



STATE OF WASHINGTON  
**GAMBLING COMMISSION**

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

March 1, 2012

Robert Saucier  
Galaxy Gaming Inc.  
6980 O'Bannon Drive  
Las Vegas, NV 89117

RE: Emperor's Challenge

Dear Mr. Saucier,

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

- The game shall be played and operated under the terms and conditions set forth under the "Emperor's Challenge Rules of Play" you provided on February 2, 2012, which 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.



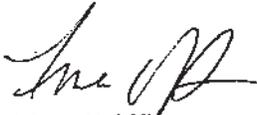
Mr. Saucier  
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- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and licensed by the Tribe prior to the sale of the equipment.

Any modifications to this game may affect this approval. If you have any questions on commercial implementation, please contact 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**

6980 O'Bannon Drive ❖ Las Vegas, Nevada 89117 ❖ (702) 939-3254 ❖ FAX: (702) 939-3255

[www.galaxygaming.com](http://www.galaxygaming.com)

*Galaxy Gaming, Inc. is a publically owned and traded company. OTC Ticker Symbol : **GLXZ***

October 30, 2012

## **RULES OF PLAY**

“Emperor’s Challenge Pai Gow Poker” (“Emperor’s Challenge”), is standard house-banked Pai Gow Poker but with additional optional bonus wagers. All rules pertaining to standard Pai Gow Poker are as stated in the approved rules of play posted on the WSGC website under “Authorized Games”. Casino operators choose which of the bonus wagers they will offer, subject to the limitations and definitions in WAC 230-15-040, WAC 230-15-140 and any restrictions 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. One of the four wagers must be limited to \$5.00. Card room operators are required to post this four wagering spot restriction on the layout of the game. 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. 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. 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. Each bonus wager may be made at the player’s option but may only be wagered prior to any cards being dealt each round. The bonus wagers are summarized as follows:

### *Pai Gow Insurance*

In Pai Gow Poker, a hand that does not contain a pair or better is commonly called a Pai Gow. The Player wins their Pai Gow Insurance wager if the seven cards in their hand is a Pai Gow. The Ace is always considered high and the Joker is always considered an Ace. The player’s hand is compared to the corresponding payable (see Appendix “A”) to determine the amount won.

Alternatively, the player may choose in advance to use the dealer’s seven cards in combination with their own to win. For the player to win, the dealer’s hand must have a Pai Gow and the player’s hand must be greater than or equal to the dealer’s hand.

### *Emperor’s Treasure*

Players are awarded an Emperor’s Treasure prize if they made the corresponding bonus wager and if the seven cards in their hand have achieved a pre-determined triggering event according to the corresponding payable (see Appendix “B”). Emperor’s Treasure has three alternative bonus features – Color Bonus, Envy Bonus or Share the Wealth Bonus. In the event the Player’s Emperor’s Treasure wager equals or exceeds a certain pre-determined minimum, (e.g. five dollars), in addition to the prize awarded according to the Emperor’s Treasure payable, the player may qualify for one of the three bonus features. Only one of the three bonus features may be incorporated with Emperor’s Treasure and in the event either the Envy Bonus or Share the Wealth Bonus feature is used, they may not also be used with any other bonus wager. The three bonus features are:

#### *Color Bonus*

A Color Bonus prize is awarded when all of the cards in the player’s seven card hand are of the same color (e.g. all red or all black). If the player’s hand contains six cards of one color and a Joker, the Joker may be designated either a red or a black card.

#### *Envy Bonus*

An Envy Bonus prize is awarded when any hand other than the player’s hand associated with the Envy Bonus wager at the same table achieves a pre-determined winning

triggering event posted on the corresponding paytable. A player may not win an Envy Bonus prize on their own hand of cards which was associated with the wager qualifying for the Envy Bonus or on the dealer's hand. If a player is playing more than one hand of cards, one of their hands may be used as the winning triggering event for the other.

### *Share the Wealth Bonus*

A Share the Wealth Bonus prize is awarded when any hand at the same table other than the dealer's hand achieves a pre-determined winning triggering event posted on the corresponding payable. A player may also win a Share the Wealth Bonus prize if their hand with the qualifying Share the Wealth wager achieves the winning triggering event.

### *Bonus Jackpot or Progressive Jackpot*

Players are awarded a Bonus Jackpot or Progressive Jackpot (collectively "Jackpot") prize if they made the corresponding bonus wager and if the seven cards in their hand have achieved a pre-determined winning triggering event according to the corresponding payable (see Appendix "C"). A Jackpot may have three alternative bonus features – Five Ace Frenzy, Envy Bonus or Share the Wealth Bonus. A Jackpot wager is restricted to either a one or two dollar wager. In the event the player's Jackpot wager equals two dollars, the player may qualify for one of the three bonus features. Only one of the three bonus features may be incorporated with the Jackpot wager and in the event either the Envy Bonus or Share the Wealth Bonus is used, they may not be used with any other bonus wager. The three bonus features are:

#### *Five Ace Frenzy*

The Five Ace Frenzy prize is awarded when the player's seven card hand contains a ranking of five aces (e.g. four aces and a Joker) or a higher ranking hand.

#### *Envy Bonus*

An Envy Bonus prize is awarded when any hand other than the player's hand associated with the Envy Bonus wager at the same table achieves a pre-determined triggering event which is posted on the corresponding payable. A player may not win an Envy Bonus prize on their own hand of cards which was associated with the wager qualifying for the Envy Bonus or on the dealer's hand. If a player is playing more than one hand of cards, one of their hands may be used as the winning triggering event for the other.

#### *Share the Wealth Bonus*

A Share the Wealth Bonus prize is awarded when any hand at the same table other than the dealer's hand achieves a pre-determined triggering event posted on the corresponding payable. A player may also win a Share the Wealth Bonus prize if their own hand with the qualifying Share the Wealth wager achieves the winning triggering event.

### *Gambling Promotions*

A gambling promotion may be added to any of the bonus wagers at the discretion of the casino operator.

### *Jackpot Accumulation*

The operator's internal controls must define how the Jackpots accumulate and how they are won.

### *Bonus Features' Procedures and Restrictions*

Whenever a player places a wager that qualifies for one of the bonus features (e.g. Color Bonus, Five Ace Frenzy Bonus, Envy Bonus or Share the Wealth Bonus, a bonus indicator known as a "lammer" must be placed on the table layout in the proximity of the gaming chip. The lammer becomes an integral part of the wager. If the table layout incorporates sensors for the purpose of detecting a lammer, the lammer is placed directly on the sensor. Only one Envy

Bonus or Share the Wealth Bonus, bonus feature may be used on one table. For example, if the Envy Bonus is offered as a bonus feature with a wager, the Envy Bonus may not be used with any other wager and the Share the Wealth would be excluded from use on all wagers. Only players playing at the same table may participate in the Envy Bonus and Share the Wealth bonus features.

**Appendix “A”**

**Pai Gow Insurance Paytables**

<b>Paytable:</b>	<b>EC/PGI 1</b>	<b>EC/PGI 2</b>	<b>EC/PGI 3</b>	<b>EC/PGI 4</b>	<b>EC/PGI 5</b>
<b>Triggering Event</b>					
Nine-High Pai Gow	400	250	100	100	100
Ten-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 odds shown above are “to 1”.
2. Only the highest qualifying hand is paid.
3. A player’s wager is assumed to be on the player’s hand unless the player declares in advance that they want to wager that the dealer’s hand is a Pai Gow. To win this wager, the player’s hand must be greater than or equal to the dealer’s hand, otherwise the wager results in a push.

**Appendix "B"**

**Emperor's Treasure Paytables:**

<b>Paytable:</b>	<b>EC/ET 1</b>	<b>EC/ET 2</b>	<b>EC/ET 3</b>	<b>EC/ET 4</b>	<b>EC/ET 5</b>	<b>EC/ET 6</b>	<b>EC/ET 7</b>
<b>Triggering Event</b>							
7-card Straight Flush w/o Joker	5,000	8,000	5,000	2,500	1,000	5,000	50
Royal Flush w/ A-K Suited	1,000	2,000	2,000	1,000	150	1,000	400
7-card Straight Flush w/Joker	750	1,000	1,000	750	1,000	500	50
5 Aces	250	400	400	250	400	300	25
Royal Flush	100	150	150	100	150	110	400
Straight Flush	50	50	50	50	50	45	50
4-of-a-Kind	20	25	25	25	25	25	25
Full House	5	5	5	5	5	5	5
Flush	4	4	4	4	4	4	4
3-of-a-Kind	3	3	3	3	3	3	3
Straight	2	2	2	2	2	2	2
3 Pair	Push	Loss	Loss	Loss	Loss	Loss	Loss

**Bonus Features**

<b>Envy or Share the Wealth Bonus</b>	<b>EC/BF 1</b>	<b>EC/BF 2</b>	<b>EC/BF 3</b>	<b>EC/BF 4</b>	<b>EC/BF 5</b>	<b>EC/BF 6</b>	<b>EC/BF 7</b>	<b>EC/BF 8</b>
7-card Straight Flush w/o Joker	\$1,000	\$5,000	\$3,000	\$1,000	\$2,500	\$2,500	\$10	Bonus
Royal Flush w/ A-K Suited	\$250	\$1,000	\$1,000	\$750	\$500	\$500	\$100	Bonus
7-card Straight Flush w/Joker	\$100	\$500	\$500	\$250	\$250	\$250	\$10	Bonus
5 Aces	\$50	\$250	\$250	\$100	\$150	\$150	\$5	Bonus
Royal Flush	\$25	\$50	\$50	\$50	\$55	\$55	\$100	Bonus
Straight Flush	\$10	\$20	\$20	\$20	\$25	\$25	\$10	Bonus
4-of-a-Kind	\$5	\$5	\$5	\$5	\$5	\$6	\$5	Bonus

<b>Color Bonus</b>	<b>EC/CB 1</b>	<b>EC/CB 2</b>	<b>EC/CB 3</b>	<b>EC/CB 4</b>
7 Cards, Same Color	\$30	\$25	\$20	Bonus

**Notes:**

1. All odds shown above are "to 1" except for the Bonus Feature prizes which are paid in dollars.
2. Only the highest qualifying hand is paid. For example, if five of the Player's cards comprise 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. "Bonus" amounts are at the discretion of the casino operator.
4. Either the Envy Bonus or Share the Wealth Bonus may be offered on a table, but not both.

## Appendix “C”

### Jackpot Paytables

#### Bonus Jackpot

Paytable:	EC/BJ 1	EC/BJ 2	EC/BJ 3	EC/BJ 4
<b>Triggering Event</b>				
7-card Royal Flush w/o Joker in Diamonds		Bonus	Bonus	Bonus
7-card Royal Flush w/o Joker		Bonus	Bonus	Bonus
7-card Straight Flush w/o Joker	10,000	Bonus	Bonus	Bonus
Royal Flush w/ A-K Suited	7,500	Bonus	Bonus	Bonus
7-card Straight Flush w/Joker	5,000	Bonus	Bonus	Bonus
5 Aces (see Note 6)	2,500	2,500	1,500	Bonus
Royal Flush	200	200	200	Bonus
Straight Flush	100	100	80	Bonus
4-of-a-Kind	75	75	50	Bonus
3 Pair			7	Bonus
Full House	6	6	5	Bonus

#### Progressive Jackpot

Paytable:	EC/PJ 1	EC/PJ 2	EC/PJ 3	EC/PJ 4	EC/PJ 5	EC/PJ 6	EC/PJ 7	EC/PJ 8	EC/PJ 9	EC/PJ 10
<b>Triggering Event</b>										
7-card Royal Flush w/o Joker in Diamonds	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
7-card Royal Flush w/o Joker	100%	50%	100%	100%	100%	100%	100%	100%	100%	100%
7-card Straight Flush w/o Joker	100%	25%	25%	25%	100%	100%	100%	100%	100%	100%
Royal Flush w/ A-K Suited	100%	10%	10%	10%	50%	50%	100%	50%	200	200
7-card Straight Flush w/Joker	100%	5,000	5,000	5,000	10%	10%	100%	25%	100%	100%
5 Aces	100%	2,500	2,500	2,500	2,500	2,500	2,500	1,500	2,500	2,500
Royal Flush w/o Joker	100%	200	200	200	200	200	200	200	200	200
Royal Flush	325	200	200	200	200	200	200	200	200	200
Straight Flush	75	80	100	80	100	80	100	80	100	80
4-of-a-Kind	50	50	75	50	75	50	75	50	75	50
3 Pair	7	7		7		7		7		7
Full House	5	5	6	5	6	5	6	5	6	5

<b>Paytable:</b>	<b>EC/PJ 11</b>	<b>EC/PJ 12</b>	<b>EC/PJ 13</b>	<b>EC/PJ 14</b>	<b>EC/PJ 15</b>	<b>EC/PJ 16</b>	<b>EC/PJ 17</b>	<b>EC/PJ 18</b>	<b>EC/PJ 19</b>	<b>EC/PJ 20</b>	<b>EC/PJ 21</b>
<b>Triggering Event</b>											
7-card Royal Flush w/o Joker in Diamonds	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
7-card Royal Flush w/o Joker	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
7-card Straight Flush w/o Joker	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Royal Flush w/ A-K Suited	100%	100%	50%	50%	100%	100%	100%	100%	50%	50%	100%
7-card Straight Flush w/Joker	100%	100%	25%	25%	100%	100%	100%	100%	25%	25%	100%
5 Aces (see Note 6)	100%	100%	2,500	1,500	2,500	2,500	100%	100%	2,500	2,500	100%
Royal 3 Pair (AA, KK, QQ – w/o Joker)		7		6		7		7	200	200	
Royal Flush	200	200	200	200	200	200	200	200	200	200	325
Straight Flush	100	80	100	80	100	80	100	80	100	100	75
4-of-a-Kind	75	50	75	40	75	50	75	50	75	75	50
3 Pair		7		6		7		7	7		
Full House	6	5	6	5	6	5	6	5	5	6	5

### Bonus Features

<b>Envy or Share the Wealth Bonus</b>	<b>EC/BF 9</b>	<b>EC/BF 10</b>	<b>EC/BF 11</b>	<b>EC/BF 12</b>
7-card Straight Flush w/o Joker	\$1,000	\$5,000	\$3,000	Bonus
Royal Flush w/ A-K Suited	\$250	\$1,000	\$1,000	Bonus
7-card Straight Flush w/Joker	\$100	\$500	\$500	Bonus
5 Aces	\$50	\$250	\$250	Bonus
Royal Flush	\$25	\$50	\$50	Bonus
Straight Flush	\$10	\$20	\$20	Bonus
4-of-a-Kind	\$5	\$10	\$15	Bonus

<b>Five Ace Frenzy Bonus</b> (See Note 8)	<b>EC/FAF 1</b>
5 Aces	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), except for an Envy or Share the Wealth Jackpot, 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" amounts are a component of a Bonus Jackpot and are 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."
6. Progressive 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.
7. A player's Jackpot wager may be either one or two dollars only. A two dollar wager entitles the player to one of the bonus features and requires the placement of a lammer on the table layout in the proximity of the gaming chip or directly on the corresponding sensor if used.
8. In Five Ace Frenzy, if the prize is a "Bonus," the player wins a separately displayed prize offered by the casino operator specifically for that winning triggering event.

**[Appendix “D” intentionally left blank]**

## Appendix “E”

### 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,<sup>1</sup> 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 1 (aka “Andromeda-1”) and Andromeda Series – Stage 3 (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.

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.

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1 - 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.

### ***Andromeda-1***

Andromeda-1's Bet Tabulator System is identical to the Milky Way's except that the count of the wagers for each hand is also sent to an MCU data logger which can be forwarded to a server.

Andromeda-1's TableVision System uses the same LED display and LCD photo frame display used with Milky Way except, the LED display may also be changed by remote access from the data center.

### ***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 and Andromeda-1, rather each sensor position use LED indicator lights, if visible wager detection is required.<sup>2</sup>

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.

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2 - 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.

