STATE OF WASHINGTON
WASHINGTON STATE GAMBLING COMMISSION
4301 South Pine Street, Suite 307, MS: WT-29 Tacoma Washington 98409 (253) 471-5312 Fax Number (253) 471-5317

January 16, 2004

Xuming Shangguan
4903 112th Street SE
Everett, WA 98208

Dear Mr. Shangguan:

Thank you for requesting approval to market the card game "Wired Aces" to Washington State commercial card rooms. Based on our review of the documentation we received, 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 "Wired Aces" – 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.

Please be advised any modifications to this game may affect this approval. Contact the Commission should you contemplate modifications. If you have any further questions on Commercial implementation, please contact Keith Wittmers at (253) 471-5312, extension 231.

Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,

Greg Thomas
Acting Assistant Director – Field Operations

Cc: Keith Wittmers, Card Room Coordinator
Michelle Mack – FIU
F.O. Program Managers

Game Name: Wired Aces
Alternate Name: Wired Bullets

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Date: January 10, 2004

CARDS: NUMBER OF DECKS

Wired Bullets shall be played with six or eight 52-card decks of cards with backs of the same color and design.

VALUE OF EACH CARD

K, Q, J, 10 ---------- Zero
9 ---------- 9
8 ---------- 8
7 ---------- 7
6 ---------- 6
5 ---------- 5
4 ---------- 4
3 ---------- 3
2 ---------- 2
Ace ---------- 1

RANK OF HANDS

Pair of Aces
Pair of Kings
Pair of Queens
Pair of Jacks
Pair of 10s
Pair of 9s
Pair of 8s
Pair of 7s
Pair of 6s
Pair of 5s
Pair of 4s
Pair of 3s
Pair of 2s
Value of 9
Value of 8
Value of 7
Value of 6
Value of 5
Value of 4
Value of 3
Value of 2
Value of 1
Value of zero

BASIC CONCEPTS

Every player with a wager and the dealer will each receive two cards face up. The value of each hand will be the sum of the values of the two cards if it is less than 10, and it will be the sum of the values of the two cards subtracting 10 if it is over 10. Thus the maximum value of a hand is 9.

For example: The value of a hand containing a "6" and an "8" is four;
The value of a hand containing an Ace and a Jack is one.

The exception is when the first two cards make a pair. Pairs are the premiere hands in the game of Wired Bullets. Any first-two-card pair is ranked higher than a 9-value hand.

Each player has the option to receive one more card to try to achieve a hand with a higher value. If the sum of the values of the three cards exceeds 10, the value of the hand will be the sum subtracting 10. If the sum of the values of the three cards exceeds 20, the value of the hand will be the sum subtracting 20.

For example: a player's first two cards are a "3" and a "9", and the third card he requests is a "9", that will give his hand a value of one. And he is not allowed to receive any more cards.

The dealer must not receive the third card if the first two cards make a pair or the value of the first two cards is 5, 6, 7, 8 or 9. And the dealer must receive the third card if the value of the first two cards is 4, 3, 2, 1 or zero.

Both the player and the dealer will have a minimum of two cards and a maximum of three cards.

The house wins if the dealer's hand is higher than the player's hand, and the house also wins if the dealer's hand ties with the player's hand in value.

It is a push when the dealer and the player have the same pair.

Player wins 100% of the wager if his hand beats dealer's hand in value. Player wins 3/2 of the wager with a winning pair. If the dealer has a higher pair than the player, the player loses 100% of the wager.

If the player requests one more card for his pair, the 3/2 payouts are void. And the value of the hand is calculated as described in the first paragraph of this section.

The player has the option to raise his/her wager up to four times the original bet (double down, triple down or quadruple down) after he/she receive the first two cards. For example, if a player's original wager is $10, he/she can raise up to $30 to make a

total of $40 bet. At no time, the additional wager may exceed the maximum single wager allowed. By raising the wager, the player must receive a third card.

SIDE BET FOR TIE

There will be an optional side bet for the game of Wired Aces. Player gets paid on the side bet if his first two cards tie with the dealer's first two cards. Or player hits into a tie. Player also gets paid for a bad beat Jackpot.

Tie in value (first two cards only, pays 4 to 1):
Player's first two cards tie with dealer's first two cards in value.

Example: Player's first two cards are a "5" and a "6", and dealer's first two cards are a "9" and a "2". Both hands have value "one".

Hit into tie (pays 6 to 1):
Player and dealer have the same value after both stay or hit on the hands.

Example: Player's first two cards are an Ace and a Jack making a value "one", and dealer has a "4" and "5" making a value "9". And the third card the player requests is an "8", which give the player a value "9".

Note: Player is not eligible to win "hit into tie" if he already wins on the first two cards tie.

Note: Player is not eligible to win "hit into tie" if he hits a won hand, which means the player's first two cards is ranked higher than dealer's made hand (first two cards with a value "five" or higher)

Example: Player has a value of seven with a "2" and a "5", and dealer has a value of five with a "4" and an Ace. Player wins the hand if he stays because the dealer, with a value of five, will not hit the third card. If the player decides to receive the third card (most likely for purpose of raising the original bet), "hit into tie" is void.

Note: Player cannot "hit into tie" if either player or dealer has a pair.

Tie with faces (first two cards only, pays 20 to 1):
Dealer and player both have two zero value cards without making a pair, "10" is considered a face card.

Example: Player's first two cards a "10" and a Jack vs. dealer's first two cards a Queen and a King.

Note: Pair of Queens vs. KJ is not tied.

Tie with a pair (first two cards only, pays 100 to 1):
Player and dealer have the same pair.

Example: Player's pair of "4s" vs. dealer's pair of "4s".

Bad beat Jackpot (first two cards only, pays 300 to 1):
Player's pair of Jacks or better beaten by dealer's one rank higher pair.

Only three scenarios:

1. Dealer's pair of Queens beats Player's pair of Jacks.
2. Dealer's pair of Kings beats Player's pair of Queens.
3. Dealer's pair of Aces beats Player's pair of Kings.

Note: The Licensees may establish an aggregate limit as permitted by WAC 230-40-810.

DEALING THE GAME

1. A standard Blackjack dealing shoe shall be used. Standard Blackjack shuffling procedure shall be used, or a shuffle machine may be used.

2. The dealer shall offer the player to cut the decks with a standard blackjack cut card.

3. The dealer shall, starting from the player farthest to the dealer's left moving clockwise around the table, deliver one card to each player who has wagered. After every player receives the first card, the dealer shall deliver one card to himself. And the second card shall be delivered the same way. (This is similar to the standard Blackjack dealing procedure, except both dealer's cards are face up.)

4. All cards shall be face up and placed like a Blackjack game.

5. If dealer has a first-two-card pair, players don't have to receive the optional third card. Dealer shall pay or take the "tie" bets from right to left accordingly. Then dealer shall pay or take the main wagers from right to left accordingly.

Example:	Player 1	Player 2	Player 3	Player 4	Dealer
First 2 cards:	4, 5	8, 8	3, 3	J, J	8, 8

   Dealer shall collect the losing "tie" bets from Players 4, 3 and 1. And he will pay Player two 100 to 1 on the "tie" bet.
   Then for the main bet, dealer takes from Player 1, pushes Player 2, takes from Player 3, and pays Player four 3 to 2.

6. If dealer has first-two-card value 5, 6, 7, 8 or 9, meaning the dealer must not hit the third card, dealer will, starting from the left to right, pay or take each "tie" bet and each main wager accordingly after each player stays, hits or doubles down.

Example:	Player 1	Player 2	Player 3	Player 4	Dealer
First 2 cards:	4, K	8, 8	A, 4	6, K	2, 3
Third card:	A	stay	2	9 (raise)	

   Dealer pays Player 1 the "tie" bet 6 to 1 (hit into tie), and collects the main bet.
   Dealer collects the "tie" bet from Player 2, and pays the main bet 3 to 2.
   Dealer pays Player 3 the tie bet 4 to 1, and pays the main bet after the player hits.
   After Player 4 raises, dealer collects both bets. Notice Player 4 doesn't win the "hit into tie" because he hit on the won hand.

7. If dealer has first-two-card value 4, 3, 2, 1 or zero, meaning the dealer has to hit the third card, the dealer will first pay the "tie in value" from right to left. Dealer shall not collect any losing "tie" bet because players can still "hit into tie". Then starting from left to right, dealer will allow each player to stay, hit or double

down. Dealer will hit the third card to his/her hand after every player finishes. Then, starting from right to left, the dealer will pay or take the "tie" bets and the main wagers accordingly.

Example:	Player 1	Player 2	Player 3	Player 4	Dealer
First 2 cards:	4, K	8, 8	7, 4	6, K	5, 6
Third card:	J (raise)	stay	Q	5 (raise)	10

Dealer pays Player 3 the "tie" bet 4 to 1.
Dealer allows everyone hit, stay or raise.
Dealer gives his/her hand the third card.
Dealer collects the "tie" bet from Player 1, and pays the main bet including the raised amount.
Dealer collects the "tie" bet from Player 2, and pays the main bet 3 to 2.
Dealer collects the main bet from Player 3. Notice player 3 doesn't win "hit into tie" because he won the first-two-card tie already.
Dealer pays Player four 6 to 1 for "hit into tie", and collects the main bet including the raised amount.

8. All cards collected by the dealer shall be picked up in order and placed in the discard rack in such a way that they can be readily arranged to reconstruct each hand in the event of a question of dispute.

9. This completes a round of play.

PAYOUTS AND ODDS FOR "TIE"

Six Decks	Payout	Hit rate (once in every...)
Tie in value	4 to 1	12.2 hands
Hit to tie	6 to 1	17.8 hands
Tie with Faces	20 to 1	202.5 hands
Tie with a pair	100 to 1	2803.6 hands
Bad beat Jackpot	300 to 1	10168.0 hands
Total hit rate		7.0 hands
House Advantage		2.77%

Eight Decks	Payout	Hit rate (once in every...)
Tie in value	4 to 1	12.2 hands
Hit to tie	6 to 1	17.8 hands
Tie with Faces	20 to 1	201.8 hands
Tie with a pair	100 to 1	2631.0 hands
Bad beat Jackpot	300 to 1	9998.8 hands
Total hit rate		7.0 hands
House Advantage		2.59%

The calculations of probabilities for this section are based on mathematical methods. A statistical report based on computer simulation from Caliber Consulting Group is also enclosed.

Note: The Licensees may establish an aggregate limit as permitted by WAC 230-40-810.

OPTIONS OF WIRED ACES

Casinos or card rooms who decide to use this game shall have the following options:

Number of decks of cards: six or eight.

Raising options: triple down or quadruple down on the main bet.

Triple down: players are allowed to raise the main bet up to twice time the original amount.
Example: making a $10 bet a total of $30 bet.

Quadruple down: players are allowed to raise the main bet up to three times the original amount.
Example: making a $10 bet a total of $40 bet.

Note 1: The additional wager must not exceed the maximum single wager allowed.

Note 2: The Licensees may establish an aggregate limit as permitted by WAC 230-40-810.

ACES
TS 4 OR LESS
R PAYS 2 TO 1