

Mustang Money

Promotional Game Compliance Proposal

Prepared for: [CLIENT NAME REDACTED]

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Purpose

We understand that the submission deadline for the August cycle has already passed. The purpose of this document is to clarify the approval process for a digital promotional game and to identify any gaps in our supporting documentation ahead of future submissions.

Executive Summary

This document outlines how the in-house game Mustang Money is designed to align with the regulatory standards applicable to Southern California Indian Gaming operations. Specifically, it demonstrates that the game qualifies as a non-skill-based, chance-driven, Class II-style promotional game that guarantees fairness, transparency, and controlled outcomes.

The game meets the Class II criteria on the following grounds: no player skill is required, outcomes are randomly generated, the house does not compete against the player, and electronic aids are permitted. Most importantly, there is no wagering and no player choice that affects the outcome.

Game Overview



Figure 1. Mustang Money gameplay.

Mustang Money is a promotional mini-game designed to engage players through an immersive, animated coin-collection experience. The player moves forward automatically on a horse and collects coins by proximity alone. No aiming, targeting, or skill-based input is required.

While the game includes an interactive jump feature, this mechanic does not constitute a skill-based element under Class II definitions. Jumping affects only the number of visible coins collected, not the tiered outcome or prize structure, both of which are governed by randomized logic.

Coins are randomly placed and are guaranteed to appear in a minimum quantity of 30, with prize eligibility ensured regardless of collection performance. The jump mechanic therefore functions as a form of engagement and animation, not as a tool for altering probability or outcome.

The reward structure consequently remains non-deterministic and non-skill-dependent, aligning it with Class II regulatory guidelines for Southern California tribal gaming jurisdictions.

Gameplay video: [LINK REDACTED]

Current Reward Redundancy

As currently built, the player receives a minimum base reward regardless of how many coins are actually collected. A 30-coin baseline corresponds to 300 points, or \$300 in Free Slot Play. If a player collects only 5 coins, the system still awards the full 300-point minimum as though 30 coins had been collected. We also intend to implement a data file that is exported for each playthrough of the promotional game.

Regulatory Compliance Features

1. Non-Skill-Based Gameplay

The player has no influence over the number of coins that spawn or their values. The only permitted inputs are directional movement and jumping, and neither has any bearing on scoring potential. The outcome is determined entirely by chance through a controlled spawning system.

2. Guaranteed Minimum Outcomes

Each game session guarantees the following:

- At least 30 coins will spawn.
- Each coin is worth 10 points.

A player is therefore guaranteed a minimum of 300 points, equivalent to \$300 in Free Slot Play, regardless of performance. This ensures that no player ever receives less than the minimum promotional value.

3. Probability-Based Coin Tiers

Coins spawn according to the tiered probability ranges below.

Tier	Coin Range	Tier Hit Chance	Bonus Coin Chance
Common	30 to 60	70%	70%
Uncommon	61 to 120	15%	75%
Rare	121 to 130	8%	80%
Epic	131 to 149	5%	90%
Legendary	150 (fixed)	2%	100%

The final point total equals the number of coins collected multiplied by 10. While it is possible to earn the maximum of 1,500 points, equivalent to \$1,500 in Free Slot Play, that result is determined entirely by tier probability rather than by user input.

Bonus coin distribution is handled by internal randomization logic. Each bonus coin beyond the minimum guaranteed threshold is individually tested against a preset, tier-based spawn probability. This probability differs by tier, ensuring statistical variation within the controlled range.

The bonus coin mechanism ensures that outcomes remain randomized and are not influenced by user input, consistent with Class II and promotional game compliance guidelines, which prohibit player-dependent outcomes.

4. Promotional Guarantee

If a player collects fewer than 300 points, they are automatically credited with the minimum \$300 in Free Slot Play. This redundancy maintains consistency across all players and protects against player dissatisfaction.

Built-in Safeguards

- Random number generation. Coins and tiers are generated through random-based logic in-engine, providing fair statistical randomness.
- Auditability. Coin counts, tiers, and scores are logged and can be exported to .txt or .csv files.
- Score reset. Each new session automatically resets score data to ensure fair tracking.
- No manual override. Operators cannot alter outcomes or spawn behavior manually.

Legal Alignment: Class II and Promotional Game Standards

Under Southern California tribal gaming regulations, and particularly with respect to Class II or promotional devices, the game meets each of the following requirements.

Regulatory Requirement	Status
Skill must not be a factor in the outcome	Met
Outcomes must be predetermined or randomly generated	Met
All players must have an equal opportunity to win	Met
Free Slot Play awards must be clearly defined and traceable	Met

The game is presented as a non-wagered bonus tool and is not intended for monetary purchase or exchange. It serves as a promotional engagement mechanism, comparable to kiosk-based spin wheels or pick-a-prize screens.

Licensing

All assets used in the game were acquired with full commercial-use licensing. We are permitted to modify, redistribute, and use these assets in a promotional environment. The only restrictions are that we may not resell modified versions of the assets individually and may not use them in NFT production.

Budget

The prototype as currently built required approximately \$5 in direct cost and no more than 10 hours of labor. The assets and code underlying the game are reusable, which would simplify development of future titles and reduce both labor hours and budget costs.

Appendix: Notes on This Redacted Version

The notes below were added for this redacted copy and were not part of the original proposal. They are provided as context for readers outside the organization the document was written for.

Project Context

- Mustang Money was a prototype. It was built to demonstrate feasibility and to open a conversation about the digital game approval process, not as a finished production title.
- The promotional theme for that month was cowboys and Yellowstone, which is how the concept became a mustang-themed coin-collection game. The preceding month ran under a different promotion along the lines of Buffalo Bucks.
- The prototype was produced for roughly \$5 in asset costs and under 10 hours of development time.
- The game was built in Godot. Godot is free and open source under the MIT license, with no license fees and no royalties on titles made with it, and the engine's license terms do not apply to the content created with it. The one obligation is attribution: the Godot copyright notice and license text must be included with any distributed build that ships the engine binary, which is satisfied by a credits screen, a licenses menu, or an accompanying text file.
- I was the sole developer on this project. I designed the game, wrote the code and the spawn and scoring logic, assembled the asset set, and prepared this proposal.
- Assets came from three sources: some I created, some I sourced at no cost, and some I purchased. All were cleared for commercial use before being incorporated, subject to the restrictions described in the Licensing section above.

What Has Been Redacted

- The name of the operator the proposal was prepared for has been replaced with a placeholder throughout.
- The gameplay video link has been removed.
- The black rectangle in Figure 1 covers the operator's logo. The logo was overlaid on the moon in the static background backdrop, so it remained in a fixed position on screen for the duration of a run. The same region is covered in the accompanying gameplay video.
- No player data, operator system details, or other confidential operational information appears in this document.

Reading Figure 1

- The yellow horizontal box visible in the screenshot is a development debugging overlay, not a gameplay element. It marks the vertical bounds of the coin spawn region, showing where and how coins could be generated during a run.
- All prize values, tier probabilities, and point totals shown reflect the prototype as configured at the time of writing and were subject to change before any live deployment.