy.greatluck.com

Validates all information sent to it, then queues that request into the request database.

Buils the Queue and Reads the Audit's Response



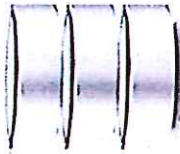
The Proxy will notify the user if the Audit cluster found any problems with the billing via popup.

Asynchronous calls:

LeaderBoards, Games, Chat and others will also be displayed to the patron from the proxy.



READS and accepts submissions



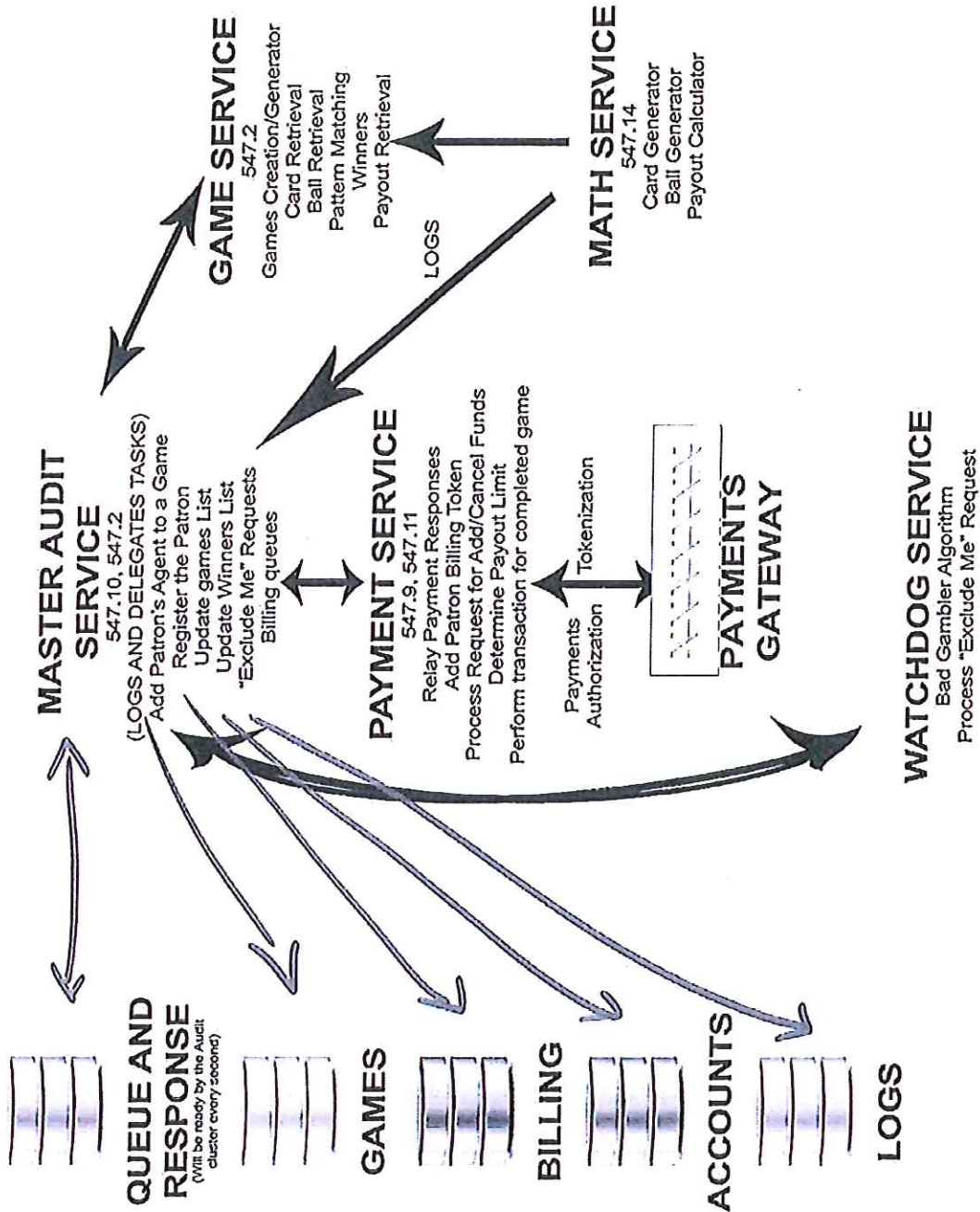
## QUEUE AND RESPONSE DATABASE

(Will be ready by the Audit cluster every second)

**ALL SUBMISSIONS TO THE PROXY (AGENT) ARE LOGGED**



# THE AUDIT CLUSTER



June 2014

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# Desert Rose Bingo

## Overview

The following sections entails the bingo game flow *after* logging in

### Section 1: To Join a Bingo Game

To join a bingo game, user must access the "Bingo" tab from the website and join a game through the dashboard under the "Games" tab. User selects the type of denomination and click on "Buy Ticket" to proceed to the request from

"Bingo" tab directs to the Bingo Dashboard page

The screenshot shows the Desert Rose Bingo website dashboard. At the top, there is a navigation bar with links: Home, Bingo, Rules, My Account, FAQ, Support, and Blog. Below the navigation bar, there are two tabs: "Games" (selected) and "Bonus Games". The "Games" tab displays a list of denominations and their corresponding card costs. A yellow arrow points from the "Bingo" tab in the navigation bar to the "Games" section. Another yellow arrow points to the "Buy Ticket" button for the "1 Dollar Game".

Denomination	Card Cost	Buy Ticket
Penny Game	\$0.01	Buy Ticket
5 Cent Game	\$0.05	Buy Ticket
10 Cent Game	\$0.10	Buy Ticket
25 Cent Game	\$0.25	Buy Ticket
50 Cent Game	\$0.50	Buy Ticket
1 Dollar Game	\$1.00	Buy Ticket

Below the "Games" section, there is a "Your Games" section with a sub-tab for "Completed Games". It displays a table of game history:

Ticket	Date	Denomination	Pattern	Cards	Games	Status
29	July 29, 2013	1 Dollar Game	[Pattern]	5	0/1	waiting..
28	July 29, 2013	25 Cent Game	[Pattern]	5	0/4	waiting..
27	July 29, 2013	1 Dollar Game	[Pattern]	5	0/2	waiting..
25	July 29, 2013	1 Dollar Game	[Pattern]	5	0/1	waiting..

Click on "Buy Ticket" to access the bingo game request form



**Section 2: Complete Bingo Game Request Form and Submission**

Once the user has selected a denomination, he or she must complete and submit a request form. It is required for the user to accept Alturas regulations in order to participate in Desert Rose Bingo.

Games		Bonus Games	?
Denomination	Card Cost		
Penny Game	\$0.01	Buy Ticket	
5 Cent Game	\$0.05	Buy Ticket	
10 Cent Game	\$0.10	Buy Ticket	
25 Cent Game	\$0.25	Buy Ticket	
50 Cent Game	\$0.50	Buy Ticket	
1 Dollar Game	\$1.00	Buy Ticket	



## Request Form

Balance: \$0.52

**DENOMINATION:** PENNY GAME **TOTAL:** \$0.01

**SELECT A NUMBER OF GAMES?**  
Select a number of games and this will automatically place you in the next round.

1

**SELECT A NUMBER OF CARDS?**  
Select and purchase number of cards to participate in each game! Each card costs \$0.01

1 X \$0.01 = 0.01

**CHOOSE A PATTERN**  
A pattern is randomly selected by default. If you want to choose a pattern, click on "My Pick".

Quick Pick
  My Pick

**CHOOSE A THEME**

You hereby accept Alturas regulations when submitting a Bingo Game Request. In addition, you permit the Alturas casino to make plays on your behalf.

Cancel
Submit Request!

Request Form – Displaying for "Random" (Theme)

## Section 2.1: Request Form Items

All items within the request form must be filled out in order to proceed to the game:

- Number of games to engage in
- Number of cards to play in each game
- Pattern selection
  - Quick Pick: Randomly selects a pattern
  - My Pick: User selects a pattern
- Theme Selection
  - Player selects a theme for the playback of the game
- Alturas agreement check box
- 'Submit Request' button

Request Form – Displaying for "My Pick" (Theme)

# Request Form

Balance: \$0.52

**DENOMINATION:** PENNY GAME **TOTAL:** \$0.01

**SELECT A NUMBER OF GAMES?**  
Select a number of games and this will automatically place you in the next round.

1


**SELECT A NUMBER OF CARDS?**  
Select and purchase number of cards to participate in each game! Each card costs \$0.01

1 X \$0.01 = 0.01

**CHOOSE A PATTERN**  
A pattern is randomly selected by default.  
If you want to choose a pattern, click on "My Pick".

Quick Pick  My Pick

**CHOOSE A THEME**



You hereby accept Alturas regulations when submitting a Bingo Game Request.  
In addition, you permit the Alturas casino to make plays on your behalf.

**Cancel** **Submit Request!**



### Section 3: Accessing Joined Bingo Games

From the Dashboard, under "Your Games" tab, users will be able to witness the status of the game.

The Timer category indicates the following status:

- **Waiting:** The game is waiting for other players to join
- **# of Seconds:** When the timer displays numerical values in a descending order, this indicates the game starting
- **Closed:** When the timer displays "Closed", this indicates that the game is not accepting players

Your Games		Completed Games						
Ticket	Date	Denomination	Pattern	Cards	Games	Timer	PPL	Theme
29	July 29, 2013	1 Dollar Game		5	0/1	waiting..	1	
28	July 29, 2013	25 Cent Game		5	0/4	waiting..	1	
27	July 29, 2013	1 Dollar Game		5	0/2	waiting..	1	
25	July 29, 2013	1 Dollar Game		5	0/1	waiting..	1	

"Waiting" indicates that the game is waiting for more participants.



### Section 4: Watching Bingo Game Results

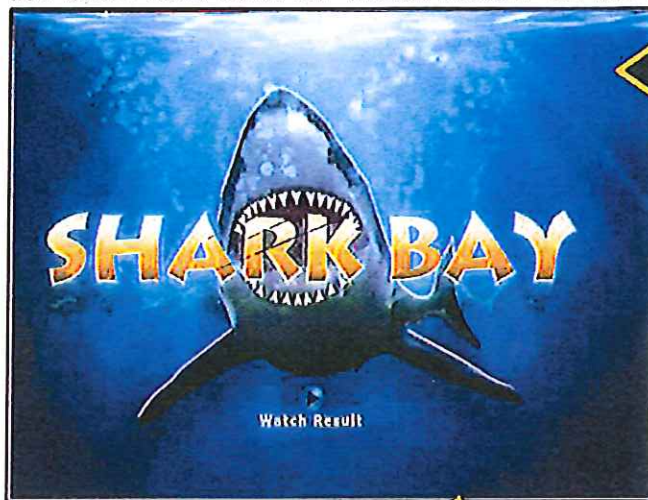
In the "Completed Games" tab from the Dashboard, users will be able to watch a playback of the bingo game by clicking on the theme icon beneath the Watch category.

Your Games		Completed Games					
Ticket	Date	Denomination	Pattern	Watch	Games	Cards	Prize
26	July 29, 2013	1 Dollar Game			2	5	\$0.00
24	July 29, 2013	1 Dollar Game			2	5	\$7.30
22	July 29, 2013	10 Cent Game			2	4	\$0.00
19	July 29, 2013	25 Cent Game			2	10	\$4.48
16	July 29, 2013	1 Dollar Game			2	10	\$10.22
15	July 29, 2013	10 Cent Game			2	5	\$0.91
12	July 29, 2013	Penny Game			1	1	\$0.00

Click on the Theme icon to watch bingo game results



Once the user has clicked on the Theme icon, the results play back in a pop-up - an overlay played on top of the interface. Prior to watching the results, a splash page (an introductory) is the first scene the users see. Click on "Watch Result" on the splash page to proceed to the playback of the Bingo game.



Splash screen for Shark Bay

Playback scene of bingo game results

After clicking on "Watch Result" button from the splash screen, the following scene is the playback of the bingo game results





### Section 4.1: Bingo Game Interfaces (Results Playback)

The Bingo Game Interface, for results playback, has 2 different layouts: Bingo game and Half-Hour Bonus game.

Bingo Game Interface



Bonus Game Interface





The two layouts do not differ significantly, but there are some alterations, mainly emphasizing on naming conventions for each category.

Below is a description for both, Bingo and Bonus Game, layout.

The **Bingo Game layout** has the following categories or items within the interface:

- Top Panel: Username, Balance, Advertisement Space, Options Bar and Date/Time
- Left Panel: Bingo Board, Call Count, Prize (End Game)
- Middle Panel: Bingo Cards, Page Indicators (Holds cards)
- Right Panel: Name of Theme, Game ID, Games (Amount user selected), Amount of cards purchased, Price of cards, Total price of cards (Total cards selected x Price of Cards), iBonus indicator, Winnings, and Winning Pattern

The **Bonus Bingo Game layout** has all of the same items and category as the Bingo Game layout, but instead of the iBonus indicator (iBonus only occurs in Bingo Game), it is replaced with Bonus Type. Bonus Type displays the type of Bonus games. Currently, the only available Bonus game Desert Rose Bingo provides is the Half-Hour, which runs every half hour of every hour.



Bingo Game – Right Panel



Bonus Bingo Game – Right Panel



**Section 5: Bonus Games – Half Hour**

A user is eligible for Half-Hour Bonus games – available for every denomination – if he or she abides by the “Every-5-Cards Purchased Rule”. If the user is eligible, he or she receives an additional bonus card for free and automatically places the user in an upcoming Half-Hour Bonus game.

Half-hour Bonus games occur every 30 minutes, and each Half-Hour Bonus game starts at the 30 minute mark of every hour.

**Example:**

If a user purchased 10 cards and selected 2 games for a 10 Cent Bingo game at 2:00pm, he or she receives a total of 4 bonus cards for the upcoming 10 Cent Bonus game.

- Every 5 cards = 1 additional Half Hour Bonus card
  - User selected 10 cards and 2 games, which equals to 4 Bonus Cards

He or she is placed in the upcoming Half-Hour Bonus game that will occur at 2:30pm and will be using the additional cards obtained from the corresponding 10 Cent Bingo game.

Games
Bonus Games
P

Bonus Denominations	Card Cost	
Half Hour Penny Game	\$0.01	Buy Ticket
Half Hour Nickel Game	\$0.05	Buy Ticket
Half Hour 10 cent Bonus Game	\$0.10	Buy Ticket
Half Hour 25 cent Bonus Game	\$0.25	Buy Ticket
Half Hour 50 Cent Bonus Game	\$0.50	Buy Ticket
Half Hour 1 Dollar Bonus Game	\$1.00	Buy Ticket

Your Games
Completed Games

Ticket	Date	Denomination	Pattern	Cards	Games	Timer	PPL	Watch
242	August 14, 2013	Half Hour 1 Dollar Bonus Game		1	0/1	waiting..	1	
341	August 14, 2013	Half Hour 10 cent Bonus Game		3	0/1	waiting..	2	
315	August 14, 2013	10 Cent Gam						
312	August 14, 2013	10 Cent Gam						

Games
Bonus Games
P

Bonus Denominations	Card Cost	
Half Hour Penny Game	\$0.01	Buy Ticket
Half Hour Nickel Game	\$0.05	Buy Ticket
Half Hour 10 cent Bonus Game	\$0.10	Buy Ticket
Half Hour 25 cent Bonus Game	\$0.25	Buy Ticket
Half Hour 50 Cent Bonus Game	\$0.50	Buy Ticket
Half Hour 1 Dollar Bonus Game	\$1.00	Buy Ticket

The user is also able to purchase additional Half-Hour Bonus cards by clicking on "Bonus Games" tab from the Dashboard, but will only be eligible if he or she has:

- The total amount of cards purchased follows the "Every-5-Cards Purchased Rule"
  - Example: Purchased 10 cards and selected 2 games
    - $10 \text{ cards}/5 \Rightarrow 2 \text{ Bonus cards} + 10 \text{ cards}/5 \Rightarrow 2 \text{ Bonus cards} = 4 \text{ Bonus cards}$
- Bonus cards available per denomination: Penny, 5 Cent, 10 Cent, 25 Cent, 50 Cent and 1 Dollar, and each bonus card retrieved is only valid per corresponding bonus game
  - Example: A user has purchased 10 cards and selected 2 games from a Penny game. The bonus cards will be utilized in the upcoming Half-Hour Bonus Penny game, but cannot be redeemable, reused or saved for future bonus games.
    - $10 \text{ cards}/5 \Rightarrow 2 \text{ Bonus cards} + 10 \text{ cards}/5 \Rightarrow 2 \text{ Bonus cards} = 4 \text{ Bonus cards}$
- User must continue to participate in regular bingo games to participate in Half-Hour Bonus games
  - Example: If a user participated in a Half-Hour Bonus Penny game at 2:00pm and wants to participate in the Half-Hour Bonus Penny game that starts at 2:30pm, he or she must purchase cards, *where he or she abides by the "Every 5 Card Purchase" rule*, in a regular Penny game in order to participate.



**Section 5.1: Bonus Game Request Form**

A user is able to purchase additional cards, but he or she must be eligible in order to participate in a Bonus game and purchase additional cards. To be eligible, he or she must follow the "Every-5-Cards Purchased Rule" - Every 5 card gives the user a Bonus card and automatically enters them in an upcoming Half-Hour Bonus game.

If the user is eligible, he or she can purchase additional cards by clicking on "Buy Ticket" from the "Bonus Games" tab from the Dashboard.

Bonus Denominations	Card Cost	
Half Hour Penny Game	\$0.01	Buy Ticket
Half Hour Nickel Game	\$0.05	Buy Ticket
Half Hour 10 cent Bonus Game	\$0.10	Buy Ticket
Half Hour 25 cent Bonus Game	\$0.25	Buy Ticket
Half Hour 50 Cent Bonus Game	\$0.50	Buy Ticket
Half Hour 1 Dollar Bonus Game	\$1.00	Buy Ticket

The user is then proceeded to the request form which appears as a pop-up overlay.

**Buy Additional Bonus Cards** Balance: \$

**DENOMINATION:** HALF HOUR PENNY GAME **TOTAL:** \$0.00

**SELECT A NUMBER OF CARDS?**  
Select and purchase number of cards.

0 X 0.01 0.00

You hereby accept Alturas regulations when submitting a Bonus Bingo Game Request  
In addition, you permit the Alturas casino to make plays on your behalf.

**Cancel** **Submit Request!**



The Bonus Game Request Form items include the following:

- Selecting number of cards
- Displaying the Winning Pattern
- Accepting Alturas to participate on the user's behalf

### Section 6: Accessing Joined Bonus Games

From the Dashboard, under "Your Games" tab, users will be able to witness the status of the Half-Hour Bonus game (Same display elements as regular bingo games – refer to *Accessing Joined Bingo Games*)

Games		Bonus Games		P	
Bonus Denominations			Card Cost		
Half Hour Penny Game			\$0.01	Buy Ticket	
Half Hour Nickel Game			\$0.05	Buy Ticket	
Half Hour 10 cent Bonus Game			\$0.10	Buy Ticket	
Half Hour 25 cent Bonus Game			\$0.25	Buy Ticket	
Half Hour 50 Cent Bonus Game			\$0.50	Buy Ticket	
Half Hour 1 Dollar Bonus Game			\$1.00	Buy Ticket	

Your Games		Completed Games						
Ticket	Date	Denomination	Pattern	Cards	Games	Timer	PPL	Watch
342	August 14, 2013	Half Hour 1 Dollar Bonus Game		1	0/1	waiting..	1	
341	August 14, 2013	Half Hour 10 cent Bonus Game		3	0/1	waiting..	2	
315	August 14, 2013	10 Cent Game		5	2/3	waiting..	1	

Your Games		Completed Games						
Ticket	Date	Denomination	Pattern	Cards	Games	Timer	PPL	Watch
342	August 14, 2013	Half Hour 1 Dollar Bonus Game		1	0/1	waiting..	1	
341	August 14, 2013	Half Hour 10 cent Bonus Game		3	0/1	waiting..	2	
315	August 14, 2013	10 Cent Game		5	2/3	waiting..	1	
312	August 14, 2013	10 Cent Game		5	0/1	waiting..	1	

# Description of Bingo Games to be Conducted by Santa Ysabel Interactive Using Virtual Private Network Assisted Play System (“VPNAPS”)

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## Introduction

Santa Ysabel Interactive, a tribal gaming operation owned and operated by the Iipay Nation of Santa Ysabel (“Tribe”) intends to offer server-based bingo games to be played on the Tribe’s sovereign Indian lands using a Class II gaming system known as the “Virtual Private Network Assisted Play System” (“VPNAPS”). In sum, the VPNAPS allows the Tribe to offer Class II electronic linked bingo machine gaming conducted on Indian lands using a proxy system. The nature of the games to be played using the linked bingo system will be Class II server-based games requiring peer-to-peer competition in a single game of bingo with a common ball draw.

## How Play of Bingo Games Will Be Conducted

The games to be conducted using the VPNAPS will use the traditional bingo game format and be played electronically on a networked system of components, an advanced technology platform version of multi-site bingo systems in operation today in Indian gaming facilities (i.e. players compete against one another either within one Indian gaming facility and/or against all players in linked Indian gaming facilities). The collection of “technologic aids” contained within the VPNAPS will allow the gaming system to function as a series of linked “electronic” Class II gaming devices at the Santa Ysabel Interactive facility located on the Tribe’s Indian lands without changing the essential game characteristics or statutory criteria required under IGRA for the play of a Class II bingo game. In this respect, while there will be a number of game graphical display themes, each game theme will utilize a common bingo pattern set. The winning of prizes is determined under established rules by matching designated numbers on a digital bingo card with corresponding numbers randomly drawn in a predetermined pattern.

Game play is achieved via “proxy play.” In this respect, real time live bingo game action is played only by the “proxy” of an individual who has used a web-browser enabled device to access the Santa Ysabel Interactive gaming facility and its servers (each located on the Tribe’s Indian lands) via the VPNAPS; no live bingo game action is ever performed by the user of the web-browser enabled device. Once an individual is approved as an “Account Holder” (i.e. an individual at least twenty-one (21) years of age who has used the VPNAPS to establish an account to become a properly registered account holder with Santa Ysabel Interactive), system



components of the VPNAPS allow the Account Holder to access a “VPN gateway” connecting them to a virtual “proxy engagement station” – to hire a proxy to conduct the bingo game play on their behalf. On behalf of an Account Holder, their proxy participant commences play of the game on the VPNAPS by requesting from the game action server component of the VPNAPS the purchase of one or more digital bingo cards in a common game of bingo with a set denomination (i.e. penny, \$.05, \$.10, \$.25, \$.50 or \$1.00 game). At all times the games played using the VPNAPS require peer-to-peer competition between at least five (5) proxy participants in the game of bingo which is accomplished through a linked network contained within the VPNAPS. There is a single bingo ball draw for all proxy participants included in each common bingo game. Components of the VPNAPS assist the Account Holder’s proxy in playing the game of bingo by providing a visual representation of the digital bingo card, displaying the balls drawn, daubing or covering the corresponding numbers on the digital bingo card when matched with ball numbers as they are drawn, and presenting any prizes won through the play of the bingo game for later display to the Account Holder. Game play results are revealed on a time-delayed basis to the Account Holder, and an Account Holder can select the theme for watching the replay display of the game played by their proxy on their behalf.

A proxy participant’s digital bingo card will consist of a traditional 5X5 “bingo” matrix with numbers for each card. The five columns of the digital bingo card face are labeled “B” “I” “N” “G” and “O” from left to right. The center space on the card is marked “Free Space” and is considered automatically filled when contained in a pattern. The range of numbers is restricted by column, with the “B” column containing numbers between one and fifteen inclusive, the “I” column containing sixteen through thirty, the “N” column containing thirty-one through forty-five, the “G” column containing forty-six through sixty, and the “O” column containing sixty-one through seventy-five. All digital bingo cards used by proxy participants for a common game of bingo are unique (i.e. each card contains a uniquely identifying serial number).

Each bingo game uses a pool of 75 bingo balls numbered from 1 to 75 inclusive which are randomly selected without replacement. Once five or more proxy participants have purchased cards for a common game within a set period of time, the bingo game will commence. In the event there are not five or more proxy participants initiating game play for a common game within the maximum allotted period, that bingo game will not be permitted to commence. Failure to attain five or more proxy participants within the allotted period will result in the common game being cancelled and the value of the purchased cards being refunded to the Account Holder’s account. Digital bingo cards are first randomly distributed to each proxy participant as requested and then ball numbers are randomly drawn using an electronic random number generator. As they are drawn, the ball numbers are released one at a time in rapid succession in the same sequence and delivered to all proxy participants at the same time (although during the replay display of the game played an Account Holder can set the speed of the actual ball draw to their individual time preference to watch the results of the game unfold). Assisted by

components of the VPNAPS, an Account Holder's proxy participant immediately daubs or covers the corresponding numbers on the digital bingo card when the ball numbers are drawn. This is consistent with applicable tribal regulations that state that: (1) use of technologic aids such as auto-daub features or reader/dauber devices are expressly permitted to assist the proxy agent playing Class II bingo games on the Account Holder's behalf in determining whether a held card has a pre-designated pattern matching the numbers drawn for the Class II bingo game; and (2) there is no requirement for the proxy agent playing the Class II bingo game on the Account Holder's behalf to manually declare a "bingo" upon matching the numbers drawn with the pre-designated game-ending pattern on a card in order to collect the game-ending prize award. The ball draw release continues until a "bingo" has been made (i.e. game-ending pattern is achieved) and the game ends. If a card held by the proxy participant meets the standards for an iBonus prize (i.e. achieves the game-ending pattern within a pre-determined limited set of ball numbers drawn), the proxy participant's card will win both the iBonus prize and game-ending prize. Each bingo game will be played to cover a single prize pattern randomly selected prior to commencement of the game from a set of seven (7) designated patterns that each require a minimum of eight (8) numbers to achieve "bingo" (i.e. an "X" pattern, "7" pattern, "T" pattern, etc.).

In each bingo game, the VPNAPS will have an "iBonus" that is ten thousand times the card cost. For each pattern that is being called, game participants have the opportunity to win the iBonus if they achieve "bingo" for the designated pattern in the prescribed number of balls called. For example, in a twenty-five cent game, the proxy participant could win twenty-five hundred dollars for an X pattern bingo (which requires eight (8) numbers with a free space to cover the pattern in order to achieve "bingo") achieved within the first twelve (12) or less numbers drawn; but in a ten-cent game, the proxy participant could only win one thousand dollars for achieving the same X pattern bingo within the first twelve (12) or less numbers drawn, and so on for each game of different denominations. If the iBonus is not won before one million cards are sold cumulatively for that game denomination, then the iBonus activates a "floodgate" feature that permits the iBonus to be won without regard to the limited set of numbers drawn requirement – in other words, after one million cards are sold cumulatively for that specific game denomination and no iBonus has yet been won for that game denomination, the proxy participant whose card achieves the next game-ending prize pattern for that denomination, even if it takes more than twelve (12) numbers to achieve the pattern, will automatically win both the iBonus prize and game-ending prize for that game denomination.

All bingo games will pay out prizes in a pari-mutual format. For example, for every penny paid in by proxy participants on behalf of their Account Holders for a common penny bingo game, the prize amount for that game will be a certain percentage of the pay-in amount of game cards purchased for that common game. See Appendix A. In addition, upon the initial opening of Santa Ysabel Interactive, four percent (4%) of the pay-in amount for every common bingo game



will be retained for prize pay-out for a “Half Hour Bonus Game,” one percent (1%) will be retained for prize pay-out for an in game bonus (“iBonus”), and a certain percentage will be retained by Santa Ysabel Interactive. See Appendix A.

## **Bonus Game Play**

Santa Ysabel Interactive intends to offer a number of bonus game play features as part of the games to be conducted using the VPNAPS.

### **Half Hour Bonus Game**

This is a bonus game play feature that will be included upon the initial opening of Santa Ysabel Interactive. For every five cards purchased in a single game per denomination by a proxy participant on behalf of the Account Holder during the previous half hour, the proxy participant will receive one free bingo card for that denomination’s “Half Hour Bonus Game.” Collection of the amount to be used for each denomination’s Half Hour Bonus Game prize will cease being collected before the game begins to allow proxy participants to submit requests for game play on behalf of their Account Holders. The proxy participant must have played in the previous half hour to be eligible to purchase extra game cards for that denomination’s Half Hour Bonus Game.

Account Holders, through their proxy participants, may receive reminders that they have free cards coming up in the denomination’s bonus game and are eligible to purchase additional cards. This allows proxy participants to buy cards on behalf of their Account Holders in games not yet played of the same denomination, and to receive more free cards along with those they can purchase to participate in that denomination’s Half Hour Bonus Game, subject to the card purchase request being accepted prior to commencement of the Half Hour Bonus Game.

### **Monthly Bonus Game**

This is a bonus game play feature that may be added following the initial opening of Santa Ysabel Interactive. There will be no free cards in play, but the proxy participant must have played on behalf of the Account Holder during the previous month with a minimum number of cards in play. Proxy participants will be able to purchase cards on behalf of their Account Holder for twenty-five cents per card for the Monthly Bonus Game as soon as they are qualified to be eligible, until one minute prior to the start of the Monthly Bonus Game. This game is played for a bonus prize consisting of all of the monthly bonus money collected plus seventy (70%)(i.e. 17.50 cents) of the value of any cards purchased to play the bonus game (with thirty (30%)(i.e. 7.50 cents) of the bonus game card purchase value retained by Santa Ysabel Interactive), and will use a “coverall” for the prize winning pattern.

### **Quarterly Bonus Game**

This is a bonus game play feature that may be added following the initial opening of Santa Ysabel Interactive. There will be no free cards to play, however, if proxy participants have

played on behalf of their Account Holder during the previous quarter with a minimum of five cards in a single game, they will be eligible to participate. Proxy participants will be able to purchase cards on behalf of their Account Holder for twenty-five cents per card for the Quarterly Bonus Game as soon they are qualified to be eligible, until 5 minutes prior to the start of the Quarterly Bonus Game. This game is played for a bonus prize consisting of all of the quarterly bonus money collected plus seventy (70%)(i.e. 17.50 cents) of the value of any cards purchased to play the bonus game (with thirty (30%)(i.e. 7.50 cents) of the bonus game card purchase value retained by Santa Ysabel Interactive), and will use a “coverall” for the prize winning pattern.

### **Summary**

The VPNAPS has been specifically developed, designed and engineered to be (1) in strict compliance with the minimum technical requirements specified in 25 CFR Part 547, and (2) to constitute an electronic linked Class II bingo gaming system that serves as a “technologic aid” to server-based bingo games classified as “class II gaming” under IGRA. The games to be played using the VPNAPS are specifically designed to meet the statutory criteria for a Class II bingo game pursuant to IGRA. To ensure proper performance of the VPNAPS, all hardware, software, and electronic components of the gaming system are specifically tested and approved by an independent compliance lab competent to conduct such testing and approval.



# APPENDIX A

## PAY-OUT PERCENTAGES FOR BINGO GAMES PLAYED USING VPNAPS

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### Penny Bingo Game Pay-Out Percentages

65.00% paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out) – *Note: the 65.00% will be decreased to 64.00% if Monthly Bonus Game and Quarterly Bonus Game are played*  
04.00% retained for Half Hour Bonus Game  
00.5% retained for Monthly Bonus Game – *if played*  
00.5% retained for Quarterly Bonus Game – *if played*  
01.00% paid for iBonus funding for a \$100 bonus  
30.00% retained by Santa Ysabel Interactive

### Five Cent (\$.05) Bingo Game Pay-Out Percentages

65.00% paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out) – *Note: the 65.00% will be decreased to 64.00% if Monthly Bonus Game and Quarterly Bonus Game are played*  
04.00% retained for Half Hour Bonus Game  
00.5% retained for Monthly Bonus Game – *if played*  
00.5% retained for Quarterly Bonus Game – *if played*  
01.00% paid for iBonus funding for a \$500 bonus  
30.00% retained by Santa Ysabel Interactive

### Ten Cent (\$.10) Bingo Game Pay-Out Percentages

65.00% paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out) – *Note: the 65.00% will be decreased to 64.00% if Monthly Bonus Game and Quarterly Bonus Game are played*  
04.00% retained for Half Hour Bonus Game  
00.5% retained for Monthly Bonus Game – *if played*  
00.5% retained for Quarterly Bonus Game – *if played*  
01.00% paid for iBonus funding for a \$1,000 bonus  
30.00% retained by Santa Ysabel Interactive

### Twenty-Five Cent (\$.25) Bingo Game Pay-Out Percentages

65.00% paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out) – *Note: the 65.00% will be decreased to 64.00% if Monthly Bonus Game and Quarterly Bonus Game are played*  
04.00% retained for Half Hour Bonus Game  
00.5% retained for Monthly Bonus Game – *if played*  
00.5% retained for Quarterly Bonus Game – *if played*  
01.00% paid for iBonus funding for a \$2,500 bonus  
30.00% retained by Santa Ysabel Interactive

### Fifty Cent (\$.50) Bingo Game Pay-Out Percentages

70.00% paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out) – *Note: the 70.00% will be decreased to 69.00% if Monthly Bonus Game and Quarterly Bonus Game are played*  
04.00% retained for Half Hour Bonus Game  
00.5% retained for Monthly Bonus Game – *if played*  
00.5% retained for Quarterly Bonus Game – *if played*  
01.00% paid for iBonus funding for a \$5,000 bonus  
25.00% retained by Santa Ysabel Interactive

### One Dollar (\$1.00) Bingo Game Pay-Out Percentages

74.00% paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out) – *Note: the 74.00% will be decreased to 73.00% if Monthly Bonus Game and Quarterly Bonus Game are played*  
04.00% retained for Half Hour Bonus Game  
00.5% retained for Monthly Bonus Game – *if played*  
00.5% retained for Quarterly Bonus Game – *if played*  
01.00% paid for in iBonus funding for a \$10,000 bonus  
21.00% retained by Santa Ysabel Interactive

### Half Hour Bonus Game Pay-Out Percentages

100% of amount collected for free card play and 74.00% of value of extra cards purchased for that denomination's Half Hour Bonus Game paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out) – *Note: the 74.00% will be decreased to 73.00% if Monthly Bonus Game and Quarterly Bonus Game are played*  
04.00% retained for next Half Hour Bonus Game  
00.5% retained for Monthly Bonus Game – *if played*

*00.5% retained for Quarterly Bonus Game – if played*  
01.00% paid for in game bonus funding for a bonus consistent with that denomination  
21.00% retained by Santa Ysabel Interactive

#### Monthly Bonus Game Pay-Out Percentages

100% of amount collected for free card play and 70.00% of value of extra cards purchased for that Monthly Bonus Game paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out)  
30.00% retained by Santa Ysabel Interactive

#### Quarterly Bonus Game Pay-Out Percentages

100% of amount collected for free card play and 70.00% of value of extra cards purchased for that Quarterly Bonus Game paid to holders of winning bingo pattern (multiple winners in any common game share equally in winning prize pay-out)  
30.00% retained by Santa Ysabel Interactive



# APPENDIX B

## CLASS II GAMING CLASSIFICATION

### UNDER IGRA

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#### Class II Gaming Classification

##### IGRA Definition

IGRA governs gaming on Indian lands. IGRA defines “Class II Gaming” in relevant part to include:

1. The game of chance commonly known as bingo (whether or not electronic, computer, or other technologic aids are used in connection therewith) –
  - a. which is played for prizes, including monetary prizes, with cards bearing numbers or other designations;
  - b. in which the holder of the card covers such numbers or designations when objects, similarly numbered or designated, are drawn or electronically determined; and
  - c. in which the game is won by the first person covering a previously designated arrangement of numbers or designations on such cards, including (if played in the same location) pull-tabs, lotto, punch boards, tip jars, instant bingo, and other games similar to bingo, and
2. card games that –
  - a. are explicitly authorized by the laws of the State, or
  - b. are not explicitly prohibited by the laws of the State and are played at any location in the State, but only if such card games are played in conformity with those laws and regulations (if any) of the State regarding hours or periods of operation of such card games or limitations on wagers or pot sizes in such card games.

See 25 U.S.C. §2703(7) (A). Games that are not within the definition of Class I or Class II games are Class III games, see 25 U.S.C. §2703(8), including:

1. any banking card games, including baccarat, chemin de fer, or blackjack (21), or
2. electronic or electromechanical facsimiles of any game of chance or slot machines of any kind.

##### NIGC Definition

The NIGC’s current regulations define Class II gaming very similar to the statutory definition under IGRA:

1. Bingo or lotto (whether or not electronic, computer, or other technologic aids are used) when players:
  - a. Play for prizes with cards bearing numbers or other designations;
  - b. Cover numbers or designations when objects, similarly numbered or designated, are drawn or electronically determined; and
  - c. Win the game by being the first person to cover a designated pattern on such cards.
2. If played in the same location as bingo or lotto, pull-tabs, punch boards, tip jars, instant bingo, and other games similar to bingo;
3. Nonbanking card games that:
  - a. State law explicitly authorizes, or does not explicitly prohibit, and are played legally anywhere in the state; and
  - b. Players play in conformity with state laws and regulations concerning hours, periods of operation, and limitations on wagers and pot sizes;

See 25 C.F.R. §502.3.

The NIGC regulations also define “other games similar to bingo” for purposes of Class II gaming.

25 C.F.R. §502.9 Other games similar to bingo.

Other games similar to bingo means any game played in the same location as bingo (as defined in 25 USC 2703(7)(A)(i)) constituting a variant on the game of bingo, provided that such game is not house banked and permits players to compete against each other for a common prize or prizes.

# APPENDIX C

## CLASS II GAMING USING TECHNOLOGICAL AIDS

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### Class II Gaming Using a Technologic Aid

#### NIGC Definition

Class II games that may utilize “electronic, computer or other technologic aids” as part of players’ participation in the game are distinguished under the NIGC regulations as follows:

25 C.F.R. §502.7 Electronic, computer or other technologic aid.

1. Electronic, computer or other technologic aid means any machine or device that
  - a. assists a player or the playing of a game;
  - b. is not an electronic or electromechanical facsimile; and
  - c. is operated according to applicable Federal communications law.
2. Electronic, computer or other technologic aids include, but are not limited to, machines or devices that:
  - a. broaden the participation levels in a common game;
  - b. facilitate communication between and among gaming sites; or
  - c. allow a player to play a game with or against other players rather than with or against a machine.
3. Examples of electronic, computer or other technologic aids include pull tab dispensers and/or readers, telephones, cables, televisions, screens, satellites, bingo blowers, electronic player stations, or electronic cards for participants in bingo games.

The NIGC regulation which applies to any Class III games using an electronic or electromechanical facsimile of any game of chance is found at:

25 C.F.R. §502.8 Electronic or electromechanical facsimile.

Electronic or electromechanical facsimile means a game played in an electronic or electromechanical format that replicates a game of chance by incorporating all of the characteristics of the game, except when, for bingo, lotto, and other games similar to bingo, the electronic or electromechanical format broadens participation by allowing multiple players to play with or against each other rather than with or against a machine.



1 **PROOF OF SERVICE**

2 I, Little Fawn Boland, hereby declare:

3 I am employed by Ceiba Legal, LLP in the City of Mill Valley and County of Marin,  
4 California. I am a resident in the City of Mill Valley. I am over the age of eighteen  
5 years and not a party to the within action. My business address is CEIBA LEGAL, LLP,  
35 Madrone Park Circle, Mill Valley, California, 94941. I hereby certify that on  
6 November 25, 2014, I electronically filed the foregoing with the Clerk of the Court  
using the ECF system.

7 **DECLARATION OF DAVID CHELETTE IN SUPPORT OF DEFENDANTS'  
8 OPPOSITION TO STATE OF CALIFORNIA'S APPLICATION FOR A  
9 TEMPORARY RESTRAINING ORDER**

10 Notice of this filing will be sent by operation of the Court's electronic filing system to  
11 all parties indicated on the electronic filing receipt, described as:

12 Kamala D. Harris  
13 Attorney General of California  
14 Sara J. Drake  
15 Senior Assistant Attorney General  
16 William P. Torgren  
17 Deputy Attorney General  
18 1300 I Street Suite 125  
19 P.O. Box 944255  
20 Sacramento, CA 94244-2550

21 I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct, and that this declaration was executed on November 25,  
2014 in Mill Valley, California.

By: /s/ Little Fawn Boland  
LITTLE FAWN BOLAND  
CEIBA LEGAL, LLP  
35 Madrone Park Circle  
Mill Valley, California 94941  
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