

STATE OF WASHINGTON GAMBLING COMMISSION

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

June 14, 2023

Sent via email to rsantoriello@lnw.com

Renee Santoriello Light and Wonder 6601 S. Bermuda Road Las Vegas, NV 89119

RE: L&W GM Atlas Game Rule Update (multiple games) - Submission #3119

Dear Ms. Santoriello:

Light and Wonder amended multiple previously approved card games to include some of the following information:

- Added reference to the GM Atlas/Nexus Command II Progressive System.
- Added updated utility products.
- Updated name to Light and Wonder.

The amended games were as follows:

1	6-5-4 Poker	34	High Five Poker		
2	6 Card Fortune Pai Gow	35	House Money – Dual Progressives		
3	Bahama Bonus Blackjack	36	I Luv Suits Poker – Dual Progressives		
4	Bet The Bust	37	King's Bounty		
5	Bet The Set 21	38	King's Bounty – Dual Progressives		
6	Bet The Set 21 Deluxe	39	Let It Ride, 3 Card Bonus – Cover All Bonus		
7	Big Raise Hold'Em	40	Match Jack		
8	Big Raise Stud Poker	41	Mississippi Stud – Cover All		
9	Blackjack Switch	42	Pai Wow Bonus		
10	Blazing 7's Progressive – Dealer's Up Card	43	Rabbit Hunter Stud Poker		
11	Blazing 7's Progressive – Player Cards Only	44	Roll Your Own Blackjack		
12	Caribbean Stud Poker	45	Royal Match 21 – Dual Progressives		
13	Casino War	46	Royal Match 21 Deluxe		
14	Cincinnati Seven Card Stud	47	Sharp Shooter – Tribal		
15	Crazy 4 Poker - Coverall	48	Six Card Poker		
16	Dakota Stud	49	Solitaire Stud		

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17	DJ Wild Stud Poker - Coverall	50	Straight Edge Poker
18	Dragon Bonus	51	Super Fun 21
19	Dragon Bonus – Commission Free	52	Supreme 99
20	EZ Baccarat with Dragon Bonus	53	Texas Hold'Em Bonus
21	EZ Pai Gow	54	Three Card Baccarat
22	Face Up Pai Gow Poker – Dual Progressives	55	Three Card Draw Poker
23	Fast Action Hold'Em	56	Three Card Draw Poker, Pairs Plus
24	Field Gold 21	57	Three Card Poker
25	25 Flush Rush		Three Card Poker 6 Card Bonus – Face
25		58	Up
26	Flushes Gone Wild	59	Three Card Poker Bonus – Face Up
27	Fortune 7 Baccarat	60	Three Card Poker Bonus - Tribal
28	Fortune Asia Poker	61	Three Card Poker Progressive – Cover All
29	Fortune Blackjack	62	TriLux Bonus – Dual Progressives
30	Fortune Pai Gow Poker Progressive	63	Triple Shot Rummy
31	Fortune San Lo Poker Progressive	64	Triple Shot Bonus
32	Four Card Poker	65	Ultimate Texas Hold'Em – Cover All
33	Free Bet Blackjack – Dual Progressives	66	Zappit Blackjack – Dual Progressives

We have reviewed the changes to the games noted above. Based on our review of the documentation we received from Light and Wonder, the Washington State Gambling Commission will approve the games under the conditions listed below:

• The games shall be played and operated under the terms and conditions set forth under the game rules you provided on May 5, 2023 and June 5, 2023 and are enclosed.

Commercial Card Rooms

- Commercial card room operators seeking to operate any of these games 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 these games must be licensed by the state prior to the sale of the equipment.

<u>Tribal Casinos</u>

- Each Tribal Gaming Operation must request and obtain approval from their respective Tribal Gaming Agencies (TGA).
- Before TGA allows your games to operate, they will seek concurrence from our agency as well.

- 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.

Any modifications to these games may affect this approval. If you have any questions on commercial implementation, please contact Jess Lohse at (206) 786-3530. 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,

DocuSigned by: Flowst 8E8993B8572D46E.

Gary Drumheller Assistant Director Enforcement and Operations Division

 cc: Jim Nicks, Special Agent in Charge, Regulation Unit Dan Wegenast, Special Agent in Charge, Tribal Gaming Unit Jess Lohse, Special Agent, Regulation Unit Brian Lane, Special Agent, Regulation Unit Kelly Main, Special Agent Supervisor, Tribal Gaming Unit File 6 Card Fortune Pai Gow Poker is a variation of Pai Gow Poker. All rules pertaining to Pai Gow Poker as posted on the WSGC's website remain the same with any exceptions noted in our Procedures below



RULES AND DEALING PROCEDURES

6 Card Fortune Pai Gow Poker is a variation of the popular seven-card game. It features head-tohead play against the dealer and an optional bonus bet. Players and the dealer each get six cards to make two poker hands—a five-card "high" hand and a one-card "low" hand.

The dealer then compares his five-card hand with each player's five-card hand, and he compares his one-card hand with each player's one-card hand. If the player wins both matchups, he is paid 1 to 1 on his standard wager. If he loses both matchups, he loses his standard wager. If he wins one and loses one, the standard wager is a push.

The house wins copies.

Exceptions: 1) If the player uses a Joker in his low hand, it beats any dealer low hand.

There is no commission on winning bets. There is no player banking.

The game is played with a 53-card deck, including a joker that is used as an Ace or to complete a straight or flush.

A2345 is the second-highest straight.

Optional Bonus Bets

Double Down Wager:

The optional Double Down wager allows the player to double down after viewing their hand

The player may double down, with a wager equal* to their original 6 Card Fortune Pai Gow, on any hand. However, the dealer must qualify with a pair of 8's or better for the players' double down wager to receive action; otherwise the double down wager is a push and will be returned to the player.

*Properties may allow the customer to Double Down for less if there are any limit restrictions.

<u>Fortune</u>: This bet wins if the player's best possible five-card hand is three of a kind or better. Paytables below:

Player's Hand	Pay Table #1	Envy Bonus*
5 Aces	1,000 to 1	\$1,000
Royal Flush	250 to 1	\$200
Straight Flush	100 to 1	\$50
4 of a Kind	50 to 1	\$15
Full House	15 to 1	\$5
Flush	10 to 1	
Straight	8 to 1	
3 of a Kind	5 to 1	

Player's Hand	Pay Table #2	Pay Table #3
Five Aces	1,000 to 1	\$1,000
Royal Flush	250 to 1	\$250
Straight Flush	100 to 1	\$100
Four of a Kind	50 to 1	\$50
Full House	15 to 1	\$15
Flush	11 to 1	\$10
Straight	9 10 1	\$8
Three of a Kind	6 to 1	\$6

*\$5 minimum Fortune bet to "envy" other hands. Players cannot envy the dealer or themselves.

<u>Insurance</u>: This bet wins if the player's best possible five-card hand from the six-cards dealt is a King-high or less. Paytable below:

Hand	Pay
8-high	100 to 1
9-high	30 to 1
10-high	10 to 1
Jack-high	7 to 1
Queen-high	4 to 1
King-high	3 to 1

Rules and Dealing Procedures

- 1. Set the i-Deal or i-Deal Plus shuffler to "6 Card Fortune Pai Gow."
- 2. Players must make the standard bet against the dealer. They may also may the optional Fortune and Insurance bets.
 - a. If players make the Fortune bet for at least \$5, the dealer will place an "Envy" lammer next to the bet. This lets the dealer know that player will win if another player at the table has a full house or better.
- 3. To begin the game, the dealer presses the green button on the i-Deal or i-Deal Plus. The LCD in the table will display a number, chosen randomly, between 1 and 7. This indicates which player position gets the first hand out of the shuffler. [Note: As in pai gow poker, positioning can change from casino to casino. Contact your LNW Gaming, Inc. service technical for assistance.] The dealer will work counter-clockwise and deliver cards to each position, whether occupied or not.
- 4. The shuffler will then dispense packs of six cards. The dealer, starting with the spot indicated by the LCD, works counter-clockwise to dispense hands to each player position and himself. As in pai gow poker, each player spot—occupied or not—will get a hand.
- 5. Players now set their hands. The only rule for players is they must rank their hands in order. The high hand must be higher than the low hand. If a player does not follow that rule, his hand fouls and he automatically loses to the dealer. His Fortune bet would still receive action.
 - a. If the licensee utilizes the optional i-Verify equipment for this game they will need to follow the Washington State requirements listed below:
 - i. Licensee must ensure all other players at the table have set their hands before using the i-Verify Display to set a player's hand to the Casinos "house way".
 - ii. Dealers must not access the i-Verify Display to reveal the dealer "house way" until all players at the table have set their hands or had their hand set according to the Casinos "house way".
 - iii. Licenses and Tribal Casinos must ensure the i-Verify Display can be viewed by surveillance as required in WAC 230-15-280 and Tribal-State Compacts.

- 6. Once players finish, the dealer reveals his cards and sets them according to the house way.
 - a. No Pair Dealer MUST play the highest ranking card in the High Hand, the second highest ranking card as the Low Hand and the remaining cards in the High Hand.
 - b. The Dealer may NOT break apart any sets. The Dealer may not break apart any one pair, two pairs, three of a kind, straights, flushes, full houses, four of a kinds, straight flush or royal flush in order to play a higher card in the Low Hand. Once the dealer has played the set, he must use the highest-ranking kicker as his low hand.
 - c. 1st exception to rule #2 If the Dealer has two three of a kinds in his hand he will play the lower ranking card as the three of a kind and the higher ranking one as the pair in order to play the higher card in the Low Hand.
 - d. 2^{nd} exception to rule #2 If the Dealer has 3 pair, he will play the lower ranking two pairs as the high hand and the highest ranking card of the 3^{rd} pair as the low hand.
 - e. 6 Card Straights or Flushes The Dealer must use the highest ranking card as the Low Hand and use the lower ranking straight or flush as the High Hand.
 - f. Straights and Flushes If the Dealer has both a straight and a flush in their hand, they will set the flush as their High Hand.
 - g. If the Dealer has BOTH a FLUSH and a 5-Card Straight Flush (i.e. a 6-card Flush and a 5-Card Straight Flush), he plays the Straight Flush in the High Hand and the remaining card in the Low Hand.
 - h. The Joker can only be used as an "Ace" or to complete straights or flushes.
 - i. If the Player's High Hand ties the Dealer's High Hand, this is considered a loss for the player.
 - j. For the Low Hand, all ties of Two thru the Ace are considered a loss to the Player.
 - k. If in the Low Hand, the Player has a Joker and the Dealer has an Ace, this is considered a win for the Player in the Low Hand.
- 7. The dealer then compares each of his hands against the corresponding player hand.
 - a. If the player and dealer have identical hands, the dealer wins that matchup.
 - i. If the player has a Joker in his low hand, he automatically wins that matchup.
 - b. If the player wins both matchups, his main bet pays 1 to 1.
 - c. If the player loses both matchups, his main bet loses.
- 8. The dealer then resolves Fortune bonus wagers. When he is done, he makes any and all envy payouts.
- 9. The dealer then resolves Insurance wagers.

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

An optional LNW Gaming, Inc. LCD Display that can be used on this game utilizes i– Verify v1.0.017 (or higher), i–Deal v3.8.024 (or higher), i–Deal Plus NXP v1.0.114 (or higher).

6 Card FPGP

	Paytable 1			
Hand	Pays*	Envy		
Five Aces	1,000	\$1,000		
Royal Flush	250	\$200		
Straight Flush	100	\$50		
Four of a Kind	50	\$15		
Full House	15	\$5		
Flush	10			
Straight	8			
Three of a Kind	5			
House Advantage	4.56%			
Hit Frequency	9.11%			
*Pavs "to 1"				

*Pays "to 1"

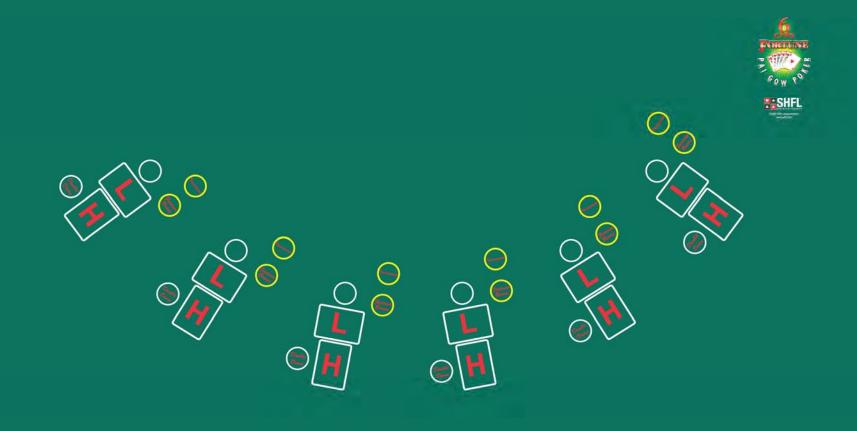
	2	3		
Hand	Pays*	Pays*		
Five Aces	1,000	1,000		
Royal Flush	250	250		
Straight Flush	100	100		
Four of a Kind	50	50		
Full House	15	15		
Flush	11	10		
Straight	9	8		
Three of a Kind	6	6		
House Advantage	4.10%	<mark>8.41%</mark>		
Hit Frequency	9.11%	9.11%		

*Pays "to 1"

Paytables #2 and #3 DO NOT include Envy Bonus payouts

Insurance			
Hand	Pays*		
8 High	100		
9 High	30		
Ten High	10		
Jack High	7		
Queen High	4		
King High	3		
House Advantage	7.63%		
Hit Frequency	15.32%		
*Davia +a 4			

*Pays "to 1"



6 Card Fortune Pai Gow Poker Progressive is a variation of Pai Gow Poker. All rules pertaining to Pai Gow Poker as posted on the WSGC's website remain the same with any exceptions noted in our Procedures below and in our 6 Card Fortune Pai Gow game.



RULES OF PLAY:

- 1. 6 Card Fortune Pai Gow Poker Progressive is an optional progressive bet.
- 2. The bet considers the best hand possible among all the player's cards.

Note: The joker is used as an Ace, or to complete a straight or flush. The Semi Wild Joker completes a Straight Flush, Straight, and Flush; or substitutes for an Ace.

- 3. The individual meter associated with the winning progressive hand will be reseeded when the 100% award hits. The cost of the reseed has been factored in to the casino's mathematical advantage.
- 4. To begin each round, players must make their regular game's wager. They may optionally place any bonus wagers and the progressive wager. Players must place the progressive wagers on the sensor in front of their betting position. The sensor will light up.
- 5. Once all players place their bets, the dealer will press "COIN IN" on the keypad. The sensors will then light up, indicating a progressive wager. The dealer will then remove all progressive bets from the table.
- 6. The dealer then follows house procedures for dealing the regular game.
- 7. The dealer reconciles the standard wager, bonus wagers, and progressive wagers at the same time. Follow the procedure in the next section for reconciling percentage pays from the progressive meter.
 - a. If the licensee utilizes the optional i-Verify equipment for this game they will need to follow the Washington State requirements listed below:
 - i. Licensee must ensure all other players at the table have set their hands before using the i-Verify Display to set a player's hand to the Casinos "house way".
 - ii. Dealers must not access the i-Verify Display to reveal the dealer "house way" until all players at the table have set their hands or had their hand set according to the Casinos "house way".
- LNW Gaming, Inc. 6 Card Fortune Pai Gow Poker Progressive[®] Page 1 of 3

- iii. Licenses and Tribal Casinos must ensure the i-Verify Display can be viewed by surveillance as required in WAC 230-15-280 and Tribal-State Compacts.
- 8. Progressive winners:
 - a. The percentage pays are paid from the progressive jackpot shown on the progressive meter.
 - b. Other hands are paid from the tray or from the meter, at the casino's requirements.
 - c. In the event more than one progressive meter pay hits during the same round, the dealer will first pay the player farthest on this right and then move counter-clockwise to pay other players. As Regulatory procedures permit, this policy can be replaced by casino internal controls.
 - d. When a player has a progressive winner, the dealer shall press the appropriate hand button on the keypad. (If the hand button is pressed by accident, pressing it again will turn it off.)
 - e. The dealer shall then contact a supervisor.
 - f. Once the casino verifies the progressive win, the supervisor shall insert the key and rotate it to "JPH" and then press "J-pot" button. This records the win onto the Game Manager. House procedures are then followed for paying the prize. (Reviewing the monitor connected to the Game Manager will show the prize amount to be paid, and pressing the "money bag" icon will print a win page, which can be used to help record the payout for accounting.)
 - g. Returning the supervisor key to the "Run" position will restore normal operation of the table, and adjust the meter appropriately for the prize won.
 - h. When the dealer reconciles all action, he presses "Game Over." This resets the system to begin the next hand.
 - i. Once the "J-pot" button is pressed, the prize is logged into Game Manager. If the progressive pay needs to be backed out at this point, the award will need to be manually backed out using the Game Manager manual adjustment feature.
- 9. Envy Bonus: (available for paytables #2, #3 and #4 only)
 - a. A player making the progressive wager also qualifies to win an envy payout. If another player at the table hits a hand associated with an envy pay, all other players who made the progressive bet win the envy pay. The player hitting the hand receives the normal prize pay only, but does NOT receive the envy pay. **Rule of thumb: You can't win an envy bonus pay from yourself, or the dealer.**
 - b. If a player's hand triggers an envy payout, the dealer will leave the hand face-up on the layout; otherwise, the dealer will lock up the cards. The dealer will then move on to the next player.
 - c. The dealer pays any Envy Bonuses at the end of the round. In the event that more than one player is involved in a qualifying envy pay, then all players win multiple envy payouts.

This game will use the approved LNW Gaming, Inc. owned progressive system containing the following components and their compatible software versions: Game manager v6.6 Build 520 or higher, Aquarius Controller v6.5.6SP, Coin Spot v6.0 and the progressive displays can be either CHAM2+ v1.66P\$ or ViPS v1.2.0 or higher.

An optional LNW Gaming, Inc. LCD Display that can be used on this game utilizes i-Verify v1.0.017 (or higher), i-Deal v3.8.024 (or higher) and i-Deal Plus NXP v1.0.114 (or higher).

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

6 Card Fortune Pai Gow Poker Progressive is a variation of Pai Gow Poker. All rules pertaining to Pai Gow Poker as posted on the WSGC's website remain the same with any exceptions noted in our Procedures below and in our 6 Card Fortune Pai Gow game.



RULES OF PLAY:

- 1. 6 Card Fortune Pai Gow Poker Progressive is an optional progressive bet.
- 2. The bet considers the best hand possible among all the player's cards.

Note: The joker is used as an Ace, or to complete a straight or flush. The Semi Wild Joker completes a Straight Flush, Straight, and Flush; or substitutes for an Ace.

- 3. The individual meter associated with the winning progressive hand will be reseeded when the 100% award hits. The cost of the reseed has been factored in to the casino's mathematical advantage.
- 4. To begin each round, players must make their regular game's wager. They may optionally place any bonus wagers and the progressive wager. Players must place the progressive wagers on the sensor in front of their betting position. The sensor will light up.
- 5. Once all players place their bets, the dealer will press "START GAME" on the keypad. The sensors will then light up, indicating a progressive wager. The dealer will then remove all progressive bets from the table.
- 6. The dealer then follows house procedures for dealing the regular game.
- 7. The dealer reconciles the standard wager, bonus wagers, and progressive wagers at the same time. Follow the procedure in the next section for reconciling percentage pays from the progressive meter.
 - a. If the licensee utilizes the optional i-Verify equipment for this game they will need to follow the Washington State requirements listed below:
 - i. Licensee must ensure all other players at the table have set their hands before using the i-Verify Display to set a player's hand to the Casinos "house way".

- ii. Dealers must not access the i-Verify Display to reveal the dealer "house way" until all players at the table have set their hands or had their hand set according to the Casinos "house way".
- iii. Licenses and Tribal Casinos must ensure the i-Verify Display can be viewed by surveillance as required in WAC 230-15-280 and Tribal-State Compacts.
- 8. Progressive winners:
 - a. The percentage pays are paid from the progressive jackpot shown on the progressive meter.
 - b. Other hands are paid from the tray or from the meter, at the casino's requirements.
 - c. In the event more than one progressive meter pay hits during the same round, the dealer will first pay the player farthest on this right and then move counter-clockwise to pay other players. As Regulatory procedures permit, this policy can be replaced by casino internal controls.
 - d. When a player has a progressive winner, the dealer will select the player spot corresponding to the player with the winning progressive hand. The dealer will then press the appropriate hand button on the display. (If the hand button is pressed by accident, pressing it again will turn it off.)
 - e. The dealer shall then contact a supervisor.
 - f. Once the casino verifies the progressive win, the supervisor will press the confirm button. To complete the action, a Supervisor or Executive card (depending on jackpot level) swipe is required. This records the win onto the Game Manager computer and adjusts the meter appropriately for the prize won. House procedures are then followed for paying the prize. (Reviewing the monitor connected to the Game Manager will show the prize amount to be paid, and pressing the "money bag" icon will print a win page, which can be used to help record the payout for accounting.)
 - g. When the dealer reconciles all action, he presses "END GAME." This resets the system to begin the next hand.
 - h. Once the Supervisor or Executive card (depending on jackpot level) is swiped the prize is logged into Game Manager. If the progressive pay needs to be backed out at this point, the award will need to be manually backed out using the Game Manager manual adjustment feature.
- 9. Envy Bonus:
 - a. A player making the progressive wager also qualifies to win an envy payout. If another player at the table hits a hand associated with an envy pay, all other players who made the progressive wager win the envy pay. The player hitting the hand receives the normal prize pay only, but does NOT receive the envy pay. **Rule of thumb: You can't win an envy bonus pay from yourself, or the dealer.**
 - b. If a player's hand triggers an envy payout, the dealer will leave the hand face-up on the layout; otherwise, the dealer will lock up the cards. The dealer will then move on to the next player.
 - c. The dealer pays any Envy Bonuses at the end of the round. In the event that more than one player is involved in a qualifying envy pay, then all players win multiple envy payouts.

This game will use the approved LNW Gaming, Inc. owned progressive system containing the following components and their compatible software versions: Nexus Command Game Manager TCP v1.3.0 or higher, Nexus Command Table Controller v2.0.0 or higher and a progressive display ViPS v1.2.0 or higher. Or the GM Atlas v5.4.0/Nexus Command II v5.4 (or higher).

An optional LNW Gaming,Inc. LCD Display that can be used on this game utilizes i-Verify v1.0.017 or higher, i-Deal v3.8.024 or higher or i-Deal Plus NXP v1.0.114 (or higher)

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



PROGRESSIVE SYSTEMS FLEXIBILITY and RECOMMENDATIONS:

• <u>Progressive meter contribution</u>

- When using a pay table in which all payouts are deducted from the meter, we recommend utilizing the system to configure meter contribution rates anywhere between 0-100%.
 - Most pay tables with this style of math are designed to grow over time when a contribution rate of 70% or more is used. If less is contributed, the risk of the meter "running dry" increases.
- When using a pay table in which only the progressive (percentage) pays are deducted from the meter, we recommend only reducing the pre-configured meter contribution rate if any changes are made. Adjusting the contribution rate above the pre-configured value would reduce the mathematical house advantage of the wager.
- <u>Reserve contribution</u>
 - We recommend contributing a small portion of each progressive wager to the reserve.
 This amount will be added on to any configured seed amount after a 100% award is given, and will help reduce the drop in play expected after a jackpot hits.
 - We do not recommend eliminating a seed amount entirely and using the reserve as the only seed mechanism. All games present a certain likelihood of back-to-back awards, and this method runs the risk of restarting the meter at a very low amount in that case.
- <u>Seed amount</u>
 - We recommend using the pre-configured seed amount in the system. This amount is specific to the pay table selected for use, and is designed to offer a reasonable starting point that works with the pay table's math.
 - If any changes are made, we recommend the seed amount to be at least as large as the largest "fixed" award on the pay table.
 - We do not recommend configuring a \$0 seed amount.

6 Card FPGPP

	Paytable 2		Paytable 3 (QH)		Paytable 4		Paytable 5
Hand	Pays*	Envy	Pays*	Envy	Pays*	Envy	Pays*
Five Aces	100%	\$100	100%	\$100	100%	\$500	100%
Royal Flush	10%	\$50	100%		10%	\$100	10%
Straight Flush	300	\$10	100		100		300
Four of a Kind	150	\$5	75		75		150
Full House	15		10		10		15
Flush	6		8		8		6
Straight	3		4		4		4
House Advantage	19.	00%	23.00)%	23.00	0%	21.25%
Hit Frequency	5.3	38%	5.38	%	5.38	%	5.38%

*Pays "for 1"

