



October 18, 2005

Via facsimile 864-220-6167
and First Class mail

Mr. David Waters
VP Engineering
Nova Gaming
920 Frontage Rd.
Greenville SC 29611

Re: Classification, Nova Gaming Bingo system version 4.2.7.50

Dear Mr. Waters:

This is in response to your letter of September 22, 2005, requesting classification of Nova Gaming's Bingo system, version 4.2.7.50.

This office issued an opinion letter on April 4, 2005, concluding that the Nova Bingo system version 4.2.0.12 was Class II. Subsequently, in the ordinary course of business, Nova added features and fixed bugs. On August 25, 2005, this office concluded that Bingo system version 4.2.5.9 was also Class II because the changes incorporated into that version left the bingo game's features and method of play unchanged.

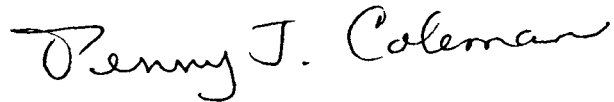
Time has passed again, and Nova is now seeking to place version 4.2.7.50 in Tribal casinos. We have reviewed a list from Nova of all of the new features and bug fixes incorporated into version 4.2.7.50 that were not in version 4.2.5.9. We have also reviewed a report from BMM test labs, which concludes that none of those modifications alters in any way the game features and play described in our April 4 letter.

Accordingly, the opinion expressed in our April 4 letter that Nova Bingo system is Class II applies as well to the Bingo gaming central server file, BGC.EXE, version 4.2.7.50, which has an SHA-1 signature of 3b8d57845bca9456cc04c5d1965fd78487faabab.

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If you have any questions, please do not hesitate to call Michael Gross, Senior Attorney,
at 202-632-7003.

Sincerely,

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

Penny J. Coleman
Acting General Counsel

cc: Geoffrey Standing Bear, Esq.