



STATE OF WASHINGTON
GAMBLING COMMISSION

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

May 2, 2012

John Coonan
Gow Zip Gow LLC
325 Broadway
Cle Elum, WA 98922

RE: Gow Z Gow

Dear Mr. Coonan,

We have reviewed the changes made to Gow Z Gow. Based on our review of the documentation we received from Gow Zip Gow LLC, 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 "Gow Z Gow Rules of Play" you provided on April 24, 2012, which is enclosed.

Commercial Card Rooms

- 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

- 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.

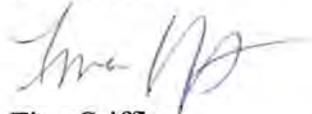


Mr. Coonan
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Any modifications to this game may affect this approval. If you have any questions on commercial implementation, please contact Jess Lohse at (425) 277-7017. If you have any questions on Tribal implementation, please contact Kelly Main at (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

Description and Rules of GowZGow including Example of House Rules

PART 1 – DESCRIPTION AND RULES

GowZGow is a table game that is similar to Baccarat. The game is dealt from a 6 or 8 deck shoe and can be played by up to seven players against a House Dealer.

The object of the game is simply to have a higher total than the Dealer's, closest to nine, with the following exception: the highest hand in **GowZGow** is two nines dealt on the first two cards. The cards from 2 to 9 are worth their face value. Aces count as one, and Tens, Jacks, Queens, and Kings count as zero. The count total of the hands shall be constituted by the single digit total from 0 to 9. If the cards total two digits, the count is the right digit only. Whoever has the higher total wins the hand, subject to the exception noted above.

Wagering Limits

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

Pass Line Wager

Prior to any cards being dealt for any round of play, each player at the table shall make a "Pass Line" wager. Starting with the first player to the Dealer's left and going clockwise, the Dealer shall deal each player two cards face up. He also deals himself two cards, one of which is turned face up and one of which is face down (the "hole" card). Again in clockwise order from the Dealer's left, the Dealer will announce the player's two card total and ask each player how he would like to play his hand. The player has the option to draw one more card or to stand.

Once all the players have acted on their hands, the Dealer will turn over his hole card and announce his total. If the Dealer's first two card total is 5 or more, he must stand. If the Dealer's first two card total is less than 5, he must draw one more card and announce his new total. The Dealer then compares his hand with each player's hand and either collects the losing bet or pays the winning hand. A winning Pass Line wager is paid even money less a 5% commission. The House may establish conditions under which the House may waive the commission, subject to regulatory approval. When the player's first two cards are a pair of 9s, the player will win his Pass Line wager unless the Dealer's first two cards are also a pair of 9s, in which case it's a push. Should the player's final total equal the Dealer's final total, then this hand becomes a push and no money is exchanged.

Bonus Bet Wager

The Player also has the option to make a Bonus Bet wager along with the Pass Line wager. This Bonus Bet wager cannot exceed the Pass Line wager. The Bonus Bet wager uses the same hand used to determine the Pass Line wager results, with the following exception. If a Player's first two cards are a pair of nines, the Player will receive an automatic third card which shall not be counted in the hand value to determine the outcome of the Pass Line wager but which shall be used to determine the outcome of the Bonus Bet wager. When a Player receives an automatic

third card, if the third card is anything other than a nine, the Player will receive a Bonus on his first two cards. If the third card is a nine, the Player will receive a bonus on the three card hand, but not on the two card hand.

Bonus Bet

The Bonus Bet wager is considered a secondary bet. The outcome of the Dealer's hand has no impact on the outcome of the Bonus Bet wager. All Bonus Bet wagers must be placed before the Dealer begins to deal the cards for the hand. Before dealing the hand, the Dealer will place an Envy Button on all Bonus Bet wagers of \$5 or more. This will qualify the Player for any Envy Bonuses they are entitled to receive.

- **NOTE: All Envy Bonus payouts are a set payout regardless of the amount of the Bonus Bet wager.**
- **The Player that is dealt the qualifying hand does not receive an Envy Bonus payout.**
- **Players are not awarded Envy Bonus payouts based off of the House Hand.**
- **An Aggregate Payout can be applied to Bonus wager pay table in accordance with regulatory rules.**

The House may choose from the following Bonus wager paytables:

Bonus Bet Wager Pay Tables

Event	A-1	A-2	B-1	B-2	C-1
Winning Hand	Pay (to 1)				
3 Suited Nines	2000	1000	2000	1000	1000
3 Nines of the Same Color	200	200	200	200	200
3 Nines	100	100	100	100	100
2 Suited Nines	30	30	25	25	25
2 Nines of the Same Color	15	15	12	12	10
2 Nines	8	8	6	6	5
Natural Nine	4	4	4	4	4
1 Nine	2	2	2	2	2

Envy Bonus

If a Player's Bonus Bet wager is \$5 or more, the Player will qualify for an Envy Bonus. The Envy Bonus is paid to a qualifying Player if any hand, other than his/her own hand or the Dealer's hand, results in two nines or triple nines as shown below. Only the highest Envy Bonus winner is paid when a Player's hand has more than one winning hand combination. For example, if a Player is dealt 3 nines of the same color, then the Bonus Bet wager participants will

receive an Envy Bonus of \$100 instead of the Envy Bonus paid for 3 nines or 2 nines of the same color.

In each round all qualified Bonus Bet wager hands will result in the Envy Bonus being paid to all qualified Bonus Bet wager participants. For example, suppose that two Players have a qualified Envy Bonus hand, one being 3 nines of the same color and one being 2 suited nines. Both \$100 and \$5 will be paid to other qualified Bonus Bet wager participants.

The Envy Bonus Pay Table follows:

Envy Bonus Pay Table

Winning Hand	Envy Bonus
3 Suited Nines	\$500
3 Nines of the Same Color	\$100
3 Nines	\$50
2 Suited Nines	\$5

Note that, as an alternative rule, the House may choose to only award the highest value Envy Bonus when multiple Envy Bonuses would otherwise be triggered, upon regulatory approval.

PART 2 – EXAMPLE OF HOUSE RULES

Number of Hands

Players may play more than one hand according to the House Rules. One example of those House Rules follows:

- a. Players may play multiple spots in addition to their primary wager on the condition that the additional spots are in consecutive order to the primary wager.
- b. Two hands (on each hand) – twice (2X) the table minimum. If on a five-dollar game, both bets must be at least \$10.00 each.
- c. For three or more hands (on each hand) – five times (5X) the table minimum. If on a five-dollar game, each bet will be a minimum of \$25.00 each.
- d. Players may play as many spots as are available on the table.

Prohibition of Side Betting

Side betting is prohibited between Players and between Player(s) and the House.

Irregularities – Notify Floor Supervisor Immediately

- a. A card found turned face upwards in the shoe will not be used in the game and will be placed in the Discard Rack.
- b. A card drawn in error without its face being exposed will be used as though it were the next card from the shoe.
- c. After the initial two cards are dealt to each Player and a card is drawn in error and exposed it will be burned. Any Players who are still involved in the hand will be given the option of backing out of the hand.
- d. If the Dealer misses dealing him/herself the first or second card, the Dealer will continue dealing the first two cards to each Player, and then deal the appropriate number of cards to him/herself.
- e. If there are insufficient cards remaining in the shoe to complete a round of play, all the cards in the Discard Rack will be reshuffled and cut according to the procedures outlined, the first card will be drawn face downwards and burned, and the Dealer will complete the round of play.
- f. If no cards are dealt to the Player's hand, the hand is dead and the Player will be included in the next deal. If only one card is dealt to the Player's hand, at the Player's option, the

Dealer will deal a second card to the Player after all other Players have received a second card or call the Player's hand dead and return Player's original wager.

- g. If after receiving the first two cards and the Dealer fails to deal an additional card(s) to a Player who has requested such card, then, at the Player's option, the Dealer will either deal the additional card(s) after all other Players have received their additional cards but prior to the Dealer revealing his/her hole card, or call the Player's hand dead and return the Player's original wager.

Each House may establish their own rules regarding irregularities upon proper regulatory approval. The foregoing rules are an example of what those rules might look like.

DEALER PAYS
100% OF THE BET

GOW Z GOW

DEALER FIRST TWO CARD TOTAL 4 OR LESS - DEALER MUST TAKE A CARD

99 BONUS

GOW Z GOW

BONUS BET PAY TABLE

Hand	Pay
Two Aces	100
Two Kings	100
Two Queens	100
Two Jacks	100
Two 10s	100
Two 9s	100
Two 8s	100
Two 7s	100
Two 6s	100
Two 5s	100
Two 4s	100
Two 3s	100
Two 2s	100
Two Aces & King	100
Two Aces & Queen	100
Two Aces & Jack	100
Two Aces & 10	100
Two Aces & 9	100
Two Aces & 8	100
Two Aces & 7	100
Two Aces & 6	100
Two Aces & 5	100
Two Aces & 4	100
Two Aces & 3	100
Two Aces & 2	100
Two Kings & Queen	100
Two Kings & Jack	100
Two Kings & 10	100
Two Kings & 9	100
Two Kings & 8	100
Two Kings & 7	100
Two Kings & 6	100
Two Kings & 5	100
Two Kings & 4	100
Two Kings & 3	100
Two Kings & 2	100
Two Queens & Jack	100
Two Queens & 10	100
Two Queens & 9	100
Two Queens & 8	100
Two Queens & 7	100
Two Queens & 6	100
Two Queens & 5	100
Two Queens & 4	100
Two Queens & 3	100
Two Queens & 2	100
Two Jacks & 10	100
Two Jacks & 9	100
Two Jacks & 8	100
Two Jacks & 7	100
Two Jacks & 6	100
Two Jacks & 5	100
Two Jacks & 4	100
Two Jacks & 3	100
Two Jacks & 2	100
Two 10s & 9	100
Two 10s & 8	100
Two 10s & 7	100
Two 10s & 6	100
Two 10s & 5	100
Two 10s & 4	100
Two 10s & 3	100
Two 10s & 2	100
Two 9s & 8	100
Two 9s & 7	100
Two 9s & 6	100
Two 9s & 5	100
Two 9s & 4	100
Two 9s & 3	100
Two 9s & 2	100
Two 8s & 7	100
Two 8s & 6	100
Two 8s & 5	100
Two 8s & 4	100
Two 8s & 3	100
Two 8s & 2	100
Two 7s & 6	100
Two 7s & 5	100
Two 7s & 4	100
Two 7s & 3	100
Two 7s & 2	100
Two 6s & 5	100
Two 6s & 4	100
Two 6s & 3	100
Two 6s & 2	100
Two 5s & 4	100
Two 5s & 3	100
Two 5s & 2	100
Two 4s & 3	100
Two 4s & 2	100
Two 3s & 2	100