



Washington State Gambling Commission

Protect the Public by Ensuring that Gambling is Legal and Honest

October 28, 2025

Daniel McCoy
Compliance Manager- Tables
AGS LLC
6675 S Edmonds St. Ste. 300
Las Vegas, NV 89118

Sent via e-mail dmccoy@playags.com

RE: SP21- GET Submission #3218

Dear Mr. McCoy:

Thank you for requesting approval to market the card game SP21 to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from AGS LLC, 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 SP21 rules of play you provided 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

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.

Furthermore, any modifications to this game may affect this approval. Contact the Commission should you contemplate modifications. 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,



Jim Nicks
Assistant Director
Enforcement Operations Division

Enclosure

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



(With Optional Match Super Bonus and/or Blackjack Match Progressive) Rules & Procedures

INTRODUCTION

SP21 is an exciting Blackjack variation that combines the excitement of a Blackjack game with more wagering action and more ways to win. SP21 is played with a deck of 48 cards (the four '10s' have been removed). The object of the game requires the players to achieve a hand total closest to 21 without going over. In addition to the regular 21 bet, casinos may offer any of the possible Match Super Bonus wagers listed in the Paytables listed below and/or the Blackjack Match Progressive wager.

- a. Operators cannot allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.
- b. All rules pertaining to standard blackjack as posted on the WSGC website remain the same except as noted in these rules of play.

SP 21 (RULES)

SP21 is played like Blackjack with the following exceptions;

- The game can either be played where the dealer hits "soft 17", or where the dealer stands on all totals of 17.
- Late surrender on the first two cards is allowed, provided the Dealer does not have Blackjack (the player forfeits half of their original wager).
- A Player 21 beats a Dealer 21.
- Player Blackjack beats a Dealer Blackjack.
- Player Blackjacks are paid at odds of **3:2** (player's initial 2 cards only).
- Players may double down on 2 or more cards, even after hitting or splitting, including Aces.
- **Double-Double Down Option**
 - If the table requires the dealer to hit soft 17, the casino may allow an option known as "double-double down". If the casino allows the double-double down option, once a player elects to double and receives a double card, the player then has the option to double-double down (double his total wager again), rescue the last doubled portion of the bet, or stand.
 - A player may double the total wager up to three times, once via double down and twice via double-double down, creating a maximum wager up to 8 times the original wager. After doubling a third time and receiving a double card, a player only has the option to rescue or stand.
 - Important: The "double-double down" option is not available to the player when the dealer stands on all totals of 17. Doubling for less is only allowed if the double-double down option is not allowed. In other words, when the double-double down option is allowed there is no doubling for less, however, the 2 double-double down wager amount would be capped at the maximum wager allowed. If the last double double



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down wager made is capped, the "last doubled portion of the bet" would be the maximum wager allowed. If a player doubles for less, the last doubled portion of the bet would be that lesser amount.

- Players may surrender after doubling, known as "double down rescue." The Player forfeits an amount equal to his original bet.
- Players may split equal-valued cards, including Aces, to a maximum of four hands.
- Insurance pays 2 to 1.

BONUS HANDS

SP21 does offers multiple bonus payouts on the following winning 21 hands;

- Non-Bonus SP 21 hand pays **1:1**
- 5 CARD 21 pays **3:2**
- 6 CARD 21 pays **2:1**
- 7 OR MORE CARD 21 pays **3:1**
- 6-7-8 OR 7-7-7 UNSUITED pays **3:2**
- 6-7-8 OR 7-7-7 SUITED pays **2:1**
- 6-7-8 OR 7-7-7 ALL SPADES pays **3:1**

Important Note: Doubled or Split hands **DO NOT QUALIFY** for a Bonus payout.

SUPER BONUS AND ENVY BONUS PAYOUTS

When a Player's first three cards are suited 7's and the Dealer's up card is a 7, the player is paid as follows;

- WAGER of \$25 or more (Super Bonus pays \$5,000).
- WAGER under \$25 (Super Bonus pays \$1,000).
- Each other Wagering Player (Envy Bonus pays \$50).

Important Note: Doubled or Split hands **DO NOT QUALIFY** for a Super Bonus payout.

In addition to the regular 21 bet, casinos may offer any of the possible Match Super Bonus wagers.

Match Super Bonus is an optional wager for SP21 games played with 6 or 8 modified 48-card decks, which are standard decks with the 10s removed. The player may place the **Match Super Bonus** wager at the beginning of the game before any cards are dealt.



(With Optional Match Super Bonus and/or Blackjack Match Progressive)

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Match Super Bonus wager can be offered on the first two player cards and the Dealer's face-up and/or down card when configured by the casino operator. If elected to have both versions of the game of Blackjack, it would require additional Match Super Bonus wagers to be added to the player positions of the felt game. If at least one of the player cards matches the Dealer card in rank, the wager wins. The player receives different pay according to whether both the player cards match, and whether one or more rank matches match in suit as well, see posted payable. If neither player card matches the Dealer card in rank, the wager loses.

RULES OF PLAY

1. To begin, Player's will place their normal base Blackjack wager and an optional Match Super Bonus wager(s).
2. Once all wagers have been placed, working from left to right, each Player is dealt their two initial cards while the Dealer receives cards according to the underlying Blackjack house rules.
3. If the Player initial two-cards and the Dealer face-up do not match pair, the wager loses, and the game of Blackjack continues by underlying Blackjack house rules. Once the Dealer face-down card is exposed, if it does not match pair, the wager loses, and the game of Blackjack continues by underlying Blackjack house rules.
4. If the Player initial two-cards and the Dealer face up and/or face-down does match, then the hand is evaluated to the posted payable.
5. Once all Match Super Bonus wagers have been settled, the game of blackjack continues per house rules.

Match Super Bonus Paytable			
Scenario	PAY TABLE 1	PAY TABLE 2	PAY TABLE 3
2 Suited Matches	24 to 1	18 to 1	26 to 1
1 Suited and 1 Unsuited Match	15 to 1	13 to 1	16 to 1
1 Suited Match	12 to 1	9 to 1	13 to 1
2 Unsuited Matches	6 to 1	8 to 1	6 to 1
1 Unsuited Match	3 to 1	4 to 1	3 to 1

Please note that Paytable 3 is not available for 8 SP21 Decks.



(With Optional Match Super Bonus and/or Blackjack Match Progressive)

Rules & Procedures

In addition to the regular 21 bet and the Match Super Bonus wagers, casinos may offer the Blackjack Match Progressive wager.

RULES OF PLAY

1. To begin, player must place the base SP21 wager, optional Match Super Bonus wagers, and optional BLACKJACK MATCH PROGRESSIVE wager (also referred to as STAX PROGRESSIVE). Rules & guide for the BLACKJACK MATCH PROGRESSIVE wager are listed below.
2. Once all wagers have been placed, working from left to right, each player is dealt two cards while the dealer receives cards according to the underlying SP21 rules.
3. If a player does NOT have BLACKJACK and does NOT have ACE, the BLACKJACK MATCH PROGRESSIVE wager loses.
4. If the player has an ACE and does NOT have a BLACKJACK, player qualifies for a listed pay. See posted payable.
5. If the player hand is a BLACKJACK and the dealer does NOT have a BLACKJACK, player qualifies for a listed pay. See posted payable.
6. If the player hand is a BLACKJACK and the dealer hand is a BLACKJACK, this hand is then evaluated based on the configured pay tables posted at the table. See posted payable.
7. If the player hand has Two Ace's or Two King's and the dealer up-card is an Ace or King creating a Three of a Kind Poker hand. This hand is then evaluated based on the configured pay tables posted at the table. See posted payable.
8. Once all BLACKJACK MATCH PROGRESSIVE wagers have been reconciled, the dealer will select END ROUND before normal SP21 game can continue.

WHEN THE PLAYER/DEALER QUALIFYING HANDS

- 1) If the player has an Ace in their hand and does not have Blackjack, they are paid according to the Player Any Ace payout.
- 2) If the player has a Blackjack, and the dealer does NOT have Blackjack they are paid according to the Player Any Blackjack payout.
- 3) If the player has a Blackjack (Suited), and the dealer does NOT have Blackjack they are paid according to the Player Suited Blackjack payout.
- 4) If the player has a Blackjack (Unsuited), and the dealer DOES have a Blackjack (Unsuited), they are paid according to the Player/Dealer Unsuited Blackjack payout.



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- 5) If the player has two face-up Kings along with dealer one face up King, they are paid according to the Three Kings payout.
- 6) If the player has two face-up Aces along with dealer one face up Ace they are paid according to the Three Aces payout.
- 7) If the player has a Blackjack (Suited), and the dealer DOES have a Blackjack (Suited), they are paid according to the Player/Dealer Suited Blackjack payout.
- 8) If the player has a Blackjack (Matching Suit), and the dealer DOES have a Blackjack (matching Suite), they are paid according to the Player/Dealer Matching Suite Blackjack payout.
- 9) If the player has a Blackjack (Ace-King Matching Suit), and the dealer DOES have a Blackjack (Ace-King Matching Suit), they are paid according to the Player/Dealer Ace-King Matching Suite Blackjack payout.

HAND DEFINITIONS

- 1) Ace-King Blackjack(s)
 - a) Player/Dealer (Matching Suit): the player's two cards containing an ace and king of the same suit and the dealer's two card containing an ace and king of the exact same suit as the players.
- 2) Blackjack(s)
 - a) Player/Dealer (Matching Suit): the player's two cards containing a blackjack in the same suit and the dealer's two card containing a blackjack of the exact same suit and rank as the players.
- 3) Blackjack(s)
 - a) Player/Dealer (Suited): the player's two cards containing a blackjack in the same suit and the dealer's two card containing a blackjack in the same suit (the suits of the dealer and player blackjacks do not need to be the same).
- 4) Three Ace(s)
 - a) Player/Dealer (Three Aces): the player's two up cards (Ace's) and the dealer's first up card (Ace) create a three Ace's hand.
- 5) Three King(s)
 - a) Player/Dealer (Three Kings): the player's two up cards (King's) and the dealer's first up card (King) create a three King's hand.
- 6) Blackjack(s)



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- a) Player/Dealer (Unsuited): the player's two cards containing a blackjack and the dealer's two cards containing a blackjack.
- 7) Blackjack
 - a) Player (Suited): the player's two cards containing a blackjack in the same suit and the dealer's two cards not containing a blackjack.
- 8) Blackjack
 - a) Player (Any Blackjack): the player's two cards containing a blackjack and the dealer's two cards not containing a blackjack.
- 9) Any Ace
 - a) Player (Any Ace): the player's first two cards containing at least one ace but does not have a blackjack.

BLACKJACK MATCH PROGRESSIVE (STAX PROGRESSIVE) RULES

- 1) Players must place their regular wagers for the game and an optional BLACKJACK MATCH PROGRESSIVE wager.
- 2) The dealer will deal the base game as per the dealing procedures.
- 3) During the initial game, the dealer will determine if any triggering BLACKJACK MATCH PROGRESSIVE hand.
 - a) If a player has a triggering hand, the dealer will resolve and pay the player the denomination/prize won. See posted payable.
 - b) If there are no triggering hand for the progressive wager, then the game continues according the house rules of the game.
- 4) In order to win on the BLACKJACK MATCH PROGRESSIVE wager
 - a) Player must have an ACE and NO BLACKJACK or player BLACKJACK.
 - b) The dealer will determine the BLACKAJCK MATCH PROGRESSIVE hand according to the posted payable. See posted payable. If no BLACKJACK MATCH PROGRESSIVE wagers are made, then the game plays as normal and the dealer does not have to use the interface.

STAX PROGRESSIVE (KEYPAD GUIDE)



(With Optional Match Super Bonus and/or Blackjack Match Progressive)

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- 1) Select START ROUND and collect BLACKJACK MATCH PROGRESSIVE wagers.
 - a) If start round was touched to soon, CANCEL ROUND to reset lights.
 - i. CANCEL ROUND: (Doesn't add to the PROGRESSIVE meter)
 - ii. END ROUND: (Adds to the PROGRESSIVE meter)
- 2) Deal the game normally until a BLACKJACK MATCH PROGRESSIVE triggering hand.
 - a) Select the seat number on the DEALER TERMINAL, scroll up or down and select the type of winning hand.
- 3) Select PENDING JACKPOT.
- 4) Select PAY JACKPOT.
- 5) Verify amount on DEALER TERMINAL and select PAY THE AGREED SUM.
- 6) Once paid then select OK.
- 7) If another player gets a triggering hand, repeat steps starting with Step 2a.
- 8) If no other player has a triggering hand, select END ROUND.

\$5 Wager Paytable

Scenario	Progressive / Awards	Reseed	Primary Increment Rate Contribution	Reserve Increment Rate
Ace King Blackjacks - Matching Suit	100% Star Progressive	\$50,000/\$25,000	0.00% to 4.50%	1.50% to 6%
Matching Suited Blackjacks	100% Spade Progressive	\$5,000	2%	N/A
Three Aces	100% Heart Progressive	\$300	4%	N/A
Three Kings	100% Diamond Progressive	\$300	4%	N/A
Player and Dealer Suited Blackjack	\$1,000			
Player and Dealer Blackjack	\$100			
Player Suited Blackjack	\$50			
Player Blackjack	\$25			
Player Any Ace (1st two cards)	\$10			

Note: For the Star Progressive, a reserve meter is used. The primary and reserve increment rates must be set so that they sum to 6.00%.

Note: This game utilizes the AGS STAX Table Game Progressive System v1.0.1 or higher hardware and software.



