

Functionality Report for "Tennessee Hold Em® Poker Tournaments" :
USPTO patent number 1160 5270
GLI file number CS00THD 20401

Dear Mr Scott Hill,

Based on a request from Tennessee Hold Em® Limited, **Gaming Laboratories International LLC (GLI) has conducted an evaluation of Tennessee Hold Em® Poker Tournaments**, specifically one of 7 patented game variations of Tennessee Hold Em®, known as Tennessee Riverboat or Tennessee 223.

Tennessee Hold 'Em® is a peer-to-peer online, and multiplayer land-based casino poker game with a predefined entry fee, a percentage of the purchased chip value, set by the operator to host the game. The game has a minimum of three players, and a maximum of nine players with six players being recommended. Players make their best five poker hand from seven cards. After three card distributions, players hold four or five hole cards according to the game variant selected.

Players may keep three hole cards. When the dealer calls, "Men Overboard", one or two cards may be discarded by each player. Players may also use all four community cards, with the exceptions that, if a player holds four hole cards, they may not use the River in their hand. If a player holds all five hole cards, they may not use the River or the Turn cards in their hand.

In multiplayer table tournaments, blinds double after every six hands. All chips bet during the hand are placed in front of each player's table position. When a player folds, folded cards are placed face downward, and the player places any chips bet previously (during that hand) on top of their folded hand. Discards are placed face downwards by each player's table position.

There are seven variations of Tennessee Hold 'Em®. Each variation is dealt differently and named according to the number of cards distributed before the first three betting rounds.

This Letter of Attestation provides a detailed analysis of the championship variation, Tennessee Hold 'Em® 223, also known as Tennessee Riverboat. The term, "rake" applies to a percentage of each hand pot charged by the operator. Instead of rake, Tennessee Hold'Em operators charge an entry fee, defined as a percentage of the purchased chip value. Therefore, hand winners receive 100% of all hand pots.

Tennessee Hold 'Em® Tournaments end after a Showdown when a player or players are eliminated, and only one or two players remain. If two players remain, the player with a greater chip count is declared the winner, and the other player with the lesser chip count is runner-up. If more than one player is eliminated in the last hand, and only one player remains, the tournament ends, and the winner of the final hand is awarded the entire tournament pot.

The table felt (Figure 1) is used by the dealer to place community cards face up for each player to see and to assist in creating their best five card Poker hand. The community cards consist of two Launch placements, a Turn, and a River. Along with the felt, there are red "No River" discs (Figure 2) and black "No Turn" discs (Figure 3) that the dealer uses to place by each player that holds four or five cards during the "Men Overboard" phase.

Figure 1

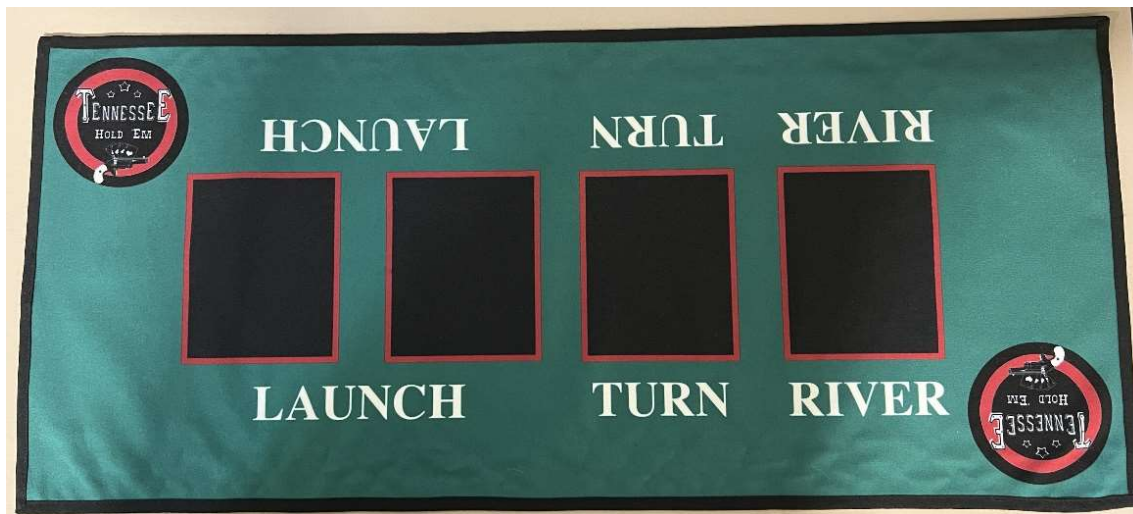


Figure 2



Figure 3



Phase 1: Blind Bets

Before the start of hand, there are three blind bets made. The player to the left of the dealer places the opening blind. The next player to the left places the small blind, and the third player to the left of the dealer places the big blind.

Phase 2: Hole

Once the blind bets are completed, two cards are dealt faced down to each player starting from the left of the dealer. Once the cards are dealt, betting round one begins. Players can either see, to place a minimum bet or raise the bet level. Players may also fold. However, unlike the 70% hole card fold rate of Texas Hold 'em, in Tennessee Hold 'Em®, the fold rate is less than 10%. In betting round one, each player is limited to one raise, and the maximum raise permitted is equal to the Big Blind.

Phase 3: Launch

On the Launch phase, two community cards are dealt. Then betting round two begins, where players can either check, raise, or see the bet level. In betting round two, each player is limited to 2 raises and the maximum raise permitted is equal to 2 times the BB.

Phase 4: Boat

In the Boat phase, three more hole cards are dealt to each player for a total of five cards in hand. Again, after the cards are dealt, players can either check, raise, or see the bet level or fold. In betting round three, each player is limited to 3 raises and the maximum raise permitted is equal to 3 times the Big Blind.

Phase 5: Men Overboard

When the dealer calls, “Men Overboard”, players must choose which cards to discard or keep. Players holding four cards, may not use the River, and players holding all five cards, may not use the River or Turn cards. Once all players have discarded or indicated they will “stick” with all five hole cards, each player’s discards are revealed to opponents, altering the odds of getting a desirable Turn or River. Revealed cards may provide insight into opponents’ hands, but may also be used for strategic bluffing. Next, the dealer places “No River” and “No Turn” discs adjacent to applicable players’ table positions to notify opponents.

Phase 6: Turn

After the dealer removes the discards, the community turn card is placed. Players can either check, raise, or see the bet level, or fold. In bedding on the turn, round four, each player is limited to 4 raises, and the maximum raise permitted is equal to 4 times the BB.

Phase 7: River

After betting on the Turn, the dealer deals the final community card, the River. Players can either check, raise, or see the bet level, or fold. In betting on the River, round five, each player is limited to 5 raises, and the maximum raise permitted is equal to 5 times the BB.

Phase 8: Showdown

The Showdown is when all of the players’ hold cards are revealed, and the hand winner is declared. The last player to bet or raise reveals their cards first, then the remaining players’ cards are revealed in a clockwise direction.

Tournament Elimination:

When any player goes all in, he or she may draw a temporary house loan, equivalent to the Chip value at the tournaments start, known as overdrawn chips or ODC; overdrawn chips eliminate side pots. The patented ODC system gives all in players a last chance to continue betting that hand to completion and get back into the tournament, allowing all players to continue betting to the end of that hand. Any OC that Bet365 added to the total hand pot. House loans provide a significant bonus for winning players boosting the total tournament pot.

Additional to the entry fee, before the start of play, players deposit a reserve fee to cover any ODC that may be needed during the tournament. In electronic versions, the banker is a digital processor. in a casino or poker club, a professional dealer holds a reserve of chips to loan. If a player is a player using OC wins that hand, the ODC loan is repaid to the banker info, and that player continues in the tournament using chips one in the previous hand. Players requiring bonus OC are permitted to borrow in any hand, as long as they begin that hand with a positive chip count equal to or greater than the big blind. In a casino or poker room, operators may require an additional surcharge for loaning ODC.

Conclusion:

Gaming Laboratories International, LLC’s evaluation of Tennessee Hold ‘Em ® Poker Tournaments consisted of verifying documented functionality of the rules and description along with the Table felt and online version of the game.

Please note, GLI in no way considered the jurisdictions of Colorado, Illinois, Indiana, Kansas (KRGK), Missouri, Mississippi, or Nevada during this evaluation. Requests for a functional evaluation of any concepts, systems, or devices intended for these jurisdictions, must be addressed directly with the respective gaming regulatory agency in that jurisdiction.