



STATE OF WASHINGTON
GAMBLING COMMISSION

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

June 15, 2020

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

Dear Mr. Walensky,

This is an update to the letter dated June 12, 2020.

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

- Cajun Stud
- Four Card Stud
- Heads Up Hold'em
- High Card Flush
- Three Card Prime

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

Prior to implementing face-up dealing, licensees should

- 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.

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,

Tina Griffin
Assistant Director
Licensing, Regulation, and Enforcement Division



STATE OF WASHINGTON
GAMBLING COMMISSION

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

April 23, 2015

Nina Rieger
Galaxy Gaming Inc.
6767 Spencer St.
Las Vegas, NV 89119

RE: Four Card Stud

Dear Ms. Rieger,

Thank you for requesting approval to market the card game "Four Card Stud" 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:

Commercial Card Rooms

- The game shall be played and operated under the terms and conditions set forth under the "Four Card Stud – Rules of Play" you provided and 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 "Four Card Stud – Rules of Play" you provided and 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.



Ms. Rieger
April 23, 2015
Page 2 of 2

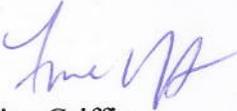
- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and licensed by the Tribe prior to the sale of the equipment.

Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-03-045, related to this game and may be contacting you.

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 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.

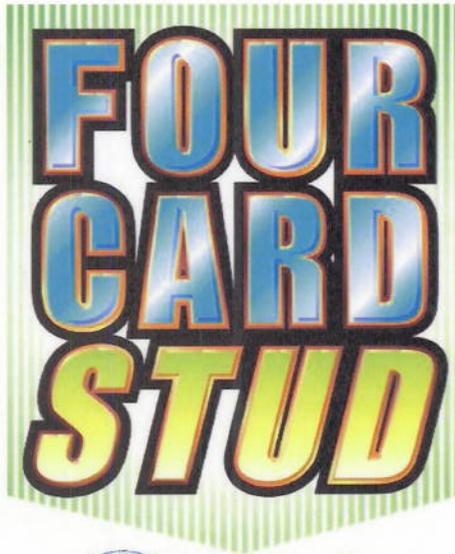
Sincerely,



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



Rules of Play

Washington State



Galaxy Gaming

6767 SPENCER STREET ♦ LAS VEGAS, NEVADA 89119 ♦ (702) 939-3254 ♦ FAX: (702) 939-3255
WWW.GALAXYGAMING.COM

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RULES OF PLAY

Four Card Stud is a house-banked, four card poker based card game played with a standard 52-card deck of playing cards. The object of Four Card Stud is for the player to make a four card hand (player's two hole cards plus two community cards) of a certain level that will receive payment against a payable. Additionally, the Game offers several optional bonus wagers.

Casino operators choose which wagers they will offer and the minimum and maximum wagering limits, subject to the limitations and definitions in WAC 230-15-040¹, WAC 230-15-140 and any other rules or restrictions mandated by the appropriate gaming regulatory agency or as contained within these Rules of Play. On games where there are more than four wagering options for players, the players are limited to wagering on a maximum of four of the options. Card room operators are required to post this four wagering spot restriction on the layout of the game.

Main Game Play

1. The players make a Play wager.
2. The dealer deals each player two cards, and deals two cards to the community board area, which are placed face down.
3. The players review their two cards, and decide whether to wager an equal amount on the first Check or Raise wagering spot, or to check.
4. The dealer then turns over the first community card, which the forms the third card of each player's hand.
5. Players may now either wager an amount equal to their Play wager on the second Check or Raise wagering spot, or check.
6. The dealer turns over the second community card, which forms the fourth and final card of each player's hand.
7. The dealer now examines each player's hand. All players are paid on the Play and Check or Raise wagers based on the four card hand level achieved, according to the paytables in Appendix "A."

¹ - All references to rules contained within the Washington Administrative Code are not applicable to tribal gaming operations.

Bonus Wagers

The game also offers optional Bonus wagers. Casino operators choose which of the Bonus wagers they will offer. The Bonus wagers are:

Two Card Poker

A Two Card Poker wager is made before the start of a round of play. A player wins their Two Card poker wager if their two card starting hand forms a winning hand event according to the paytables in Appendix "B."

Pocket Bonus

A Pocket Bonus wager is made before the start of a round of play. A player wins their Pocket Bonus wager if their starting two card hand forms a winning hand event according to the paytables in Appendix "C."

Three Card Bonus

A Three Card Bonus wager is made before the start of a round of play. A player wins their Three Card Bonus wager if their starting two card hand plus the first card of the two card community board forms a winning hand event according to the paytables in Appendix "D."

Four Card Bonus

A Four Card Bonus wager is made before the start of a round of play. A player wins their Four Card Bonus wager if their starting two card hand plus the two cards of the community board form a winning hand event according to the paytables in Appendix "E."

Any Pair Bonus

An Any Pair Bonus wager is made before the start of a round of play. A player wins their Any Pair Bonus wager if their starting two card hand plus the two cards of the community board form a winning hand event according to the paytables in Appendix "F."

Bonus Jackpots

The Jackpot wagers are made prior to the start of a round of play. The Jackpot systems are optional, and an operator may elect to offer Four Card Stud without the Jackpot systems. There are two jackpot wagers offered:

Royal Flush Jackpot: Players are awarded a Bonus Jackpot prize if they made the corresponding bonus wager and if their four card hand (the player's two cards plus the two card community board) forms a predetermined winning triggering event according to the corresponding paytables in Appendix "G." The top award is triggered by a Royal Flush.

Four Aces Jackpot: Players are awarded a Bonus Jackpot prize if they made the corresponding bonus wager and if their four card hand (the player's two cards plus the two card community board) forms a predetermined winning triggering event according to the corresponding payable in Appendix "H." The Top award is triggered by a final hand composed of Four Aces.

Appendix "A"

Main Wagers (Play, and Check or Raise wagers):

Triggering Event	MW 1	MW 2	MW 3	MW 4	MW 5	MW 6	MW 7
Royal Flush	100	50	50	50	50	100	Bonus
Quads	50	40	30	40	30	50	Bonus
Straight Flush	40	30	20	30	20	40	Bonus
Straight	8	8	8	6	6	8	Bonus
Flush	5	6	6	5	5	4	Bonus
Trips	3	3	3	4	4	3	Bonus
Two pairs	2	2	2	3	3	2	Bonus
Pair of 8's through Aces	1	1	1	1	1	1	Bonus
Pair of 2's through 7's	Push	Push	Push	Push	Push	Push	Bonus
High Cards only	Loss	Loss	Loss	Loss	Loss	Loss	Bonus

Notes:

1. All odds shown above are "to 1."
2. Bonus amounts are at the discretion of the operator.

Appendix "B"
Two Card Poker

Triggering Event	2CP1	2CP2	2CP3	2CP4	2CP5
Two-Card Royal	3	2.5	3	5	Bonus
Straight flush	3	2.5	3	3	Bonus
Pair	2	2	1.5	2	Bonus
Straight	1	1	1	1	Bonus
Flush	1	1	1	1	Bonus

Notes:

1. All odds shown above are "to 1."
2. Uses player's two cards only.
3. The Two Card Poker wager is independent of the main game's result.
4. Bonus amounts are at the discretion of the operator.

Appendix "C"
Pocket Bonus

Triggering Event	PB1	PB2	PB3	PB4
Pair of Aces	30	25	30	Bonus
Ace-Face suited (AK, AQ, AJ suited)	20	20	20	Bonus
Ace-Face offsuit (AK, AQ, AJ offsuit)	10	10	10	Bonus
Pair of Kings or lower pair	5	5	4	Bonus

Notes:

1. All odds shown above are "to 1."
2. Uses player's two cards only.
3. The Pocket Bonus wager is independent of the main game's result.
4. Bonus amounts are at the discretion of the operator.

Appendix "D"
Three Card Bonus

Triggering Event	3CB1	3CB3	3CB4	3CB7
Mini-Royal	50	50	100	Bonus
Straight flush	40	40	40	Bonus
Trips	30	30	30	Bonus
Straight	6	6	6	Bonus
Flush	3	4	3	Bonus
Pair	1	1	1	Bonus
High Cards	Loss	Loss	Loss	Bonus

Notes:

1. All odds shown above are "to 1."
2. Hand is formed from Player's two cards plus one community card, which card is specified by the operator, but must be the same for all games.
3. The Three Card Bonus is independent of the main game's result.
4. Bonus amounts are at the discretion of the operator.

Appendix "E"
Four Card Bonus

Triggering Event	4CB1	4CB2	4CB3	4CB4	4CB5	4CB6	4CB7	4CB8
Royal Flush	300	300	300	300	300	300	300	Bonus
Quads	100	100	100	100	100	100	100	Bonus
Straight flush	50	50	50	50	50	50	50	Bonus
Flush	25	25	25	12	12	15	15	Bonus
Straight	12	12	15	25	25	25	25	Bonus
Trips	10	8	10	10	8	10	8	Bonus
Two pair	5	4	4	5	4	4	4	Bonus
Pair of Jacks-Aces	3	3	3	3	3	3	3	Bonus
Pair or 10's or less	Loss	Bonus						

Notes:

1. All odds shown above are "to 1."
2. Paytables 4CB4 – 4CB7 have the straight at a higher payout than the flush.
3. Uses players' two cards plus the two community board cards.
4. The Four Card Bonus is independent of the main game's result.
5. Bonus amounts are at the discretion of the operator.

Appendix "F"
Any Pair Bonus

Triggering Event	APB1	APB2	APB3	APB4
Royal Flush	300	300	300	Bonus
Quads	100	100	100	Bonus
Straight flush	40	30	40	Bonus
Flush	10	12	10	Bonus
Straight	5	8	8	Bonus
Trips	4	5	5	Bonus
Two pair	3	4	4	Bonus
Pair of Jacks-Aces	2	1	1	Bonus
Pair of 2's through 10's	1	1	1	Bonus
High Cards	Loss	Loss	Loss	Bonus

Notes:

1. All odds shown above are "to 1."
2. Uses players' two hole cards plus the two community board cards.
3. The Any Pair Bonus is independent of the main game's result.
4. Bonus amounts are at the discretion of the operator.

Appendix "G"
Royal Flush Jackpot

Triggering Event	RJP1	RJP2	RJP3	RJP4	RJP5
Royal Flush	100%	100%	100%	100%	Jackpot
Quads	10%	10%	\$500	\$500	Jackpot
Straight flush	\$500	\$300	\$300	\$250	Bonus
Flush	\$25	\$25	\$15	\$20	Bonus
Straight	\$10	\$15	\$12	\$10	Bonus
Trips	\$7	\$7	\$10	\$10	Bonus
Two pair	\$0	\$0	\$6	\$4	Bonus

Notes:

1. All odds shown above are "for 1."
2. Only the highest qualifying hand is paid.
3. The Royal Flush Jackpot is independent of the main game's result.
4. Prizes shown as a percentage means the player receives that percentage of the corresponding displayed Jackpot(s), which is divided equally among all qualifying players.
5. Prizes shown as a dollar amount means the player receives a fixed dollar amount regardless of the amount wagered, provided that, a minimum amount may be required to qualify for certain bonus features.
6. "Bonus" and "Jackpot" amounts are components of a posted, variable jackpot amount. "Jackpot" represents prizes that are a percentage of the amount shown on the meter. "Bonus" amounts represent fixed payouts.
7. When operated as a Daily Bonus Jackpot, the Jackpot Amount is at the discretion of the casino operator. Prizes are set by the casino operator and are required to be displayed at each gaming table. Prizes displayed are considered property of the casino until won by one or more players. Each Bonus Jackpot display 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."
8. When operated as a progressive, rules for jackpot prizes for commercial casino operators are contained within 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.
9. A player's Jackpot wager must be one dollar only.

Appendix "H"
Four Aces Jackpot

Triggering Event	4AJ1	4AJ2	4AJ3	4AJ4	4AJ5
Four Aces	100%	100%	100%	100%	Jackpot
Royal Flush	10%	\$1000	10%	\$1000	Jackpot
Quad Kings or lower	\$500	\$500	\$500	\$500	Bonus
Straight flush	\$100	\$100	\$200	\$200	Bonus
Flush	\$25	\$20	\$15	\$15	Bonus
Straight	\$15	\$15	\$20	\$20	Bonus
Trips	\$7	\$10	\$10	\$10	Bonus

Notes:

1. All odds shown above are "for 1."
2. Only the highest qualifying hand is paid.
3. The Four Aces Jackpot is independent of the main game's result.
4. Prizes shown as a percentage means the player receives that percentage of the corresponding displayed Jackpot(s), which is divided equally among all qualifying players.
5. Prizes shown as a dollar amount means the player receives a fixed dollar amount regardless of the amount wagered, provided that, a minimum amount may be required to qualify for certain bonus features.
6. "Bonus" and "Jackpot" amounts are components of a posted, variable jackpot amount. "Jackpot" represents prizes that are a percentage of the amount shown on the meter. "Bonus" amounts represent fixed payouts.
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9. A player's Jackpot wager must be one dollar only.

Appendix "X" Equipment

Game play is conducted on a table layout and may also include electronic gambling equipment such as bet detection equipment and visual payable and jackpot displays. The rules of play of the game are identical regardless of whether or not electronic gambling equipment is incorporated or which version is used. If the use of equipment changes the dealing procedures for the game, they are reflected in the casino operator's dealing procedures and/or internal controls. Galaxy Gaming's Bonus Jackpot System is approved for this game.

The Bonus Jackpot System is an electronic system comprising of two sub-systems known as the Bet Tabulator System and TableVision. The Bet Tabulator System collects and tabulates the number of wagers placed at a table. Only the total number of wagers are tabulated – the dollar amount of each wager is not determined. One sensor is required for each wager counted. After players have placed their wagers, the dealer pushes a button on the dealer control panel to register all wagers on the table. If a wager is present, it is recorded. If the wager is to be removed prior to game play,² the sensor detecting the wager triggers one or more LED light(s) indicating each wager counted. These LED light(s), which are either on the dealer control pad or directly on the sensor, remain lit during the current round until the dealer presses the button for the next round. The TableVision System is an electronic display system that is used to display jackpot amounts, paytables and other information at the gaming table. Information displayed on this media is controlled by the casino operator. The functionality of collecting wager information and displaying available prizes permits operators to use these products to provide promotions, bonus jackpots or progressive jackpots. In the event the Bonus Jackpot System is not functioning, the casino operator's dealing procedures and/or internal controls determine the methodology used to operate the game during equipment malfunction.

There are various models of the Bonus Jackpot System currently approved in Washington. They are referred to as the Milky Way Series and Andromeda Series – Stage 3c and Stage 3d (aka "Andromeda-3"). Information regarding each of the approved systems follows.

Milky Way

Milky Way's Bet Tabulator System and the TableVision System are used in concert with one another. Milky Way is limited to detecting one wager per player position and up to a total of seven player positions. Small LED lights on the dealer control panel indicate each player position wager counted, and the LED remains lit during the current round. The count of the wagers for each hand is recorded on an electronic non-resettable LCD counter.

² - An example of a wager removal is when the wager amount is predetermined such as a \$1 progressive wager. The dealer records the wager (which is a fixed amount) then collects the wager and deposits it into the chip tray. In this instance, an indicator light is necessary to confirm that the wager was placed.

Milky Way's TableVision System uses an LED display and an LCD photo frame display which are adjustable by casino control. The LED display is changed either by a remote control supplied by the sign's manufacturer or by a computer that is temporarily plugged into the sign to modify the display. The LCD display is an electronic photo frame commonly found on shelves in most retail stores. Images displayed on the LCD electronic photo frame are copied first onto a removable SD storage chip and then inserted into the device.

Andromeda-3

Andromeda-3's Bet Tabulator System is capable of detecting up to six sensors per player position and up to sixteen player positions. The dealer control panel does not have the LED indicator lights as in Milky Way, rather each sensor position uses LED indicator lights, if visible wager detection is required.³

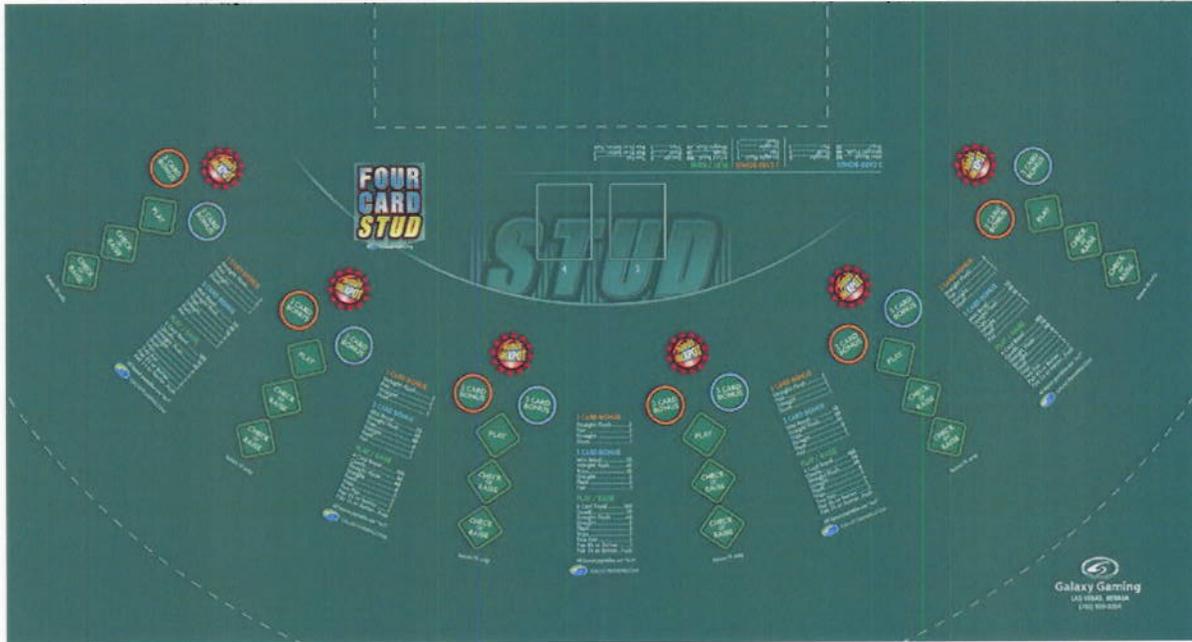
Andromeda-3's TableVision System uses a computer monitor powered by a computer/server located on the casino property. Images for the display are controlled by the casino operator via the computer/server.

Approved versions for use in Washington State are Andromeda-3c and Andromeda-3d.

³ - Visible wager detection is required whenever a wager is removed. For example, if a player places a fixed wager that pays a prize that is "for 1," typically the wager is first recorded then removed by the dealer prior to the start of play. Conversely, if the wager is a variable amount and the prize paid is "to 1," then the wager must remain on the table layout (to determine the prize amount to be paid) and there is no need for a visible indicator.

Appendix "J"

Game Layout



2 CARD BONUS	
Straight Flush	3
Pair	2
Straight	1
Flush	1

3 CARD BONUS	
Mini Royal	50
Straight Flush	40
Trips	30
Straight	6
Flush	3
Pair	1

PLAY / RAISE	
4 Card Royal	100
Quads	50
Straight Flush	40
Straight	8
Flush	5
Trips	3
Two Pair	2
Pair 8's or Better	1
Pair 7's or Better	Push

Raises 1X only

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