



Washington State Gambling Commission

Protect the Public by Ensuring that Gambling is Legal and Honest

February 15, 2024

Sent via email to tc Cox@galaxygaming.com

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

Re: Emperor's Challenge Exposed - Submission #3156

Dear Tiffini Cox,

We have reviewed the changes made to your Emperor's Challenge Exposed 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 Exposed 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.

4565 7th Avenue SE
Lacey, WA 98503
wsgc.wa.gov

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

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

- 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 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 Operation 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



Rules of Play

Washington



GALAXY GAMING

DISTINCTIVELY DIFFERENT

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Game Description

Emperor's Challenge Exposed Pai Gow Poker ("Emperor's Challenge Exposed") is a commission-free, house-banked Pai Gow Poker-based game 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, with the exception of commission-free options and face up dealing procedures. *Emperor's Challenge Exposed* 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 Exposed Pai Gow* wager. Each player may also place optional *Emperor's Treasure*, *Pai Gow Insurance*, and/or *Jackpot* wagers.
2. Each player and the dealer receive seven cards, with the dealer's cards being dealt face up (exposed) and the player's cards dealt face down.
3. The dealer sets their five-card high and two-card low hands according to the House Way.
4. Each player must then set a two-card low hand and a five-card high hand and place each hand in their designated areas. The ranking of the five-card hand must be higher than the two-card hand. If not, the hand is a foul and settled in accordance with house procedure.
5. The dealer examines each player's hand and settles the base game wager as follows:
 - a. **Commission-Free Option #1:** If the dealer has a King-high Pai Gow or less, all player base-game wagers automatically push*.
 - b. Otherwise, standard Pai Gow Poker reconciliation is followed:
 - i. If *both* the player's low-hand and high-hand *are greater* than the dealer's hands, the player's wager is paid 1 to 1.
 - ii. If *one* of the player's hands *is greater* than the dealer's corresponding hand, the player's wager is a push.
 - iii. If *both* the player's hands *are less* than both the dealer's hands, the player's wager loses.

**Alternative Commission-Free Options (Operators choose which one of the three options to offer)*

- **Commission-Free Option #2:** If the dealer has an Ace-high Pai Gow, all player base-game wagers push.
- **Commission-Free Option #3:** If *both* the player's low-hand and high-hand *are greater* than the dealer's hands (i.e., the player wins) **and** the dealer has any Pai Gow, the player's wager is paid 1 to 2.

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 payable 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 payable 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* payable. 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.

Ace High Pai Gow Insurance

Players win if the dealer's 7-card hand is an Ace-high Pai Gow. The top award is achieved if the player and the dealer both have an Ace-high Pai Gow. Pays are based on the corresponding payable in Appendix C.

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

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 Exposed* tables, and to link jackpots between *Emperor's Challenge Exposed 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.

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 E. This progressive can be used: as a standalone jackpot, to link jackpots between multiple *Emperor's Challenge Exposed* tables, and to link jackpots between *Emperor's Challenge Exposed 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.

House and Progressive Jackpot Definitions

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

Ace High Pai Gow Insurance

Triggering Event	PT-FLT-AHPG-01	PT-FLT-AHPG-02	PT-FLT-AHPG-03	PT-FLT-AHPG-04	PT-FLT-AHPG-05
Dealer and Player Ace High Pai Gow	20	40	30	25	40
Dealer Ace High Pai Gow, with Joker	10	15	15	10	12
Dealer Ace High Pai Gow, No Joker	8	5	6	7	5

Notes:

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

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

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:

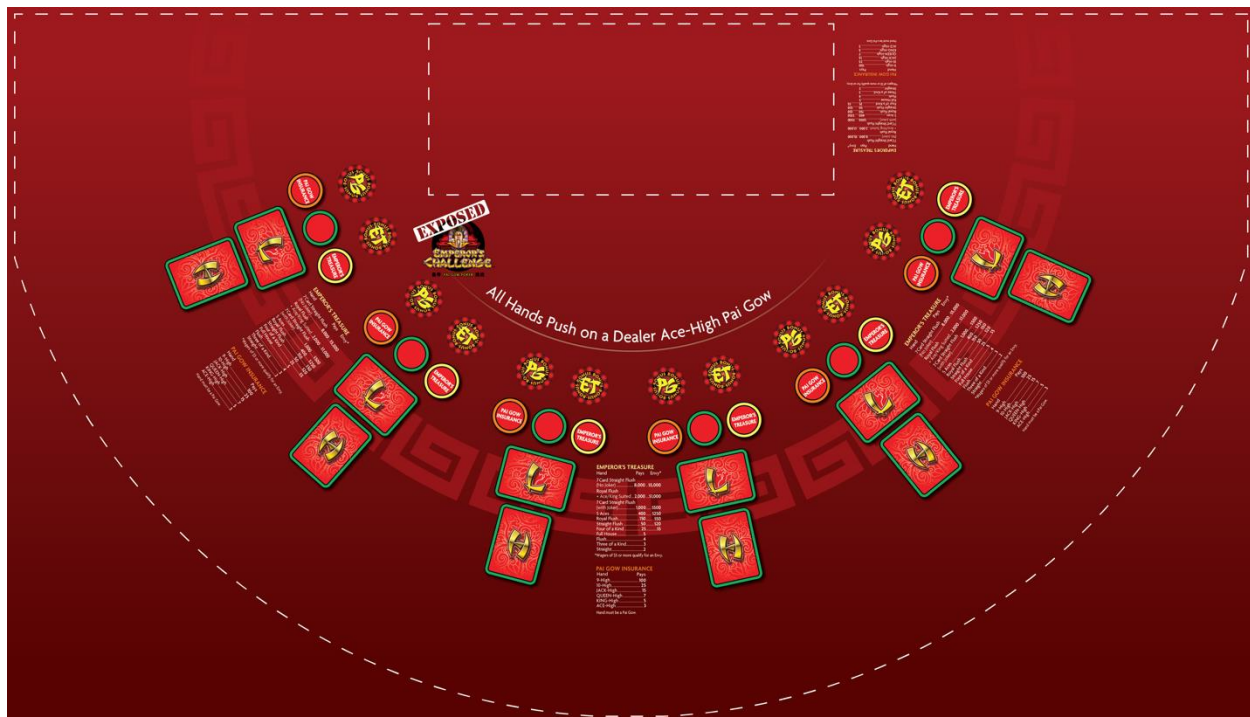
1. All pays are “for 1.” The jackpot wager is not returned.
2. Only the highest qualifying hand is paid.
3. The Ace/King Suited combination cannot include the Joker. The five card Royal Flush may include the Joker (for example: Joker-K♥Q♥J♥10♥-A♠K♠).
4. Prizes shown as a percentage mean the player receives 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 F

Example Table Layouts



When two jackpot sensors are used:



EMPEROR'S TREASURE

Hand	Pays	Envy*
7 Card Straight Flush (No Joker)	8,000	\$5,000
Royal Flush + Ace/King Suited	2,000	\$1,000
7 Card Straight Flush (with Joker)	1,000	\$500
5 Aces	400	\$250
Royal Flush	150	\$50
Straight Flush	50	\$20
Four of a Kind	25	\$5
Full House	5	
Flush	4	
Three of a Kind	3	
Straight	2	

*Wagers of \$5 or more qualify for an Envy.

PAI GOW INSURANCE

Hand	Pays
9-High	100
10-High	25
JACK-High	15
QUEEN-High	7
KING-High	5
ACE-High	3

Hand must be a Pai Gow.



1/31/24





PG
BONUS



**ACE HIGH
PAI GOW**



ET
BONUS



**PAI GOW
INSURANCE**



**EMPEROR'S
TREASURE**



L



H

EMPEROR'S TREASURE

Hand	Pays	Envy*
7 Card Straight Flush (No Joker)	8,000	\$5,000
Royal Flush + Ace/King Suited	2,000	\$1,000
7 Card Straight Flush (with Joker)	1,000	\$500
5 Aces	400	\$250
Royal Flush	150	\$50
Straight Flush	50	\$20
Four of a Kind	25	\$5
Full House	5	
Flush	4	
Three of a Kind	3	
Straight	2	

*Wagers of \$5 or more qualify for an Envy.

PAI GOW INSURANCE

Hand	Pays
9-High	100
10-High	25
JACK-High	15
QUEEN-High	7
KING-High	5
ACE-High	3

Hand must be a Pai Gow.

ACE HIGH PAI GOW INSURANCE

Hand	Pays
Dealer & Player Ace High	40
Dealer Ace High w/ Joker	15
Dealer Ace High w/ no Joker	5