



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: Four Card Prime

Dear Ms. Rieger,

Thank you for requesting approval to market the card game "Four Card Prime" 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 "Four Card Prime – 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 "Four Card Prime – 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.



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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



Washington State



Galaxy Gaming

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April 17, 2015

Four Card Prime Rules

Four Card Prime (the “**Game**”) is a house-banked, four-card poker card game played with one standard 52-card deck of playing cards. The object of the Game is for the player to form a four card hand from five cards dealt that is higher than the dealer’s four card hand, which is formed from six cards dealt. Additionally, the Game offers several optional bonus wagers.

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.

Main Game Wagers

1. The player makes an Ante wager.
2. The Dealer deals each player five cards, and deals six cards to the dealer’s position, showing one of the dealer’s cards face up.
3. The player decides to play or fold upon determining the best four card hand that can be made from their five card hand. The fifth card is not discarded, but is set aside, as it may be used for bonus wagers.
4. If the player chooses to play the hand, the player must make a Raise wager equal to one time, two times, or three times the Ante wager. If the player folds, the hand may be tucked under a bonus wager to claim a bonus wager win.
5. The dealer’s hand is revealed. The dealer plays the highest four card hand by slanting the two unused cards that are not in play.
6. After the dealer’s hand is formed, the player’s best four card hand is compared to the dealer’s four card hand, with the higher hand winning. In cases of any four card hand copies, the player wins the result. Note: The hands are ranked in the following order from highest to lowest:
 - Quads
 - Straight flush
 - Trips
 - Flush
 - Straight
 - Two pair
 - One pair
 - Four singleton cards
7. If the dealer’s hand is higher and the player’s hand is a flush or lower, the player will lose the Ante and Raise wagers. If the dealer’s hand is higher and the player’s hand is trips or higher, the player will lose the Raise wager, and win a Bad Beat Bonus according to appendix “A”, with the Ante wager remaining on the layout.
8. If the player’s hand is higher or equal to the dealer’s hand and the player has a flush or lower, then the Ante and Raise will pay even money. If the player’s hand is higher or equal to the dealer’s hand and the player has trips or higher, then the Raise wager will pay even

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

money, and the Ante wager will pay even money plus an additional “Win Bonus” according to appendix “A.”

Optional Bonus Wagers

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

Aces Baby Bonus

An Aces Baby bonus wager is made before the start of a round of play. A player wins if their hand consists of a pair of Aces or better. The Aces Baby bonus result is independent of the main game's result. See Appendix "B" for triggering events and paytables.

Prime Wager

A Prime wager is made before the start of a round of play. A player wins if their hand contains four or five of one color cards. The Prime wager's result is independent of the main game's result. See Appendix "C" for triggering events and paytables.

Bonus Jackpot or Jackpot

The Jackpot wagers are made prior to the start of a round of play. The Jackpot systems are optional, and an operator may elect to offer Four Card Prime without the Jackpot systems. There are two Jackpot wagers offered:

Five Card Jackpot

The player is wagering that their original five-card hand consists of one of the winning triggering events shown in the posted payable (Appendix "D") and is paid accordingly. The Five Card Jackpot result is independent of the main game's result.

Four Card Jackpot

The player is wagering that their best four-card hand consists of one of the winning triggering events shown in the posted payable (Appendix "E") and is paid accordingly. The Four Card Jackpot result is independent of the main game's result. The Four Card Jackpot contains an Envy component where a player wins if any other player on the same game had a triggering event during the same round of play.

Appendix "A"

Ante Wager Bonuses

Win Bonus:

Player hand and result	Win-1	Win-3
Any Quads	25	Bonus
Any Straight Flush	20	Bonus
Any Trips	2	Bonus
Flush or less	Push	Bonus

Bad Beat Bonus:

Player hand and result	BB-1	BB-2	BB-3	BB-4	BB-5
Any Quads	25	50	100	100	Bonus
Any Straight Flush	20	40	50	50	Bonus
Any Trips	2	5	5	10	Bonus
Flush or less	Loss	Loss	Loss	Loss	Bonus

Notes:

1. All odds shown above are "to 1."
2. Bad beat paytables apply when a player's hand loses to the dealer.
3. Ante wager remains (not taken) on a Bad beat event.
4. Bonus amounts are determined by the operator.

Appendix “B”

Aces Baby Bonus

Triggering Event	AB-1	AB-2	AB-3	AB-4	AB-5	AB-6	AB-7	AB-8	AB-9
Four Aces	500	500	500	500	500	50	50	50	Bonus
Quads	100	100	100	100	100	50	50	50	Bonus
Royal	50	40	50	50	50	30	30	40	Bonus
Straight flush	30	30	40	30	20	30	30	40	Bonus
Three Aces	20	15	25	20	15	7	9	8	Bonus
Trips	10	10	10	10	10	7	9	8	Bonus
Flush	5	5	5	5	5	6	6	5	Bonus
Straight	4	4	3	3	3	5	4	4	Bonus
Two Pair	2	2	2	2	2	2	2	3	Bonus
AA	1	1	1	1	1	1	1	1	Bonus
Kings or less	Loss	Bonus							

Notes:

1. All odds shown above are “to 1.”
2. The Aces Baby bonus’ result is independent of the main game’s result.
3. Bonus amounts are determined by the operator.

Appendix "C"

Prime Wager

Prime Paytable	Prime-1	Prime-2	Prime-3
All five one color	6	5	Bonus
Four one color	1	1	Bonus

Notes:

1. All odds shown above are "to 1."
2. The Prime wager considers the player's five card hand.
3. If player folds the main hand with a Prime bonus win, the player tucks cards under the Prime wager.
4. The Prime wager's result is independent of the main game's result.
5. Bonus amounts are determined by the operator.

Appendix “D”

Five Card Jackpot

Triggering Event	PJ-1	PJ-2	PJ-3	PJ-4	PJ-5
Five-card Royal Flush	100%	100%	100%	100%	Jackpot
Five-card Straight Flush	10%	10%	\$1,000	\$1,000	Bonus
Four of a kind	\$200	\$500	\$200	\$500	Bonus
Full House	\$100	\$100	\$100	\$100	Bonus
Five-card Flush	\$25	\$25	\$25	\$25	Bonus
Five-card Straight	\$15	\$15	\$15	\$15	Bonus
Three of a kind	\$10	\$7	\$10	\$7	Bonus
two pairs & less	\$0	\$0	\$0	\$0	Bonus

Notes:

1. All odds shown above are “for 1.”
2. Only the highest qualifying hand is paid.
3. The Five Card Jackpot is independent of the main game’s result.
4. 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.
5. 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.
6. “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.
7. 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.”
8. 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.
9. A player’s Jackpot wager must be one dollar only.

Appendix “E”

Four Card Jackpot

Best four-card hand	Pays	Envy	Pays 2	Envy 2	Pays 3	Envy 3
Four Aces	100%	\$100	100%	\$100	Jackpot	Bonus
Quads	\$300	\$10	\$300	\$25	Bonus	Bonus
Straight Flush	\$100	\$5	\$100	-	Bonus	Bonus
Trips	\$9	-	\$15	-	Bonus	-

Notes:

1. All odds shown above are “for 1.”
2. Player’s four card hand is considered.
3. Envy is paid to all participating players except to the player with the triggering event.
4. The Four Card Jackpot’s result is independent of the main game’s result.
5. With the exception of multiple Envy payouts, only the highest qualifying hand is paid.
6. 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.
7. 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.
8. “Bonus” and “Jackpot” amounts are a component of a Bonus Jackpot and are at the discretion of the casino operator. “Jackpot” represents prizes that are a percentage of the amount shown on the meter. “Bonus” amounts represent fixed payouts. 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.”
9. 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.
10. 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 and 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

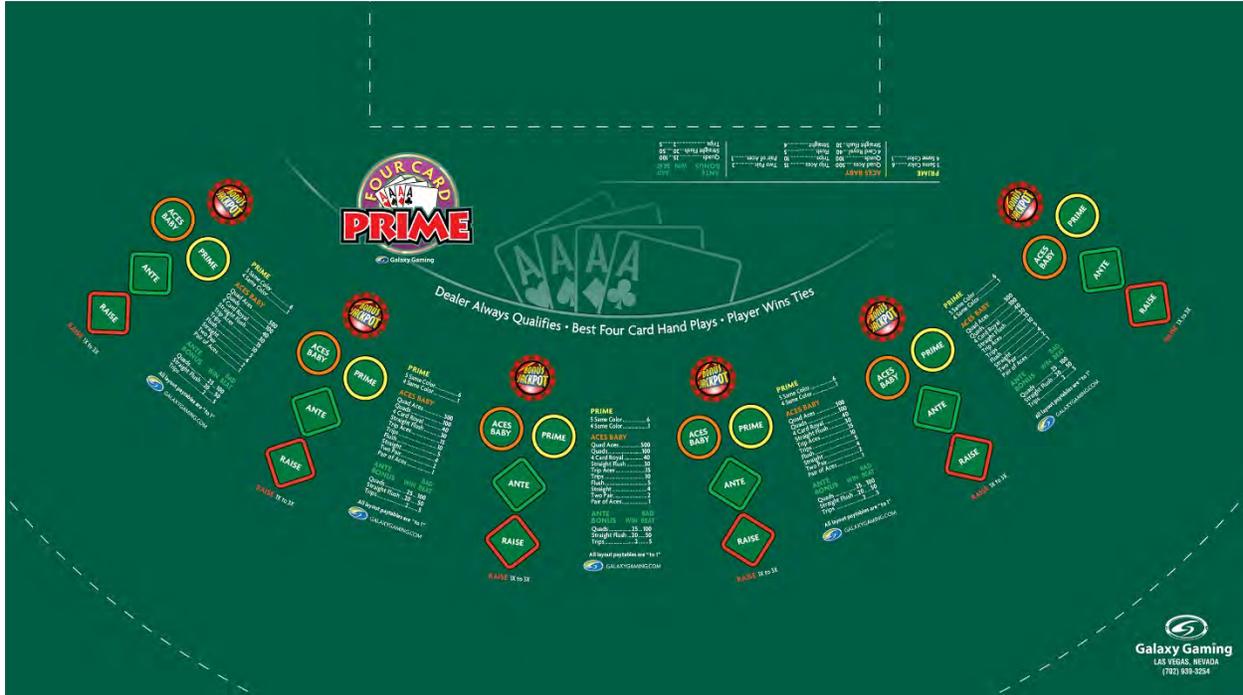
Andromeda-3's Bet Tabulator System is capable of detecting up to six sensors per player position and up to sixteen player positions. The dealer control panel does not have the LED indicator lights as in Milky Way, rather each sensor position uses LED indicator lights, if visible wager detection is required.³

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" Layout



PRIME
5 Same Color 6
4 Same Color 1

ACES BABY
Quad Aces 500
Quads 100
4 Card Royal 40
Straight Flush 30
Trip Aces 15
Trips 10
Flush 5
Straight 4
Two Pair 2
Pair of Aces 1

ANTE
Quads 25
Straight Flush 20

BAD WIN BEAT
Quads 100
Straight Flush 50

All layout paytables are *to 1*

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RAISE 1X to 3X