



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:  
  
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



## **RULES AND DEALING PROCEDURES**

Straight Edge Poker features head-to-head play against the dealer and two optional bonus bets. Players get seven cards to make their longest straight possible. The dealer does the same with eight cards.

The game allows “wrap-around” straights, where the Ace is used as something other than a starting point or ending point. For example, J-Q-K-A-2-3 counts as a six-card straight.

If the player and dealer have straight of identical length, the rank of the ending card in the straight determines the winner. For example, 3-4-5 loses to 5-6-7. Players win copies (an identical straight as the dealer).

### **Rules and Dealing Procedures**

1. Set the i-Deal/i-Deal Plus shuffler to “Straight Edge,” or any game that deals packets of seven cards.
2. To begin the game, players make an Ante wager. Players may also make the optional Bonus and Insurance wagers. The Bonus wager wins if players have at least a four-card straight. The Insurance wager wins if players have less than a two-card straight.
3. The dealer presses the green button to dispense the first packet of cards.
4. The dealer, working clockwise from his left to his right, gives each player a packet of seven cards.
5. The dealer then gives himself eight cards. He does this by first taking a packet of seven cards and then adding the top card from the next packet. He keeps all his cards face down.
6. The dealer then presses the green button on the i-Deal/i-Deal Plus to dispense all the remaining cards and begin shuffling the next deck.
7. 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.
    - i. Players should discard their non-straight cards.
  - b. If players fold with a winning Insurance bet, they should tuck their cards under the Insurance bet.

8. The dealer then reveals his hand.
9. The dealer, working counter-clockwise from right to left, compares his hand with the hand of each player that stayed in the game.
10. Players win if their straight is longer than the dealer's. Players also win if they have a straight of equal length but their kicker (final card in the straight) is equal to or higher than the dealer's.
  - a. When players win, their Ante pays 1 to 1 and their Play bet pays according to the margin of victory. See below:

Win By	Pays
6 Cards	200 to 1
5 Cards	25 to 1
4 Cards	8 to 1
3 Cards	3 to 1
2 Cards	2 to 1
0/1 Cards	1 to 1

- i. Example: The Play bet pays 3 to 1 if the player beats the dealer six cards to three.
11. Players lose if the dealer has a straight with more cards or has a straight with the same number of cards but with a higher final card. When players lose, their Ante and Play bets lose.
12. Players win the Bonus bet if they can make a four-card straight or better, even if they lose to the dealer. Sample payable below:

Length of Straight	Pays
7 Cards	40 to 1
6 Cards	15 to 1
5 Cards	6 to 1
4 Cards	3 to 2

13. Players win the Insurance bet if they have less than a two-card straight. This bet pays 25 to 1.

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

[illegible]



## **VERSION 2**

# **RULES AND DEALING PROCEDURES**

Straight Edge Poker features head-to-head play against the dealer and two optional bonus bets. Players and the dealer get seven cards to make their longest straight possible.

If the player and dealer have straight of identical length, the rank of the ending card in the straight determines the winner. For example, 3-4-5 loses to 5-6-7.

Copies push.

Ace can be the lowest card in a straight or the highest card in a straight.

### **Rules and Dealing Procedures**

1. Set the i-Deal/i-Deal Plus shuffler to “Straight Edge,” or any game that deals packets of seven cards.
2. To begin the game, players make equal wagers on the Ante and Blind. Players may also make the optional 4+ and insurance bonus bets.
3. The dealer presses the green button to dispense the first packet of cards.
4. The dealer, working clockwise from his left to his right, gives each player and himself a packet of seven cards.
5. The dealer then presses the green button on the i-Deal/i-Deal Plus to dispense all the remaining cards and begin shuffling the next deck.
6. Players look at their hands and have a choice:
  - a. Fold or stay in the game by making a Play bet of 2x their Ante.
    - i. Players should discard their non-straight cards.
7. The dealer then reveals his hand.
8. If the dealer has less than 9-10 (a two-card straight of 10-high), he immediately goes around the table and refunds each player’s Ante bet.

9. The dealer, working counter-clockwise from right to left, compares his hand with the hand of each player that stayed in the game.
10. If players win, their Ante (if applicable) and Play bets pay 1 to 1, and their Blind bet is resolved based on their margin of victory over the dealer. See below:

Win By	Pays
6 Cards	100 to 1
5 Cards	25 to 1
4 Cards	5 to 1
3 Cards	3 to 1
2 Cards	2 to 1
1 Cards	1 to 1

11. If players lose, their Ante (if applicable), Play and Blind bets lose.
12. If players tie, their Ante, (if applicable), Play and Blind bets push.
13. Players win the 4+ bonus bet if they can make a four-card straight or better, even if they lose to the dealer. Sample payable below:

Length of Straight	Pays
7 Cards	50 to 1
6 Cards	15 to 1
5 Cards	8 to 1
4 Cards	2 to 1

14. Players win 25 to 1 on the Insurance bet if they have less than a two card straight.

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





## Straight Edge Stud Poker

Version 1 Blind

Win By	Pays*
6 Cards	200
5 Cards	25
4 Cards	8
3 Cards	3
2 Cards	2
0/1 Cards	1

Version 2 Blind

Win By	Pays*
6 Cards	100
5 Cards	25
4 Cards	5
3 Cards	3
2 Cards	2
1 Card	1

Bonus                      1                      2

Length of Straight	Pays*	Pays*
7	40	50
6	15	20
5	6	4
4	3 to 2	3 to 2
House Advantage	3.60%	5.86%

4 + Bonus\*\*                      1

Length of Straight	Pays*
7	50
6	15
5	8
4	2
House Advantage	5.60%

Bonus and 4+ Bonus wagers are based on the Length of Straight, Player's Hand Only

\*Payout are "to 1"

\*\*V2 only

Insurance*	25 to 1
Hold	9.12%

\*Less than a two card straight



## **RULES OF PLAY:**

1. Straight Edge Stud Poker Two Way Bad Beat Progressive is an optional progressive bet.
2. The bet wins if the player is involved in a bad beat with the dealer.
  - a. The bet wins if the player and dealer each have a 4-card straight or better, and they do not tie. If there's a tie the TWBB wager loses.
  - b. The payout is based on the lowest hand.
3. 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.
4. To begin each round, players must make their regular game's wager. They may optionally place any bonus bet 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.
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: (if available)

- 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. Envy Bonuses should only be paid to player's at the table where the qualifying hand occurred.**
- 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.

*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 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.*



## **RULES OF PLAY:**

1. Straight Edge Stud Poker Two Way Bad Beat Progressive is an optional progressive bet.
2. The bet wins if the player is involved in a bad beat with the dealer.
  - a. The bet wins if the player and dealer each have a 4-card straight or better, and they do not tie. If there's a tie the TWBB wager loses.
  - b. The payout is based on the lowest hand.
3. 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.
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.
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: (if available)

- 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. Envy Bonuses should only be paid to player's at the table where the qualifying hand occurred.**
- 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.

*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 containing the following components and their compatible software versions: Nexus Command Game Manager v1.3.0 or higher, Nexus Command Table Controller Software v2.0.0 and ViPS display or GM Atlas v5.4.0/Nexus Command II, Nexus Command II v5.4 or higher.*

## **Straight Edge Stud Poker TWBB Prog.**

TWBB Hand	1*	Envy**	2*
7-Card Straight	100%	\$100	100%
6-Card Straight	250 for 1		250 for 1
5-Card Straight	25 for 1		25 for 1
4-Card Straight	5 for 1		5 for 1

\*The player may bad beat the dealer or the dealer may bad beat the player

\*\*The Envy is only available on payable 01



## 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.





**WRAP AROUND STRAIGHTS PLAY**  
DEALER ALWAYS QUALIFIES    PLAYERS WIN COPIES

The diagram illustrates a poker table layout for a game called "Wrap Around Straights Play". The table is represented by a large, light blue, curved shape. In the center, there is a large, bold title "WRAP AROUND STRAIGHTS PLAY" with the subtitle "DEALER ALWAYS QUALIFIES PLAYERS WIN COPIES" below it. The table is divided into several sections, each with a red circular button labeled "ANTE" and a blue circular button labeled "PLAY 1x ANTE". There are also yellow diamond-shaped buttons labeled "BONUS" and "INSURANCE". The layout is symmetrical, with the "ANTE" and "PLAY 1x ANTE" buttons arranged in a circular pattern around the central title. The "BONUS" and "INSURANCE" buttons are placed between the "ANTE" and "PLAY 1x ANTE" buttons. The diagram also shows a stack of playing cards in the center of the table, and a small table of rules or payouts in the bottom right corner.