STATE OF WASHINGTON
GAMBLING COMMISSION
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April 9, 2019

Bo Zarach
Bally Technologies
6601 S. Bermuda Rd
Las Vegas, NV 89119

RE: Face Up Pai Gow Poker – Reinserting i-Verify - Submission #2189

Dear Ms. Zarach,

We have reviewed the changes made to your "Face Up Pai Gow Poker" game. Based on our review of the documentation we received from Bally Technologies, 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 "Face Up Pai Gow Poker – Rules of Play" you provided which 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 "Face Up Pai Gow Poker – Rules of Play" you provided which are enclosed.
- 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.

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) 886-6231. 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

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

- *Face Up Pai Gow Poker is a variation of the standard game of Pai Gow Poker. Face Up Pai Gow Poker offers the player optional Ace-High, Fortune Bonus and progressive wagers. All rules pertaining to Pai Gow Poker as posted on the WSGC's website remain the same except as noted in the rules of play. Side bets among players are prohibited.*

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

- *Players are limited to wagering on a maximum of four games.*

- *If the below game is to be hand dealt, dealers will shuffle according to house procedures. The dealer then follows the house dealing procedures. If any automatic shuffle machine is used in conjunction with this game, it must be a WSGC approved model, manufactured by a WSGC licensed manufacture.*

- *An optional Bally Gaming LCD Display that can be used on this game is i- Verify v1.0.026 (or higher) when used together with the i-Deal v3.8.084 (or higher).*

- *If the licensee utilizes the optional i-Verify Display together with the i-Deal Shuffler equipment for this game they will need to follow the Washington State requirements for use of this equipment as outlined in the approval letter posted on the WSGC's website.*

RULES OF PLAY

1. *Face Up Pai Gow Poker* is a pai gow poker variant played with a 53 card deck, consisting of a standard 52 card deck and one joker. The joker may either complete a straight, flush, straight flush or act as an ace. It plays like conventional pai gow poker, except in which all the dealer cards are exposed first. If the dealer has exactly an ace-high hand "pai gow," then the hand will automatically result in a push (tie). Player's do NOT pay commission on winning hands. Face Up Pai Gow also offers the optional Fortune Bonus and (if available) the Ace-High bonus wagers.

2. To begin each round, players must make their standard Pai Gow wagers. They may also make the, *Fortune Bonus*, and/or (if available) Ace High bonus.

3. The *Fortune Bonus* bet considers the best hand possible among the player's seven cards and is reconciled against an approved posted paytable. See paytable for odds.

4. Players may bet any amount within table limits; however, a *Fortune Bonus* bet of at least $5 qualifies them for **Envy Bonus** payouts. If a player wagers at least $5 on the *Fortune Bonus*, the dealer must place an "Envy" lammer either on top of the *Fortune Bonus* wager or next to it, depending on jurisdictional rules. Players win the **Envy Bonus** when a player at the table receives a four of a kind or higher, excluding the dealer and his/her own hand.

5. The Ace-High bonus wager (if available) pays if the dealer's seven cards are an Ace High Pai Gow. See paytable for odds.

6. Once all players have made their wagers, the dealer then follows house procedure for pai gow poker.

7. After all packets of cards are dealt, the dealer exposes their seven card and, sets it in accordance to the house way.

8. After the dealer's hand is set, and it's determined their hand doesn't contain an Ace-High pai gow, the players set their seven card hand, and standard pai gow play continues.

9. If the dealer's hand is an ace-high "pai gow," all player main wagers are pushed.

10. While reconciling the standard Pai Gow poker wagers, the dealer also reconciles the *Fortune Bonus* and (if available) Ace High bonus.

    a. If the player's hand qualifies for payouts, the dealer pays the player according to the posted paytable.
        i. Notwithstanding to the payout odds on the approved paytable options and subject to gaming regulations, a casino licensee may establish a maximum aggregate amount that is payable per table limit or player limit. It remains the casino licensee's sole responsibility to post a sign at the table explaining the details and the ramifications of the aggregate win limit. The **Envy Bonus** payout is not an odds based payout and therefor it is not subject to an aggregate limit.
        ii. The dealer leaves the "Envy" lammer, if applicable, next to the player's original wager and payouts. The dealer will not pick up the envy lammer(s) until all wagers have been reconciled.

    b. If the player's hand does not qualify for payouts, the dealer takes the players *Fortune Bonus* wager.
        i. The dealer leaves the "Envy" lammer, if applicable, next to the player's original wager and payouts. The dealer will not pick up the envy lammer(s) until all wagers have been reconciled.

11. The dealer pays all **Envy Bonuses** at the end of the round. If at least one player has a four of a kind or higher, all players with envy lammers win—see paytable**. In the event more than one player has at least four of a kind, then all players with envy lammers win multiple payouts.
    a. A player cannot win the **Envy Bonus** for their own—or the dealer's—hand.

****Casino to select from attached Paytable Options**

Face Up Pai Gow Poker

Ace-High

	1	2	3	4	5
Hand	**Pays**	**Pays**	**Pays**	**Pays**	**Pays**
Dealer and Player Ace-High	20 to 1	40 to 1	30 to 1	25 to 1	40 to 1
Dealer Ace-High w/Joker	10 to 1	15 to 1	15 to 1	10 to 1	12 to 1
Dealer Ace-High No Joker	8 to 1	5 to 1	6 to 1	7 to 1	5 to 1

Fortune Bonus

	1	
Hand	**Pays**	**Envy**
7 Card Straight Flush	5,000 to 1	$1,000
Royal Flush + Royal Match*	1,000 to 1	$250
7 Card Straight Flush w/Joker	750 to 1	$100
5 Aces	250 to 1	$50
Royal Flush	100 to 1	$25
Straight Flush	50 to 1	$10
4 of a Kind	20 to 1	$5
Full House	5 to 1	
Flush	4 to 1	
3 of a Kind	3 to 1	
Straight	2 to 1	
Three Pair	Push	

	2	
Hand	**Pays**	**Envy**
7 Card Straight Flush	8,000 to 1	$5,000
Royal Flush + Royal Match*	2,000 to 1	$1,000
7 Card Straight Flush w/Joker	1,000 to 1	$500
5 Aces	400 to 1	$250
Royal Flush	150 to 1	$50
Straight Flush	50 to 1	$20
4 of a Kind	25 to 1	$5
Full House	5 to 1	
Flush	4 to 1	
3 of a Kind	3 to 1	
Straight	2 to 1	

	3	
Hand	**Pays**	**Envy**
7 Card Straight Flush	5,000 to 1	$3,000
Royal Flush + Royal Match*	2,000 to 1	$1,000
7 Card Straight Flush w/Joker	1,000 to 1	$500
5 Aces	400 to 1	$250
Royal Flush	150 to 1	$50
Straight Flush	50 to 1	$20
4 of a Kind	25 to 1	$5
Full House	5 to 1	
Flush	4 to 1	
3 of a Kind	3 to 1	
Straight	2 to 1	

	4	
Hand	**Pays**	**Envy**
7 Card Straight Flush	2,500 to 1	$1,000
Royal Flush + Royal Match*	1,000 to 1	$750
7 Card Straight Flush w/Joker	750 to 1	$250
5 Aces	250 to 1	$100
Royal Flush	125 to 1	$50
Straight Flush	50 to 1	$20
4 of a Kind	25 to 1	$5
Full House	5 to 1	
Flush	4 to 1	
3 of a Kind	3 to 1	
Straight	2 to 1	

	6	
Hand	**Pays**	**Envy**
7 Card Straight Flush	5,000 to 1	$2,500
Royal Flush + Royal Match*	1,000 to 1	$500
7 Card Straight Flush w/Joker	500 to 1	$250
5 Aces	300 to 1	$150
Royal Flush	110 to 1	$55
Straight Flush	45 to 1	$25
4 of a Kind	25 to 1	$6
Full House	5 to 1	
Flush	4 to 1	
3 of a Kind	3 to 1	
Straight	2 to 1	

	7	
Hand	**Pays**	**Envy**
7 Card Straight Flush	5,000 to 1	$2,500
Royal Flush + Royal Match*	2,000 to 1	$500
7 Card Straight Flush w/Joker	1,000 to 1	$250
5 Aces	400 to 1	$150
Royal Flush	150 to 1	$55
Straight Flush	50 to 1	$25
4 of a Kind	25 to 1	$6
Full House	5 to 1	
Flush	4 to 1	
3 of a Kind	3 to 1	
Straight	2 to 1	

Face up
PAI GOW
POKER
Shuffle
MASTER

ALL HANDS PUSH ON DEALER'S ACE HIGH PAI GOW
Ace High
Hand
Pays
Dealer and Player Ace-High
20 to 1
Dealer Ace-High w/Joker
10 to 1
Dealer Ace-High No Joker
5 to 1
Ace High
Hand
Pays
Dealer and Player Ace-High
20 to 1
Dealer Ace-High w/Joker
10 to 1
Dealer Ace-High No Joker
5 to 1
Ace High
Hand
Pays
Dealer and Player Ace-High
20 to 1
Dealer Ace-High w/Joker
10 to 1
Dealer Ace-High No Joker
5 to 1
Ace High
Hand
Pays
Dealer and Player Ace-High
20 to 1
Dealer Ace-High w/Joker
10 to 1
Dealer Ace-High No Joker
5 to 1
Ace High
Hand
Pays
Dealer and Player Ace-High
20 to 1
Dealer Ace-High w/Joker
10 to 1
Dealer Ace-High No Joker
5 to 1

- *Face Up Pai Gow Poker Progressive is an optional progressive wager. All rules pertaining to standard Pai Gow Poker and approved Pai Gow Poker variation games as posted on the WSGC's website remain the same and are not altered in this game. If linked, the same paytable and the same number of decks must be used between all linked Pai Gow Poker games.*

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

- *This game will use the approved Bally Technology owned progressive system: Nexus Command Game Manager 2 v2.5.4 or higher and a Progressive display. The progressive display can either be provided by Bally or the operator.*

- *The Progressive display should be a table mounted monitor with no additional intelligence or functionality, including but not limited to network capability (wired or wireless). This non-intelligent monitor can either be provided by Bally or the operator so long as it does not introduce any additional functionality.*

- *If the below game is to be hand dealt using a dealing shoe, dealers will shuffle according to house procedures. The dealer then follows the house dealing procedures. The dealer must comply with WAC 230-15-465. If any automatic shuffle machine is used in conjunction with this game, it must be a WSGC approved model, manufactured by a WSGC licensed manufacturer.*

NEXUS COMAND

RULES OF PLAY:

1. Face Up Pai Gow Poker offers an optional progressive wager.

2. The bet considers the best hand possible among all the player's cards.

3. Sample paytables are listed separately.

Note: The joker is used as an Ace in the 5 Aces hand, or as any card to complete a straight flush, straight or flush.

4. The meter will be reseeded when the 100% award hits. The cost of the reseed has been factored in to the casino's mathematical advantage.

5. To begin each round, players must make their regular game's wager. They may optionally place any bonus wagers and the progressive wager. Players must place the progressive wagers on the sensor in front of their betting position. The sensor will light up.

6. Once all players place their bets, the dealer will press "START GAME" on the keypad. The sensors will then light up, indicating a progressive wager. The dealer will then remove all progressive bets from the table.

7. The dealer then follows house procedures for dealing the regular game.

8. The dealer reconciles the standard wager, bonus wager, and progressive wagers at the same time. Follow the procedure in the next section for reconciling percentage pays from the progressive meter.

9. Progressive winners:
    a. The percentage pays are paid from the progressive jackpot shown on the progressive meter.
    b. Other hands are paid from the tray; they do not come off the meter.
    c. In the event more than one progressive meter pay hits during the same round, the dealer will first pay the player farthest on the right and then move counter-clockwise to pay other players. As regulatory procedures permit, this policy can be replaced by casino internal controls.
    d. When a player has a progressive winner, the dealer will select the player spot corresponding to the player with the winning progressive hand. The dealer will then press the appropriate hand button on the display. (If the hand button is pressed by accident, pressing it again will turn it off.)
    e. The dealer shall then contact a supervisor.
    f. Once the casino verifies the progressive win, the supervisor will press the confirm button. To complete the action, a Supervisor or Executive card (depending on jackpot level) swipe is required. This records the win onto the Game Manager computer and adjusts the meter appropriately for the prize won. House procedures are then followed for paying the prize. (Reviewing the monitor connected to the Game Manager will show the prize amount to be paid, and pressing the "money bag" icon will print a win page, which can be used to help record the payout for accounting.)
    g. Once the dealer has reconciled all action, they press "END GAME." This resets the system to begin the next hand.
    h. Once the Supervisor or Executive card (depending on jackpot level) is swiped the prize is logged into Game Manager. If the progressive pay needs to be backed out at this point, the award will need to be manually backed out using the Game Manager manual adjustment feature.

PROGRESSIVE SYSTEMS FLEXIBILITY and RECOMMENDATIONS:

- Progressive meter contribution
    - When using a pay table in which all payouts are deducted from the meter, we recommend utilizing the system to configure meter contribution rates anywhere between 0-100%.
        - Most pay tables with this style of math are designed to grow over time when a contribution rate of 70% or more is used. If less is contributed, the risk of the meter "running dry" increases.
    - When using a pay table in which only the progressive (percentage) pays are deducted from the meter, we recommend only reducing the pre-configured meter contribution rate if any changes are made. Adjusting the contribution rate above the pre-configured value would reduce the mathematical house advantage of the wager.

- Reserve contribution
    - We recommend contributing a small portion of each progressive wager to the reserve. This amount will be added on to any configured seed amount after a 100% award is given, and will help reduce the drop in play expected after a jackpot hits.
    - We do not recommend eliminating a seed amount entirely and using the reserve as the only seed mechanism. All games present a certain likelihood of back-to-back awards, and this method runs the risk of restarting the meter at a very low amount in that case.

- Seed amount
    - We recommend using the pre-configured seed amount in the system. This amount is specific to the pay table selected for use, and is designed to offer a reasonable starting point that works with the pay table's math.
    - If any changes are made, we recommend the seed amount to be at least as large as the largest "fixed" award on the pay table.
    - We do not recommend configuring a $0 seed amount.

Face Up Pai Gow Poker Progressive Paytables
(Paytables to be used on Face Up Pai Gow Poker Progressive Tables Only)

Hand	FUPGPP-WA01*
7 Card Natural Straight Flush	100%
Royal Flush + Royal Match**	50%
7 Card Wild Straight Flush with Joker	25%
5 Aces	2,500 for 1
Royal Flush	200 for 1
Straight Flush	100 for 1
4 of a Kind	75 for 1
Full House	6 for 1
*Original Wager is NOT Returned	
**Royal Match is a Suited King Queen	

Hand	FUPGPP-WA03*
7 Card Straight Flush	100%
5 Aces	10%
Royal Flush	500 for 1
Straight Flush	100 for 1
Four of a Kind	75 for 1
Full House	4 for 1
*Original Wager is NOT Returned	

Hand	FUPGPP-WA07*
5 Aces	100%
Royal Flush	500 for 1
Straight Flush	100 for 1
Four of a Kind	75 for 1
Full House	5 for 1
*Original Wager is NOT Returned	

Hand	FUPGPP-ML02*
7 Card Straight Flush	100% Mega
5 Aces	100% Major
Royal Flush	100% Minor
Straight Flush	100 for 1
Four of a Kind	75 for 1
Full House	4 for 1
*Original Wager is NOT Returned	

Linked Paytables for Face Up Pai Gow Poker Progressive and Fortune Pai Gow Poker Progressive

Paytables

Hand	FUPGPP-WA01 FPGPP-WA01*
7 Card Natural Straight Flush	100%
Royal Flush + Royal Match**	50%
7 Card Wild Straight Flush with Joker	25%
5 Aces	2,500 for 1
Royal Flush	200 for 1
Straight Flush	100 for 1
4 of a Kind	75 for 1
Full House	6 for 1
*Original Wager is NOT Returned	
**Royal Match is a Suited King Queen	

Hand	FUPGPP-03/ FPGPP-WA03*
7 Card Straight Flush	100%
5 Aces	10%
Royal Flush	500 for 1
Straight Flush	100 for 1
Four of a Kind	75 for 1
Full House	4 for 1
*Original Wager is NOT Returned	

Hand	FUPGPP-07/ FPGPP-WA07*
5 Aces	100%
Royal Flush	500 for 1
Straight Flush	100 for 1
Four of a Kind	75 for 1
Full House	5 for 1
*Original Wager is NOT Returned	

Hand	FUPGPP-ML02/ FPGPP-ML2*
7 Card Straight Flush	100% Mega
5 Aces	100% Major
Royal Flush	100% Minor
Straight Flush	100 for 1
Four of a Kind	75 for 1
Full House	4 for 1
*Original Wager is NOT Returned	

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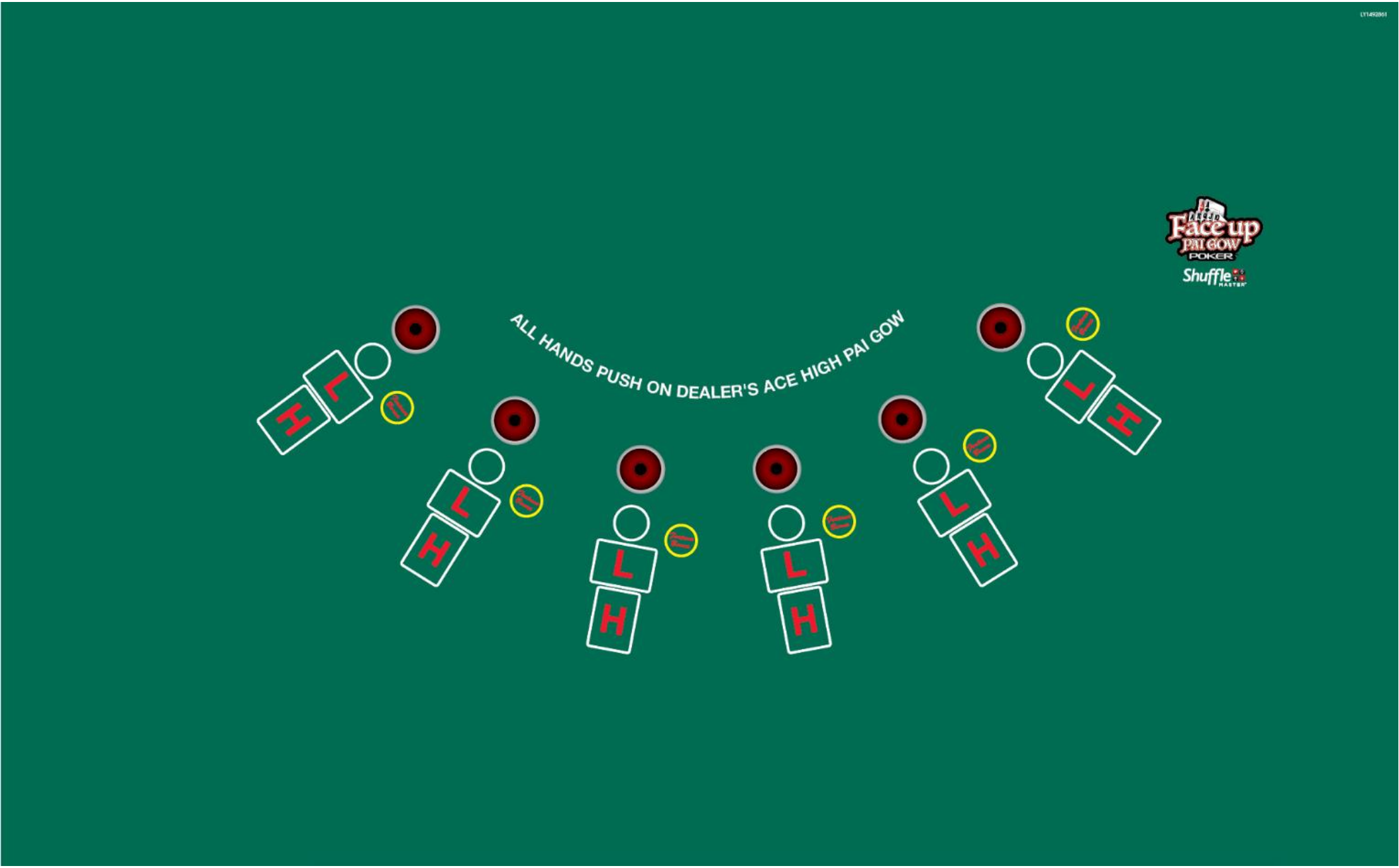
Face up
PAI GOW
POKER
Shuffle
MASTER
ALL HANDS PUSH ON DEALER'S ACE HIGH PAI GOW
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ALL HANDS PUSH ON DEALER'S ACE HIGH PAI GOW

Ace High

Hand	Pays
Dealer and Player Ace-High	20 to 1
Dealer Ace-High w/Joker	10 to 1
Dealer Ace-High No Joker	5 to 1

Ace High

Hand	Pays
Dealer and Player Ace-High	20 to 1
Dealer Ace-High w/Joker	10 to 1
Dealer Ace-High No Joker	5 to 1

Ace High

Hand	Pays
Dealer and Player Ace-High	20 to 1
Dealer Ace-High w/Joker	10 to 1
Dealer Ace-High No Joker	5 to 1

Ace High

Hand	Pays
Dealer and Player Ace-High	20 to 1
Dealer Ace-High w/Joker	10 to 1
Dealer Ace-High No Joker	5 to 1

Ace High

Hand	Pays
Dealer and Player Ace-High	20 to 1
Dealer Ace-High w/Joker	10 to 1
Dealer Ace-High No Joker	5 to 1