



May 5, 2005

Mr. Tom Logar, President
GlobalNet Management LC
80 Celestial Way #110
June Beach FL 33408

Re: InterBlock roulette and dice games

Dear Mr. Logar:

This is in response to your January 10, 2003, request for classification of Interblock's various roulette and dice games. Please accept my sincere apologies for the length of time that has passed between your inquiry and this answer.

The materials you provided depict single- and double-zero roulette, implemented with an automated roulette wheel and individual player stations where players insert money, make their wagers, and receive their winnings. The materials also depict similarly automated implementations of Sic Bo and two related dice games. I agree with your assessment of the games as Class III.

The games fall within the definition of Class III, a catch-all category encompassing all forms of gaming that are not Class I or Class II. 25 U.S.C. § 2703(8). The games are not Class I because they are not social games played "solely for prizes of minimal value" or "traditional form[s] of Indian gaming" played "as a part of, or in connection with" tribal ceremonies or celebrations. 25 U.S.C. § 2703(6). Likewise, they are not Class II, which includes only bingo, non-house banked card games and, provided that they are played in the same location as bingo, lotto, pull tabs, tip jars, punch boards, instant bingo, and games similar to bingo. 25 U.S.C. § 2703(7)(A).

That said, you also ask whether the games are slot machines or table games, and, if they are slot machines, whether each assembly is a single machine or whether each player station is an independent slot machine. These are questions upon which I offer no opinion.

Such questions call for the interpretation of individual tribal-state compacts - *e.g.* those that place limitations on the number of slot machines allowed in one tribal gaming facility or those that call for payment of gaming revenue from slot machines but not from table games. As a general matter, we leave interpretation of compacts to the States and Tribes in the first instance. Only if necessary do we venture into such matters.

If you have any questions about this advisory opinion, please do not hesitate to contact Michael Gross, Staff Attorney, at 202-632-7003.

Sincerely,

Penny J. Coleman

Penny J. Coleman
Acting General Counsel