

13 May 2008

Mr. Andre Wilsenach
Chief Executive Officer (CEO)
Alderney Gambling Control Commission (AGCC)
St Anne's House
Queen Elizabeth II Street
Alderney, Channel Islands
GY9 3TB

Dear Mr. Wilsenach,

RE: TST's Evaluation of GameAccount's IGS for AGCC

This Certification Letter pertains to Technical Systems Testing (TST)'s First Pass and Second Pass Evaluations of GameAccount's Interactive Gaming System (IGS), for use within the jurisdiction of Alderney, as regulated by the Alderney Gambling Control Commission (AGCC).

TST's First Pass and Second Pass Evaluations of GameAccount's IGS were performed with the aim of identifying and detailing system weaknesses and potential issues of non-compliance with any applicable requirements from the following sets of standards and specifications:

1. The Technical Standards Document (TSD) for online gambling within the jurisdiction of Alderney: AGCC's **Internal Control System Guidelines for eGambling, Version 1.4.2, August 13, 2007**, and
2. GameAccount's technical specifications for their IGS, including the games and Random Number Generator (RNG).

Accordingly, the scope of work for the First Pass Evaluation of GameAccount's IGS included (but was not necessarily limited to) the following elements:

1. Software System and Version Control,
 - Supervised Build and Gathering of Checksums, and
 - Supervised Install and Gathering of Checksums.
2. IGS Evaluation,
 - Appendix J: RNG / Scaling / Mapping Requirements, and
 - Appendix K: Gaming Requirements.

The scope of work for the Second Pass Evaluation of GameAccount's IGS was limited to the following elements*:

1. Software System and Version Control,
 - Supervised Build and Gathering of Checksums, and
 - Supervised Install and Gathering of Checksums.
2. IGS Evaluation,
 - Compliance Report (CR) Responses Review (Check for Changes), and
 - Game Testing (Test Changes – CR Fixes Only).

*** Note:** *The objective of TST's Second Pass Evaluation was to close any outstanding CRs (as issued throughout the First Pass Evaluation) as quickly as possible. Therefore, in the interest of time, TST's Second Pass Evaluation did not include a full sweep of Source Code Comparison or Accounting (Regression Testing). This customized scope of work instead focused directly and solely on the specifically documented game fixes necessary to close the outstanding CRs. Naturally, it must be recognized that any undocumented and / or untested changes made to the Source Code were outside of TST's scope of work.*

TST completed the First Pass Evaluation of GameAccount's IGS on 27 March 2008, with 22 CRs issued (**CR#10728001** to **CR#10728022**).

TST completed the Second Pass Evaluation of GameAccount's IGS on 13 May 2008. GameAccount successfully addressed 21 of the 22 outstanding CRs, and these CRs were subsequently verified and closed by TST. GameAccount has indicated that they will seek dispensation for the remaining issue of non-compliance, **CR#10728019**, which relates to multiplayer games.

TST has verified, through mathematical and statistical analysis, between 95% to 98% confidence intervals (these are documented intervals of confidence for such statistical analysis), that GameAccount's RNG distributes numbers with sufficient non-predictably, fair distribution and lack of bias to particular outcomes.

The evaluation has shown that GameAccount's RNG produces a statistically acceptable source of random numbers for the following games / applications**:

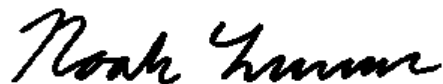
Mathematical Degrees of Freedom (DOFs)	Associated Games / Applications	Game / Application Type
51	Hi-Lo Solitaire	House Based Game
415	Pro BlackJack	House Based Game
36	Roulette Royale	House Based Game
51	Fortune52 Keno	Keno House Based Game
51	Gin Rummy	Lobby Game
5	Backgammon	Lobby Game
5	Hypergammon	Lobby Game
2, 3, 5 & 18	In the Grid	Lobby Game
207	Multi-Player Blackjack	Lobby Game
179 & 100	Skill Slots, Bonus	Slot Game

**** Note:** The games listed were tested during TST's First Pass Evaluation of GameAccount's IGS.

Subject to 1) the standard limitations of laboratory compliance testing, 2) AGCC granting special dispensation for the outstanding issue of non-compliance, **CR#10728019**, and 3) the specific limitations of the scope of work as discussed herein, it is TST's position that the evaluated components of GameAccount's IGS comply with any applicable requirements from the sets of standards and specifications listed above. Accordingly, subject to these conditions, TST recommends the approval of GameAccount's IGS, for operation by GameAccount within the jurisdiction of Alderney, as regulated by AGCC.

TST's evaluation was limited to the laboratory environment, and was performed using a particular test version of GameAccount's IGS. TST's evaluation was therefore based on specific information and materials (including, but not necessarily limited to, source code, software, hardware, configurations, documentation and general correspondence), as submitted to TST throughout the duration of the evaluation. For verification purposes, TST has maintained a control version (or the means of verifying the control version) of all information and materials as listed above.

Yours sincerely,



Mr. Noah Turner
 Chief Technical Officer (CTO)
TECHNICAL SYSTEMS TESTING (TST)