



JUN 6 2003

Mr. Tom Loger
GlobalNet Management LC
80 Celestial Way, 110
Juno Beach, FL 33408

RE: Interblock Gaming Machines

Dear Mr. Loger:

You have requested confirmation that the Interblock family of gaming machines, sold and leased by Eletroncek Company, are class III games under the Indian Gaming Regulatory Act (IGRA), 25 U.S.C. §2701 *et. seq.* (1988) and National Indian Gaming Commission (NIGC) regulations at 25 C.F.R. § 501, *et. seq.* The devices are electronic roulette games (Supernova, Queen, Megastar) and electronic dice games (Fantastic Dice, Sic-Bo Dice, Stardust, and Paradise). This letter confirms that all of the above named games, as described in your submission received on April 9, 2003, are class III games.

With respect to Supernova, Queen and Megastar, you describe these games as electronic, multi-player automatic versions of roulette. The games use a real roulette wheel and ball, and players place bets through a keyboard or touch screen.

Pursuant to the IGRA, class III games means all forms of gaming that are not class I or class II. 25 U.S.C. § 2703(8). NIGC regulations provide additional guidance by specifically identifying several examples of class III games, one of which is roulette. 25 C.F.R. § 502.4(a)(2). In addition, NIGC regulations provide that a game played in an electronic format that replicates a game of chance is a class III game. 25 C.F.R. § 502.8. Because Supernova, Queen and Megastar are both roulette and electronic facsimiles, we conclude that they are class III games.

With respect to the electronic dice games (Fantastic Dice, Sic-Bo Dice, Stardust, and Paradise) we reach the same conclusion. Because the game of dice is not defined in the IGRA as a class I or class II game, it is therefore a class III game. Furthermore, NIGC regulations specifically define the game of craps, which is a dice game, as a class III game. Moreover, the dice games at issue here are completely electronic games, and therefore class III electronic facsimiles.

Thank you for providing us the opportunity to review the above referenced games.

Please contact our office if you have any additional questions.

Sincerely,

A handwritten signature in cursive script that reads "Penny Coleman".

Penny J. Coleman
Acting General Counsel