



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

Ms. Santoriello

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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	Flush Rush	58	Three Card Poker 6 Card Bonus – Face 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.

Tribal Casinos

- 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:

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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



- I Luv Suits is a variation of the standard game of Poker. I Luv Suits offers the player an optional Flush Rush, Super Flush Rush and jackpot wagers. Side bets among players are prohibited.
- Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230 15-040 and WAC 230 15-140.
- If the below game is to be hand dealt with or without 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.
- Additional Light and Wonder equipment can be used on this game. This equipment will be the i-Deal Shuffler with software Mico 32 v3.8.024 or higher, the i-Deal Plus with software NXP v1.1.114 or higher, CardRec v4.0.033 or higher and RNG v1.002.004 or higher.

I Luv Suits Poker Rules of Play

I Luv Suits Poker features head-to-head play against the dealer and the optional Flush Rush and Super Flush Rush bonus bets. Players are dealt packets of 7 cards, and the dealer is dealt a packet of 7 cards.

Players play against Dealer's hand, object is to get more suited cards than the Dealer. There are multiple ways to win at this game: head-to-head play against the Dealer and/or the optional Flush Rush and Super Flush Rush bonus wagers.

If the player and dealer have flushes of identical length, the rank of the highest kicker card in the flush determines the winner. For example, Ac-7c-3c loses to Ah-10h-7h.

Copied hands push. Ace will be the highest card in the flush.

Rules and Dealing Procedures

1. Set the i-Deal Plus shuffler to I Luv Suits Poker or if using a shuffler that does not have the game definition already programmed, set the shuffler to a game definition that delivers packets of 7 cards for each player and the dealer.
2. To begin the game, players make an Ante wager. Players may also make the Flush Rush and Super Flush Rush bonus bets. See payable for odds.

3. Next, the dealer pushes the green button on the i-Deal Plus shuffler and working clockwise from their left to their right, gives each player a packet of 7 cards and themselves a packet of 7 cards.
4. If less than seven packets of cards are dealt, the dealer then presses the green button on the i-Deal to dispense all the remaining cards and begin shuffling the next deck.
5. Players look at their hands and have a choice:
 - a. Fold or stay in the game by making a Play bet of;
 - 1x their Ante if they have a 4 card flush or less
 - Up to 2x their Ante if they have a 5 card flush
 - Up to 3x their Ante if they have a 6 card flush or more
 - b. The Flush Rush and Super Flush Rush bonus wagers (if played) are always in action. If the player folds, the dealer will pick up the players Ante wager and tuck the cards face down under the player's bonus wager that's closest to the dealer. All folded hand bonus wagers will be resolved at the end of each hand along with the remaining active hands.
6. The dealer then reveals their cards and sets their longest flush hand. The dealer's 7-card hand must contain at least a three-card 9-high flush or better to qualify.
7. If the dealer does not qualify, Play bets are immediately refunded and Ante bet is paid 1-to-1.
8. If the dealer does qualify, working counter-clockwise from right to left, compares their hand with the hand of each player that stayed in the game.
 - a. If the player's hand beats the dealer's hand, the Ante and Play bet will be paid even money.
 - b. If the player's hand ranks less than the dealer's hand, the Ante and Play will lose.
 - c. If the player's and dealer's hand result in a tie, then both the Ante and Play will result in a push.
9. Players win the Flush Rush bonus bet if they can make a four-card flush or better, even if they lose to the dealer. Paytables submitted separately:
10. Players win the Super Flush Rush bonus bet if they can make a three-card straight flush or better, even if they lose to the dealer. Paytables submitted separately.

I Luv Suits Poker

	Flush Rush Side Bet				
	1	2	3	4	5
HAND	PAYS	PAYS	PAYS	PAYS	PAYS
7-Card Flush	300 to 1	100 to 1	250 to 1	200 to 1	300 to 1
6-Card Flush	100 to 1	20 to 1	25 to 1	60 to 1	75 to 1
5-Card Flush	10 to 1	10 to 1	7 to 1	12 to 1	5 to 1
4-Card Flush	1 to 1	2 to 1	2 to 1	1 to 1	2 to 1

	Super Flush Rush Side Bet				
	1	2	3	4	5
HAND	PAYS	PAYS	PAYS	PAYS	PAYS
7-Card Straight Flush	8000 to 1	500 to 1	500 to 1	300 to 1	250 to 1
6-Card Straight Flush	1000 to 1	200 to 1	200 to 1	150 to 1	100 to 1
5-Card Straight Flush	100 to 1	100 to 1	100 to 1	100 to 1	75 to 1
4-Card Straight Flush	60 to 1	50 to 1	75 to 1	50 to 1	50 to 1
3-Card Straight Flush	7 to 1	9 to 1	7 to 1	8 to 1	8 to 1

NEXUS COMMAND/GM ATLAS

I Luv Suits Poker Jackpot Rules of Play Rules of Play:

1. I Luv Suits Poker offers an optional jackpot wager.
2. The bet considers the best 5-card hand possible from the player's 7-cards.
3. Paytables are listed separately
4. The meter will be reseeded when the 100% award hits. The cost of the reseed has been factored into the casino's mathematical advantage.
5. To begin each round, players must make their regular game's wager. They may also place any bonus wagers and the jackpot wager. Players must place the jackpot wagers on the sensor in front of their betting position. The sensor will light up.
6. Once all players place their bets, the dealer will press "START GAME" on the keypad. The sensors will then light up, indicating a jackpot wager. The dealer will then remove all jackpot bets from the table.
7. The dealer then follows house procedures for dealing the regular game.
8. The dealer reconciles the standard wager, bonus wager, and jackpot wagers at the same time. It's at the sole discretion of the casino to allow, or not to allow for folded hands to qualify for jackpot payouts. Follow the procedure in the next section for reconciling percentage pays from the jackpot meter.
9. Jackpot winners:
 - a. The percentage pays are paid from the jackpot shown on the jackpot meter.
 - b. Other hands are paid from the tray; they do not come off the meter.
 - c. In the event more than one jackpot meter pay hits during the same round, the dealer will first pay the player farthest on the 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 jackpot winner, the dealer will select the player spot corresponding to the player with the winning jackpot 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 jackpot 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. Once the dealer has reconciled all action, they press "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 jackpot 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.

I Luv Suits Poker Jackpot

- This game will use the approved Light and Wonder owned jackpot system Nexus Command Game Manager 2 v2.5.4 or higher, GM Atlas v5.4.0/Nexus Command II v5.4 or higher and a jackpot display. The jackpot display can either be provided by Light and Wonder or the operator.
- The jackpot display should be a table mounted monitor with no additional intelligence or functionality, including but not limited to network capability (wired or wireless). This non-intelligent monitor can either be provided by Light and Wonder or the operator so long as it does not introduce any additional functionality.

House Jackpot 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 House Jackpots.
- All jackpots on a table must be of a single jackpot type (House Jackpot or Jackpot).
- Operators can only offer one jackpot game option per sensor.
- When operated as a house jackpot, the jackpot amount is at the discretion of the casino. Prizes are set by the casino and are required to be displayed at each gaming table. Prizes displayed are considered property of the casino until won by one or more players. The casino must post all required notices and disclosures at each table and follow all rules for house jackpots in WAC 230-15-671.
- When operated as a progressive jackpot, rules for progressive jackpot prizes are contained within WAC 230-15-680 through WAC 230-15-720.

I Luv Suits Poker Jackpot

	1
Hand	Pays
Royal Flush - Hearts	100%
Royal Flush - Other	10%
Straight Flush	250 for 1
Four-of-a-Kind	75 for 1
Full House	5 for 1
Flush	4 for 1
Straight	2 for 1

	2	3
Hand	Pays	Pays
7-Card Straight Flush	100%	100%
6-Card Straight Flush (Ace High)		
6-Card Straight Flush (King High or Lower)	10%	10%
5-Card Straight Flush	300 for 1	200 for 1
4-Card Straight Flush	50 for 1	50 for 1
3-Card Straight Flush	3 for 1	3 for 1

	ML 1
Hand	Pays
Royal Flush - Hearts	100% Major
Royal Flush - Other	100% Minor
Straight Flush	250 for 1
Four-of-a-Kind	75 for 1
Full House	5 for 1
Flush	4 for 1
Straight	2 for 1

All settings and pays, listed in the above pay tables, are based off a fixed \$1 wager. Card room operators 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 meter.



PROGRESSIVE SYSTEMS FLEXIBILITY and RECOMMENDATIONS:

- Progressive meter contribution
 - 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.

- Reserve contribution
 - 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.

- Seed amount
 - 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.

