



STATE OF WASHINGTON
GAMBLING COMMISSION

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

May 21, 2010

Denis Miron
DEQ Systems Corporation
4760 South Pecos Road, Suite 103-11
Las Vegas, NV 89119

Re: EZ Pai Gow Version 2

Dear Mr. Miron:

Thank you for requesting approval to market the card game "EZ Pai Gow – Version 2" in Washington State. Based on our review of the documentation we received, 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 "EZ Pai Gow Version 2 – Rules of Play" you provided.
- 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

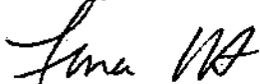
- The game shall be played and operated under the terms and conditions set forth under the "EZ PAI GOW Version 2 – Rules of Play" you provided.
- Each Tribal Gaming Operation must request and obtain approval from their respective Tribal Gaming Agencies (TGA).



- 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.

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 Keith Wittmers at (253) 671-6289. Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,



Tina Griffin
Assistant Director
Licensing Operations Division

cc: Mark Harris, Assistant Director Field Operations
Julie Lies, Assistant Director Tribal Gaming Division
Jennifer LaMont, Acting Tribal Certification Manager
Keith Wittmers, Special Agent Field Operations
Kelly Main, Special Agent Tribal Gaming
File



EZ PAI GOW™: RULES OF PLAY

EZ Pai Gow plays the same as regular Pai Gow with the exception that it replaces the taking of the commission on every player's winning hand by "barring" one specific Dealer's hand – a Queen High Pai Gow. A Pai Gow is a hand of seven different ranks and which does not contain a straight, a flush or a straight flush in it. It is a hand defined by a high card. If the Dealer's hand is a Pai Gow with the highest card being a Queen, then the player's wager on the base game will be a "push".

1. The object of the game is the same as regular Pai Gow – to create two poker hands out of the seven-card hand that is dealt: a five card hand and a two card hand. The five-card hand's value must exceed the two-card hand's value. The game uses a total of 53 cards, the standard 52 cards plus 1 joker. Whether the joker is "fully" wild or "semi" wild makes little difference to this game. In the "semi" wild variation, the joker can only be used to complete a straight, a flush or a straight flush. In all other cases, the joker will be considered as an ace. In the fully wild version, the joker can replace any card not already included in the player's hand and can also be used to complete a five of a kind.
 - a. The only two card hands are one pair and high cards.
 - b. Five card hands use standard poker hand ranking with one exception: the hand **A-2-3-4-5** is the second strongest straight right after the ace high straight.

2. Players make a wager on the base game of EZ Pai Gow.

3. At the discretion of the casino, players can be offered the option to place a bonus wager called the *Dynasty Bonus* bet. The *Dynasty Bonus* bet is a high hand bet against a pay table. See pay tables for odds. All wagers must be placed before the cards are dealt. To qualify for the *Envy Bonus*, players must place a minimum of \$5 on the *Dynasty Bonus* bet.

Dynasty Bonus Pay Table 1

Hand	Pay Table	Return Percentages	Envy Bonus	Max Value
Natural Luhn Tao* Wheel with AQ Suited (AQs)	2,000 to 1	0.01558%	\$500	0.00078%
Seven Card Natural Straight Flush (S/F)	2,000 to 1	0.04154%	\$400	0.00166%
Natural Royal Flush With AQ Suited (AQs)	1,000 to 1	0.04676%	\$300	0.00280%
Seven Card Wild Straight Flush	1,000 to 1	0.12728%	\$200	0.00509%
Five Aces	500 to 1	0.36663%	\$100	0.01464%
Luhn Tao Wheel*	120 to 1	0.33817%	\$75	0.04192%
Royal Flush	120 to 1	2.04253%	\$50	0.16880%
Straight Flush	50 to 1	5.96623%	\$20	0.46794%
Four of a Kind	25 to 1	5.18627%	\$5	0.19947%
Full House	5 to 1	16.30379%	-	-
Flush	4 to 1	20.02065%	-	-
Three of a Kind	3 to 1	19.91007%	-	-
Straight	2 to 1	21.47525%	-	-
House Advantage	0 other players:			8.16%
	Optimal house edge (full table and \$5 bet):			3.64%

*A *Luhn Tao Wheel* is an Ace to 5 natural straight flush which cannot include the joker.

Dynasty Pai Gow Poker Pay Tables

Hand	Pay Table 2	Pay Table 3	Pay Table 4	Pay Table 5	Pay Table 6	Pay Table 7
Natural 7 Card S/F	5,000 to 1	8,000 to 1	5,000 to 1	2,500 to 1	5,000 to 1	5,000 to 1
Royal Flush + A/Qs	1,000 to 1	2,000 to 1	2,000 to 1	1,000 to 1	2,000 to 1	1,000 to 1
Wild 7 Card S/F	750 to 1	1,000 to 1	1,000 to 1	750 to 1	1,000 to 1	500 to 1
5 Aces	250 to 1	400 to 1	400 to 1	250 to 1	400 to 1	300 to 1
Royal Flush	100 to 1	150 to 1	150 to 1	125 to 1	150 to 1	110 to 1
Straight Flush	50 to 1	45 to 1				
4 of a Kind	20 to 1	25 to 1				
Full House	5 to 1					
Flush	4 to 1					
3 of a Kind	3 to 1					
Straight	2 to 1					

Three Pair	<i>Push</i>	Loss	Loss	Loss	Loss	Loss
All Other	Loss	Loss	Loss	Loss	Loss	Loss

Dynasty Pai Gow Poker Detailed Return Table For Pay Table 3

Event	Pays	Combinations	Probability	Return
Natural 7 Card S/F	8,000 to 1	32	0.00000021	0.00166079
Royal Flush + A/Qs	2,000 to 1	72	0.00000047	0.00093420
7 Card S/F with Joker	1,000 to 1	196	0.00000127	0.00127155
5 Aces	400 to 1	1,128	0.00000732	0.00292715
Royal Flush	150 to 1	26,020	0.00016880	0.02532063
Straight Flush	50 to 1	184,644	0.00119787	0.05989370
4 of a Kind	25 to 1	307,472	0.00199472	0.04986795
Full House	5 to 1	4,188,528	0.02717299	0.13586494
Flush	4 to 1	6,172,088	0.04004129	0.16016517
3 of a Kind	3 to 1	7,672,500	0.04977518	0.14932555
Straight	2 to 1	11,034,204	0.07158417	0.14316833
Three Pair	Loss	2,862,000	0.01856717	-0.01856717
Total			1.00000000	-0.07765575

Dynasty Pai Gow Poker Envy Bonuses

Hand	Pay Table 2	Pay Table 3	Pay Table 4	Pay Table 5	Pay Table 6	Pay Table 6
Natural 7 Card S/F	\$1000	\$5000	\$3000	\$1000	\$2500	\$2500
Royal Flush + A/Qs	\$250	\$1000	\$1000	\$750	\$500	\$500
7 Card S/F with Joker	\$100	\$500	\$500	\$250	\$250	\$250
5 Aces	\$50	\$250	\$250	\$100	\$150	\$150
Royal Flush	\$25	\$50	\$50	\$50	\$55	\$55
Straight Flush	\$10	\$20	\$20	\$20	\$25	\$25
4 of a Kind	\$5	\$5	\$5	\$5	\$6	\$6

Dynasty Pai Gow Poker Detailed Return Pay Table 2 Envy Bonus

Event	Pays	Combinations	Probability	Return
Natural 7 Card S/F	1000 to 1	32	0.00000021	0.00020760
Royal Flush + A/Q	200 to 1	72	0.00000047	0.00009342
7 Card S/F with Joker	100 to 1	196	0.00000127	0.00012715
5 Aces	50 to 1	1,128	0.00000732	0.00036589
Royal Flush	10 to 1	26,020	0.00016880	0.00168804
Straight Flush	4 to 1	184,644	0.00119787	0.00479150
4 of a Kind	1 to 1	307,472	0.00199472	0.00199472
All Other	Loss	153,623,516	0.99662934	0.00000000
Total		154,143,080	1.00000000	0.00926832

Dynasty Pai Gow Poker Return Tables for Pay Tables 2 to 7

Hand	Pay Table 2	Pay Table 3	Pay Table 4	Pay Table 5	Pay Table 6	Pay Table 7
Natural 7 Card S/F	0.001038	0.001661	0.001038	0.000519	0.001038	0.001038
Royal Flush + A/Q	0.000467	0.000934	0.000934	0.000467	0.000934	0.000467
7 Card S/F with Joker	0.000954	0.001272	0.001272	0.000954	0.001272	0.000636
5 Aces	0.001829	0.002927	0.002927	0.001829	0.002927	0.002195
Royal Flush	0.016880	0.025321	0.025321	0.021101	0.025321	0.018568
Straight Flush	0.059894	0.059894	0.059894	0.059894	0.059894	0.053904
4 of a Kind	0.039894	0.049868	0.049868	0.049868	0.049868	0.049868
Full House	0.135865	0.135865	0.135865	0.135865	0.135865	0.135865
Flush	0.160165	0.160165	0.160165	0.160165	0.160165	0.160165
3 of a Kind	0.149326	0.149326	0.149326	0.149326	0.149326	0.149326
Straight	0.143168	0.143168	0.143168	0.143168	0.143168	0.143168
Three Pair	0.000000	-0.018567	-0.018567	-0.018567	-0.018567	-0.018567
All Other	-0.789489	-0.789489	-0.789489	-0.789489	-0.789489	-0.789489
Total	-0.080008	-0.077656	-0.078279	-0.084900	-0.078279	-0.092855

Dynasty Pai Gow Poker Return Tables for Envy Bonus

Hand	Pay Table 2	Pay Table 3	Pay Table 4	Pay Table 5	Pay Table 6	Pay Table 7
Natural 7 Card S/F	0.000042	0.000208	0.000125	0.000042	0.000104	0.000104
Royal Flush + A/Q	0.000023	0.000093	0.000093	0.000070	0.000047	0.000047
7 Card S/F with Joker	0.000025	0.000127	0.000127	0.000064	0.000064	0.000064
5 Aces	0.000073	0.000366	0.000366	0.000146	0.000220	0.000220
Royal Flush	0.000844	0.001688	0.001688	0.001688	0.001857	0.001857
Straight Flush	0.002396	0.004791	0.004791	0.004791	0.005989	0.005989
4 of a Kind	0.001995	0.001995	0.001995	0.001995	0.002394	0.002394
Total	0.005398	0.009268	0.009185	0.008796	0.010674	0.010674

Dynasty Pai Gow Poker House Edge

Players	Pay Table 2	Pay Table 3	Pay Table 4	Pay Table 5	Pay Table 6	Pay Table 7
6	5.30%	3.13%	3.24%	4.09%	2.49%	3.95%
5	5.84%	4.06%	4.15%	4.97%	3.56%	5.02%
4	6.38%	4.99%	5.07%	5.85%	4.63%	6.08%
3	6.92%	5.91%	5.99%	6.73%	5.69%	7.15%
2	7.46%	6.84%	6.91%	7.61%	6.76%	8.22%
1	8.00%	7.77%	7.83%	8.49%	7.83%	9.29%

4. At the discretion of the casino, players can be offered the option to place a bonus wager called the *EZ Pai Gow Protection* bet. The *EZ Pai Gow Protection* bet is a low hand bet against a pay table. See pay table for odds. All wagers must be placed before the cards are dealt.

EZ Pai Gow Protection Pay Table		
Hand	Pay Table	Return Percentages
A-5 Natural Straight Flush	120 to 1	0.3391%
9 High Pai Gow	100 to 1	2.0365%
Ten-High Pai Gow	25 to 1	4.1939%
Jack-High Pai Gow	15 to 1	10.0009%
Queen-High Pai Gow	7 to 1	14.1142%
King-High Pai Gow	5 to 1	24.8611%
Ace-High Pai Gow	3 to 1	37.4478%
House advantage		7.01%

5. At the discretion of the casino, players can be offered the option to place a bonus wager called the *EZ Pai Gow Red/Black* bet where players are betting a “color” majority hand. Players having placed this bonus wager win if their hand contains at least four cards of the chosen color and will win at a premium rate if every card in their hand is of the chosen color. For purposes of this bonus wager, the joker counts as neither a black nor a red card. See pay table for odds. All wagers must be placed before the cards are dealt.

EZ Pai Gow Red/Black Pay Table		
Hand	Pay Table	Return Percentages
7 cards of the chosen color	5 to 1	2.5605%
6 cards of the chosen color	1 to 1	8.0655%
5 cards of the chosen color	1 to 1	29.9576%
4 cards of the chosen color	1 to 1	56.7379%
House advantage		2.68%

6. All wagers must be placed before the cards are dealt. House rules determine who receives the first hand in the game. Betting positions are assigned a number from 1 to 7. A number is randomly chosen manually using dice, then the deal begins with the corresponding position and proceeds counter- clockwise.
7. The cards are dealt from an approved dealing show of shuffling device. Each spot at the table receives a hand, regardless if there is a wager made for the spot, and is dealt traditionally counter clockwise, starting with the seat that was selected to receive the first hand. The Dealer’s hand is dealt in order and receives their cards after the first seat, unless the dealer was selected to receive their cards first, then the first seat would be last.
- 7b. Alternatively, only betting spots with a wager at the table may receive a hand. When a random number is used to determine the first position dealt, and that position has no wager under the alternative dealing method that skips inactive seating positions, then the next active seating position with a wager will receive the first card packet of the deal.

8. Once the cards are dealt, the dealer will remove all hands that do not have wagers and place them in the discard pile. Also there will be 4 extra cards that will be placed in the discard pile as well.
9. The players take their own seven cards and create two separate hands, a five card hand and a 2 card hand. The only rule in arranging their cards being that the five card hand's value must exceed the 2 card hand's value.
10. After all players have separated their hands, the dealer turns over his cards and creates his own two separate hands of two cards and five cards according to a fixed set of rules known as the House Way. The House Way will vary from casino to casino with minor variations.
11. After the dealer has separated his hand, the hands of each player are compared to the dealer's hands. If each of the player's now separated hands beat the dealer's corresponding hands then the player wins the bet and is paid one to one on his base game's wager. If only one of his hands beats the dealer then he pushes. If both of his hands lose to the dealer then he loses. The only exception is if the dealer's hand is a Queen High Pai Gow, then the bet pushes. This takes the place of the 5% house commission. Banker wins all ties.
12. The optional bonus wagers are resolved according to their respective pay tables when players have chosen to participate.



Note: Some pay table variations are only available in certain jurisdictions. Contact your DEQ sales representative for availability status.

**Operators must not allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.*

Equipment

The official approved gambling equipment used in association with the Ez Pai Gow game is "EZ Trak Pai Gow System version 1.0".