



STATE OF WASHINGTON
GAMBLING COMMISSION

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

February 10, 2006

Warren Montney
Badabing's Big Games
404 Sanford Ave
Richland, WA 99352

Dear Mr. Montney:

Thank you for requesting approval to market the card game "Pai Gow Pow" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Badabing's Big Games, 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 "Pai Gow Pow – Rules of Play" you provided.
- Commercial card room operators seeking to operate this game must first submit their internal controls and receive approval from the Commission prior to implementing.

TRIBAL CASINOS

- The game shall be played and operated under the terms and conditions set forth under the "Pai Gow Pow – 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.
- 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.

Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-02-300, related to this game and may be contacting you.

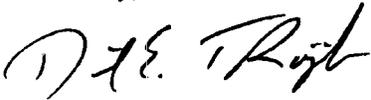
Furthermore, any modifications to this game may affect this approval. Contact the Commission should you contemplate modifications.

If you have any further questions on Commercial implementation, please contact Mark Harris at (425) 339-1728, extension 228.

If you have any further 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,



David Trujillo, Assistant Director
Licensing Operations Division

Cc: Mark Harris, Special Agent Supervisor, Northwest Region Field Operations
Julie Lies – Agent in Charge, Tribal Gaming Unit
Kelly Main, Special Agent, Tribal Gaming Unit
Tina Griffin – Special Agent Supervisor, Financial Investigations Unit

PAI GOW POW!

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This game uses a standard 52 card deck plus one joker. The joker maybe used to fill in a straight or a flush, other wise it is considered an ACE. The Game has a maximum of 4 wagers, the main PAI GOW wager, and the following optional wagers 1) The Pow Bonus 2) The Joker in Hand 3) Pow Progressive. It may be Played with any combination of 1-2 or all 3 bonus wagers
Pai Gow Pow is a Bonus Wager for Pai Gow Poker . The Pai Gow portion of the game may be played by any rules approved by the WSGC. The Pai Gow Pow Bonus Wager is administered as follows.

Each player has the option to place a bonus wager in addition to the Pai Gow bet . The Minimum bet for the Pai Gow Pow Bonus Wager is 1\$ and the maximum is what ever amount the house chooses within WSGC regulations. The house may allow players to bet more on the Pai Gow Pow Bonus Wager than the main Pai Gow Wager if they choose.

The house always banks the Pai Gow Pow Bonus Wager even if a Player is banking the Pai Gow portion.

The house may set any minimum aggregate limit they choose within WSGC regulations.

After the players have set their hands the dealer begins to take and pay as normal . Paying each players Bonus Wager first then their hand, before moving on to the next player.

Players win a bonus for a 7card hand of 3 of a kind or better .

Additionally players win PAIGOW POW bonus if they have one of the following 3 hands.

9 high, 10 high, or Jack high.

Straights, flushes pairs 3 of a kind or Jokers eliminate any Pai Gow Pow, Jack high or lower bonus. A player with 2-3-4-5-6 plus 7-8 does not have an 8 high Pai Gow Pow winner. They do However have a straight and would win the corresponding bonus for that hand.

JOKER IN HAND

In addition to the Pai Gow Pow Bonus Wager there is a second Bonus Wager that may be ordered called Joker in Hand, Patent Pending.

This Bonus Wager pays 6-1 if the player receives a joker in their hand. Minimums and maximums for this bet are set by the house. Within WSGC limits

The game requires a custom felt for Pai Gow Pow that may be ordered from Andrographics by calling 253-584-4500 For the Envy Bonus, envy buttons must also be used They can be ordered from any supplier licensed by the WSGC.

THE ENVY BONUS FEATURE

When a player places a 5\$ bonus bet the house gives them an envy button placed on top of the wager. If any other player at the table has a qualifying hand all players with an envy button win the corresponding bonus.

A player May not collect an envy bonus on the house hand, or their own hand. If they are playing two or more hands one hand may envy the other.

Players may win more than one envy bonus if there are multiple envy bonus hands on the table. The envy bonus does not count towards the house aggregate pay out limit.

Players may not win an Envy Bonus off the house hand. Players may not bet on the house hand or side bet on another players hand.

The envy bonus does not count as side betting on another players hand. Any discrepancies (misdeals) are to be handled by the house policy for such occurrences , this policy must comply with WSGC rules for such an occurrence. Below are the pay tables for Pai Gow Pow.

The bonus wager in **Pai Gow Poker** is a straightforward wager. Player's place their wagers in the appropriate areas of the table before any cards are dealt. The dealer then deals 7 cards face down to each player and himself. If a player's 7 cards contain any of the winning hands on the pay table, they are paid odds on their bonus wager according to the displayed pay schedule.

In addition, if a player wagers \$5 of more on the side bet, he qualifies for the **envy bonus**. If another player at the same table gets a 9-high pai gow hand, straight flush, royal flush, 5 aces, or 7-card straight flush (wild or natural), the original player wins a bonus. See "envy bonus" column in Table 1.

Players do not receive envy bonuses for their own hands, but may win more than one bonus per Round.

Pay Table 1

	Hand win	envy
9-High Pai Gow	100-1	\$50
10-High Pai Gow	10 -1	\$0
Jack-High Pai Gow	4 -1	\$0
Natural 7-card straight flush	2500 -1	\$500
Wild 7-card straight flush	500-1	\$200
Five aces	250-1	\$75
Royal flush	100-1	\$50
Straight flush	50-1	\$20
Four of a kind	25-1	\$0
Full house	5-1	\$0
Flush	4-1	\$0
Three of a kind	2-1	\$0
Straight	2-1	\$0
Other	(-1)	\$0

House edge 7.023% before envy bonus

Number Of Other Players Player's EV% House Edge

0 -7.0273% 7.0273%

1 -6.1591% 6.1591%

2 -5.2909% 5.2909%

3 -4.4227% 4.4227%

4 -3.5545% 3.5545%

5 -2.6863% 2.6863%

Bonus Bet EV and house edge for a \$5 wager

Pay Table 2

	Hand Pays	envy
9-High Pai Gow	100-1	\$50
10-High Pai Gow	20-1	\$0
Jack-High Pai Gow	4-1	\$0
Natural 7-card straight flush	2500-1	\$500
Wild 7-card straight flush	500-1	\$200
Five aces	200-1	\$75
Royal flush	100-1	\$50
Straight flush	50-1	\$20
Four of a kind	20-1	\$0

Continued next page

Full house	4-1	\$0
Flush	4-1	\$0
Three of a kind	2-1	\$0
Straight	2-1	\$0
Other	-1	\$0

House edge before envy bonus 9.1655%

Number Of Other Players Player's EV% House Edge

0	-9.1655%	9.1655%
1	-8.2973%	8.2973%
2	-7.4291%	7.4291%
3	-6.5609%	6.5609%
4	-5.6927%	5.6927%
5	-4.8245%	4.8245%

Bonus Bet EV and house edge for a \$5 wager, alternate pay schedule.

There are two additional pay tables 1-B & 2-B they are the same as above except there is no envy bonus for a 9 high.

Pow Progressive

The pow progressive is an optional 1\$ progressive wager.

The Pow Progressive is seeded with \$1000 by the house . The seed money is included in the house edge. You may use any third party progressive system approved by the WSGC or place a second drop box on the table for progressive wagers. For every 1\$ dropped the house will add a minimum of .20 cents to the progressive jackpot.

If you are not using a third party progressive system for the Pow progressive you must conspicuously post the jackpot amount on the table. The jackpot must be updated daily before opening the table for play .

In the event more than one person hits one of the top three payouts in the same hand , surveillance will determine who received their cards first. That player will be paid first . The next player will receive the appropriate percentage of the remaining jackpot. If the first player to receive cards hits the top pay out anyone else receiving one of the top 3 payouts will get the highest fixed payout remaining for their hand . Example the first player has a 7 card straight flush with no joker. They get 100% of the jackpot. The next player also has a seven card straight flush with a joker . They will be paid \$100 for a straight flush . If they have five aces . They will get \$75 for a four of a kind.

Players receiving a hand with a fixed payout receive that amount regardless of what else has been hit. Table aggregate limits do not apply to progressive payouts.

The following is the pay table for the pow progressive.

Pow Progressive Jackpot pay table

Seven card straight flush, without joker	100% of jackpot
Seven card Straight flush with a joker	50% of jackpot
Five Aces	25% of jackpot
Nine high Pai Gow.....	\$200
Royal Flush.....	\$200
Straight Flush.....	\$100
Four of a kind.....	\$75
Ten High Pai Gow	\$20
Jack High Pai Gow	\$5
Full House.....	\$5

House edge based on a .20 cent per dollar contribution rate 21.58%.Hit rate 1 in 25.8

PAI GOW POW is a standard house banked and or player banked Pai Gow game with optional bonus wager(s) All standard rules pertaining to Pai Gow as posted on the WSGC's website remain the same except for those listed in these Rules of Play

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

The envy (share the wealth) bonus on this game may not be linked to any other game.

