



STATE OF WASHINGTON  
GAMBLING COMMISSION

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

June 11, 2020

Allen Walensky  
Galaxy Gaming, Inc.  
6767 Spencer Dr.  
Las Vegas, NV 89119

RE: Emperor's Challenge Exposed, Submission #3008

Dear Mr. Weiss,

Thank you for requesting approval to market the card game "Emperor's Challenge Exposed" 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:

The game shall be played and operated under the terms and conditions set forth under the "Emperor's Challenge Exposed" rules of play you provided and are 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.

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- 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.

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 Brian Lane at (509) 387-7095. 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, Regulation and Enforcement Division

Enclosure

cc: Jim Nicks, Special Agent in Charge, Regulation Unit  
Cathy Harvey, Special Agent in Charge, Tribal Gaming Unit  
Kelly Main, Special Agent Supervisor, Tribal Gaming Unit  
Jess Lohse, Special Agent, Regulation Unit  
Brian Lane, Special Agent, Regulation Unit  
File



## Rules of Play



**GALAXY GAMING**

**DISTINCTIVELY DIFFERENT**

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## Game Description

*Emperor's Challenge Exposed Pai Gow Poker* ("*Emperor's Challenge Exposed*") is a commission-free, house-banked Pai Gow Poker-based game using a standard 52-card deck and a Joker. The object of the game is for the player to beat the dealer in both their two-card low hand and their five-card high hand. All rules pertaining to standard Pai Gow Poker, stated in the approved rules of play posted on the WSGC website under "Authorized Games", remain the same and are not altered in this game, with the exception of commission-free options and face up dealing procedures. *Emperor's Challenge Exposed* contains optional bonus wagers that are not dependent on the base game's outcome.

Casino operators choose which bonus wagers they will offer, subject to the limitations and definitions in WAC 230-15-040, WAC 230-15-140 and any restrictions contained within these Rules of Play. Operators cannot offer more than four "separate games" with a single hand of cards and no more than three of the "separate games" may offer a wager that exceeds five dollars each. Card room operators are required to post the four wagering-spot restriction on the layout or a placard placed on the table. Each bonus wager may be made at the player's option and there is no effect on the primary game and no changes in player strategy. Minimum and maximum wagering limits are established by the casino operator in accordance with the limits set in WAC 230-15-040, WAC 230-15-140, or their specific regulatory body.

## Rules of Play

1. To begin, each player must make an *Emperor's Challenge Exposed Pai Gow* wager. Each player may also place optional *Emperor's Treasure*, *Pai Gow Insurance*, and/or *Jackpot* wagers.
2. Each player and the dealer receive seven cards, with the dealer's cards being dealt face up (exposed) and the player's cards dealt face down.
3. The dealer sets their five-card high and two-card low hands according to the House Way.
4. Each player must then set a two-card low hand and a five-card high hand and place each hand in their designated areas. The ranking of the five-card hand must be higher than the two-card hand. If not, the hand is a foul and settled in accordance with house procedure.
5. The dealer examines each player's hand and settles the base game wager as follows:
  - a. **Commission-Free Option #1:** If the dealer has a King-high Pai Gow or less, all player base-game wagers automatically push\*.
  - b. If *both* the player's low-hand and high-hand *are greater* than the dealer's hands, the player's wager is paid 1 to 1.
  - c. If *one* of the player's hands *is greater* than the dealer's corresponding hand, the player's wager is a push.
  - d. If *both* the player's hands *are less* than both the dealer's hands, the player's wager loses.

*\*Alternative Commission-Free Options (Operators choose which one of the three options to offer)*

- **Commission-Free Option #2:** If the dealer has an Ace-high Pai Gow, all player base-game wagers push.
  - **Commission-Free Option #3:** If *both* the player's low-hand and high-hand *are greater* than the dealer's hands **and** the dealer has any Pai Gow, the player's wager is paid 1 to 2.
6. The dealer reconciles all optional wagers and pays according to the corresponding paytables identified in Appendices A through C.

## Optional Bonus Wagers

### *Pai Gow Insurance (felt)*

The player wins their *Pai Gow Insurance* wager if their seven-card hand is a Pai Gow (does not contain a pair or better). The Ace is always considered high and the joker is always considered an Ace. The wager is paid according to the payable (Appendix A).

Alternatively, an operator can choose to offer the following variation: The player may choose, in advance, to use the dealer's seven-card hand. For the player to win, the dealer's hand must have a Pai Gow and the player's hand must be greater than or equal to the dealer's hand. Should the player's hand not be greater than or equal to the dealer's Pai Gow hand, the player will not receive a payout and the *Pai Gow Insurance* wager will result in a push. If the dealer's hand does not consist of a Pai Gow, the result is a loss.

### *Emperor's Treasure (felt)*

A player wins their *Emperor's Treasure* wager if their seven-card hand achieves a triggering event displayed on the corresponding payable (Appendix B). *Emperor's Treasure* may incorporate a bonus feature called *Envy Bonus*.

#### *Envy Bonus*

To qualify for an *Envy Bonus* prize, the player must place an *Emperor's Treasure* wager of \$5 or more per hand. A player's hand is awarded an *Envy Bonus* prize when another player's hand, at the same table, achieves a triggering event listed on the corresponding Emperor's Treasure payable. A player may be permitted to play more than one hand. If a player is playing more than one hand, then one of their hands may be used as the winning triggering event for the other hand. The player's hand that achieves the *Emperor's Treasure* trigger event is not awarded both an *Emperor's Treasure* prize and an *Envy Bonus*. This hand is only awarded the *Emperor's Treasure* prize.

## **Bonus Jackpots or Progressive Jackpots (Operators may use only one Jackpot configuration)**

### *Emperor's Treasure Jackpot (Available for use on Bonus or Progressive Jackpots)*

A player wins their *Emperor's Treasure Jackpot* wager if their seven-card hand achieves a triggering event displayed on the corresponding payable (Appendix C).

### *Pai Gow Insurance Jackpot (Available for use on Bonus or Progressive Jackpots)*

A player wins their *Pai Gow Insurance Jackpot* if their seven-card hand achieves a triggering event displayed on the corresponding payable (Appendix C).

### **Bonus and Progressive Jackpot Definitions**

If operated as a **Bonus Jackpot**, the table display does not increment after each wager is placed. All Bonus Jackpot displays 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."

If operated as a **Progressive Jackpot**, the table display should increment after each wager is placed. Casino operators must follow the rules contained in 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.

The operator's internal controls must define how the Jackpots are configured and how they are won and if operated as a bonus or a progressive game.

### **Equipment**

This game will use the Galaxy Gaming owned Andromeda Bonus Jackpot System Series 3d or higher. Jackpot meter displays will not contain additional intelligence or functionality, including but not limited to network capability, wired or wireless.

### **Gambling Promotions**

A gambling promotion may be added to any of the bonus wagers at the discretion of the casino operator and with the written consent of Galaxy Gaming.

## Appendix A

### *Pai Gow Insurance (felt) Paytables*

Triggering Event	PT-FLT- EC-PGI-01	PT-FLT- EC-PGI-02	PT-FLT- EC-PGI-03	PT-FLT- EC-PGI-04	PT-FLT- EC-PGI-05
<b>9-High Pai Gow</b>	400	250	100	100	100
<b>10-High Pai Gow</b>	40	75	50	25	25
<b>Jack-High Pai Gow</b>	20	25	25	15	15
<b>Queen-High Pai Gow</b>	5	5	10	6	7
<b>King-High Pai Gow</b>	3	3	5	5	5
<b>Ace-High Pai Gow</b>	2	2	1	3	3

**Notes:**

1. All pays are “to 1.”
2. Casino operators may post a maximum aggregate amount payable per round or per hand.

## Appendix B

### *Emperor's Treasure (felt) Paytables*

Triggering Event	PT-FLT-EC-ET-E01		PT-FLT-EC-ET-E02		PT-FLT-EC-ET-E03	
	Pays	Envy	Pays	Envy	Pays	Envy
7-Card Straight Flush (No Joker)	5,000	\$1,000	8,000	\$5,000	5,000	\$3,000
Royal Flush w/ A-K Suited	1,000	\$250	2,000	\$1,000	2,000	\$1,000
7-Card Straight Flush w/ Joker	750	\$100	1,000	\$500	1,000	\$500
5 Aces	250	\$50	400	\$250	400	\$250
Royal Flush	100	\$25	150	\$50	150	\$50
Straight Flush	50	\$10	50	\$20	50	\$20
4-of-a-Kind	20	\$5	25	\$5	25	\$5
Full House	5	-	5	-	5	-
Flush	4	-	4	-	4	-
3-of-a-Kind	3	-	3	-	3	-
Straight	2	-	2	-	2	-
3 Pair	Push	-	-	-	-	-

Triggering Event	PT-FLT-EC-ET-E04		PT-FLT-EC-ET-E09		PT-FLT-EC-ET-E06	
	Pays	Envy	Pays	Envy	Pays	Envy
7-Card Straight Flush (No Joker)	2,500	\$1,000	5,000	\$2,500	5,000	\$2,500
Royal Flush w/ A-K Suited	1,000	\$750	1,000	\$500	2,000	\$500
7-Card Straight Flush w/ Joker	750	\$250	500	\$250	1,000	\$250
5 Aces	250	\$100	300	\$150	400	\$150
Royal Flush	125	\$50	110	\$55	150	\$55
Straight Flush	50	\$20	45	\$25	50	\$25
4-of-a-Kind	25	\$5	25	\$6	25	\$6
Full House	5	-	5	-	5	-
Flush	4	-	4	-	4	-
3-of-a-Kind	3	-	3	-	3	-
Straight	2	-	2	-	2	-
3 Pair	-	-	-	-	-	-

**Notes:**

1. All pays are “to 1” except for the *Envy Bonus*, which is a fixed payout.
2. Only the highest qualifying hand is paid. For example, if five of the player’s cards comprise a Royal Flush and the remaining cards are an Ace and a King of the same suit, the hand is paid as “Royal Flush w/ A–K Suited” only. They do not also receive payment for a “Royal Flush.”
3. Ace/King Suited combination cannot include the Joker. The five card Royal Flush may include the Joker (an example would be: Joker-K♥Q♥J♥10♥-A♠K♠).
4. Casino operators may post a maximum aggregate amount payable per round or per hand.

## Appendix C

### *Bonus Jackpot or Progressive Jackpot Paytables*

*Emperor's Treasure Jackpot (Available for use on Bonus or Progressive Jackpots)*

A player wins their *Emperor's Treasure Jackpot* if their seven-card hand achieves a pre-determined triggering event displayed on the corresponding payable.

Triggering Event	PT-BJS-EC-ET-05
<b>7-Card Straight Flush (No Joker)</b>	100%
<b>Royal Flush w/ A-K Suited (see Note 3)</b>	100%
<b>7-Card Straight Flush w/ Joker</b>	100%
<b>5 Aces</b>	100%
<b>Royal Flush (No Joker)</b>	100%
<b>Royal Flush</b>	\$325
<b>Straight Flush</b>	\$75
<b>4-of-a-Kind</b>	\$50
<b>3 Pair</b>	\$7
<b>Full House</b>	\$5

Triggering Event	PT-BJS-EC-ET-13	PT-BJS-EC-ET-09	PT-BJS-EC-ET-11	PT-BJS-EC-ET-17	PT-BJS-EC-ET-21
<b>7-Card Straight Flush (No Joker)</b>	100%	100%	100%	100%	100%
<b>Royal Flush w/ A-K Suited (see Note 3)</b>	50%	50%	100%	100%	100%
<b>7-Card Straight Flush w/ Joker</b>	25%	10%	100%	100%	100%
<b>5 Aces</b>	\$2,500	\$2,500	\$2,500	100%	100%
<b>Royal Flush</b>	\$200	\$200	\$200	\$200	\$325
<b>Straight Flush</b>	\$100	\$100	\$100	\$100	\$75
<b>4-of-a-Kind</b>	\$75	\$75	\$75	\$75	\$50
<b>Full House</b>	\$6	\$6	\$6	\$6	\$5

Triggering Event	PT-BJS-EC-ET-12	PT-BJS-EC-ET-10	PT-BJS-EC-ET-22	PT-BJS-EC-ET-14	PT-BJS-EC-ET-19	PT-BJS-EC-ET-16
<b>7-Card Straight Flush (No Joker)</b>	100%	100%	100%	100%	100%	100%
<b>Royal Flush w/ A-K Suited (see Note 3)</b>	50%	50%	50%	50%	50%	100%
<b>7-Card Straight Flush w/ Joker</b>	25%	10%	25%	25%	25%	100%
<b>5 Aces</b>	\$1,500	\$2,500	\$2,500	\$1,500	\$2,500	\$2,500
<b>Royal Flush</b>	\$200	\$200	\$200	\$200	\$200	\$200
<b>Straight Flush</b>	\$80	\$80	\$80	\$80	\$100	\$80
<b>4-of-a-Kind</b>	\$50	\$50	\$50	\$40	\$75	\$50
<b>3 Pair</b>	\$7	\$7	\$7	\$6	\$7	\$7
<b>Full House</b>	\$5	\$5	\$5	\$5	\$5	\$5

**Notes:**

1. All pays are “for 1” when a fixed \$1 wager amount is chosen.
2. Only the highest qualifying hand is paid.
3. The Ace/King Suited combination cannot include the Joker. The five card Royal Flush may include the Joker (for example: Joker-K♥Q♥J♥10♥-A♠K♠).
4. Prizes shown as a percentage mean the player receives that percentage of the corresponding displayed Jackpot. Percentage pays are the only payouts deducted from the jackpot meter.
5. Prizes shown as a dollar amount mean the player receives a fixed dollar amount.
6. All settings and pays, listed in the above paytables, are based off a fixed \$1 wager. The operator may select a different fixed wager amount. If the Jackpot is configured with a different fixed wager amount, pays are multiplied accordingly and displayed on the TableVision image. It is also recommended that seed/reseed values are multiplied accordingly when operating a progressive jackpot.

*Pai Gow Insurance Jackpot (Available for use on Bonus or Progressive Jackpots)*

A player wins their *Pai Gow Insurance Jackpot* if their seven-card hand achieves a pre-determined triggering event displayed on the corresponding payable.

Triggering Event	PT-BJS-EC-PGI-01	PT-BJS-EC-PGI-02	PT-BJS-EC-PGI-03	PT-BJS-EC-PGI-04	PT-BJS-EC-PGI-05
<b>9-High Pai Gow, Same Color</b>	100%	100%	100%	100%	100%
<b>9-High Pai Gow</b>	10%	10%	\$250	\$500	\$1,000
<b>10-High Pai Gow</b>	\$125	\$100	\$125	\$125	\$100
<b>Jack-High Pai Gow</b>	\$30	\$25	\$30	\$25	\$25
<b>Queen-High Pai Gow</b>	\$7	\$10	\$7	\$5	\$5

**Notes:**

1. All pays are “for 1” when a fixed \$1 wager amount is chosen.
2. Only the highest qualifying hand is paid.
3. Prizes shown as a percentage mean the player receives that percentage of the corresponding displayed Jackpot. Percentage pays are the only payouts deducted from the jackpot meter.
4. Prizes shown as a dollar amount mean the player receives a fixed dollar amount.
5. All settings and pays, listed in the above paytables, are based off a fixed \$1 wager. The operator may select a different fixed wager amount. If the Jackpot is configured with a different fixed wager amount, pays are multiplied accordingly and displayed on the TableVision image. It is also recommended that seed/reseed values are multiplied accordingly when operating a progressive jackpot.



