



STATE OF WASHINGTON
GAMBLING COMMISSION

"Protect the Public by Ensuring that Gambling is Legal and Honest"

April 23, 2015

Nina Rieger
Galaxy Gaming Inc.
6767 Spencer St.
Las Vegas, NV 89119

RE: Dueling For Dollars

Dear Ms. Rieger,

Thank you for requesting approval to market the card game "Dueling For Dollars" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Galaxy Gaming Inc., the Washington State Gambling Commission will approve the game under the conditions listed below:

Commercial Card Rooms

- The game shall be played and operated under the terms and conditions set forth under the "Dueling For Dollars – Rules of Play" you provided and are enclosed.
- 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

- The game shall be played and operated under the terms and conditions set forth under the "Dueling For Dollars – Rules of Play" you provided and are enclosed.
- 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.



Ms. Rieger
April 23, 2015
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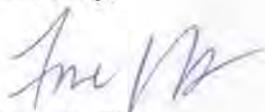
- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and licensed by the Tribe prior to the sale of the equipment.

Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-03-045, related to this game and may be contacting you.

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 (425) 277-7017. 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,



Tina Griffin
Assistant Director
Licensing Operations Division

Enclosure

cc: Mark Harris, Assistant Director Field Operations
Julie Lies, Assistant Director Tribal Gaming Division
Jess Lohse, Special Agent Field Operations
Kelly Main, Special Agent Supervisor Tribal Gaming
File



Rules of Play

Washington State



Galaxy Gaming

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RULES OF PLAY

Dueling for Dollars is a house-banked, one card poker-based card game played with multiple standard 52-card decks of playing cards. The object of the game is for the player to choose whether their card is higher ranked or lower ranked than the community card,. There are also additional bonus wagers, which are described below.

Casino operators choose which wagers they will offer and the minimum and maximum wagering limits, subject to the limitations and definitions in WAC 230-15-040¹, WAC 230-15-140 and any other rules or restrictions mandated by the appropriate gaming regulatory agency or as contained within these Rules of Play. On games where there are more than four wagering options for players; the players are limited to wagering on a maximum of four of the options. Card room operators are required to post this four wagering spot restriction on the layout of the game.

HOW TO PLAY (*with DEALER or PLAYER wagering spots*)

1. Each player must make a wager prior to the cards being dealt. The player may select either the PLAYER or DEALER wagering spot. If the player selects the PLAYER spot the player is wagering that their card will be higher than the community card. If the player selects the DEALER spot the player is wagering that their card is lower than the community card.
2. After all players have made their initial wager, the dealer gives each player one card and then deals one community card.
3. Each player's card will be compared with the community card.
4. If the initial wager was placed on the PLAYER spot and:
 - a) the player's card is higher in rank than the community card, the player wins even money
 - b) the player's card is lower in rank than the community card, the player's wager is lost.
5. If the initial wager was placed on the DEALER spot and:
 - a) the player's card is lower in rank than the community card, the player wins even money.
 - b) the player's card is higher in rank than the community card, the player's wager is lost.
6. In the event of a tie the player will have two options:
 - a) surrender and forfeit half their initial wager

¹ - All references to rules contained within the Washington Administrative Code are not applicable to tribal gaming operations.

- b) “go to war.”
- 7. If the player elects to “go to war” they must raise their initial wager by an equal amount as a War wager by placing the War wager next to the initial wager. A War wager will also be presented next to the community card by the dealer, to indicate that a “going to war” tie event has occurred.
- 8. The dealer will then optionally burn three cards.
- 9. The dealer will deal one additional player card and one additional community card.
- 10. If the initial wager (and War wager) was placed on the PLAYER spot and:
 - a) the player’s additional card is equal to or higher in rank than the additional community card, the War wager wins even money and the initial wager will push.
 - b) the player’s additional card is lower in rank than the additional community card, both wagers are lost.
- 11. If the initial wager (and War wager) was placed on the DEALER spot and:
 - a) the player’s additional card is equal to or lower in rank than the additional community card, the War wager wins even money and the initial wager will push.
 - b) the player’s additional card is higher in rank than the additional community card, both wagers are lost.
- 12. Optionally, a tie after a tie will result in a bonus equal to both the initial wager plus the War wager.

OPTIONAL HOW TO PLAY (with single PLAY wagering spot)

- 1. Each player must make an initial PLAY wager prior to the cards being dealt.
- 2. After all players have made their initial wager, the dealer gives each player one card and then deals one community card.
- 3. Each player's card will be compared with the community card. If the player's card is higher than the community card, then the PLAY wager wins even money. If the player's card is lower than the community card, the PLAY wager is lost.
- 4. In the event of a tie the player will have two options:
 - a) surrender and forfeit half the PLAY wager
 - b) “go to war.”

5. If the player elects to “go to war”, the player must raise the initial wager by an equal amount as a War wager by placing the War wager next to the initial wager. A War wager will also be presented next to the community card by the dealer, to indicate that a “going to war” tie event has occurred.
6. The dealer will then optionally burn three cards.
7. The dealer will deal one additional card to the player and deal one additional community card.
8. If the player’s additional card is equal to or higher in rank than the additional community card, the War wager wins even money and the initial wager will push. If the player’s additional card is lower in rank than the additional community card, both wagers are lost.
9. Optionally, a tie after a tie will result in a bonus equal to the original PLAY wager plus the War wager.

Number of Decks

The game may be played with five decks, six decks, or eight decks. The recommended configuration is six decks.

Optional Bonus Wagers

The game also contains several optional bonus wagers. Casino operators choose which of the bonus wagers they will offer. The bonus wagers are:

Tie Plus

The Tie Plus is wagered before the start of a round of play. A player wins the TIE PLUS wager if the player's initial card plus the initial community card form a pair. The payout odds are based on the number of decks used, and are displayed on the corresponding payable Appendix "A."

Combo Bet

The Combo Bet wager is wagered before the start of a round of play. A player wins the Combo Bet wager if the player's initial card plus the initial community card form a two card poker hand, such as a flush (two suited cards) a straight (two connecting cards), a straight flush (two suited connecting cards), or a pair. The triggering combinations and payout odds are shown on the payable in Appendix "B."

Bonus Jackpots:

Tie After Tie Jackpot

The Tie After Tie Jackpot is wagered before the start of a round of play. The Tie After Tie Jackpot wager wins when the player's initial card and the initial community card tie AND the player's second card and the second community card tie again after "going to War". The corresponding paytables are shown in Appendix "C."

2 + 2 Jackpot

The 2 + 2 Jackpot is wagered before the start of a round of play. The 2 + 2 Jackpot is an optional bonus wager that is based on the player's initial card, the initial community card, and two added community cards. A player qualifies to win the 2 + 2 Jackpot wager when the player's initial card and the initial community card form either a pair or a two card straight flush. On this event, two additional community cards are dealt to form a four card hand. If a player had started with a pair event (a tie event), the tie-breaking "go to war" cards are not used. The corresponding paytables are shown in Appendix "D."

Appendix "A"

Tie Plus

Paytable #1:

Number of Decks: Triggering Event	5 Decks	6 Decks	8 Decks	5, 6 and 8 decks
Suited Pair tie	12	12	12	Bonus
Pair Ties, unsuited	12	12	12	Bonus

Paytable #2:

Number of Decks: Triggering Event	5 Decks	6 Decks	8 Decks	5, 6 and 8 decks
Suited Pair tie	20	18	18	Bonus
Pair ties, unsuited	10	10	10	Bonus

Notes:

1. All odds shown above are "to 1."
2. Only the highest qualifying hand is paid.
3. Bonus awards are at the discretion of the operator.

Appendix “B”

Combo Bet

The Combo Bet wager is wagered before the start of a round of play. The player wins the wager when the player’s card plus the community card forms a triggering two card poker hand, as shown below.

Paytable #1 through #3, all deck configurations (5 Decks, 6 decks, and 8 decks):

Triggering Event	2CPB-1	2CPB-2	2CPB-3	2CPB-4
Pair	2	3:2	2	Bonus
Straight Flush	2	3	2.5	Bonus
Straight – or - Flush	1	1	1	Bonus

Paytable #5 and #6 (omits the winning pair triggering event, - all deck configurations):

Triggering Event	2CPB-5	2CPB-6	2CPB-7
Straight Flush	5	4	Bonus
Straight	2	2	Bonus
Flush	1	1	Bonus
Pair	loss	loss	loss

Notes:

1. All odds shown above are “to 1.”
2. Only the highest qualifying hand is paid.
3. Bonus awards are at the discretion of the operator.

Appendix “C”

Tie After Tie Jackpot

Triggering Event	TAT1	TAT2	TAT3	TAT4
Quads same suit	100%	100%	100%	Jackpot
Quads same color	\$500	100%	20%	Jackpot/Bonus
Quads two color	\$100	10%	\$100	Bonus
Two pairs same color	\$50	\$100	\$50	Bonus
Trips same color	\$25	\$50	\$25	Bonus
Trips two color	\$15	\$20	\$15	Bonus
Two pairs two color	\$10	\$10	\$10	Bonus
One Tie one color	\$4	\$4	\$4	Bonus
One Tie two color	\$3	\$2	\$4	Bonus
Not a tie	\$0	\$0	\$0	Bonus

Notes:

1. All odds shown above are “for 1.”
2. Only the highest qualifying hand is paid.
3. Prizes shown as a percentage means the player receives that percentage of the corresponding displayed Jackpot(s), which is divided equally among all qualifying players.
4. Prizes shown as a dollar amount means the player receives a fixed dollar amount regardless of the amount wagered, provided that, a minimum amount may be required to qualify for certain bonus features.
5. “Bonus” and “Jackpot” amounts are components of a posted, variable jackpot amount. “Jackpot” represents prizes that are a percentage of the amount shown on the meter. “Bonus” amounts represent fixed payouts.
6. When operated as a Daily Bonus Jackpot, the Jackpot Amount is at the discretion of the casino operator. Prizes are set by the casino operator and are required to be displayed at each gaming table. Prizes displayed are considered property of the casino until won by one or more players. Each Bonus Jackpot display must include the following language:
 “Bonus 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 Bonus Jackpot prize may be modified or discontinued at any time without prior notice.”
7. When operated as a progressive, rules for jackpot prizes for commercial casino operators are contained within 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.
8. A player’s Jackpot wager must be one dollar only.

Appendix “D”

2 + 2 Jackpot

Triggering Event	2+2P1	2+2P2	2+2P3
Royal Flush	100%	100%	Jackpot
4-Card Straight Flush	10%	\$500	Jackpot/Bonus
Four-of-a-Kind	\$100	\$100	Bonus
3-Card Straight Flush	\$30	\$30	Bonus
Three-of-a-Kind	\$15	\$15	Bonus
Starting Straight Flush	\$3	\$3	Bonus
Starting Pair	\$2	\$2	Bonus

Notes:

1. All odds shown above are “for 1.”
2. Only the highest qualifying hand is paid.
3. Prizes shown as a percentage means the player receives that percentage of the corresponding displayed Jackpot(s), which is divided equally among all qualifying players.
4. Prizes shown as a dollar amount means the player receives a fixed dollar amount regardless of the amount wagered, provided that, a minimum amount may be required to qualify for certain bonus features.
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8. A player’s Jackpot wager must be one dollar only.

Appendix “X”

Equipment

Game play is conducted on a table layout and may also include electronic gambling equipment such as bet detection equipment and visual payable and jackpot displays. The rules of play of the game are identical regardless of whether or not electronic gambling equipment is incorporated or which version is used. If the use of equipment changes the dealing procedures for the game, they are reflected in the casino operator’s dealing procedures and/or internal controls. Galaxy Gaming’s Bonus Jackpot System is approved for this game.

The Bonus Jackpot System is an electronic system comprising of two sub-systems known as the Bet Tabulator System and TableVision. The Bet Tabulator System collects and tabulates the number of wagers placed at a table. Only the total number of wagers are tabulated – the dollar amount of each wager is not determined. One sensor is required for each wager counted. After players have placed their wagers, the dealer pushes a button on the dealer control panel to register all wagers on the table. If a wager is present, it is recorded. If the wager is to be removed prior to game play,² the sensor detecting the wager triggers one or more LED light(s) indicating each wager counted. These LED light(s), which are either on the dealer control pad or directly on the sensor, remain lit during the current round until the dealer presses the button for the next round. The TableVision System is an electronic display system that is used to display jackpot amounts, paytables and other information at the gaming table. Information displayed on this media is controlled by the casino operator. The functionality of collecting wager information and displaying available prizes permits operators to use these products to provide promotions, bonus jackpots or progressive jackpots. In the event the Bonus Jackpot System is not functioning, the casino operator’s dealing procedures and/or internal controls determine the methodology used to operate the game during equipment malfunction.

There are various models of the Bonus Jackpot System currently approved in Washington. They are referred to as the Milky Way Series, the Andromeda Series – Stage 3c and Stage 3d (aka “Andromeda-3”). Information regarding each of the approved systems follows.

Milky Way

Milky Way’s Bet Tabulator System and the TableVision System are used in concert with one another. Milky Way is limited to detecting one wager per player position and up to a total of seven player positions. Small LED lights on the dealer control panel indicate each player position wager counted, and the LED remains lit during the current round. The count of the wagers for each hand is recorded on an electronic non-resettable LCD counter.

² - An example of a wager removal is when the wager amount is predetermined such as a \$1 progressive wager. The dealer records the wager (which is a fixed amount) then collects the wager and deposits it into the chip tray. In this instance, an indicator light is necessary to confirm that the wager was placed.

Milky Way's TableVision System uses an LED display and an LCD photo frame display which are adjustable by casino control. The LED display is changed either by a remote control supplied by the sign's manufacturer or by a computer that is temporarily plugged into the sign to modify the display. The LCD display is an electronic photo frame commonly found on shelves in most retail stores. Images displayed on the LCD electronic photo frame are copied first onto a removable SD storage chip and then inserted into the device.

Andromeda-3

Andromeda-3's Bet Tabulator System is capable of detecting up to six sensors per player position and up to sixteen player positions. The dealer control panel does not have the LED indicator lights as in Milky Way, rather each sensor position use LED indicator lights, if visible wager detection is required.³

Andromeda-3's TableVision System uses a computer monitor powered by a computer/server located on the casino property. Images for the display are controlled by the casino operator via the computer/server.

Approved versions for use in Washington State are Andromeda-3c and Andromeda-3d.

³ - Visible wager detection is required whenever a wager is removed. For example, if a player places a fixed wager that pays a prize that is "for 1," typically the wager is first recorded then removed by the dealer prior to the start of play. Conversely, if the wager is a variable amount and the prize paid is "to 1," then the wager must remain on the table layout (to determine the prize amount to be paid) and there is no need for a visible indicator.

Appendix "G"

Game Layout Sample

