



# Washington State Gambling Commission

Protect the Public by Ensuring that Gambling is Legal and Honest

June 5, 2025

Sent via email to [RSantoriello@lnw.com](mailto:RSantoriello@lnw.com)

Renne Santoriello  
Light & Wonder  
6601 S. Bermuda Road  
Las Vegas, NV 89119

Re: Commission Free Dragon Bonus – Submission #3200

Dear Ms. Santoriello,

We have reviewed the changes made to your Commission Free Dragon Bonus Baccarat card game rules. Based on our review of the documentation we received from Light & Wonder, 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 Commission Free Dragon Bonus Baccarat game rules you provided on January 17, 2025, 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.
- 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.

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901 N Monroe St Suite 240  
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Ms. Santoreillo

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Any modifications to this game may affect this approval. If you have any questions on commercial implementation, please contact Jaelene Leeson at (509) 790-2809. 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,



Jim Nicks  
Assistant Director  
Enforcement 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  
Jaelene Leeson, Special Agent, Regulation & Enforcement Unit  
Kelly Main, Special Agent Supervisor, Tribal Gaming Unit  
File



- *Commission Free Dragon Bonus is a standard Mini-Baccarat game but with the optional wagers called Dragon Bonus, Fortune 7, Golden 8, Dragon Bonus Jackpot, Fortune 7 Jackpot. All rules pertaining to Mini-Baccarat are posted on the WSGC's website remain the same except as noted in the Rules of Play below.*
- *Additional LNW equipment can be used on this game. This equipment will be the i-Shoe with software Mico32 v2.0.141 or higher, Safe-Shoe DMC v1.2.0.0 or higher, and CardRec v4.0.014 or higher; and the i-Score with software v1.5.19 or higher.*
- *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 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 manufacture.*

# **RULES OF PLAY**

**Commission Free Dragon Bonus** is a version of mini-baccarat. The game play is identical to standard mini-baccarat, with two exceptions:

- Banker bets push if they win with a three-card total of 7.
- Winning Banker bets are not charged commission.

## **OPTIONAL BONUS WAGERS:**

This game features two optional wagers: **Dragon Bonus, Fortune 7 and Golden 8**. There are two betting spots per position for **Dragon Bonus** (Player and Banker) and one betting spot per position for Fortune 7 and Golden 8. It is up to the sole discretion of the casino if the casino requires the player to make the original Mini-Baccarat wager.

The **Dragon Bonus** wager wins if:

1. The selected hand for the **Dragon Bonus** wager is a natural (two-card 8 or 9) winner; or
2. The selected hand for the **Dragon Bonus** wager is a non-natural that wins by four or more points.

The **Fortune 7** bet wins if the Banker wins with a three-card total of 7 points.

The **Golden 8** bet wins if the Player wins with a three-card total of 8 points.

## **Dealing Procedures**

1. Players must make the Dragon Bonus, Fortune 7 and Golden 8 wagers before the dealer deals any cards.
2. The dealer will then deal the traditional Mini-Baccarat hand according to house procedures.
3. When the hand is over, the dealer will reconcile traditional Mini-Baccarat wagers according to house procedures.
4. Casinos can reconcile bonus bets any way they like. Example: Remove losing bets immediately, and then pay winners.
5. Notes on naturals:
  - a. Natural\* winners always pay even-money on the Dragon Bonus bet.
  - b. In the event of a natural\* tie (8-8, 9-9), the Dragon Bonus pushes.
    - i. All other ties will result in Dragon Bonus bet losing.

\*Natural= Two-card total consisting of 8 or 9.



- 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 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 manufacture.
- Commission Free Dragon Bonus Jackpot is a standard Mini-Baccarat game but with optional jackpot wagers called Dragon Bonus, Fortune 7 and Golden 8. Operators choose which of the jjackpot wagers to offer. Note: Card Room operators may only choose one of the jackpot options to be incorporated with the game. All rules pertaining to Mini-Baccarat are posted on the WSGC's website remain the same except as noted in the Rules of Play below. Commission Free Dragon Bonus Jackpot cannot be linked to any other jackpot game nor linked to any other base game. Side wagers among players are prohibited.
- Additional LNW Gaming, Inc equipment can be used on this game. This equipment will be the i-Shoe with software Mico32 v2.0.141 or higher, Safe-Shoe DMC v1.2.0.0 or higher and CardRec v4.0.014 or higher; and the i-Score with software v1.5.19 or higher.
- This game will use the approved LNW Gaming, Inc owned jackpot system containing the following components and their compatible software versions: Nexus Command Game Manager 2 v2.5.4 or higher, GM Atlas v5.4.0/Nexus Command II v5.4 or higher, and a jackpot display. The jackpot display can either be provided by LNW Gaming, Inc or the operator.
- The jackpot 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 LNW or the operator so long as it does not introduce any additional functionality.

## **NEXUS COMMAND/GM ATLAS**

### **RULES OF PLAY:**

**Introduction – Paytable specific:** Commission Free Dragon Bonus Jackpot is an optional jackpot wager for Mini-Baccarat.

**Players have two ways to win when using Paytable #1:**

- 1) If the winning Mini-Baccarat hand is a 2, 3 and 4 (equaling a total of 9 over 0).
- 2) If the winning (non-natural) Mini-Baccarat hand wins 9 over 0.

**Players have three ways to win when using Paytable #2:**

- 1) If the winning Mini-Baccarat hand is a 2, 3 and 4 (equaling a total of 9 over 0).
- 2) If the winning Mini-Baccarat hand wins 8 or 9 (non-natural) over 0.
- 3) A natural win.

**Players have three ways to win when using Paytable #3:**

1. If the winning Mini-Baccarat hand is a same suit 6 card win by 9 points (equaling a total of 9 over 0).
2. If the winning Mini-Baccarat hand is a same suit 4 card win by 9 points (equaling a total of 9 over 0).
3. If the winning Mini-Baccarat hand is a natural or non-natural win by 9 points (equaling a total of 9 over 0).

The Progressive jackpot is tied to the winning Mini-Baccarat wager.

Ex. Make a bet on the player, and on the jackpot wager. If the player wager wins with one of the qualifying jackpot payouts listed below, the player will win according to the payable.

Ex. Make a bet on the banker, and on the jackpot wager. If the banker wager wins with one of the qualifying jackpot payouts listed below, the player will win according to the payable.

## Dealing Procedure

1. To begin each round, players must make the standard Mini-Baccarat game wager. They may also place the optional Dragon Bonus Fortune 7 and Golden 8 jackpot wagers. Players must place the jackpot wagers on the sensor in front of their betting position. The sensor will light up once wager is recognized.
2. Once all players place their bets, the dealer will press “START GAME” on the keypad. The sensors will then light up, indicating jackpot wager. The dealer will remove all \$1 jackpot wagers from bet sensors or, if applicable, leave the \$5 progressive wager on the coin spot.
3. The dealer then follows house procedures for dealing the regular game.
4. Once the hand is over, the dealer will reconcile traditional Mini-Baccarat wagers according to house procedures.
5. Casinos may reconcile bonus bets any way they like. Example: Remove losing bets immediately, and then pay winners.
6. Notes on Naturals for standard Commission Free Dragon Bonus Wager (if applicable):
  - a. Natural\* winners always pay even-money on the Commission Free Dragon Bonus bet.
  - b. In the event of a natural\* tie (8-8, 9-9), the Commission Free Dragon Bonus pushes.
    - i. All other ties will result in Commission Free Dragon Bonus bet loss.

7. Progressive/Jackpot winners:

- a. The percentage pays are paid from the jackpot shown on the jackpot meter. Other hands are paid from the tray or from the meter at the casino's requirements.
- b. The percentage prize pay amount shown on the meter is split among all players, at that table, participating in the jackpot wager that round.
- c. When a player has a jackpot winner, the dealer, using the dealer display will press the appropriate hand button that corresponds to the player with the winning jackpot hand.(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 jackpot 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. When the dealer reconciles all action, he presses "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.

8. **Natural= Two-card total consisting of 8 or 9.**





- *Commission Free Dragon Bonus Jackpot is a proprietary game based on standard Mini-Baccarat rules with optional jackpot wagers called Dragon Bonus, Fortune 7 and Golden 8. All rules pertaining to Mini-Baccarat as posted on the WSGC's website remain the same except as noted in the Rules of Play below. Commission Free Dragon Bonus Jackpot cannot be linked to any other jackpot game nor linked to any other base game. Side wagers are prohibited.*
- *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 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.*
- *Additional LNW Gaming, Inc equipment can be used on this game. This equipment will be the i-Shoe with software Mico32 v2.0.141 or higher, Safe-Shoe DMC v1.2.0.0 or higher and CardRec v4.0.014 or higher; and the i-Score with software v1.5.19 or higher; and i-Score Score Plus with software v1.0.0 or higher.*
- *This game will use the approved LNW Gaming, Inc owned jackpot system containing the following components and their compatible software versions: Nexus Command Game Manager 2 v2.5.4 or higher, GM Atlas v5.4.0/Nexus Command II v5.4 or higher, and a jackpot display. The jackpot display can either be provided by LNW gaming, Inc or the operator.*
- *The jackpot 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 LNW Gaming, Inc or the operator so long as it does not introduce any additional functionality.*

## **Nexus Command/GM Atlas**

# **RULES OF PLAY:**

1. Fortune 7 Baccarat Jackpot is an optional jackpot wager.
2. The bet considers both the Player and Banker three card hand for the percentage payouts. See payable for odd with top percentage pays based on exact order.
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 jackpot wager. Players must place the jackpot 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 jackpot wager. The dealer will then remove all jackpot bets from the table.
6. The dealer then follows house procedures for dealing the regular game.
7. The dealer reconciles the standard wager, any bonus wagers and jackpot wagers at the same time. Follow the procedure in the next section for reconciling percentage pays from the jackpot meter.

8. Progressive/Jackpot winners:

- a. The percentage pays are paid from the jackpot shown on the jackpot meter. Other hands are paid from the tray or from the meter, at the casino's requirements.
- b. The percentage prize pay amount shown on the meter is split among all players, at that table, participating in the jackpot wager that round.
- c. When a player has a jackpot 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.)
- d. The dealer shall then contact a supervisor.
- e. Once the casino verifies the jackpot win, the supervisor shall swipe the keycard and press the corresponding seat number and then press the hand the player received. 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.)
- f. When the dealer reconciles all action, he presses "END GAME." This resets the system to begin the next hand.
- g. Once the keycard is swiped after choosing the jackpot on the touchscreen, 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.
- h. The table below shows example progressive hands.

	Card 1	Card 2	Card 3	Hand Value	Progressive Type
Player	A-Spades	9-Diamonds	7-Hearts	7	<b>Double 3-Card7 with Rank and Exact matches</b>
Banker	A-Diamonds	9-Clubs	7-Hearts	7	
Player	9-Clubs	A-Clubs	7-Spades	7	<b>Double 3-Card7 with Rank and Exact matches</b>
Banker	A-Spades	9-Clubs	7-Spades	7	
Player	10-Hearts	2-Hearts	5-Spades	7	<b>Double 3-card 7 with Rank matches</b>
Banker	2-Spades	10-Spades	5-Diamonds	7	
Player	2-Hearts	10-Diamonds	5-Hearts	7	<b>Double 3-card 7 with Rank matches</b>
Banker	2-Clubs	10-Clubs	5-Clubs	7	
Player	10-Spades	2-Diamonds	6-Hearts	8	Does not qualify Hand Value 8
Banker	10-Spades	2-Diamonds	6-Hearts	8	
Player	10-Diamonds	7-Hearts	n/a	7	Does not qualify - 2 Card 7s



## 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.



Paytable 1		Paytable 2		Paytable 3	
Win by 9 points*	30 to 1	Win by 9 points*	20 to 1	Win by 9 points*	30 to 1
Win by 8 points*	10 to 1	Win by 8 points*	8 to 1	Win by 8 points*	10 to 1
Win by 7 points*	6 to 1	Win by 7 points*	7 to 1	Win by 6-7 points	4 to 1
Win by 6 points*	4 to 1	Win by 6 points*	4 to 1	Win by 4-5 points	2 to 1
Win by 5 points*	2 to 1	Win by 5 points*	3 to 1	Natural winner	1 to 1
Win by 4 points*	1 to 1	Win by 4 points*	1 to 1	Natural ties	PUSH
Natural winner	1 to 1	Natural winner	1 to 1	* Non-naturals	
Natural ties	PUSH	Natural ties	PUSH		

\* Non-naturals

\* Non-naturals

House edge		House edge		House edge	
4 decks Player	2.70%	4 decks Player	2.62%	4 decks Player	2.54%
4 decks Banker	9.42%	4 decks Banker	8.88%	4 decks Banker	8.57%
6 decks Player	2.67%	6 decks Player	2.59%	6 decks Player	2.51%
6 decks Banker	9.39%	6 decks Banker	8.86%	6 decks Banker	8.54%
8 decks Player	2.65%	8 decks Player	2.58%	8 decks Player	2.50%
8 decks Banker	9.37%	8 decks Banker	8.85%	8 decks Banker	8.53%

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Fortune 7	
Banker's Hand	Pays
winning 3-card total of 7	40 to 1
House Edge	7.61%



## GOLDEN 8

Paytable #1

Hand	Pays
3-card total of 8	25 to 1

## Dragon Bonus Progressive

#1	\$1	\$5
Hand	Payouts	Payouts
2, 3 & 4 - 0 Diamonds	100%	100%
2, 3 & 4 - 0 Suited	10%	10%
2, 3 & 4 - 0 Unsited	1000 for 1	1000 to 1
9 - 0 (non-natural)	10 for 1	10 to 1
Seed amount	\$10,000	\$50,000
House advantage	22.90%	22.90%
Hit frequency	3.47%	3.47%
Probability of top payout	569,182	569,182
Top payout average	\$98,101	\$490,504

#2	1\$	
Hand	Payouts	
2, 3 & 4 - 0 Diamonds	100%	
2, 3 & 4 - 0 Suited	25%	
2, 3 & 4 - 0 Unsited	1000 for 1	
9 - 0 (Non-Natural)	40 for 1	
8 - 0 (Non-Natural)	20 for 1	
Natural Win	2 for 1	
Seed amount	\$10,000	
	Banker	Player
House advantage	25.52%	17.41%
Hit frequency	16.87%	16.99%
Probability of top payout	2,011,729	855,757
Top payout average	\$231,027	\$104,044

#3	\$1
Hand	Payouts
Suited 6 Card Win by 9	100%
Suited 4 Card Win by 9	300 for 1
Win by 9 (Other)	10 for 1
Seed amount	\$5,000
House advantage	24.22%
Hit frequency	3.48%
Probability of top payout	171,375
Top payout average	\$49,557



## Fortune 7 Baccarat Progressive

F7BP 01	
Hand	Pays
Double 3-Card 7- w/Rank & Exact Matches	100%
Double 3-Card 7 w/Rank Matches	10%
Player and Banker 3-Card 7	100 for 1
Player or Banker 3-Card 7	5 for 1
Hold	21.91%
Hit Freq.	7.00%

3-Card 7 is a final total of 7





