



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



- *King's Bounty is a standard house-banked blackjack game but with optional wagers called King's Bounty and Blazing 7's Progressive or TriLux Blackjack Progressive. Note: Card room operators may only choose one of the progressive options to be incorporated with the game. All rules pertaining to standard blackjack as posted on the WSGC's website remain the same and are not altered in this game.*
- *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.*

RULES OF PLAY

1. Players must make a blackjack wager in order to participate in the Kings' Bounty bonus wager
2. Casinos set the minimum and maximum bets.
3. Players make the King's Bounty bonus wager by betting in the marked area.
4. The dealer follows house procedures for blackjack.

5. When each player and the dealer have two starting cards, the dealer settles King's Bounty wagers.
 - a. Exception: If a player has two Kings of Spades and the dealer has a potential blackjack, the dealer will settle that bet at the end of the round.
6. Sample paytables are submitted separately



	KB01
2 Kings of Spades + Dealer BJ	1,000 to 1
2 Kings of Spades	100 to 1
2 Suited Kings	30 to 1
2 Suited Queens, Jacks or 10s	20 to 1
Suited 20	9 to 1
2 Kings	6 to 1
Unsuited 20	4 to 1



DEALER MUST HIT SOFT 17 • INSURANCE •

2 PATS 1

INSURANCE

PAYS
2 TO 1


THE UNIVERSITY OF CHICAGO

1

Account	Debit	Credit
Accounts Receivable	100.00	
Accounts Payable		100.00
Inventory	50.00	
Prepaid Insurance	10.00	
Equipment	20.00	
Accumulated Depreciation		10.00
Common Stock		100.00
Retained Earnings		10.00
Dividends	10.00	
Salaries Expense	20.00	
Rent Expense	10.00	
Utilities Expense	5.00	
Insurance Expense	5.00	
Depreciation Expense	5.00	
Cost of Sales	50.00	
Sales Revenue		100.00
Net Income		10.00
Total	200.00	200.00



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- *Blazing 7's Progressive is an optional Progressive wager for house-banked blackjack games in which one common progressive jackpot can be used with the following WSGC approved game titles:*

Bet the Set

Free Bet Blackjack

House Money

Kings Bounty

Royal Match

TriLux Blackjack

Zappit Blackjack.

All rules pertaining to standard blackjack and approved blackjack variation games as posted on the WSGC's website remain the same and are not altered in this game. If linking multiple blackjack games, the same payable and the same number of decks must be used between all linked games. This game uses a minimum of six decks.

- *Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.*
- *This game will use the approved Light and Wonder owned progressive system Nexus Command Game Manager 2 v2.5.4 or higher or GM Atlas v5.4.0/Nexus Command II v5.4 or higher and a Progressive display. The progressive display can either be provided by Light and Wonder or the operator.*
- *The progressive 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.*
- *If the below 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.*

NEXUS COMMAND/GM Atlas

RULES OF PLAY:

1. Blazing 7's Progressive is an optional progressive bonus wager for blackjack.
2. Players must make a standard blackjack bet in order to make a Blazing 7's progressive wager.
3. The Blazing 7's Progressive considers the player's hand only. If the player does not have at least one 7 in the player's initial two cards, the progressive bet will lose.
4. To begin each round, players must make their standard blackjack wager. They may also place an optional 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 remove all progressive wagers on the table.
6. The dealer will then follow standard dealing procedures for blackjack.
7. The player's Blazing 7's wager will win if the player has any 7's in their initial two cards. (see payable)
8. If the player has two 7's in the first two cards and their first hit card is also a 7, the player will qualify for one of the Three 7's payouts.
 - a. Note: The "Two 7's" payout is based upon the player's first two cards only.
9. If the player receives two 7's in their first two cards and chooses to split, the progressive payout will be based on the third card dealt to that player.
10. If the player busts, the bust card does NOT count toward the player's Blazing 7's Prog. bet.
 - a. The dealer will pick up the player's losing primary wager first, then pay the progressive wager, pick up the cards, and continue dealing.
11. After the dealer has completed their hand, the dealer will pay and take player's hands as follows.
 - a. Working from right to left pay or take primary wager first.
 - b. Pay the progressive wager if applicable.
12. Once all bets have been reconciled the dealer will hit "END GAME. " Progressive Winner: The percentage pays are paid from the progressive jackpot shown on the progressive meter.
 - a. Other hands are paid from the chip tray; they do not come off the meter.
 - b. In the event more than one progressive meter pay hits during the same round, the dealer will first pay the player farthest on their right and then move counter-clockwise to pay other players. As Regulatory procedures permit, this policy can be replaced by casino internal controls.
 - c. 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.)
 - d. 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.
- 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 the jackpot level) is swiped the prize is logged into the 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.

Dealer's Up Card



- *Blazing 7's Progressive is an optional Progressive wager for house-banked blackjack games in which one common progressive jackpot can be used with the following WSGC approved game titles:*

Bet the Set

Free Bet Blackjack

House Money

Kings Bounty

Royal Match

TriLux Blackjack

Zappit Blackjack

All rules pertaining to standard blackjack and approved blackjack variation games as posted on the WSGC's website remain the same and are not altered in this game. If linking multiple blackjack games, the same payable and the same number of decks must be used between all linked games. This game uses a minimum of six decks.

- *Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.*
- *This game will use the approved Light and Wonder owned progressive system Nexus Command Game Manager 2 v2.5.4 or higher or GM Atlas v5.4.0/Nexus Command II v5.4 or higher and a Progressive display. The progressive display can either be provided by Light and Wonder or the operator.*
- *The progressive 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.*
- *If the below 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.*

NEXUS COMMAND/GM Atlas

RULES OF PLAY:

1. Blazing 7's Progressive is an optional progressive bonus wager for blackjack.
2. Players must make a standard blackjack bet in order to make a Blazing 7's progressive wager.
3. The Blazing 7's Progressive considers both the player's initial two cards and the dealer's up card. If the player does not have at least one 7 in the player's initial two cards, the progressive bet will lose.
4. To begin each round, players must make their standard blackjack wager. They may also place an optional 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 remove all progressive wagers on the table.
6. The dealer will then follow standard dealing procedures for blackjack.
7. The player's Blazing 7's wager will win if the player has any 7's in their initial two cards. (see payable)
8. If the player has two 7's in the first two cards and the dealer's up card is a 7, the player will qualify for one of the Three 7's payouts
 - a. Note: The "Two 7's" payout is based only upon the player's first two cards.
9. After the dealer has completed the initial deal and revealed their up card, they may resolve the progressive wager immediately.
 - a. Working from right to left pay or take primary wager first.
 - b. Pay the progressive wager if applicable.
10. Once all bets have been reconciled the dealer will hit "END GAME. "
11. Progressive Winner:
 - a. The percentage pays are paid from the progressive jackpot shown on the progressive meter.
 - b. Other hands are paid from the chip tray; they do not come off the meter.
 - c. In the event more than one progressive meter pay hits during the same round, the dealer will first pay the player farthest on their 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.
- 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 the jackpot level) is swiped the prize is logged into the 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.

Blazing 7's Progressive

	1
Hand	Pays*
Three 7's - Same Suit	100%
Three 7's - Same Color	10%
Three 7's	200 for 1
First Two Cards - 7	25 for 1
Either of the First Two Cards - 7	2 for 1
Hold	24.78%
Hit Frequency	14.82%
*Original wager NOT returned	

Designed for 6 decks

	2
Hand	Pays*
Three 7's - Diamonds	100%
Three 7's - Suited (Other)	10%
Three 7's - Same Color	500 for 1
Three 7's	200 for 1
First Two Cards - 7	25 for 1
Either of the First Two Cards - 7	2 for 1
Hold	23.59%
Hit Frequency	14.82%
*Original wager NOT returned	

Designed for 6 decks

	ML03
Hand	Pays*
Three 7's - Diamonds	100% Mega
Three 7's - Suited (Other)	100% Major
Three 7's - Same Color	100% Minor
Three 7's	200 for 1
First Two Cards - 7's	25 for 1
Either of the First Two Cards - 7	2 for 1
Hold	21.65%
Hit Frequency	14.81%
*Original wager NOT returned	

Designed for 6 & 8 decks

	ML04
Hand	Pays*
Three 7's - Diamonds	100% Major
Three 7's - Suited (Other)	100% Minor
Three 7's - Same Color	500 for 1
Three 7's	200 for 1
First Two Cards - 7's	25 for 1
Either of the First Two Cards - 7	2 for 1
Hold	22.39%
Hit Frequency	14.82%
*Original wager NOT returned	

Designed for 6 decks



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.





- *TriLux BlackJack Progressive is an optional Progressive wager for house-banked blackjack games in which one common progressive jackpot can be used with the following WSGC approved game titles:*

Bet the Set

Free Bet Blackjack

House Money

Kings Bounty

Royal Match

TriLux Blackjack

Zappit Blackjack

All rules pertaining to the standard non-patented game of blackjack and approved blackjack variation games as posted on the WSGC website remain the same and are not altered in this game. If linking multiple blackjack games, the same payable and the same number of decks must be used between all linked games. This game uses six or eight decks.

- *Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.*
- *This game will use the approved Light and Wonder owned progressive system Nexus Command Game Manager 2 v2.5.4 or higher or GM Atlas v5.4.0/Nexus Command II v5.4 or higher and a Progressive display. The progressive display can either be provided by Light and Wonder or the operator.*
- *The progressive 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.*

- *If the below 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.*

Nexus Command II

RULES OF PLAY:

1. TriLux Blackjack offers an optional progressive wager.
2. All percentage and odds pays consider both the player's first two cards, and dealer's up- card ONLY
3. Paytables are listed separately
4. The meter will be reseeded when the 100% award hits. The cost of the reseed has been factored in to the casino's mathematical advantage.
5. To begin each round, players must make their regular game's wager. They may optionally place any of the offered bonus and progressive wagers. Players must place the progressive 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 progressive wager. The dealer will leave all progressive bets on the table.
7. The dealer then follows house procedures for dispensing the starting cards to all participating player's and themselves.
8. After each participating player has received their first two starting cards and the dealer has revealed their up-card, the progressive wagers can be resolved. The dealer will follow the procedure in the next section for reconciling percentage pays from the progressive meter.

9. Progressive winners:
 - a. The percentage pays are paid from the progressive jackpot shown on the progressive meter. Note: Fixed pay awards are paid from the tray; they do not come off the meter.
 - b. In the event more than one progressive 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.
 - c. 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.)
 - d. The dealer shall then contact a supervisor.
 - e. 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.)
 - f. Once the dealer has reconciled all action, they press "END GAME." This resets the system to begin the next hand.
 - g. 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.
10. Once the progressive wagers have been resolved and the dealer has pressed "END GAME" standard blackjack can resume per house rules.

TriLux Blackjack Progressive

Paytable 6	
Hand	Pays*
Three Aces (Suited)	100%
Three of a Kind (Suited)	125 for 1
Straight Flush	25 for 1
Three of a Kind (Offsuit)	20 for 1
Straight	7 for 1
Flush	5 for 1
*Original wager NOT returned	

Designed for 6 and 8 decks



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.

