



STATE OF WASHINGTON
GAMBLING COMMISSION

PO Box 42400 Olympia WA 98504-2400 (360) 486-3440 TDD (360) 486-3637 FAX (360) 486-3626

April 13, 2016

Wayne Hong
eTable Games Inc.
2208 Encinal Ave.
Alameda, CA 94501

RE: Pay More Blackjack

Dear Mr. Hong,

Thank you for requesting approval to market the card game "Pay More Blackjack" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from eTable Games 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 "Pay More Blackjack – 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 "Pay More Blackjack – 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.



Mr. Hong
April 13, 2016
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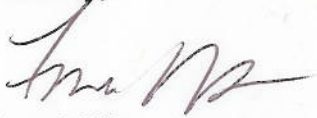
- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and 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, Regulation and Enforcement Division

Enclosure

cc: Josh Stueckle, Acting Agent in Charge, Regulation Unit
Cathy Harvey, Agent in Charge, Tribal Gaming Unit
Jess Lohse, Special Agent, Regulation Unit
Kelly Main, Special Agent Supervisor, Tribal Gaming Unit
File

Pay More Blackjack

Win More, Pay More

Card room operators must not allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.”

Pay More Blackjack is standard house-banked blackjack but with an optional bonus wager. All rules pertaining to blackjack as posted on the WSGC’s website remain the same except as listed in these rules of play.

Winning a blackjack hand no longer just gets even money. With the **Pay More** bonus wager, the player wins with odds!!!

In one case, when your blackjack hand wins by 4 points against the dealer’s hand, your bonus wager wins 4 to 1; when your blackjack hand wins by 3 points, it wins 3 to 1. In another case, when your blackjack hand wins with 18 or 19 against the dealer’s active hand, you win 4 to 1; when your hand wins with 20 or 21 against the dealer’s active hand, you win even money.

Players place the optional Pay More bonus wager before the game starts.

There are no changes to the house blackjack rules. The regular blackjack rules, including double-down, split and re-split, are played. A player’s Pay More bonus wager is resolved after the player’s Main wager has been resolved.

When the Main hand splits, the Pay More bonus wager goes with the right-most hand. Player cannot double down on the Pay More wager when player doubles down on the Main hand. If surrender is available and requested, the Pay More wager loses one half. Insurance is not offered to the Pay More bonus wager.

The resolution of the Pay More bonus wagers is as follows:

- ✓ **Pay More** wager loses / non-blackjack pushes when the Main loses / non-blackjack pushes
- ✓ **Pay More** wager is paid according to the paytable

Sample Hands of Pay More Blackjack-I

Assumptions:

- (1) Main and Pay More have the same amount of wager,
- (2) Blackjack pays 3 to 2,
- (3) Payout table is one of the proposed tables.

#	Final Point		Main Wager		Pay More Bonus Wager	
	Player	Dealer	Win / Lose / Tie	Payout (to 1)	Win / Lose / Tie	Payout (to 1)
1	21	17	Win	1	Win	4
2	20	17	Win	1	Win	3
3	19	17	Win	1	Win	2
4	18	17	Win	1	Win	1
5	21	18	Win	1	Win	3
6	20	18	Win	1	Win	2
7	19	18	Win	1	Win	1
8	21	19	Win	1	Win	2
9	20	19	Win	1	Win	1
10	21	20	Win	1	Win	1
11	20	Blackjack	Lose	-1	Lose	-1
12	18	20	Lose	-1	Lose	-1
13	17	18	Lose	-1	Lose	-1
14	19	21	Lose	-1	Lose	-1
15	18	19	Lose	-1	Lose	-1
16	Bust	17	Lose	-1	Lose	-1
17	Bust	15	Lose	-1	Lose	-1
18	Blackjack (H's)	Blackjack (H's)	Tie	0	Win	200
19	Blackjack	Blackjack	Tie	0	Win	10
20	17	17	Tie	0	Tie	0
21	18	18	Tie	0	Tie	0
22	19	19	Tie	0	Tie	0
23	Blackjack	12	Win	1.5	Win	1.5
24	14	Bust	Win	1	Tie	0
25	20	Bust	Win	1	Tie	0

Proposed Pay Tables for Pay More Blackjack-I

Event	Pay A	Pay B	Pay C	Pay D	Pay E	Pay F	Pay G
	Pay to 1						
Player & Dealer both Blackjack, all Spades	500	500	500	1000	1000	1000	500
Player & Dealer both Blackjack, all suited	100	100	200	200	100	200	200
Player & Dealer both Blackjack	15	10	10	10	10	10	15
Player Blackjack	1.5	1.5	1.5	1.5	1.5	1.2	1.2
Player wins by 4	4	4	4	4	4	4	4
Player wins by 3	3	3	3	3	3	3	3
Player wins by 2	2	2	2	2	2	2	2
Player wins by 1	1	1	1	1	1	1	1
Dealer busts	Push	Push	Push	Push	Push	Push	Push

Event	Pay a	Pay b	Pay c	Pay d	Pay e	Pay f
	Pay to 1					
Player & Dealer both Blackjack, all suited	300	200	100	200	300	200
Player & Dealer both Blackjack	10	15	15	10	15	15
Player Blackjack	1.5	1.5	1.5	1.5	1.2	1.2
Player wins by 4	4	4	4	4	4	4
Player wins by 3	3	3	3	3	3	3
Player wins by 2	2	2	2	2	2	2
Player wins by 1	1	1	1	1	1	1
Dealer busts	Push	Push	Push	Push	Push	Push

House Edges

Pay Table	2 Deck	6 Deck	8 Deck
A	9.46%	9.13%	9.04%
B	10.46%	10.20%	10.12%
C	10.34%	9.99%	9.89%
D	10.14%	9.64%	9.52%
E	10.26%	9.85%	9.75%
F	11.51%	11.00%	10.88%
G	10.71%	10.28%	10.18%

Pay Table	2 Deck	6 Deck	8 Deck
a	10.30%	9.92%	9.82%
b	9.46%	9.14%	9.04%
c	9.62%	9.42%	9.34%
d	10.46%	10.21%	10.12%
e	10.67%	10.21%	10.10%
f	10.84%	10.50%	10.40%

Sample Hands of Pay More Blackjack-II

Assumptions:

- (1) Main and Pay More have the same amount of wager,
- (2) Blackjack pays 3 to 2,
- (3) Payout table is one of the proposed tables.

#	Final Point		Main Wager		Pay More Bonus Wager	
	Player	Dealer	Win / Lose / Tie	Payout (to 1)	Win / Lose / Tie	Payout (to 1)
1	18	17	Win	1	Win	4
2	19	18	Win	1	Win	4
3	19	17	Win	1	Win	4
4	20	19	Win	1	Win	1
5	20	18	Win	1	Win	1
6	20	17	Win	1	Win	1
7	21	20	Win	1	Win	1
8	21	19	Win	1	Win	1
9	21	18	Win	1	Win	1
10	21	17	Win	1	Win	1
11	20	Blackjack	Lose	-1	Lose	-1
12	18	20	Lose	-1	Lose	-1
13	17	18	Lose	-1	Lose	-1
14	19	21	Lose	-1	Lose	-1
15	18	19	Lose	-1	Lose	-1
16	Bust	17	Lose	-1	Lose	-1
17	Bust	15	Lose	-1	Lose	-1
18	Blackjack (H's)	Blackjack (H's)	Tie	0	Win	150
19	Blackjack	Blackjack	Tie	0	Win	10
20	17	17	Tie	0	Tie	0
21	18	18	Tie	0	Tie	0
22	19	19	Tie	0	Tie	0
23	Blackjack	12	Win	1.5	Win	1.5
24	14	Bust	Win	1	Tie	0
25	20	Bust	Win	1	Tie	0

Proposed Pay Tables for Pay More Blackjack-II

Event	Pay 1A	Pay 1B	Pay 1C	Pay 1D	Pay 1E
	Pay to 1				
Player & Dealer both Blackjack, all Spades	500	300	500	500	300
Player & Dealer both Blackjack, all suited	150	60	100	150	60
Player & Dealer both Blackjack	10	8	8	10	8
Player Blackjack	1.5	1.5	1.5	1.2	1.2
Dealer does not bust:					
Player wins with 18	4	3	5	4	3
Player wins with 19	4	3	5	4	3
Player wins with 20	1	2	1	1	2
Player wins with 21	1	2	1	1	2
Dealer busts	Push	Push	Push	Push	Push

House Edges

Pay Table	2 Deck	6 Deck	8 Deck
1A	9.07%	8.83%	8.74%
1B	4.12%	4.02%	3.93%
1C	4.68%	4.54%	4.45%
1D	10.44%	10.19%	10.10%
1E	5.49%	5.38%	5.29%

PAY MORE



BLACKJACK

Blackjack Pays 3 to 2
Dealer Must Hit Soft 17

INSURANCE • PAYS • 2 TO 1



Hands	Payout
Player & Dealer both Blackjack, all Spades	500 to 1
Player & Dealer both Blackjack, all suited	200 to 1
Player & Dealer both Blackjack	10 to 1
Player Blackjack	3 to 2
Player wins by 4	4 to 1
Player wins by 3	3 to 1
Player wins by 2	2 to 1
Player wins by 1	1 to 1
Dealer busts	Push