



# Washington State Gambling Commission

Protect the Public by Ensuring that Gambling is Legal and Honest

February 16, 2024

*Sent via email to [tcx@galaxygaming.com](mailto:tcx@galaxygaming.com)*

Tiffini Cox  
Galaxy Gaming  
6480 Cameron Street, Suite 305  
Las Vegas, NV 89118

Re: Emperor's Challenge - Submission #3155

Dear Tiffini Cox,

We have reviewed the changes made to your Emperor's Challenge game. Based on our review of the documentation we received from Galaxy Gaming, 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 Emperor's Challenge game rules 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.

4565 7th Avenue SE  
Lacey, WA 98503  
[wsgc.wa.gov](http://wsgc.wa.gov)

PO Box 42400  
Olympia, WA 98504  
360-486-3440

901 N Monroe St Suite 240  
Spokane, WA 99201  
509-325-7900

- 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 this game may affect this approval. If you have any questions on commercial implementation, please contact Brian Lane at (509) 387-7095. 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.

Respectfully,

DocuSigned by:

*Jim Nicks*

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Jim Nicks  
Interim Assistant Director  
Enforcement and Operations Division

Enclosures

cc: Tony Hughes, Special Agent in Charge, Regulation & Enforcement Unit  
Dan Wegenast, Special Agent in Charge, Tribal Gaming Unit  
Jess Lohse, Special Agent Supervisor, Regulation & Enforcement Unit  
Brian Lane, Special Agent, Regulation & Enforcement Unit  
Kelly Main, Special Agent Supervisor, Tribal Gaming Unit  
File

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## Rules of Play

*Washington*



**GALAXY GAMING**

**DISTINCTIVELY DIFFERENT**

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## Game Description

*Emperor's Challenge Pai Gow Poker* ("*Emperor's Challenge*") is standard, house-banked Pai Gow Poker using a standard 52-card deck and a Joker. The object of the game is for the player to beat the dealer in both their two-card low hand and their five-card high hand. All rules pertaining to standard Pai Gow Poker, stated in the approved rules of play posted on the WSGC website under "Authorized Games", remain the same and are not altered in this game. *Emperor's Challenge* contains optional bonus wagers that are not dependent on the base game's outcome.

Casino operators choose which bonus wagers they will offer, subject to any restrictions contained within these Rules of Play. Each bonus wager may be made at the player's option and there is no effect on the primary game and no changes in player strategy. 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, or their specific regulatory body.

## Rules of Play

1. To begin, each player must make an *Emperor's Challenge Pai Gow* wager. Each player may also place optional *Emperor's Treasure*, *Pai Gow Insurance*, and/or *Jackpot* wagers.
2. Each player and the banker receive seven cards.
3. After examining their seven cards, each player must set a two-card low hand and a five-card high hand and place each hand in their designated areas. If the low hand is incorrectly set to be of greater value than the high hand, the hand is a foul and settled in accordance with house procedure.
4. The dealer then reveals their seven cards and forms a two-card low hand and a five-card high hand in accordance with the predetermined house way.
5. The dealer examines each player's hand and settles the *Emperor's Challenge* wager as follows:
  - a) If both the player's low-hand and high hand are greater than the dealer's hands, the player is paid even money, less a five percent commission, if applicable.
  - b) If only one of the player's hands is greater than the dealer's hands, the player's wager is a push.
  - c) If both the player's hands are less than both the dealer's hands, the player's wager loses.
6. The dealer reconciles all optional wagers.

## **Equipment**

This game will use the Galaxy Gaming owned Andromeda Bonus Jackpot System Series 3d or higher. Jackpot meter displays will not contain additional intelligence or functionality, including but not limited to network capability, wired or wireless.

If operators use an automatic shuffle machine, it must be a WSGC approved model, manufactured by a WSGC licensed manufacturer.

## **Gambling Promotions**

A gambling promotion may be added to any of the bonus wagers at the discretion of the casino operator and with the written consent of Galaxy Gaming.

## Optional Bonus Wagers

### *Pai Gow Insurance (felt)*

Players win if their\* 7-card hand is a pai gow (does not contain a pair or better). The Ace is always considered high and the joker is always considered an Ace. The wager is paid based on the paytables in Appendix A.

\*Alternatively, the player may choose, prior to any cards being dealt, to use the dealer's hand instead of their own hand. If the player chooses this option, the dealer places a designated "Dealer" lammer directly adjacent to the player's *Pai Gow Insurance* wager. Only one *Pai Gow Insurance* bonus wager may be placed.

### *Emperor's Treasure (felt)*

Players win if their 7-card hand achieves a winning event based on the corresponding paytables in Appendix B. *Emperor's Treasure* may incorporate a bonus feature called *Envy Bonus*.

#### *Envy Bonus*

To qualify for an *Envy Bonus* prize, the player must place an *Emperor's Treasure* wager of \$5 or more per hand. A player's hand is awarded an *Envy Bonus* prize when another player's hand, at the same table, achieves a triggering event listed on the corresponding *Emperor's Treasure* paytable. A player may be permitted to play more than one hand. If a player is playing more than one hand, then one of their hands may be used as the winning triggering event for the other hand. The player's hand that achieves the *Emperor's Treasure* trigger event is not awarded both an *Emperor's Treasure* prize and an *Envy Bonus*. This hand is only awarded the *Emperor's Treasure* prize.

## House 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 or Progressive)
- Operators can only offer one jackpot game option per sensor

### *Emperor's Treasure House or Progressive Jackpot*

Players win if their 7-card hand achieves a winning event based on the corresponding payable in Appendix C. This progressive can be used: as a standalone jackpot, to link jackpots between multiple *Emperor's Challenge* tables, and to link jackpots between *Emperor's Challenge Tables* and other approved games that contain the *Emperor's Treasure House or Progressive Jackpot*.

**Note:** House Jackpots must operate as standalone jackpots. Conversely, linked jackpots must operate as Progressive Jackpots.

### *Pai Gow Insurance House or Progressive Jackpot*

Players win if their 7-card hand achieves a winning event based on the corresponding payable in Appendix D. This progressive can be used: as a standalone jackpot, to link jackpots between multiple *Emperor's Challenge* tables, and to link jackpots between *Emperor's Challenge Tables* and other

approved games that contain the *Pai Gow Insurance House or Progressive Jackpot*.

**Note:** House Jackpots must operate as standalone jackpots. Conversely, linked jackpots must operate as Progressive Jackpots.

### ***House and Progressive Jackpot Definition***

If operated as a **House Jackpot**, the table display does not increment after each wager is placed. All House Jackpot displays must include the following language: "House Jackpot prizes are paid by the casino and are not components of any progressive prize contest. Player wagers do not accrue to any guaranteed player fund. The displayed House Jackpot prize may be modified or discontinued at any time without prior notice."

If operated as a **Progressive Jackpot**, the table display should increment after each wager is placed. Casino operators must follow the rules contained in WAC 230-15-680 through WAC 230-15-720. Prizes displayed are considered to be held in escrow by the casino operator who acts as the custodian of the funds for the benefit of the players. Operators offering progressive jackpots must: (1) Ensure specific wager limits on progressive wagers to ensure all funds are accounted for; and (2) Maintain and account for all funds collected for progressive jackpot games.

The operator's internal controls must define how the Jackpots are configured and how they are won and if operated as a House or a Progressive game.

## Appendix A

### *Pai Gow Insurance (felt)*

Triggering Event	PT-FLT- EC-PGI-01	PT-FLT- EC-PGI-02	PT-FLT- EC-PGI-03	PT-FLT- EC-PGI-04	PT-FLT- EC-PGI-05
9-High Pai Gow	400	250	100	100	100
10-High Pai Gow	40	75	50	25	25
Jack-High Pai Gow	20	25	25	15	15
Queen-High Pai Gow	5	5	10	6	7
King-High Pai Gow	3	3	5	5	5
Ace-High Pai Gow	2	2	1	3	3

**Notes:**

1. All pays are "to 1."
2. Only the highest qualifying hand is paid.



## Appendix B

### Emperor's Treasure (felt)

Triggering Event	PT-FLT-EC-ET-E01		PT-FLT-EC-ET-E02		PT-FLT-EC-ET-E03	
	Pays	Envy	Pays	Envy	Pays	Envy
7-card Straight Flush (No Joker)	5,000	\$1,000	8,000	\$5,000	5,000	\$3,000
Royal Flush w/ A-K Suited	1,000	\$250	2,000	\$1,000	2,000	\$1,000
7-card Straight Flush w/ Joker	750	\$100	1,000	\$500	1,000	\$500
5 Aces	250	\$50	400	\$250	400	\$250
Royal Flush	100	\$25	150	\$50	150	\$50
Straight Flush	50	\$10	50	\$20	50	\$20
4-of-a-Kind	20	\$5	25	\$5	25	\$5
Full House	5	-	5	-	5	-
Flush	4	-	4	-	4	-
3-of-a-Kind	3	-	3	-	3	-
Straight	2	-	2	-	2	-
3 Pair	Push	-	-	-	-	-

Triggering Event	PT-FLT-EC-ET-E04		PT-FLT-EC-ET-E09		PT-FLT-EC-ET-E06	
	Pays	Envy	Pays	Envy	Pays	Envy
7-card Straight Flush (No Joker)	2,500	\$1,000	5,000	\$2,500	5,000	\$2,500
Royal Flush w/ A-K Suited	1,000	\$750	1,000	\$500	2,000	\$500
7-card Straight Flush w/ Joker	750	\$250	500	\$250	1,000	\$250
5 Aces	250	\$100	300	\$150	400	\$150
Royal Flush	125	\$50	110	\$55	150	\$55
Straight Flush	50	\$20	45	\$25	50	\$25
4-of-a-Kind	25	\$5	25	\$6	25	\$6
Full House	5	-	5	-	5	-
Flush	4	-	4	-	4	-
3-of-a-Kind	3	-	3	-	3	-
Straight	2	-	2	-	2	-
3 Pair	-	-	-	-	-	-

**Notes:**

1. All pays are "to 1" except for the *Envy Bonus*, which is a fixed payout.
2. Only the highest qualifying hand is paid. For example, if five of the player's cards comprise of a Royal Flush and the remaining cards are an Ace and a King of the same Suit, the hand is paid as "Royal Flush w/ A-K Suited" only. They do not also receive payment for a "Royal Flush."
3. Ace/King Suited combination cannot include the Joker. The five card Royal Flush may include the Joker (an example would be: Joker-K♥Q♥J♥10♥-A♥K♥)

**Appendix C**  
*Emperor's Treasure House or Progressive Jackpot*

Triggering Event	PT-BJS-EC-ET-05
7-card Straight Flush (No Joker)	100%
Royal Flush w/ A-K Suited (see Note 3)	100%
7-card Straight Flush w/ Joker	100%
5 Aces	100%
Royal Flush (No Joker)	100%
Royal Flush	\$325
Straight Flush	\$75
4-of-a-Kind	\$50
3 Pair	\$7
Full House	\$5

Triggering Event	PT-BJS-EC-ET-13	PT-BJS-EC-ET-09	PT-BJS-EC-ET-11	PT-BJS-EC-ET-17	PT-BJS-EC-ET-21
7-card Straight Flush (No Joker)	100%	100%	100%	100%	100%
Royal Flush w/ A-K Suited (see Note 3)	50%	50%	100%	100%	100%
7-card Straight Flush w/ Joker	25%	10%	100%	100%	100%
5 Aces	\$2,500	\$2,500	\$2,500	100%	100%
Royal Flush	\$200	\$200	\$200	\$200	\$325
Straight Flush	\$100	\$100	\$100	\$100	\$75
4-of-a-Kind	\$75	\$75	\$75	\$75	\$50
Full House	\$6	\$6	\$6	\$6	\$5

Triggering Event	PT-BJS-EC-ET-12	PT-BJS-EC-ET-10	PT-BJS-EC-ET-22	PT-BJS-EC-ET-14	PT-BJS-EC-ET-19	PT-BJS-EC-ET-16
7-card Straight Flush (No Joker)	100%	100%	100%	100%	100%	100%
Royal Flush w/ A-K Suited (see Note 3)	50%	50%	50%	50%	50%	100%
7-card Straight Flush w/ Joker	25%	10%	25%	25%	25%	100%
5 Aces	\$1,500	\$2,500	\$2,500	\$1,500	\$2,500	\$2,500
Royal Flush	\$200	\$200	\$200	\$200	\$200	\$200
Straight Flush	\$80	\$80	\$80	\$80	\$100	\$80
4-of-a-Kind	\$50	\$50	\$50	\$40	\$75	\$50
3 Pair	\$7	\$7	\$7	\$6	\$7	\$7
Full House	\$5	\$5	\$5	\$5	\$5	\$5

**Notes:**

1. All pays are "for 1." The jackpot wager is not returned.
2. Only the highest qualifying hand is paid.
3. The Ace/King Suited combination cannot include the Joker. The five card Royal Flush may include the Joker (for example: Joker-K♥Q♥J♥10♥-A♠K♠).
4. Prizes shown as a percentage mean the player receives that percentage of the corresponding displayed Jackpot. Percentage pays are the only payouts deducted from the jackpot meter.
5. Prizes shown as a dollar amount mean the player receives a fixed dollar amount.
6. All settings and pays, listed in the above paytables, are based off a fixed \$1 wager. The operator 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 TableVision image. It is also recommended that seed/reseed values are multiplied accordingly when operating a progressive jackpot.

## Appendix D

### *Pai Gow Insurance House or Progressive Jackpot*

Triggering Event	PT-BJS- EC-PGI-01	PT-BJS- EC-PGI-02	PT-BJS- EC-PGI-03	PT-BJS- EC-PGI-04	PT-BJS- EC-PGI-05
9-High Pai Gow, Same Color	100%	100%	100%	100%	100%
9-High Pai Gow	10%	10%	\$250	\$500	\$1,000
10-High Pai Gow	\$125	\$100	\$125	\$125	\$100
Jack-High Pai Gow	\$30	\$25	\$30	\$25	\$25
Queen-High Pai Gow	\$7	\$10	\$7	\$5	\$5

**Notes:**

1. All pays are “for 1.” The jackpot wager is not returned.
2. Only the highest qualifying hand is paid.
3. Prizes shown as a percentage mean the player receives that percentage of the corresponding displayed Jackpot. Percentage pays are the only payouts deducted from the jackpot meter.
4. Prizes shown as a dollar amount mean the player receives a fixed dollar amount.
5. All settings and pays, listed in the above paytables, are based off a fixed \$1 wager. The operator 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 TableVision image. It is also recommended that seed/reseed values are multiplied accordingly when operating a progressive jackpot.

# Appendix E

## Example Table Layouts



