"Protect the Public by Ensuring that Gambling is Legal and Honest"

November 13, 2015

Kerrie Kimball American Gaming Systems, LLC 5475 S. Decatur Blvd. Las Vegas, NV 89118

RE: Open Stud Poker

Dear Ms. Kimball,

Thank you for requesting approval to market the card game "Open Stud Poker" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from AGS 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 "Open Stud Poker – 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 "Open Stud Poker 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:

Josh Stueckle, Acting 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



Introduction:

Open Stud Poker is an exciting and unique game using a standard 52 card deck where the players bet as the dealer's hand is revealed. Players receive all of their cards <u>after</u> seeing all of the Dealer's cards first. A player can win odds based payouts on the "Last 2 Cards" wager when the dealer has a pair or better. The stronger the dealer's hand, the higher the odds on the "Last 2 Cards" bet if the Player beats the Dealer's hand. Standard poker rankings apply.

To play:

The player places an initial "Ante" wager before the hand begins and may optionally place the "Two Way Bonus" wager. The dealer then deals 6 cards to himself face down. Immediately thereafter the dealer exposes the first two cards of his hand. The player may check or wager 1x their Ante on the "1st 2 Cards" betting spot. The Dealer then exposes his next two cards. The player may check or wager another 1x their Ante on the "Next 2 Cards" betting spot. Finally, the dealer exposes the final two cards of their six card hand and the player must make a "Last 2 Cards" wager equal to 1x their Ante or fold and surrender all bets.

If the player makes the Last 2 Cards bet (or had wagered the optional Two Way Bonus bet), then the player will receive 6 cards to make the best 5 card poker hand to beat the exposed dealer hand. In order for the player to win the Last 2 Cards bet, the player must beat the dealer's qualifying hand. The dealer qualifies with a pair or better. Players receive odds based payouts on the Last 2 Cards bet based on the strength of the dealer's hand they beat. If the Player folds, but has made the Two Way Bonus Bet wager, then the player will still receive 6 cards and can win on the Two Way Bonus Bet if he or the dealer has a three of a kind or better.

Winning and Losing:

The Ante, 1st 2 Cards, Next 2 Cards and Last 2 Cards wagers will be paid or lost as follows:

Player Folds

All wagers are lost (except optional Two Way Bonus if played)

Dealer does not qualify and the player's hand does not beat the dealer's hand

Ante is a push; 1st 2 Cards; Next 2 Cards; Last 2 Cards wagers all lose.

Dealer does not qualify and the player's hand beats the dealer's hand	Ante is a push; 1 st 2 Cards and Next 2 Cards wagers are paid 1 to 1; Last 2 Cards wager is a push.
Dealer does not qualify and the player's hand ties the dealer's hand	All wagers are a push (except optional Two Way Bonus)
Dealer qualifies and the player's hand does not beat the dealer's hand	All wagers are lost (except optional Two Way Bonus)
Dealer qualifies and the player's hand beats the dealer's hand	Ante, 1 st 2 Cards and Next 2 Cards wagers are paid 1 to 1; Last 2 Cards wager is paid according to strength of the dealer hand.
Dealer qualifies and the player's hand ties the dealer's hand	All wagers are a push (except optional Two Way Bonus)

After the player receives the 6 cards and beats the dealer's hand, the player will place the 6 cards face down to the right of the 2 Cards betting circles. If the player does not beat the dealer's hand and neither the dealer nor the player qualifies for the Two Way Bonus wager, then the player can throw the cards in and surrender all remaining bets. If the Player or dealer qualify for the Two Way Bonus wager, but the player loses to the dealer, then the player will tuck his or her cards under the Two Way Bonus bet spot. The dealer will pick up all losing hands first and then resolve all winning hands.

Optional Wager:

- "Two Way Bonus Bet" is an optional bonus wager that wins when the player is involved in a bad beat with the dealer. This wager must be placed before the hand begins. See paytable for payout odds. There are two ways to win:
 - o The player loses to dealer's hand of three of a kind or better.
 - o The player beats the dealer's hand of three of a kind or better.
 - NOTE: The payout for a Two Way Bonus Bet is for the highest hand only (player or dealer).

Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.



Two Way Bonus Paytable A	
Winning Hand	Pays
Royal Flush	500 to 1
Straight Flush	100 to 1
Four of a Kind	25 to 1
Full House	9 to 1
Flush	7 to 1
Straight	6 to 1
Three of a Kind	4 to 1
House Advantage	3.44%

Last 2 Cards Paytable A		
Odds Paid When Player Beats Dealer Hand of:	Pays	
Four of a Kind or better	500 to 1	
Full House	250 to 1	
Flush	100 to 1	
Straight	50 to 1	
Three of a Kind	25 to 1	
Two Pair	5 to 1	
Pair of 10's-A's	3 to 1	
Pair of 2's-9's	1 to 1	
No Pair	Push	
House Advantage	2.77%	

Two Way Bonus Paytable B		
Winning Hand	Pays	
Royal Flush	500 to 1	
Straight Flush	100 to 1	
Four of a Kind	40 to 1	
Full House	15 to 1	
Flush	6 to 1	
Straight	5 to 1	
Three of a Kind	3 to 1	
House Advantage	3.79%	

Last 2 Cards Paytable B		
Odds Paid When Player Beats Dealer Hand of:	Pays	
Full House or better	250 to 1	
Flush	50 to 1	
Straight	40 to 1	
Three of a Kind	30 to 1	
Two Pair	5 to 1	
Pair of 10's-A's	3 to 1	
Pair of 2's-9's	1 to 1	
No Pair	Push	
House Advantage	3.02%	

Two Way Bonus Paytable C		
Winning Hand	Pays	
Royal Flush	250 to 1	
Straight Flush	100 to 1	
Four of a Kind	40 to 1	
Full House	15 to 1	
Flush	6 to 1	
Straight	5 to 1	
Three of a Kind	3 to 1	
House Advantage	4.25%	

AGS Recommended Paytables
Other Paytable Options

