



STATE OF WASHINGTON
GAMBLING COMMISSION

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

December 1, 2014

Kenneth Dickinson
Galaxy Gaming Inc.
676 Spencer St.
Las Vegas, NV 89119

RE: Three Card Prime

Dear Mr. Dickinson,

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



Mr. Dickinson
December 1, 2014
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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



Three Card Prime

Rules of Play

Washington State



Galaxy Gaming

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November 26, 2014

RULES OF PLAY

Three Card Prime (the “**Game**”) is a house-banked, poker-based card game played with a standard 52-card deck of playing cards. There are multiple wagers that may be made by a player. The object of the Ante and Play wagers is for the player to have a higher ranked poker hand than the dealer. There are also additional bonus wagers, which are won if the player’s hand achieves predetermined winning triggering events posted on a paytable.

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

Ante and Play Wagers

1. Each player makes an Ante wager, and receives four cards face down. The player’s top card is separated for use with any 4 card bonus wagers made. The remaining three-card hand is delivered to the player for play on the Game’s Ante and Play wagers. The dealer also receives a packet of four cards, from which the bottom card is discarded. Players are discouraged to exchange information on their hands, and they are not permitted to inspect the 4th card, to prevent game-play collusion.
2. After examining their first three cards, each player must decide whether to fold their hand and lose their Ante wager, or make a Play wager equal to their Ante wager. If a player folds, the hand is still used to determine the outcome of any bonus wagers made.
3. When all players have acted on their hands, the dealer reveals their three-card hand. The dealer must have a hand consisting of at least a Queen-high to “qualify.” The player and dealer’s hands are then compared and the player is paid as follows:

ANTE Wager

4. If the dealer’s hand does not qualify, the Ante wager automatically pushes.
If the dealer’s hand qualifies:
 - If the player’s hand is equal to or higher than the dealer’s hand, the Ante wager is paid even money.
 - If the player’s hand is lower than the dealer’s hand, the Ante wager loses.

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

PLAY Wager

5. The Play wager is then handled as follows:

- Player's hand consists of a flush or lower:
 - If the player's hand is equal to or higher than the dealer's hand, or the dealer did not qualify, the Play wager is paid even money.
 - If the player's hand is lower than the dealer's hand and the dealer had qualified, the Play wager loses.

- Player's hand consists of a straight or better:
 - If the player's hand is equal to or higher than the dealer's hand, the Play wager wins, and is paid in accordance with the posted payable (see Appendix "A" under "Win or Copy" for payouts).

 - If the player's hand is lower than the dealer's hand, the Play wager wins a Bad Beat bonus and is paid in accordance with the posted payable (see Appendix "A" under columns PW/BBx for payouts).

Optional Bonus wagers

The game also contains several optional bonus wagers. The casino operator chooses which of the bonus wagers to be offered. The bonus wagers are:

Prime

A Prime wager is made prior to the start of a round of play. The player wins 3 to 1 odds on their Prime wager if all of the cards in their three-card hand are the same color (red or black). A player wins 4 to 1 odds if the dealer's three cards are the same color as the player's three cards. (See Appendix "B")

Pair Bonus

A Pair Bonus wager is made prior to the start of a round of play. A player wins their Pair Bonus wager if their three-card hand consists of one of the winning triggering events posted on the accompanying payable. The fourth card is used to determine the amount won, and will win additional bonuses if a deuce. (See Appendix "C.")

Bonus Jackpot or Progressive Jackpot

The Jackpot wagers are made prior to the start of a round of play. There are two Jackpot wagers offered:

- a) The Final Four Jackpot: Players are awarded a Jackpot prize if they made the corresponding bonus wager and if the four card hand (the four player's cards only) had achieved a pre-determined winning triggering event according to the corresponding payable (see Appendix "D.")
- b) The All Seven Jackpot: Players are awarded a Jackpot if the seven card hand (the player's four cards plus the dealer's three cards) have achieved a pre-determined winning triggering event according to the corresponding payable (see Appendix "E.")

Appendix "A"
Play Wager Paytables

Winning Triggering Event	Win or Copy	PW/BB 1	PW/BB 2	PW/BB 3	PW/BB 4
Mini-Royal	10	n/a ³	n/a ³	n/a ³	n/a ³
Straight Flush	6	12	12	6	6
Trips	5	10	10	5	5
Straight	2	4	4	2	2
Flush and lower	1	loss	1	loss	1

Notes:

1. A Mini-Royal occurs when the player's three-card main hand is a suited Ace, King, and Queen.
2. All odds shown above are "to 1."
3. The Mini-Royal can only win or copy, and as such cannot receive a Bad Beat win.
4. Player's hand must be of an equal or higher value than dealer's hand to receive payment, except for the Bad Beat, or if the dealer fails to qualify.
5. The "PW/BB" paytables are used when the player's first three cards consist of one of the winning triggering events and is less than the dealer's hand (aka "Bad Beat").
6. Only the highest qualifying hand is paid.
7. Casino operators may post a maximum aggregate amount payable per round or per hand.

Appendix "B"

Prime Wager

The Prime wager is made at the start of play. A player wins their Prime wager if their starting three-card hand is composed of all one color (red or black), with an additional bonus if the three-card Dealer hand is all the same color as the player's hand.

Winning Triggering Event	PRW-1	PRW-2
Same Color Player and Dealer Hands	4	Bonus
Same Color Player Hand	3	Bonus
others	loss	Bonus

Notes:

1. All odds shown above are "to 1."
2. Casino operators may post a maximum aggregate amount payable per round or per hand.
3. Bonus amounts are at the discretion of the casino.

Appendix "C"

Pair Bonus Paytables

Winning Triggering Event	PB 1	PB 2	PB/LD 1	PB/LD 2	PB/LD 3	PB/LD 4	PB/LD 5
Mini Royal	50	40	100	75	75	75	Bonus
Straight Flush	40	40	80	60	50	50	Bonus
Trips	30	30	60	45	40	40	Bonus
Straight	6	6	12	10	8	8	Bonus
Flush	3	3	6	5	4	4	Bonus
Pair	1	1	1	2	2	1	Bonus

Notes:

1. The paytables PB1 and PB2 is used when the player's three card hand wins the Triggering Event, and the player's fourth card is not a 2 (deuce).
2. The paytables PB/LD1 through PB/LD5 are used when the player's three card hand wins the Triggering Event, and the player's fourth card is a 2 (deuce).
3. A Mini-Royal occurs when the player's three-card main hand is a suited Ace, King, and Queen.
4. All odds shown above are "to 1."
5. Only the highest qualifying hand is paid.
6. Casino operators may post a maximum aggregate amount payable per round or per hand.
7. Bonus amounts are at the discretion of the casino.

Appendix "D"

Final Four Jackpot Paytables

The Final Four Jackpot paytables are based on the player having at least a straight in his three card hand to qualify to win the Final Four Jackpot. If the player has an initial three-card hand of a straight or better, then the fourth "loose deuce" card is added to the player's hand, to determine the final winning 4-card hand Payout.

Winning Triggering Event	F4P-1	F4P-2	F4P-3	F4P-4
4-card diamond Royal	100%	100%	100%	Jackpot
4-card Royal	10%	10%	10%	Jackpot
4-card Straight Flush	\$1,000	\$1,000	\$1,000	Bonus
Four of a kind	\$1,000	\$500	\$1,000	Bonus
Initial 3-card SF	\$40	\$30	\$50	Bonus
Three of a Kind	\$25	\$20	\$30	Bonus
4-card Straight	\$15	\$15	\$15	Bonus
Initial 3-card straight	\$6	\$10	\$5	Bonus
initial hand < straight	\$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 "E"

All Seven Jackpot Paytables

The All Seven Jackpot Paytables are based on the player's four-card hand plus the dealer's three-card hand, and where the player has no requirement of achieving an initial three card hand of a straight or better in the original hand. Only the final seven cards are considered as a group against the Winning Triggering Event. The paytables are shown below:

Winning Triggering Event	A7P-1	A7P-2	A7P-3	A7P-2
7-card straight flush	100%	100%	100%	Jackpot
Royal	10%	10%	10%	Jackpot
Straight Flush	\$200	\$200	\$200	Bonus
Four of a kind	\$50	\$50	\$50	Bonus
Full House	\$10	\$10	\$10	Bonus
Flush	\$5	\$4	\$3	Bonus
Straight or less	\$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 "X"

Equipment

Game play is conducted on a table layout and may also include electronic gambling equipment such as bet detection equipment and visual paytable 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 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

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.

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

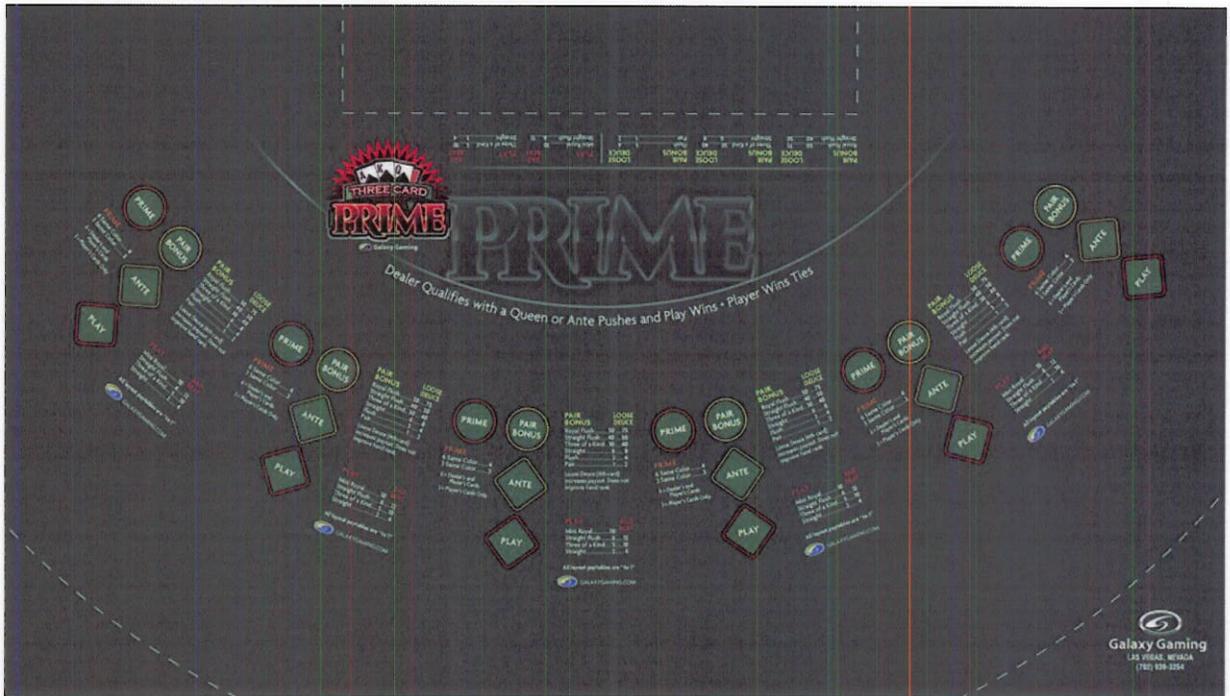
Andromeda-3's TableVision System uses a computer monitor powered by a computer/server located on the casino property. Images for the display are controlled by the casino operator via the computer/server.

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"

Sample Table Layout



PRIME

PRIME

6 Same Color 4
 3 Same Color 3

6 = Dealer's and Player's Cards
 3 = Player's Cards Only

PAIR BONUS

LOOSE DEUCE

Mini Royal	50	75
Straight Flush	40	50
Trips	30	40
Straight	6	8
Flush	3	4
Pair	1	2

Loose Deuce (4th card) increases payout. Does not improve hand rank.

PLAY

Mini Royal	10		
Straight Flush	6	12
Trips	5	10
Straight	2	4
Flush or Less	1		

*Must beat Dealer

All layout paytables are "to 1"

ANTE

PLAY

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