



**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

April 9, 2021

Sent via email to Nyoung@galaxygaming.com

Nicole Young
Galaxy Gaming
6480 Cameron Street, Suite 305
Las Vegas, NV 89118

RE: Daredevil Poker, Submission #3038

Dear Nicole Young

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

- The game shall be played and operated under the terms and conditions set forth under the Daredevil Poker rules of play you provided and are enclosed.

Commercial Card Rooms

- 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

- 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.
- 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.

Nicole Young
April 9, 2021
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- 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.

During our review, we noted Galaxy Gaming pays Ashford Gaming royalties upon placement of Daredevil Poker in Washington card rooms. Because of this, Ashford Gaming is a substantial interest holder and must maintain their Washington gaming license for continued authorization in Washington.

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 Brian Lane at (509) 387-7095. 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,



Gary Drumheller
Assistant Director
Licensing, Regulation, and Enforcement Division

Enclosure

cc: Jim Nicks, Special Agent in Charge, Regulation Unit
Cathy Harvey, Special Agent in Charge, Tribal Gaming Unit
Kelly Main, Special Agent Supervisor, Tribal Gaming Unit
Jess Lohse, Special Agent, Regulation Unit
Brian Lane, Special Agent, Regulation Unit
File



RULES OF PLAY

Washington



GALAXY GAMING

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Game Description

Daredevil Poker is a house-banked, poker-based game using a standard 52-card deck. The object of the game is for the player's hand (using between one and five cards out of seven) to beat the dealer's best five-card hand out of seven. *Daredevil Poker* also contains optional bonus wagers that are not dependent on the base game's outcome.

Casino operators choose which bonus wagers they will offer, subject to any restrictions contained within these Rules of Play. Each bonus wager may be made at the player's option and there is no effect on the primary game and no changes in player strategy. Minimum and maximum wagering limits are established by the casino operator in accordance with the limits set in WAC 230-15-040, WAC 230-15-140, or their specific regulatory body.

Rules of Play

1. To begin, each player must place equal *Ante* and *Odds* wagers. Players may also place optional *Safety Net*, *Prime 7*, *Flush*, *Straight Flush*, *Straight Flush Progressive*, and/or *Seven-Card Linked Progressive* wagers.
2. Each player and the dealer receive seven cards.
3. Each player will then choose between one and five cards to play against the dealer's best five-card hand and will separate the cards in the following manner:
 - a. The cards that will be used to play against the dealer will be placed on the "Play" spot on the layout.
 - b. The player's remaining cards are placed on the "Don't Play" spot on the layout and will be used in reconciling the *Odds* wager and any appropriate optional bonus wagers.
4. The dealer will then reveal their cards and create their best five-card hand out of their seven cards.

Note the following rules:

 - a. The dealer's hand qualifies with a King-high or better.
 - b. Straights and flushes are only formed with five-card hands.
 - c. Kickers are used to resolve all ties. If a kicker is not present because the hand contains fewer than 5 cards, it will lose to any kicker. For example:
 - i. If the dealer's hand is A♠-A♣-9♠-7♣-3♠, and the player's two-card hand is A♥-A♦, the player's hand will lose due to the absence of a kicker. However, if the player has a three-card hand, A♥-A♦-Q♦, their hand would win because the player's Queen kicker would outrank the dealer's Nine.
 - ii. In a four-card scenario, if the player's hand is a A♠-A♣-9♠-7♣, their hand would lose because of the absence of a kicker against the dealer's Three.

5. If the dealer qualifies and:
 - a. The player's hand is higher than the dealer's hand, the player's *Ante* wager wins and pays based on the number of cards used, according to the payable in Appendix A.
 - b. The player's hand ties the dealer's hand, the *Ante* wager pushes. **Note** that ties can only occur when comparing two five-cards hands.
 - c. The player's hand is lower than the dealer's hand, the player's *Ante* wager loses.
6. If the dealer does not qualify, the *Ante* wager pushes.
7. Regardless of the dealer's hand, the *Odds* wager, based on the player's seven-card hand, pays according to the payable in Appendix B.

Equipment

This game will use the Galaxy Gaming owned Andromeda Bonus Jackpot System Series 3d or higher. Jackpot meter displays will not contain additional intelligence or functionality, including but not limited to network capability, wired or wireless.

If operators use an automatic shuffle machine, it must be a WSGC approved model, manufactured by a WSGC licensed manufacturer.

Gambling Promotions

A gambling promotion may be added to any of the bonus wagers at the discretion of the casino operator and with the written consent of Galaxy Gaming.

Optional Bonus Wagers

Operators choose which optional bonus wager(s) they will offer and set all minimum and maximum wagering limits.

Safety Net

Players win if the dealer's hand does not qualify (and the player's hand is **not** a 7-card straight flush), and are paid according to the corresponding payable in Appendix C.

Prime 7

Players win if their 7-card hand has 6 or more cards of the same color and are paid based on the corresponding payable in Appendix D.

Flush

Players win if their 7-card hand achieves a winning event displayed on the corresponding payable in Appendix E.

Straight Flush

Players win if their 7-card hand achieves a winning event displayed on the corresponding payable in Appendix F.

Bonus and Progressive Jackpots

- Operators may choose to offer up to two jackpot game options on a layout using two independent wagering sensors and displaying two independent jackpot amounts
- Each jackpot sensor is considered a separate game
- Progressive Jackpots cannot be linked with Bonus Jackpots
- All jackpots on a table must be of a single jackpot type (Bonus or Progressive)
- Operators can only offer one jackpot game option per sensor

Straight Flush Bonus or Progressive Jackpot

Players win if their 7-card hand achieves a winning event displayed on the corresponding payable in Appendix G.

Seven Card Linked Bonus or Progressive Jackpot

Players win if their best 5-card hand (out of 7 cards) achieves a winning event as displayed on the corresponding payable in Appendix H.

Bonus and Progressive Jackpot Definition

If operated as a **Bonus Jackpot**, the table display does not increment after each wager is placed. All Bonus Jackpot displays must include the following language: "Bonus Jackpot prizes are paid by the casino and are not components of any progressive prize contest. Player wagers do not

accrue to any guaranteed player fund. The displayed Bonus Jackpot prize may be modified or discontinued at any time without prior notice.”

If operated as a **Progressive Jackpot**, the table display should increment after each wager is placed. Casino operators must follow the rules contained in WAC 230-15-680 through WAC 230-15-720. Prizes displayed are considered to be held in escrow by the casino operator who acts as the custodian of the funds for the benefit of the players. Operators offering progressive jackpots must: (1) Ensure specific wager limits on progressive wagers to ensure all funds are accounted for; and (2) Maintain and account for all funds collected for progressive jackpot games.

The operator’s internal controls must define how the Jackpots are configured and how they are won and if operated as a bonus or a progressive game.

Appendix A

Ante

# of Cards Used	PT-FLT-AW-01	PT-FLT-AW-02
One Card	10	10
Two Cards	3	3
Three Cards	2	2
Four Cards	1.2	1
Five Cards	1	1

Notes:

1. All pays are "to 1."
2. Only the highest qualifying hand is paid.
3. Paytable PT-FLT-AW-01 can only be configured with a minimum wager of \$5 and in \$5 increments.
4. Paytable PT-FLT-AW-02 can only be configured with a minimum wager of less than \$5.

Appendix B

Odds

Hand	PT-FLT-OD-01	PT-FLT-OD-02
7-Card Straight Flush	5000	5000
5-Card Royal Flush w/ KQ Suited	1000	1000
5-Card Royal Flush	250	250
5-Card Straight Flush	100	100
Four-of-a-Kind	30	25
Full House	5	5
5-Card Flush	3	3
5-Card Straight	2	1
Three-of-a-Kind	Loss	Push

Hand	PT-FLT-OD-03	PT-FLT-OD-04
6-Card Royal Flush	5000	\$25000
5-Card Royal Flush	400	500
5-Card Straight Flush	100	150
Four-of-a-Kind	20	25
Full House	5	4
5-Card Flush	3	3
5-Card Straight	2	1
Three-of-a-Kind	Loss	Push

Hand	PT-FLT-OD-05	PT-FLT-OD-06	PT-FLT-OD-07	PT-FLT-OD-08
7-Card Straight Flush	5000	\$25000	1000	1000
6-Card Straight Flush	1000	2000	1000	1000
5-Card Royal Flush	500	1000	250	400
5-Card Straight Flush	75	100	150	100
Four-of-a-Kind	20	15	25	20
Full House	5	4	4	5
5-Card Flush	3	3	3	3
5-Card Straight	2	2	1	2
Three-of-a-Kind	Loss	Loss	Push	Loss

Notes:

1. All pays are "to 1," except pays denoted with a \$ sign, which are fixed pays.
2. Only the highest qualifying hand is paid.
3. The 5-Card Royal Flush w/ KQ Suited means that the player's hand has a royal flush, and the remaining two cards are a suited King and Queen.

Appendix C

Safety Net

Triggering Event	PT-FLT-DNQ-01	PT-FLT-DNQ-02
Dealer Does Not Qualify	30	31
Dealer Qualifies	Loss	Loss

Notes:

1. All pays are "to 1."
2. If the player's hand is a 7-card straight flush, the player will not receive a *Safety Net* pay regardless of the dealer's hand.

Appendix D

Prime 7

Hand	PT-FLT-P7-01	PT-FLT-P7-02	PT-FLT-P7-03
7 Cards Same Color	50	50	40
6 Cards Same Color	4	3	5

Notes:

1. All pays are "to 1."
2. Only the highest qualifying hand is paid.

Appendix E

Flush

Triggering Event	PT-FLT-HCF-FB-01	PT-FLT-HCF-FB-02	PT-FLT-HCF-FB-03	PT-FLT-HCF-FB-04	PT-FLT-HCF-FB-05	PT-FLT-HCF-FB-06	PT-FLT-HCF-FB-07
7-Card Flush	300	100	200	300	200	500	400
6-Card Flush	100	20	20	75	60	50	60
5-Card Flush	10	10	10	5	12	12	12
4-Card Flush	1	2	2	2	1	1	1

Triggering Event	PT-FLT-HCF-FB-08	PT-FLT-HCF-FB-09	PT-FLT-HCF-FB-10	PT-FLT-HCF-FB-11	PT-FLT-HCF-FB-12	PT-FLT-HCF-FB-13	PT-FLT-HCF-FB-14
7-Card Flush	1000	150	150	400	300	500	500
6-Card Flush	50	20	25	100	80	80	100
5-Card Flush	10	10	10	10	11	11	10
4-Card Flush	1	2	2	1	1	1	1

Notes:

1. All pays are "to 1."
2. Only the highest qualifying hand is paid.

Appendix F

Straight Flush

Triggering Event (Highest Straight Flush)	PT-FLT- HCF-SF-01	PT-FLT- HCF-SF-02	PT-FLT- HCF-SF-03	PT-FLT- HCF-SF-04
7-Card	8000	500	500	1000
6-Card	1000	200	200	500
5-Card	100	100	100	100
4-Card	60	50	75	75
3-Card	7	9	7	7

Triggering Event (Highest Straight Flush)	PT-FLT- HCF-SF-06	PT-FLT- HCF-SF-07	PT-FLT- HCF-SF-09	PT-FLT- HCF-SF-10
7-Card	500	1000	8000	500
6-Card	200	500	1000	200
5-Card	100	100	100	100
4-Card	60	60	50	50
3-Card	8	8	8	8

Notes:

1. All pays are "to 1."
2. Only the highest qualifying hand is paid. If a player's seven-card hand contains more than one straight flush, only the highest-ranking straight flush will be paid.
3. An Ace may be used as either the lowest or highest rank of the suit.

Appendix G

Straight Flush Bonus or Progressive Jackpot

Hand	PT-BJS-HCF-SF-01	PT-BJS-HCF-SF-02	PT-BJS-HCF-SF-03a/b	PT-BJS-HCF-SF-06a/b	PT-BJS-HCF-SF-07	PT-BJS-HCF-SF-08a/b
7-Card Straight Flush	100%	100%	100%	100%	100%	100%
6-Card Straight Flush	10%	10%	100%	100%	10%	100%
5-Card Straight Flush	\$250	\$900	\$200	\$250	\$250	\$250
4-Card Straight Flush	\$40	\$50	\$40	\$40	\$50	\$50
3-Card Straight Flush	\$3	-	\$3	\$3	\$3	\$3

Hand	PT-BJS-HCF-SF-04	PT-BJS-HCF-SF-05	PT-BJS-HCF-SF-09
7-Card or 6-Card Ace High Straight Flush	100%	100%	100%
6-Card (King High or Lower) Straight Flush	10%	10%	10%
5-Card Straight Flush	\$250	\$800	\$250
4-Card Straight Flush	\$40	\$50	\$50
3-Card Straight Flush	\$3	-	3

Hand	PT-BJS-HCF-SF-E01		PT-BJS-HCF-SF-E04	
	Pays	Envy	Pays	Envy
7-Card Straight Flush	100%	\$200	100%	\$200
6-Card Straight Flush	100%	\$200	100%	\$200
5-Card Straight Flush	\$200	-	\$250	-
4-Card Straight Flush	\$40	-	\$40	-
3-Card Straight Flush	\$3	-	\$3	-

Hand	PT-BJS-HCF-SF-E02		PT-BJS-HCF-SF-E03		PT-BJS-HCF-SF-E05	
	Pays	Envy	Pays	Envy	Pays	Envy
7-Card or 6-Card Ace High Straight Flush	100%	\$250	100%	\$250	100%	\$250
6-Card (King High or Lower) Straight Flush	10%	-	10%	-	10%	-
5-Card Straight Flush	\$250	-	\$800	-	\$250	-
4-Card Straight Flush	\$40	-	\$50	-	\$50	-
3-Card Straight Flush	\$3	-	-	-	\$3	-

Notes:

- All pays are "for 1." The jackpot wager is not returned.
- Only the highest qualifying hand is paid. If a player's seven-card hand contains more than one straight flush, only the highest-ranking straight flush will be paid.
- An Ace may be used as either the lowest or highest rank of the suit.
- To qualify for an Envy pay, at least one player must win a qualifying jackpot award. All other players who have placed the jackpot wager that round will receive the listed Envy pay. Players cannot receive an Envy pay on their own hand.
- Prizes shown as a percentage mean the player receives that percentage of the corresponding displayed Jackpot. Percentage pays are the only payouts deducted from the jackpot meter
- Prizes shown as a dollar amount mean the player receives a fixed dollar amount.
- All settings and pays, listed in the above paytables, are based off a fixed \$1 wager. The operator may select a different fixed wager amount. If the Jackpot is configured with a different fixed wager amount, pays are multiplied accordingly and displayed on the TableVision image. It is also recommended that seed/reseed values are multiplied accordingly when operating a progressive jackpot.

Appendix H

Seven-Card Linked Bonus or Progressive Jackpot

Hand	PT-BJS-7CL-01	PT-BJS-7CL-02	PT-BJS-7CL-03	PT-BJS-7CL-04	PT-BJS-7CL-05	PT-BJS-7CL-06
5-Card Royal Flush	100%	100%	100%	100%	100%	100%
5-Card Straight Flush	\$500	\$250	\$1,000	\$500	\$250	\$200
Four-of-a-Kind	\$100	\$75	\$50	\$75	\$125	\$100
Full House	\$5	\$10	\$5	\$5	\$7	\$10
5-Card Flush	\$2	\$1	\$1	\$2	\$2	\$2

Hand	PT-BJS-7CL-E01		PT-BJS-7CL-E02		PT-BJS-7CL-E03	
	Pay	Envy	Pay	Envy	Pay	Envy
5-Card Royal Flush	100%	\$250	100%	\$250	100%	\$100
5-Card Straight Flush	\$500	-	\$250	-	\$500	-
Four-of-a-Kind	\$100	-	\$75	-	\$75	-
Full House	\$5	-	\$10	-	\$5	-
5-Card Flush	\$2	-	\$1	-	\$2	-

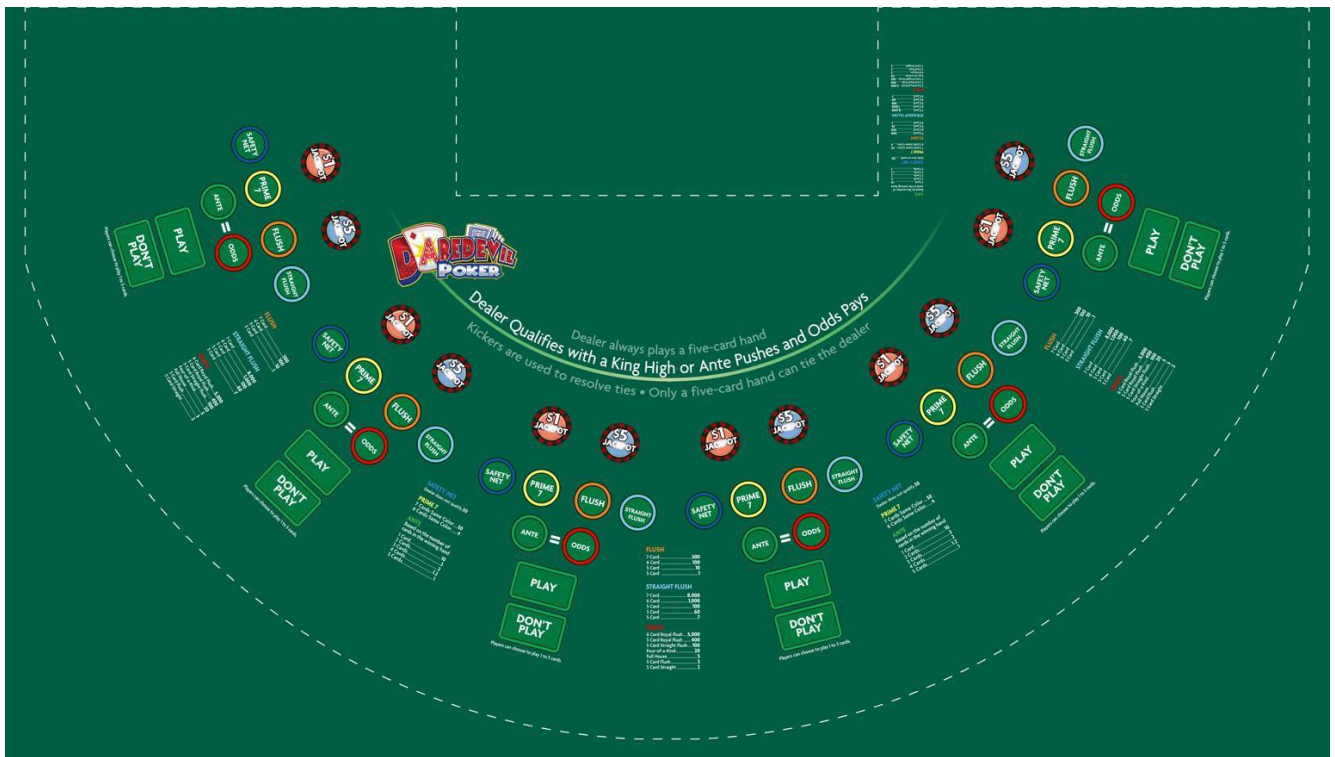
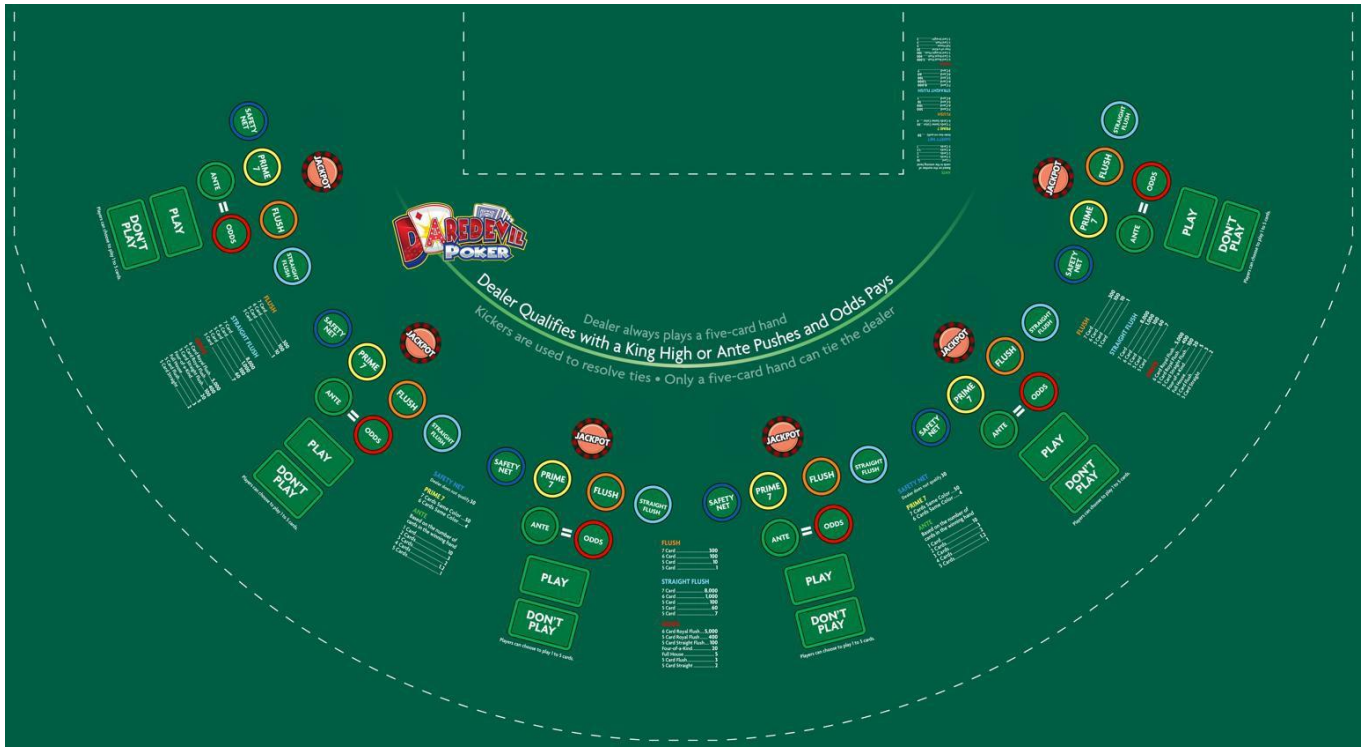
Hand	PT-BJS-7CL-E04	
	Pay	Envy
5-Card Royal Flush	100%	\$250
5-Card Straight Flush	\$200	-
Four-of-a-Kind	\$100	-
Full House	\$10	-
5-Card Flush	\$2	-

Notes:

1. All pays are "for 1." The jackpot wager is not returned.
2. Only the highest qualifying hand is paid.
3. To qualify for an Envy pay, at least one player must win a qualifying progressive award. All other players who have placed the jackpot wager that round will receive the listed Envy pay. Players cannot receive an Envy pay on their own hand.
4. Prizes shown as a percentage mean the player receives that percentage of the corresponding displayed Jackpot. Percentage pays are the only payouts deducted from the jackpot meter
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6. All settings and pays, listed in the above paytables, are based off a fixed \$1 wager. The operator may select a different fixed wager amount. If the Jackpot is configured with a different fixed wager amount, pays are multiplied accordingly and displayed on the TableVision image. It is also recommended that seed/reseed values are multiplied accordingly when operating a progressive jackpot.

Appendix I

Example Layouts



\$1 JACKPOT

\$5 JACKPOT

SAFETY NET

PRIME
7

FLUSH

STRAIGHT
FLUSH

ANTE

=

ODDS

PLAY

DON'T PLAY

Players can choose to play 1 to 5 cards.

ANTE
Based on the number of cards in the winning hand

1 Card	10
2 Cards	3
3 Cards	2
4 Cards	1.2
5 Cards	1

SAFETY NET
Dealer does not qualify ... 30

PRIME 7

7 Cards Same Color	50
6 Cards Same Color	4

FLUSH

7 Card	300
6 Card	100
5 Card	10
4 Card	1

STRAIGHT FLUSH

7 Card	8,000
6 Card	1,000
5 Card	100
4 Card	60
3 Card	7

ROYALS

4 Card Royal Flush	5,000
5 Card Royal Flush	400
5 Card Straight Flush	100
Four of a Kind	20
Full House	5
3 Card Flush	3
3 Card Straight	2