January 7, 2004

Mr. Clifton Lind
President, C.O.O.
Multimedia Games, Inc.
8900 Shoal Creek Blvd., Bldg. 3
Austin, TX 78757

RE: Reel Time Bingo modification

Dear Mr. Lind:

On December 12, 2003, you and Tony Graham came to our offices to demonstrate a variation of the game Reel Time Bingo version 2.0, as described in the September 23, 2003, advisory opinion issued by Penny Coleman, NIGC Acting General Counsel. On December 18, 2003, we received from Nick Farley & Associates an analysis of the modifications made to Reel Time Bingo version 2.0.

We asked to see the new version of the game under the terms of the Settlement Agreement in *Multimedia Games v. United States* (Docket No. 02-5161, 10th Cir.), which provides that Multimedia will not modify the game on which NIGC issued a game classification opinion without first providing ninety (90) days notice to NIGC, including a complete submission of the modifications.

The changes to the game appear to be limited to the following:

- The spinning reels display begins only once a player daubs a second time.
- The edge of the spinning reels display changes color when a player daubs.
- Wording on the daub buttons have changed.
- The prompt "Hurry" has been added to the screen for players who have slept a bingo.

We conclude that the modifications do not affect the classification of the game since they do

not involve factors that are necessary for class II games as identified in the Indian Gaming Regulatory Act, NIGC regulations, or our recently issued advisory opinions or bulletins. I am therefore of the opinion that the game with the aforementioned modifications constitutes class II gaming.

Thank you for submitting the game for our review. If you have further questions, please contact Cynthia Shaw at (202) 632-7003.

Sincerely yours,

Penny J. Coleman
Acting General Counsel