

STATE OF WASHINGTON GAMBLING COMMISSION "Protect the Public by Ensuring that Gambling is Legal and Honest"

July 10, 2015

Kerrie Kimball AGS, LLC 5475 S Decatur Blvd. Suite 100 Las Vegas, NV 89118

RE: War Baccarat

Dear Ms. Kimball,

Thank you for requesting approval to market the card game "War Baccarat" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from American Gaming Systems, LLC, the Washington State Gambling Commission will approve the game under the conditions listed below:

Commercial Card Rooms

- The game shall be played and operated under the terms and conditions set forth under the "War Baccarat Rules of Play" you provided and are enclosed.
- Commercial card room operators seeking to operate this game must first submit their internal controls and receive approval from the Commission prior to implementing.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be licensed by the state prior to the sale of the equipment.

Tribal Casinos

- The game shall be played and operated under the terms and conditions set forth under the "War Baccarat Rules of Play" you provided and are enclosed.
- Each Tribal Gaming Operation must request and obtain approval from their respective Tribal Gaming Agencies (TGA).
- Before TGA allows your game to operate, they will seek concurrence from our agency as well.

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- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and licensed by the Tribe prior to the sale of the equipment.

Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-03-045, related to this game and may be contacting you.

Furthermore, any modifications to this game may affect this approval. Contact the Commission should you contemplate modifications. If you have any questions on commercial implementation, please contact Jess Lohse at (425) 277-7017. If you have any questions on Tribal implementation, please contact Kelly Main at (206) 423-4260.

Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,

Tina Griffin' Assistant Director Licensing, Regulation and Enforcement Division

Enclosure

cc: Mark Harris, Special Agent in Charge, Regulation Unit Cathy Harvey, Special Agent in Charge, Tribal Gaming Unit Jess Lohse, Special Agent, Regulation Unit Kelly Main, Special Agent Supervisor, Tribal Gaming Unit File



DEALING PROCEDURES

War Baccarat is standard house-banked Mini-Baccarat but with an optional War bonus wager. All rules pertaining to standard Mini-Baccarat as posted on the WSGC's website remain the same except as listed in these rules of play. War Baccarat is exactly as the name suggests, being a combination of traditional War and Mini-Baccarat. The game of War Baccarat is played with 6 or 8 standard decks of 52 standard playing cards, no jokers and dealt from a shoe.

Recommended Rules

War Baccarat follows the basic rules of standard Mini-Baccarat, with the following features:

• Optional War bonus wager based on the Player and Banker's first card.

• High card in War of Player or Banker wins even money (1 to 1) and Bettors have the option to keep the War winnings on the War bonus wager betting spot or take the War winnings and the original War bonus wager. If a player elects to leave his or her War winnings on the War bonus wager spot, the original War bonus wager will be returned to the player. If a player opts to leave his or her War winnings on the War bonus wager spot, the War bonus wager spot and Baccarat spot are considered separate wagers and are decided upon the outcome of the Baccarat hand.

- In War, like Baccarat, 9 is the highest ranking card. Aces play as a value of 1 and K, Q, J, and 10 are all zero values. However, for War purposes only K > Q > J > 10.
- In War, house wins all exact match ties except 9's and 8's which push.
- War winnings pay even money.

• War Baccarat can be played with commission or no commission. For Commission Free War Baccarat, all the same rules apply except all winning Banker bets with a three card draw totaling seven will push. Additionally, the Chan Chu 7 is an optional bonus wager for Commission Free War Baccarat that pays 40 to 1 when the Banker wins with a 3 card total of 7.

• 6 or 8 deck shoe.

WAR BACCARAT BETTING

A round of War Baccarat begins with each player placing two (2) separate bets on the table, (1) on the Banker or Player War bonus wager logo directly to the right of the Banker and Player betting spots (this bet is optional) and (2) on the Baccarat wager spots directly in front of the Bettor of either Player or Banker (this bet is mandatory). However, in the event the Bettor bets Player War, the Bettor must also bet Player. Bettor cannot bet Player War and Banker.

The Bettor may wager any amount (subject to table limits) on the Player or Banker War hand and any amount on the Player or Banker hand, so long as both bets together do not exceed table limits. For example, a Player may wager \$295.00 on War and \$5.00 on Player or Banker if the Table Max is \$300.00. A player can also wager \$150.00 on War and \$150.00 on Player or Banker if the Table Max is \$300.00. Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.

Once all wagers are placed, one card is dealt to the Player hand and one card is dealt to the Banker hand. (Alternatively, two cards are dealt face down to both the Player and Banker hands, but only the card on the dealer's right of each hand is exposed to resolve the War wager). These cards will be used to settle the War bonus wager and are the first card of the respective Player and Banker Baccarat hands.

WAR WAGER

At this stage, the War game is played and War bonus wagers are settled, the highest card / hand designated the winner between the Player & Banker. House wins all exact match ties except 9's and 8's which push. Cards play at face value and by usual Baccarat ranks; however Zeros are ranked only for War purposes. The following is the list of rankings: 9, 8, 7, 6, 5, 4, 3, 2, Ace, K, Q, J, 10 - 9 being the highest and 10 being the lowest.

If the Bettor loses the War hand, the Bettor loses only the War bonus wager in the game and can continue on with the Baccarat hand. If the Bettor wins the War hand, Bettor wins even money on the War wager, where upon the Bettor is given an election, as follows:

The Bettor may collect the even money War winnings and the original War bonus wager, all winnings being paid 1:1, OR the Bettor may choose to leave all of the War winnings (not the original War bonus wager placed) on the War bonus wager betting spot. The War bonus wager spot and Baccarat spot are considered separate wagers and are decided upon the outcome of the Baccarat hand.

Once all the War wagers are settled, the game proceeds to the next phase, being Baccarat, and the dealer delivers the second Player and Banker card (or turns over the second Player and Banker card on the dealer's left), thereby completing the initial Player and Banker starting two card Baccarat hands.

The Baccarat hand is now played out as traditional Mini-Baccarat using house rules. For Commission Free War Baccarat, the optional Chan Chu 7 bonus wager is paid or collected when the Player and Banker bets are settled.



