



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"*

September 6, 2013

Kenneth Dickinson  
Galaxy Gaming Inc.  
6980 O'Bannon Drive  
Las Vegas, NV 89117

RE: Heads Up Hold 'Em

Dear Mr. Dickinson,

Thank you for requesting approval to market the card game "Heads Up Hold 'Em" 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 "Heads Up Hold 'Em – 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 "Heads Up Hold 'Em – Rules of Play" you provided.
- 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.



Mr. Dickinson  
September 6, 2013  
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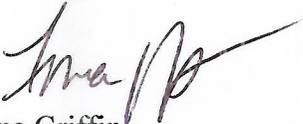
- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and 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.

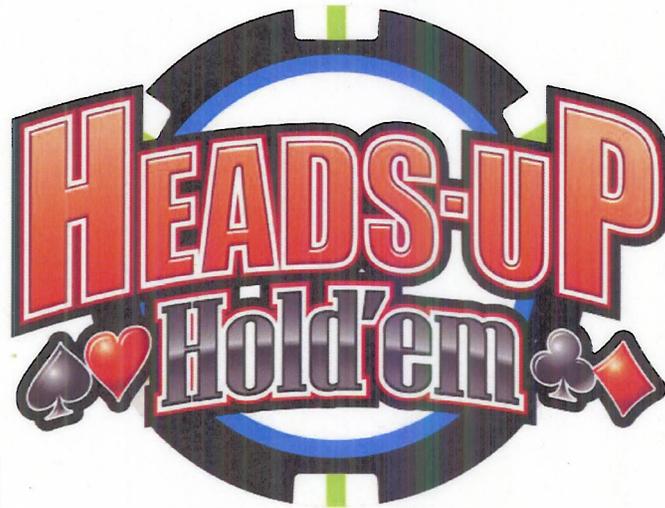
Sincerely,



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**

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[www.galaxygaming.com](http://www.galaxygaming.com)

Galaxy Gaming, Inc. is a publicly owned and traded company. OTC Ticker Symbol : **GLXZ**

## RULES OF PLAY

Heads Up Hold 'em is a house-banked, poker-based card game played with a standard 52-card deck of playing cards. There are multiple wagers that may be made by a player. The object of the Ante, Odds and Play wagers are for the player to have a higher ranked poker hand than the dealer. There are two versions of the game, which are based upon the outcome of the dealer's hand. Each version affects the outcome of the payment of the Ante and Odds wagers. There are also additional proposition wagers, which are won if the player's hand achieves predetermined winning triggering events posted on a paytable.

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<sup>1</sup>, 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

### ***Ante, Odds, and Play Wagers***

1. To play, players place an Ante wager and an Odds wager of equal amounts. Each player and the dealer receive two cards face-down (aka "pocket cards").
2. After examining their two face-down cards, each player must either make a Play wager equal to triple their Ante wager or check (meaning that they remain in the game but place no additional wager at this point.)
3. Three community cards (aka the "flop") are exposed face-up. Each player who previously did not place a Play wager may now make a Play wager equal to double their Ante wager, or check.
4. Two more community cards (aka "turn and river" cards) are exposed face-up. Each player who previously did not place a Play wager must now make a Play wager equal to their Ante wager, or fold. In the event the player folds, they forfeit their Ante and Odds wagers.
5. The dealer's two cards are exposed. Using a total of each participant's seven cards (two pocket cards combined with five community cards), the dealer's best five-card hand is compared to each player's best five-card hand. Highest hand wins and the player's Ante, Odds and Play wagers are paid or collected accordingly. Winning Ante and Play wagers are paid even money and the Odds wager is paid according to the corresponding paytable posted at the gaming table. The Bad Beat payout on the Odds wager is awarded when the dealer's hand is greater than the player's qualifying hand.
6. In an alternate version of the game, the dealer must have a qualifying hand of at least a minimum value (e.g. "Pair or Better"<sup>2</sup>). If the minimum qualifying hand is not obtained, the player's Ante wager is automatically a tie. All other wagers play as normal.

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<sup>1</sup> All references to rules contained within the Washington Administrative Code are not applicable to tribal gaming operations.

<sup>2</sup> Dealer qualifying hand is determined by the Casino Operator.

### ***Proposition Wagers***

The game also contains several optional proposition wagers. Casino operators choose which of the proposition wagers they will offer. The proposition wagers are:

#### *Trips Plus*

A player wins their Trips Plus wager if their final hand consists of one of the pre-determined winning triggering events displayed on the corresponding payable (see Appendix "B").

#### *Pocket Bonus*

A player wins their Pocket Bonus wager if their first two cards ("pocket cards") consist of one of the pre-determined winning triggering events displayed on the corresponding payable (see Appendix "C").

#### *Bonus Jackpot or Progressive Jackpot*

A player wins their Bonus Jackpot or Progressive Jackpot wager if their first two cards and the five community cards consist of one of the pre-determined winning triggering events displayed on the corresponding payable (see Appendix "D"). In some instances, additional prizes are awarded depending upon which cards are used to form the qualifying hand.

**Appendix "A"**  
**Odds Wager Paytables**

<b>Paytable: Triggering Event</b>	<b>HH/OW 1</b>	<b>HH/OW 2</b>	<b>HH/OW 3</b>	<b>HH/OW/BB Bad Beat - 1</b>	<b>HH/OW/BB Bad Beat - 2</b>
Royal Flush	500	500	Bonus	0	Bonus
Straight Flush	40	50	Bonus	500	Bonus
Quads	8	10	Bonus	50	Bonus
Full House	3	3	Bonus	10	Bonus
Flush	1	1.5	Bonus	8	Bonus
Straight	1	1	Bonus	5	Bonus
All Other	Push	Push	Bonus	Loss	Bonus

**Notes:**

1. All odds shown above are "to 1."
2. Player's hand must be of a higher value than dealer's hand to receive payment except for the Bad Beat. All ties result in a push.
3. To win the Bad Beat, the player's hand must be of a lower value than the dealer's hand.
4. Only the highest qualifying hand is paid.
5. "Bonus" amounts are at the discretion of the casino operator.
6. "Quads" are the same as Four-of-a-Kind, which means four cards of the same rank but different suits
7. Paytable HH/OW – 1 is to be used only in the variation of the game whereby the Dealer's hand is not required to meet minimum qualifying criteria.
8. Paytable HH/OW – 2 is to be used only in the variation of the game whereby the Dealer's hand is required to meet minimum qualifying criteria.
9. The Bad Beat paytables are to be used only in the variation of the game whereby the Dealer's hand is required to meet minimum qualifying criteria.
10. Casino operators may post a maximum aggregate amount payable per round or per hand.

## Appendix "B"

### Trips Plus Paytables

Paytable: Triggering Event	HH/TP 1	HH/TP 2	HH/TP 3	HH/TP 4	HH/TP 5	HH/TP 6
Royal Flush	50	50	50	50	100	Bonus
Straight Flush	40	40	40	40	40	Bonus
Quads	30	30	30	20	30	Bonus
Full house	9	8	8	7	8	Bonus
Flush	7	6	7	6	7	Bonus
Straight	4	5	4	5	4	Bonus
Trips	3	3	3	3	3	Bonus

**Notes:**

1. All odds shown above are "to 1."
2. Only the highest qualifying hand is paid.
3. "Bonus" amounts are at the discretion of the casino operator.
4. "Quads" are the same as Four-of-a-Kind, which means four cards of the same rank but different suits
5. "Trips" are the same as Three-of-a-Kind, which means three cards of the same rank but different suits.
6. Casino operators may post a maximum aggregate amount payable per round or per hand.

## Appendix "C"

### Pocket Bonus Paytables:

<b>Paytable: Triggering Event</b>	<b>HH/PB 1</b>	<b>HH/PB 2</b>
Pair of Aces	30	Bonus
Ace-Face Suited	20	Bonus
Ace-Face	10	Bonus
Pair	5	Bonus

#### Notes:

1. All odds shown above are "to 1."
2. Only the highest qualifying hand is paid.
3. "Bonus" amounts are at the discretion of the casino operator.
4. Casino operators may post a maximum aggregate amount payable per round or per hand.

## Appendix "D"

### Bonus Jackpot / Progressive Jackpot Paytables

Paytable:	HH/JP						
Triggering Event	1	2	3	4	5	6	7
Royal Flush in Spades on Flop	100%	100%	100%	100%	100%	100%	Bonus
Royal Flush on Flop	10%	1,000	10%	1,000	100%	100%	Bonus
Royal Flush	10%	1,000	10%	1,000	3,000	5%	Bonus
Community Royal Flush	10%	1,000	10%	1,000	3,000	3,000	Bonus
Straight Flush	200	200	500	500	250	250	Bonus
Quads	50	50	100	100	100	100	Bonus
Full House	10	10	10	10	10	10	Bonus
Flush	5	5					Bonus

**Notes:**

1. All odds shown above are "for 1."
2. Only the highest qualifying hand is paid.
3. A Royal Flush "on Flop" consists of the player's two pocket cards and the first three community cards.
4. A "Community Royal Flush" consists of the five community cards only.
5. "Bonus" amounts are a component of a Bonus Jackpot and are 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.
6. Progressive 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.
7. "Quads" are the same as Four-of-a-Kind, which means four cards of the same rank but different suits
8. Casino operators may post a maximum aggregate amount payable per round or per hand.

## Appendix "E"

### Equipment

Game play is conducted on a table layout and may also include electronic gambling equipment such as wager detection equipment and visual payable and jackpot displays. The rules of play 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 Wager Tabulator System and TableVision. The Wager 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,<sup>3</sup> 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. For use with this game, the Andromeda-3 series or newer is to be used.

#### ***Andromeda-3***

Andromeda-3's Wager 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 and Andromeda-1, rather each sensor position use LED indicator lights, if visible wager detection is required.<sup>4</sup>

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.

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<sup>3</sup> - 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.

<sup>4</sup> - 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 "F"

## Optional Game Layouts

