



STATE OF WASHINGTON
GAMBLING COMMISSION

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

June 22, 2020

Jacqueline Hunter
Scientific Games
6601 S. Bermuda Rd.
Las Vegas, NV 89119

Dear Ms. Hunter,

Due to COVID-19 and at the manufacturer's request, the following games can be dealt face-up until further notice:

| | |
|---|------------------------------------|
| Caribbean Stud Poker | Crazy 4 Poker |
| Crazy 4 Poker Progressive | Four Card Poker |
| Four Card Poker Bad Beat Bonus | Four Card Poker Progressive |
| Let it Ride | Let it Ride Bonus |
| Let it Ride Progressive | Mississippi Stud |
| Mississippi Stud Progressive | Mississippi Stud with 3 Card Bonus |
| Three Card Poker | Three Card Poker, 6 Card Bonus |
| Three Card Poker Bonus | Three Card Poker Face Up |
| Three Card Poker Progressive | Ultimate Texas Hold'em |
| Ultimate Texas Hold'em Bad Beat Bonus | Ultimate Texas Hold'em Progressive |
| Ultimate Texas Hold'em Ultimate Pairs Bonus | |

No other modifications to the dealing procedures, game rules, or payouts are authorized.

Prior to implementing face-up dealing, licensees should

- Review "*Scientific Games – Table Game Operations Impact of Dealing Games Face Up*", which is attached;
- Consider how play in this manner could affect the odds, play on the game, and be conducted in compliance with any state or county imposed COVID-19 public health requirements; and
- Submit their internal controls and receive approval from the Commission.

Ms. Hunter
June 22, 2020
Page 2 of 2

If you have any questions on commercial implementation, please contact Brian Lane at (509) 387-7095. If you have any questions on Tribal implementation, please contact Kelly Main at (206) 423-4260.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Griffin", with a long horizontal flourish extending to the right.

Tina Griffin
Assistant Director
Licensing, Regulation, and Enforcement

Attachment – *“Scientific Games – Table Game Operations Impact of Dealing Games Face Up”*

Scientific Games – Table Game Operations

Impact of Dealing Games Face Up

The purpose of this report is to analyze the approximate impact of dealing several Scientific Games proprietary table games ‘face up’. It is assumed that no more than THREE Players will be playing at the same time and that all cards normally dealt to the Player will be dealt face up.

Introduction:

It is a given that providing the Player with any additional information about the cards that have already been dealt can only allow the Player to enhance his strategy and reduce the house edge and potentially turn it into a Player edge. In this particular case, the additional information is knowledge about the other Players’ cards which would normally be kept hidden from the other Players. Knowledge about these cards can inform the Player both about his potential draws (if any exist) and about the Dealer’s potential hand.

This is a little like Blackjack card counting with one very important distinction. In Blackjack, knowledge about the cards remaining in the shoe can be used to determine how much the Player should wager on the next hand. This is what provides the biggest advantage to the Player. In Blackjack, the Player may get an advantage in only 10% of the hands and by just 0.25%. If a Player could not alter his wager size with this knowledge, the Player would not have an overall advantage. But, if he can increase his wager 50x on these hands, the overall payback over time would show a Player advantage.

In single deck games, this is not possible. The Player has no opportunity to change his initial wager size. Instead, he is only able to alter his strategy in-game and in some cases, his in-game wager size. This greatly reduces the Player’s ability to take advantage of ‘player advantage’ situations.

The goal of this analysis is to get a rough idea of the impact of the Player being able to see the hands of two additional Players. This is not intended as a comprehensive analysis as that would likely take weeks per game to do properly. Instead, the main purpose is to ascertain if playing the game face up poses a significant risk to the casino. Because of this, parts of the analysis relied on work done and published by another analyst – Stephen Howe. In each case where I leverage his work, I have included the URL of the column that I utilized.

Three Card Poker

Three Card Poker has a single strategy point – when to Play vs. Fold. Thus, knowing what the additional six cards are, can guide the Player by changing the distribution of potential Dealer hands. Mostly, it can tell the Player how often the Dealer will not qualify which can change the strategy for Jack or less hands. If 4 out of the 6 cards are Q/K/A, the hand becomes a marginal Play. With 5 or 6, much more strongly, but it is rather rare for 5 of the 6 to be Q/K/A. In similar fashion, if all 6 cards are low cards, there are some Q-6, Q-7 hands that should be Folded because there is a greater likelihood that the Dealer will qualify and doing so means he will likely beat the Player. While it is much more common for all 6 cards to be low, the impact is to a limited number of Player hands and the impact is not great as these hands are only marginal plays. If the Player has above a Q-8 or Q-9, the strategy is still to always Play.

Based on simulations using the strategy changes, the impact to payback would appear to be only about 0.1% – 0.2% at most with 6 additional cards displayed.

Let It Ride

As Let It Ride is a payable game, the impact is only on the Player's hand. The Player may see cards that he needs to complete his hand that have been burnt, which can reduce the potential value of his hand. Or, conversely, he may see that his needed cards are still available out of the remaining deck, with a slightly increased probability of being dealt to him.

That said, however, Let It Ride's relatively high house edge is unlikely to be able to be overcome as a result of seeing 6 additional face up cards. Given the mandatory '\$' wager with a payback of only 62.7%, the '1' and '2' wagers would need to get a significant advantage out of those 6 cards. But, the vast majority of hands wagered are guaranteed winners. That said, there are a few strategy changes that would occur as a result of seeing the extra 6 cards.

'1' Wager

- Do not wager any 3-Card SFL or Royal if any of the out cards for the SFL/Roy have been burned
- Wager all 3-Card Inside SFLs if none of the 6 other cards are of the same suit.
- Wager a Low Pair, IF none of the 6 cards are of the same rank as either of the Player's rank

'2' Wager

- If you have a 4-Card Flush and all 6 of the other cards are of same suit, don't make wager
- If you have a 4-Card Flush with 0 High Cards and 5 of the other cards are of same suit, don't make wager
- If you have a 4-Card Straight with 0 High Cards, and 2 of your (Straight) outs are burned, don't make the wager
- If you have a 4-Card Straight with 1 High Card and 3 of your (Straight) outs are burned, don't make the wager
- If you have a 4-Card Straight with 2 High Cards and 4 of your (Straight) outs are burned, don't make the wager
- If you have a 4-Card Straight with 3 High Cards and 5 of your (Straight) out are burned, don't make the Wager

The biggest strategy impact is the wagering of a Low Pair in the '1' wager. This increase the payback by roughly 0.2%. The other changes occur infrequently and likely do not add more than another 0.1%. The overall impact should be at most 0.3% to the house advantage.

Ultimate Texas Hold'em

UTH is one of the more likely games to be impacted by the Player's cards being dealt face up. With a small theoretical house advantage, it does not take much movement of the payback to potentially give the Player an advantage over the house.

That said, there are several features of UTH that work against this from happening. The first is that there are only TWO cards per Player dealt. So, the Player only gets to see four additional cards. For the Player to take advantage of the situation, the information must be actionable. If a Player has an AK and one of the 4 face up cards is also an Ace, this will reduce the Player's expected value of the hand, but not by enough to change how he should wager – he should still Wager 4x.

The impact of any strategy change to the overall payback is controlled by 2 factors. How often the situation occurs and how much it increases the expected value of that situation. From running a variety of scenarios, the number of situations in which the Player changes his strategy is rather small. Thus, the overall impact to the payback is also very small. The fact that the remaining cards are community cards shared between Player and Dealer also means that cards that are burnt that might hurt the Player can also likely hurt the Dealer as well.

Lastly, the strategy of UTH is already extremely complex. The theoretical payback can only be achieved by a tiny fraction of Players. The ability to go further and take into account the face up cards would reduce this population even further.

For my conclusion, regarding UTH, I am also relying on a more exhaustive analysis performed by Stephen Howe that can be found here: <https://discountgambling.net/2010/01/15/practical-collusion-for-ultimate-texas-holdem/>

In the end, I don't believe any human could possibly achieve a Player advantage with only two additional Player's cards turned Face up on a live game.

Caribbean Stud Poker

For Caribbean Stud Poker, I mostly relied on work already done by Stephen Howe. His column can be found here:

<https://discountgambling.net/category/caribbean-stud/>

There are actually 2 columns at the site. They both use a method that might be considered 'cheating' when the cards are dealt face down but would become unnecessary with cards dealt Face Up. The method mostly deals with counting cards that match the Dealer's Face up card and counting the number of Aces and Kings.

Per Mr. Howe's column the house edge of 5.32% (as a percent of the Ante) can be turned into a 1.1% Player advantage using his methods when there are 7 Players at the table. Per his second column, with only 6 Players, it can be turned into a 0.4% House edge using a computer and a more realistic 1.32% house edge using a simplified strategy.

Because Caribbean Stud has 5 cards per Player, dealing potentially 25-30 additional cards face up, can be very advantageous to the Player. With only an additional 10 cards being show on a 3 Player table, the number of times the Player will alter from basic strategy will be greatly reduced.

There is nothing in his column that talks about the impact of less Players at the table. However, if going from 7 Players to 6 Players reduced the impact by as much as 1.5% (of the Ante), I feel it is safe to assume that no Player will be able to come close to a Player advantage playing at a 3-Player table. Undoubtedly, a few Players will be able to shave a little off the house edge, but it is doubtful that it would be more than 0.25% of total wager.

Mississippi Stud Poker

For Mississippi Stud Poker, I again relied on work already done by Stephen Howe. His column can be found here:

<https://discountgambling.net/mississippi-stud-ev-barona/>

I don't know if Barona still does, but apparently it did offer MS Stud face up with up to 6 players. Per Mr. Howe's analysis, when the Player can see all 12 cards belonging to the Players, he can turn the 4.91% house edge into a roughly 1.5% Player edge. It should be noted that the numbers that he references are a % of the initial Ante and not total wager. When the average wager size is taken into account, this correlates to a house edge of 1.37% of the total wager. The 1.5% Player edge is really a Player edge of about 0.42% of total wager.

Thus, the total swing is about 1.8%. If the impact of seeing each additional Player's cards were linear, this would mean each Player's cards that could be seen would be worth about 0.36% of total wager. My experience in doing these analyses would indicate that the impact is not linear but more exponential. Thus seeing 2 Player's cards is worth far LESS than 40% of the total. The true impact is likely to be less than a payback of 99.4% and probably closer to about 99%.

It should also be noted that the strategy for Mississippi Stud is moderately complex and utilizing the face up cards to modify the strategy will require a Player to calculate outs on the fly. There will not be many Players who will be able to do this. Some very skilled Players might be able to lower the house edge, but it is unlikely that any will be able to gain a Player advantage.

Four Card Poker

Four Card Poker follows a structure similar to Three Card Poker with a couple of key differences. The majority of the impact of face up cards in Three Card Poker is the impact they have on the Dealer qualifying. There is no Dealer qualifying in Four Card Poker, so this is no longer an impact. In Four Card Poker, the Dealer has one card turned face up. Thus, the Player can look for at the other face up cards for rank matches to the Dealer's upcard. This will impact the Dealer's ability to draw Pairs+. The Player may also be able to take into account cards of higher rank than his own Pair and/or Aces when he is playing a non-Pair hand.

Like Three Card Poker, there will be a handful of changes, but they will not add up to much. In Stephen Howe's column on collusion for Four Card Poker, found here: (<https://discountgambling.net/category/four-card-poker/>), he states that with 6 Players at the table the house edge can be cut in half. As we are talking about a situation of only 3 Players, the impact will be far less and again is likely to be no more than 0.25% of total wager.

Crazy 4 Poker

Crazy 4 Poker is more similar to Three Card Poker than is Four Card Poker. There is no Dealer card dealt Face up, but there is qualifying. So, like Three Card Poker, most of the impact surrounds the frequency that the Dealer qualifies. While the ability to wager 3x might be a factor as well, it can only be done with a Pair of Aces or better, mostly removing it from the equation. Like Three Card Poker, the impact to being able to see additional cards will be minimal and most Players will not be able to take advantage.

Conclusion

None of my own research nor anything I could find elsewhere would indicate that any of the games mentioned in this report can be 'beaten' by dealing a total of 3 hands face up. The extent by which a Player can reduce the house edge will depend on the specifics of each game. In all cases, it would take a very well-trained Player to do so.

Some likely indications that a Player might be attempting to fully use the information available would be one that is playing relatively slowly. As many of the strategy changes require counting 'outs', a Player utilizing these strategies will have to study far more cards than normal.

Generally speaking, any Player who considers himself to be an 'Advantage' Player, believing himself to have an advantage over the house will unlikely play any of the side-bets, which generally have lower paybacks and do not have any opportunities to reduce the house edge as a result of the additional information.

| Game | Maximum Spots Recommended |
|-----------------------|---------------------------|
| Caribbean Stud Poker | 5 |
| DJ Wild Stud Poker | 4 |
| I Luv Suits | 5 |
| Mississippi Stud | 4 |
| Crazy 4 Poker | Not Beatable |
| Face Up Pai Gow Poker | Not Beatable |
| Fortune Pai Gow Poker | Not Beatable |
| Four Card Poker | Not Beatable |
| Let it Ride | Not Beatable |
| Three Card Poker | Not Beatable |
| Ultimat Texas Hold'em | Not Beatable |



Training Manual

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Overview of the Rules

Introduction

Three Card Poker uses a standard 52-card deck. There are three ways to play. The game allows the player to wager against the dealer, to wager only on the value of his own hand, or to wager both against the dealer and on the value of his own hand. Note: Exceptions are listed at page 7.

Ranking of Hands

The ranking of the hands in Three Card Poker differs from traditional poker hands. In Three Card Poker, a STRAIGHT beats a FLUSH. Cards are ranked from highest to lowest as follows.

STRAIGHT FLUSH
THREE OF A KIND
STRAIGHT
FLUSH
PAIR

If a hand does not contain a pair or better, the hand that contains the highest ranking card(s) wins. Ace is high except in 3-2-Ace sequence.

Three Ways To Play

1. Playing Against the Dealer - ANTE WAGER

The object when playing against the dealer is to get a three card poker hand with a value higher than the dealer's qualifying hand of a Queen or better. Players place an ANTE wager. After looking at their three card poker hand, players may fold or, if they believe their hand is high enough to beat the dealer's hand, they will place an amount EQUAL to the ANTE on the PLAY spot.

Playing Against the Dealer

- | | |
|--|--|
| • Player folds | LOSE |
| • When dealer does not play | PLAY is a PUSH ANTE wins 1 to 1 |
| • When dealer plays and player's hand beats dealer's hand | PLAY wins 1 to 1 ANTE wins 1 to 1 |
| • When dealer plays and dealer's hand beats player's hand | PLAY is a loss ANTE is a loss |

The ANTE BONUS is paid when a player is dealt one of the three highest ranking hands in the game. **The ANTE BONUS is paid regardless of the dealer's hand.** The ANTE BONUS payouts are attached.

(2) *Playing the Hand Value - PAIR PLUS*

The object of betting the PAIR PLUS wager is to receive a pair or better. If the player's hand contains a pair or better the player wins the PAIR PLUS wager. **Players receive PAIR PLUS payouts regardless of the dealer's hand.** PAIR PLUS payouts are attached.

(3) *Playing Both - PAIR PLUS and ANTE*

When a player bets both the PAIR PLUS and the ANTE (including PLAY), he is playing against two separate paytables with two different criteria for payouts. In playing the ANTE wager, the object is to get a three-card poker hand that beats the dealer's qualifying hand of Queen or better. In playing the PAIR PLUS wager, the object is to receive a pair or better. **The ANTE and PAIR PLUS wagers do not have to be the same amount. Players receive the PAIR PLUS payouts regardless of the dealer's hand.** Players can wager anywhere from the table minimum to the maximum allowed bet on either spot. However, the PLAY wager must always equal the ANTE wager.

If the player has made the ANTE wager and the PAIR PLUS wager, he must make the PLAY wager or will forfeit both the ANTE and PAIR PLUS wagers.

Side bets between players are prohibited.

Dealing Procedures

Three Card Poker must be dealt with an automatic card shuffler produced by SHFL entertainment, such as SHFL's i-Deal[®] or ACE[®].

1. Each player makes a wager as indicated below, according to posted table limits:
 - To play against the dealer by placing an ANTE wager on the ANTE spot.
 - To play the hand value against the payable by placing a PAIR PLUS wager on the PAIR PLUS spot.
 - To play against the dealer and the payable by placing the ANTE wager on the ANTE spot and a PAIR PLUS wager on the PAIR PLUS spot.
 - At the casino's discretion, a player may place wagers at two adjacent betting positions during a round of play.
2. The dealer shall announce "No more bets" prior to the dealer dispensing any stacks of cards. Verbally acknowledge those players who have not made the PAIR PLUS wager. (Example: "No PAIR PLUS, position 2, 3 and 5.")
3. Each player and the dealer receive three cards face down. Cards are delivered face down to the player from the dealer's left to right in rotation. To enhance game security, do not expose the bottom card.
4. After examining his or her cards, the player has the option to either make a PLAY wager in the amount EQUAL to the player's ANTE wager, or forfeit the ANTE wager by folding. If a player has placed an ANTE wager and a PAIR PLUS wager but does not make a PLAY wager, the player forfeits both the ANTE wager and the PAIR PLUS wager.
5. After each player has either placed a PLAY wager on the PLAY spot or folded, the dealer collects all forfeited wagers and cards.
6. The dealer will arrange his hand from highest card value to the lowest, and announce, "Dealer doesn't play" or "Dealer plays with a Queen."
7. The dealer will then reconcile the hands of those players who have not folded. Starting with the player on the dealer's right, bring the player's hand into the "work area" between the dealer's hand and the PAIR PLUS wager and reveal the player's cards. The dealer will pay and/or take from the back forwards, reconciling the PLAY wager first, the ANTE BONUS second, the ANTE wager third and the PAIR PLUS wager last. The dealer will lay and pay, or pick and pay, depending on casino procedures. At the casino's discretion, the dealers can resolve the bets in the order the casino wishes.

Irregularities in Dealing Procedures

1. Incorrect number of cards in player's/dealer's hand.

If any player or the dealer is dealt an incorrect number of cards, all hands are void and the cards reshuffled.

2. Card shuffler malfunction.

1. Refer to the trouble shooting guide on the back of the shuffler, or;
2. If the shuffler has continually malfunctioned, replace it as follows:
 1. Turn off the shuffler.
 2. Unplug the power cord.
 3. Replace the shuffler with the backup shuffler.
 4. Plug in the power cord and the data cable.
 5. Turn the shuffler on.
 6. CALL SHFL entertainment to service the shuffler.
 7. Resume play.

OR

3. Follow specific procedures approved by your local regulatory body.

Exceptions

In many jurisdictions, the ANTE wager is mandatory. (For Example: Louisiana and certain California casinos.)

In these cases, the player must make the ANTE wager to play against the dealer's hand, and may make the PAIR PLUS wager to bet on the outcome of his or her hand against a posted PAIR PLUS pay table.

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

Three Card Poker
Paytable Summary

| Paytable Designator Description | TCP-01 A/A | | TCP-02 A/B | | TCP-03 B/A | | TCP-04 B/B | |
|------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|
| | Ante A Ante Bonus Paytable | Pair Plus A Pair Plus Paytable | Ante A Ante Bonus Paytable | Pair Plus B Pair Plus Paytable | Ante B Ante Bonus Paytable | Pair Plus A Pair Plus Paytable | Ante B Ante Bonus Paytable | Pair Plus B Pair Plus Paytable |
| OUTCOME | | | | | | | | |
| Straight Flush | 5 | 40 | 5 | 40 | 5 | 40 | 5 | 40 |
| Three of a Kind | 4 | 30 | 4 | 25 | 3 | 30 | 3 | 25 |
| Straight Flush | 1 | 6 | 1 | 6 | 1 | 6 | 1 | 6 |
| Flush | | 4 | | 4 | | 4 | | 4 |
| Pair | | 1 | | 1 | | 1 | | 1 |
| Par per Ante | 3.37% | | 3.37% | | 3.61% | | 3.61% | |

| Paytable Designator Description | TCP-05 C/A | | TCP-06 C/B | | TCP-07 A/C | | TCP-08 B/C | |
|------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|
| | Ante C Ante Bonus Paytable | Pair Plus A Pair Plus Paytable | Ante C Ante Bonus Paytable | Pair Plus B Pair Plus Paytable | Ante A Ante Bonus Paytable | Pair Plus C Pair Plus Paytable | Ante B Ante Bonus Paytable | Pair Plus C Pair Plus Paytable |
| OUTCOME | | | | | | | | |
| Straight Flush | 4 | 40 | 4 | 40 | 5 | 40 | 5 | 40 |
| Three of a Kind | 3 | 30 | 3 | 25 | 4 | 30 | 3 | 30 |
| Straight Flush | 1 | 6 | 1 | 6 | 1 | 5 | 1 | 5 |
| Flush | | 4 | | 4 | | 4 | | 4 |
| Pair | | 1 | | 1 | | 1 | | 1 |
| Par per Ante | 3.83% | | 3.83% | | 3.37% | | 3.61% | |

| Paytable Designator Description | TCP-09 C/C | | TCP-10 A/D | | TCP-11 B/D | | TCP-12 C/D | |
|------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|----------------------------------|--------------------------------------|
| | Ante C Ante Bonus Paytable | Pair Plus C Pair Plus Paytable | Ante A Ante Bonus Paytable | Pair Plus D Pair Plus Paytable | Ante B Ante Bonus Paytable | Pair Plus D Pair Plus Paytable | Ante C Ante Bonus Paytable | Pair Plus D Pair Plus Paytable |
| OUTCOME | | | | | | | | |
| Straight Flush | 4 | 40 | 5 | 40 | 5 | 40 | 4 | 40 |
| Three of a Kind | 3 | 30 | 4 | 30 | 3 | 30 | 3 | 30 |
| Straight Flush | 1 | 5 | 1 | 6 | 1 | 6 | 1 | 6 |
| Flush | | 4 | | 3 | | 3 | | 3 |
| Pair | | 1 | | 1 | | 1 | | 1 |
| Par per Ante | 3.83% | | 3.37% | | 3.61% | | 3.83% | |



RULES OF PLAY:

1. Three Card Poker Bonus features an optional bonus bet.
2. The bet considers the best hand possible among each individual player's cards.
3. Paytables (with Envy Bonuses) offered are shown below:

| Hand | TCPB-03E | TCPB-04E | Envy (both paytables) |
|-----------------|------------|------------|-----------------------------|
| AKQ Spades | 4,000 to 1 | 3,000 to 1 | \$100 |
| AKQ Suited | 1,000 to 1 | 1,000 to 1 | \$25 |
| Straight Flush | 100 to 1 | 50 to 1 | \$5 |
| Three of a Kind | 75 to 1 | 40 to 1 | |
| Straight | n/a | 6 to 1 | |
| House advantage | 19.59% | 19.50% | |
| Hit frequency | 0.45% | 3.71% | |

4. Paytables (with no Envy Bonuses) offered are shown below:

| Hand | TCPB-01 | TCPB-02 |
|-----------------|------------|------------|
| AKQ Spades | 4,000 to 1 | 4,000 to 1 |
| AKQ Suited | 1,000 to 1 | 1,000 to 1 |
| Straight Flush | 125 to 1 | 60 to 1 |
| Three of a Kind | 100 to 1 | 40 to 1 |
| Straight | n/a | 7 to 1 |
| House advantage | 19.46% | 20.45% |
| Hit frequency | 0.45% | 3.71% |

5. SHFL entertainment recommends a \$1 bonus wager.

6. To begin each round, players must make their standard wagers and, if they like, the bonus wager.
7. The dealer will place an “Envy” lammer next to each player’s bonus bet.
8. The dealer then follows house procedures for dealing the regular game.
9. Bonus payouts:
 - a. If the player’s hand qualifies for bonus payouts, the dealer pays him according to the posted payable. If the player’s hand doesn’t qualify for payouts, the dealer removes the cards. The Envy button will remain at the player’s position until all bonus bets are reconciled.
10. Envy Bonuses (as applicable):
 - a. If a player’s hand triggers an Envy payout, the dealer will leave it face-up on the layout; otherwise, the dealer will lock up the cards. The dealer will then move on to the next player.
 - b. The dealer pays any Envy Bonuses at the end of the round. If at least one player has a straight flush or higher, all players that made the bonus bet win. See appropriate payable for Envy Bonus payouts.
 - c. **A player cannot win Envy Bonuses for his own hand or the dealer’s hand.**
 - d. If more than one Envy Bonus hand occurs during a single round, players that made the bet receive multiple Envy payouts.

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

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