



**STATE OF WASHINGTON
GAMBLING COMMISSION**

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

April 24, 2023

Sent via email to w.stevens@playags.com

William Stevens
AGS LLC
5475 S. Decatur Blvd.
Las Vegas, NV 89118

RE: Dealer Open Pai Gow, Submission #3116

Dear Mr. Stevens:

Thank you for requesting approval to market the card game Dealer Open Pai Gow 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:

The game shall be played and operated under the terms and conditions set forth under the Dealer Open Pai Gow 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.


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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.

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 (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:

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Gary Drumheller
Assistant Director
Enforcement and Operations Division

Enclosure

cc: Jim Nicks, Special Agent in Charge, Regulation Unit
Dan Wegenast, 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



Version 2 Rules & Procedures

INTRODUCTION

Dealer Open Pai Gow is an exciting Pai Gow game, played with a 53-card deck, consisting of the standard 52 cards plus 1 joker. The player begins by placing a Pai Gow wager. The Pai Gow Wager Pushes when the Dealer has Ace High Pai Gow. Optionally, the player may also place a push Ace High wager. Alternatively, the Push Ace High wager may be called the Ace High Tie wager, along with optional Chan Chu bonus wagers and the optional Jacks Beats wager. Each Player is then dealt 7 cards face-down, and the dealer is dealt 7 cards face-up.

"Side bets between players is prohibited."

"All rules pertaining to the standard non-patented game of Pai Gow as posted on the WSGC website remain the same except as specifically noted in these game rules."

"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."

If the Dealer has 2 or more Jacks, all Dealer Open Pai Gow wagers lose and Jacks Beat and/or Chan Chu bonus wagers are immediately resolved. Otherwise, the Dealer will set their cards into a 5-card hand and a 2-card hand, according to the House Way. Once the Dealer is done setting their cards, the Player will begin setting their cards into a 5-card hand and a 2-card hand, and all wagers are then resolved.

The Push Ace High wager is resolved based on the player's and dealer's total cards, regardless of how the hands are set. If the best 5-card hand the dealer can make is exactly an Ace-high hand (Ace-high Pai Gow), the Push Ace High wager wins and pays according to highest eligible scenario, as given in posted pay table. Higher pays are awarded if the player also has an Ace-high Pai Gow, or if the dealer holds the Joker. If the dealer does not have an Ace-high Pai Gow, the wager loses.

Chan Chu is an optional bonus wager that considers the Player's best possible hand among their seven cards and wins when a qualifying hand is made. If the Envy payable is used, any player who wagers \$5 or more qualifies for an Envy payable win when another participating player wins with an eligible envy hand. **See posted payable.**

HOUSE WAY

If a casino uses a different House Way, the RTP and HE may vary. The "Front" refers to the two-card hand (L) and the "Back" refers to the five-card hand (H). The Dealer will set their hands according to the highest 5-card hand that can be formed:

- **Five Aces:** Set two Kings in front if possible, otherwise set two Aces in front.
- **Royal Flush:** See the 'Complete Hand' rule.
- **Four of a Kind:** Set according to the rank of the Four of a Kind.



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- **Aces:** If the hand contains a pair of Sevens or better, set the pair in front. Otherwise set two Aces in front.
- **Jacks to Kings:** If the hand contains a pair of Tens or better, set the pair in front. Otherwise, set two of the Four of a Kind in front.
- **Sevens to Tens:** If the hand contains a pair, set the pair in front. If the hand contains a singleton Ace, set the two highest singletons in front. Otherwise, set two of the Four of a Kind in front.
- **Twos to Sixes:** If the hand contains a pair, set the pair in front. Otherwise, set the two highest singletons in front.
- **Full House:** If the hand contains two Three of a Kinds, set the highest possible pair in front and Three of a Kind in back. If the hand contains a Three of a Kind and two Pairs, set the highest possible pair in front with Full House or Two Pair in back. If the hand contains a pair of Twos and a singleton King or better, set the two highest singletons in front. Otherwise, set the pair in front with Three of a Kind in back.
- **Super Full House:** If the hand contains a Four of a Kind with a Three of a Kind.
- **Flush:** See the 'Complete Hand' rule.
- **Straight:** See the 'Complete Hand' rule.
- **Three of a Kind:** If three Aces, set one Ace and the highest singleton in front. Otherwise, set the two highest singletons in front.
- **Two Pair:** If the hand contains three Pair, set the highest pair in front. Otherwise, if both pair are Sevens or better and the hand does not contain a singleton Ace, set the low pair in front. If the hand contains Jacks or better over Sixes or better, and a singleton Ace, set the low pair in front. If the high pair is Aces, set the low pair in front. Otherwise, set the two highest singletons in front.
- **Pair:** Set the two highest singletons in front.
- **High Card:** Set the second and third highest singletons in front.
- **Complete Hand (Straight, Flush, Straight Flush, or Royal Flush):** If the hand contains a Four of a Kind, follow the Four of a Kind rule. If the hand contains a Full House, follow the Full House rule. If the hand contains Two Pair, Queens or better over Sixes or better, or if it contains Two Pair with one or more Aces, follow the Two Pair rule. Otherwise, find the best front hand settings that allow you to set a royal flush, a straight flush, or a straight or flush in back. If there are multiple ways to do it, set according to the first eligible rule:
 - Set the highest front hand possible, King-high, or better, that allows a Straight or Flush of any kind in back.
 - Set the highest front hand possible that allows a Royal Flush in back.
 - Set the highest front hand possible, Jack-high, or better, that allows a Straight or Flush of any kind in back.
 - Set the highest front hand possible that allows a Straight Flush in back.
 - Set the highest front hand possible that allows a Straight or Flush in back.



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RULES OF PLAY

Either an RNG or a cup of three dice may be used to determine the distribution order of the Player and Dealer cards. An RNG will choose a number between 1-7, with spot number #1 representing the Dealer position.

The RNG number signifies which participant receives the first packet of cards. When the cup of dice is utilized, the sum of the three dice will determine which participant receives the first packet of cards. In this scenario, the Dealer position represents spots #1, #8, and #15.

1. To begin, Players must place a Pai Gow main wager along with optional Jack Beats and/or Chan Chu bonus wager.
2. Packets of seven cards will be placed in front of the Players facedown moving in a counterclockwise rotation. The Dealer will receive their seven cards faceup.
3. If any participant on the game receives less than seven cards, all hands are declared dead.
4. Players must wait until all the hands have been delivered, the last four cards have been verified and the Dealer will arrange and set the House Way hand face-up before any Player's hands have been set.
 - a. **Important Note:** If the Dealer has 2 or more Jacks, the Dealer will not need to set their hand, the game is over, and the Jack Beats and/or Chan Chu bonus wagers will be settled based off posted payable.
5. The House Way hand will be played in front of the chip rack in full view before exposing the Player's hands.
6. The Players will rank their cards and set the Low hand (or second highest) in front (2-card spot) and the High hand (5-card spot) at the back as indicated on the layout.
7. Hands that are set making the front hand higher than the backhand are automatic losers (Foul Hand).
8. After the Dealer sets the House Way hand they will expose and spread the cards of the Players in a counterclockwise rotation, starting with the position furthest to the Dealer's right.
9. The Dealer must always set their hand according to the House Way. If during the placement of the cards, a hand is misplaced, OR if during the pay-take procedure it is discovered that the hand was set wrong; all hands must be reset, and the house-hand will be reset to the House Way.
 - a. **Important Note:** The house hand can never foul and will always be set correctly the House Way.
10. The Dealer will announce all win, lose, or push hands.
11. Losing wager will be collected and placed in the chip tray
12. PUSH hands will receive a signal from the Dealer (tap on the table) indicated the wager hand no-action.



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PAI GOW WAGER

If the Dealer has 2 or more Jacks, the Pai Gow wager loses. Otherwise, the Dealer and Player hands are compared in regular Pai Gow Poker fashion, 5-card to 5-card and 2- card to 2-card, with the Joker functioning as a semi-wild “bug”, able to complete straights and/or flushes, or otherwise acting as a suit-less Ace. If the Player beats the Dealer in both comparisons, the Pai Gow wager wins and pays 1 to 1. If the Player beats the Dealer in one of the two comparisons, the wager pushes. If each comparison results in the Player being beaten by or tying the Dealer, the wager loses.

Chan Chu is an optional bonus wager that considers the Player’s best possible hand among their seven cards and wins when a qualifying hand is made.

Pay Table 1	
Winning Hand	Pays (to 1)
Any 7 Card Straight Flush	5000
Super Full House	2000
Five Aces	500
Natural 7 Card Flush	200
Any Royal Flush	100
Natural 7 Card Straight	50
Any Straight Flush	40
Any 4 of a kind	20
Any Full House	5
Any Flush	4
Any 3 of a kind	3
Any Straight	2
House Edge	4.35%

Pay Table 2	
Winning Hand	Pays (to 1)
Any 7 Card Straight Flush	2000
Super Full House	1000
Five Aces	300
Natural 7 Card Flush	125
Any Royal Flush	100
Natural 7 Card Straight	50
Any Straight Flush	40
Any 4 of a kind	20
Any Full House	5
Any Flush	4
Any 3 of a kind	3
Any Straight	2
House Edge	5.84%

PAY TABLE 3	
Winning Hand	Pays (to 1)
Natural 7 Card Straight Flush	5000
Royal Flush + R/M	1000
Wild 7 Card Straight Flush	750
Five Aces	250
Any Royal Flush	100
Any Straight Flush	50
Any 4 of a kind	20
Any Full House	5
Any Flush	4
Any 3 of a kind	3
Any Straight	2
Three Pair	PUSH
House Edge	8.00%



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PAY TABLE 4	
Winning Hand	Pays (to 1)
Natural 7 Card Straight Flush	8000
Royal Flush + R/M	2000
Wild 7 Card Straight Flush	1000
Five Aces	400
Any Royal Flush	150
Any Straight Flush	50
Any 4 of a kind	25
Any Full House	5
Any Flush	4
Any 3 of a kind	3
Any Straight	2
Three Pair	LOSS
House Edge	7.77%

PAY TABLE 5	
Winning Hand	Pays (to 1)
Natural 7 Card Straight Flush	2500
Royal Flush + R/M	1000
Wild 7 Card Straight Flush	750
Five Aces	250
Any Royal Flush	125
Any Straight Flush	50
Any 4 of a kind	25
Any Full House	5
Any Flush	4
Any 3 of a kind	3
Any Straight	2
Three Pair	LOSS
House Edge	8.49%

CHAN CHU PLAYER ENVY - PAY TABLE 3	
Winning Hand	Pays (\$)
Natural 7 Card Straight Flush	1000
Royal Flush + R/M	250
Wild 7 Card Straight Flush	100
Five Aces	50
Any Royal Flush	25
Any Straight Flush	10
Any 4 of a kind	5

* Players qualify for Envy Bonus with a \$5 or more Chan Chu bonus wager

*House Edge reduced for each other participating player at table	0.54%
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CHAN CHU PLAYER ENVY - PAY TABLE 4	
Winning Hand	Pays (\$)
Natural 7 Card Straight Flush	5000
Royal Flush + R/M	1000
Wild 7 Card Straight Flush	500
Five Aces	250
Any Royal Flush	50
Any Straight Flush	20
Any 4 of a kind	5

* Players qualify for Envy Bonus with a \$5 or more Chan Chu bonus wager

CHAN CHU PLAYER ENVY - PAY TABLE 5	
Winning Hand	Pays (\$)
Natural 7 Card Straight Flush	1000
Royal Flush + R/M	750
Wild 7 Card Straight Flush	250
Five Aces	100
Any Royal Flush	50
Any Straight Flush	20
Any 4 of a kind	5

* Players qualify for Envy Bonus with a \$5 or more Chan Chu bonus wager

Ace High Tie Pays

Hand	Pay
Dealer and Player Ace High	40 to 1
Dealer Ace High w/ Joker	15 to 1
Dealer Ace High no Joker	5 to 1

“Electronic shuffler or dealing shoe may be used with this game. If the game is to be hand dealt using a dealing shoe, dealers will shuffle according to house procedures. The dealer then follows the house dealing procedures. The dealer must comply with WAC 230-15-465. If any automatic shuffle machine is used in conjunction with this game, it must be a WSGC approved model, manufactured by a WSGC licensed manufacturer.”

