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 <br> 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 |


| 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 <br> 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 <br> 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,


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


Blackjack Switch is a standard house-banked blackjack game except for the rules listed below. All other rules pertaining to standard blackjack as posted on the WSGC's website remain the same.

## Overview

In Blackjack Switch® each player plays two hands of Blackjack. The player can choose to switch the second card of each hand. The player can also make the optional Kings Bounty bet which is based on their first 2 cards.

## Getting Started

1. Players make equal bets on both betting spots, and the optional King's Bounty wager. The dealer then deals out two hands of Blackjack to each player and one to himself.
2. When each player has two hands and the dealer has two starting cards, the dealer settles the 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.

After seeing their two Blackjack starting hands, players have a choice: to switch the second card of each hand. Then each hand is played according to the normal house rules of Blackjack. (See Dealing Procedures below for resolving player blackjacks.) All doubling and splitting is allowed as in regular Blackjack.

## Winning and Losing

Blackjacks pay even money. Dealer total of 22 will push all non-bust player hands (See exceptions noted below).

King's Bounty wager is paid according to posted paytable.

| First Two Player Cards* | Pays |
| :--- | ---: |
| 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 | to 1 |
| *Only highest winner paid |  |

## Rules and Dealing Procedures

1. LNW Gaming, Inc recommends using an automatic shuffler such as an ONE2SIX®, ShuffleStar or a MD2® batch shuffler.
2. After players have placed their wagers, the dealer, working clockwise from his left to his right, gives each player two hands of blackjack and himself one hand of Blackjack.
3. Dealer resolves all King's Bounty Wagers (based on first 4 player's cards).
4. Depending on version, Blackjacks may be paid automatically. (See appendix A.)
5. If the dealer is showing an Ace, Insurance will be offered. Player can take insurance on either or both hands.
6. As the dealer works clockwise from his left to right the player decides to "switch" (see Appendix B for switching procedure) the second cards or play each hand according to the normal rules of blackjack. Splitting, doubling, and doubling after splitting is allowed even after a "switch".
7. If the dealer draws a total of 22, all remaining base wagers will push except Blackjack. (See appendix A for definition of Blackjack.) Otherwise base wagers are resolved according to the normal rules of blackjack.

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

## Appendix ' $A$ '

Depending on the version of Blackjack Switch that is being offered, the resolution of a "Blackjack" varies. The definition of Blackjack will be explained for each version below.

## Version 1

- Dealer Hits Soft 17
- A "switched" Blackjack is considered a Blackjack. Therefore, a player will be offered the opportunity to switch before the dealer checks his hole card.
- Blackjack pays 1 to 1 and would push if the dealer has a Blackjack.


## Version 2

- Dealer Hits Soft 17
- A "switched" Blackjack is considered a 21, not a Blackjack.
- Blackjack pays 1 to 1 and would push if the dealer has a Blackjack.
- A switched Blackjack (considered a 21) loses against a dealer blackjack and pushes against a dealer 21 or 22.


## Version 3

- Dealer Hits Soft 17
- A "switched" Blackjack is considered a 21, not a Blackjack.
- Blackjack pays 1 to 1 including against a dealer Blackjack.
- A switched Blackjack (considered a 21) loses against a dealer blackjack and pushes against a dealer 21 or 22.


## Version 4

- Dealer Stands on Soft 17
- A "switched" Blackjack is considered a 21, not a Blackjack.
- Blackjack pays 1 to 1 and would push if the dealer has a Blackjack.
- A switched Blackjack (considered a 21) loses against a dealer blackjack and pushes against a dealer 21 or 22.


## Appendix ' $B$ ’

## Procedure for Switching the Cards




| Kings Bounty | Hand |
| :--- | ---: |
| 1 |  |
| 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 |



