



STATE OF WASHINGTON  
GAMBLING COMMISSION

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

October 16, 2007

Yehia Awada  
Gaming Entertainment, Inc.  
4054 Dean Martin Drive  
Las Vegas, NV 89103

**RE: Mini Pai Gow**

Dear Mr. Awada:

Thank you for requesting approval to market the card game "Mini Pai Gow" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Gaming Entertainment, 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 "Mini Pai Gow – 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 "Mini Pai Gow – 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.



- 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 Keith Wittmers at (253) 671-6289.

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: Keith Wittmers, Special Agent Field Operations Division  
Kelly Main, Special Agent Tribal Gaming Division  
File

# Mini Pai Gow™

## Procedures & Training For the State of Washington



**GAMING  
EDGE C. LLC.**

*"Offering innovative products  
at a price you can afford".*

**4054 Dean Martin Drive, Las Vegas, Nevada 89103**

## **Mini Pai Gow™ Dealing Procedures**

NO COMMISSION

### **Overview**

Mini Pai Gow Is basically the same traditional Pai Gow Game with

- NO COMMISSION PAID
- 6 cards dealt to players and the dealer instead of seven
- Players may double down after viewing their hand
- An additional Bonus wager (a bet that the player's best five card hand from their original six cards will make a qualifying poker hand).
- A Community Bonus wager is a Bonus wager (see above) of \$5 or more, that allows a Player to win on another player's qualifying poker hand. The Community Bonus wager is optional and the Casino can choose to offer it or not.

The Bonus payoff schedule and community Bonus payoff schedule are posted at the table.

You have a choice of six or seven betting positions.

Mini Pai Gow is standart house-banked Pai Gow with an optional bonus wager. All rules pertaining to standard Pai Gow as posted on the WSGC's website remain the same except as described specifically in these rules of play.

### **Wagers**

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

### **Rules of Play**

- A. Each player must make a Mini Pai Gow Poker wager and optionally may make a Bonus wager before the start of the game. A bonus wager of \$5.00 or more qualifies the Player of the Community Bonus, if available.
- B. Each player, including the dealer, will be dealt six (6) cards face down, the players may set their hands after all the hands have been dealt to the players at the table, including the dealer of the players may set their hands as soon as they get their 6<sup>th</sup> card. When the players get to set their hand is a the discretion of the casino. The remaining cards are then placed in the discard rack.
- C. The players now set their hands with the best possible five (5) card hand in back and the second best hand set in front position consisting of only (1) card. The original Min Pai Gow Poker wager always receives action. However, the dealer must qualify with a recommended pair of 5s or higher for the player's double down wager to receive action; otherwise the double down wager is a push.

- D. The Dealer now sets his hand with the best possible five (5) card hand in back and the second best hand set in front position consisting of only one (1) card. The original Mini Pai Goa Poker wager always receives action. However, the dealer must qualify with a recommended pair of 5s or higher for the player's double down wager to receive action; otherwise the double down wager is a push.
- E. If there is a player that has Four of a Kind or higher, notify a Floor Person (Casino option) and pay the player who made the Bonus bet according to the pay table which is posted on the table game.
- F. The order for settling each hand is at the discretion of the casino. You may settle the Bonus hand then the Mini Pai Gow Poker hand or vice versa. The double down wager, if applicable, is settled at the same time as the Mini Pai Gow Poker wager.

#### **Dealing Procedures\***

- A. Mini Pai Gow is played with a standard 52 card deck plus one Joker for a total of 53 cards.
- B. 1) The dealer will use only the house shuffle or a shuffle machine.  
2) Or the game may be dealt as in traditional Pai Gow using a dice shaker.
- C. Each Player must make a Mini Pai Gow Poker wager.
- D. Each player who made a Mini Pai Gow Poker wager may make a Bonus wager up to the posted limit before the cards are dealt.
- E. The dealer will place a six (6) card packet of cards to the players at the table in a clockwise manner (as in Blackjack) and then deal one packet to themselves. The dealer will then place the remaining cards in the discard rack. Misdeal voids all hands.
- F. Each player sets their high hand (five cards) and their second high hand (one card) and places them in the appropriate areas. Same foul hand rule applies in Mini Pai Gow as it does in traditional Pai Gow Poker. Each player simultaneously decides whether to double down or not with a wager equal to the original Mini Pai Gow Poker wager.
- G. After all the player hands have been set, the dealer will then turn over his hand and set the hand according to house ways with the highest five (5) card hand in back and the second highest one (1) card hand in the front.
- H. The dealer will now, in turn, compare his two hands with the player's two hands. If the dealer qualifies for the double down wager with at least a recommended pair of fives (pair of 5s) or higher, the player's double down wager, if made, plays; otherwise, the double down wager is a push. If the dealer's two hands beat the player's two hands, the house wins the Mini Pai Gow Poker wager (and if doubling and the dealer qualifies, also the double down wager). If the player's two hands beat the dealer's two hands, the player wins even money on the Mini Pai Gow Poker wager (and if doubling and the dealer qualifies, also on the double down wager). Any other outcome (the player and dealer split the two hands) will be a push and the player's Mini Pai Gow Poker wager (and double down wager, if made) will be returned to them (but see Important Notes below for handling ties, which go to the house).
- I. If any of the players receive a hand of two (2) pair or better and they have wagered on the bonus position, they will receive the posted bonus payout. Winning bonus wagers will be paid

regardless of the outcome of the Mini Pai Gow wager. The player will receive winning bonus wagers regardless of how they have set their hand. (i.e. splitting 3 Aces, they will still receive the bonus payout for 3 of a Kind).

- J. If any of the players receive a Full House or better, any other Player at the table that wagered \$5.00 or more on the Bonus Wager will receive the posted Community Bonus payout (assuming Casino has elected to make Community Bonus option available). Winning Community Bonus wagers will be paid regardless of the outcome of the Mini Pai Gow wager. The player will receive winning Community Bonus wagers regardless of how the player has set their hand. (i.e.: splitting 4 Aces, they will still receive the bonus payout for 4 of a kind).

Note: There is no commission taken from winning players hands. For the primary Mini Pai Gow Wager, the dealer's hand does not have to qualify; for double down wagers, the dealer's hand must qualify with at least a recommended pair of 5s or higher.

### **House Ways**

- 1) No Pair – Dealer MUST play the highest ranking card in the High Hand, the second highest ranking card in the Low Hand and the remaining cards in the High Hand.
- 2) The Dealer may NOT break apart any sets or made hands. The Dealer may not break apart any one pair, two pairs, three of a kind, straights, flushes, full houses, four of a kinds, straight flush or royal flush in order to play a higher card in the Low Hand. Once the dealer has played the set, he must use the highest-ranking kicker as his low hand.
- 3) 1<sup>st</sup> clarification to rule #2 – If the Dealer has two three of a kinds in his hand he will play three of the lower ranking card and two of the higher ranking card (Full House) as the high hand in order to play the higher ranking card in the Low Hand.
- 4) 2<sup>nd</sup> clarification to rule #2 – If the Dealer has 3 pair, he will play the lower ranking two pairs as the high hand and the highest ranking card of the 3<sup>rd</sup> pair in the second highest hand.
- 5) 3<sup>rd</sup> clarification to rule #2 – If the Dealer has a 6-card straight or flush, the Dealer must use the highest ranking card as the low hand and use the lower ranking straight or flush as the high hand.

### **Important Notes**

- 1) The Joker can only be used as an "Ace" or a "Wild Card" to complete Straights or Flushes; it is acceptable for a Player to play Ace high as the high hand and Joker as the low.
- 2) If the Player's High Hand ties the Dealer's High Hand, this is considered a loss for the Player.
- 3) For the Low Hand, all ties of Two through Ace are considered a loss for the Player.
- 4) If, in the Low Hand, the Player has a Joker and the Dealer has an Ace, this is considered a win for the Player in the Low Hand.

**Mini Pai Gow Bonus bet optional Pay Tables (No Community Bonus)**

| Hand            | A    | B    | C    |
|-----------------|------|------|------|
| Five Aces       | 1000 | 1000 | 1000 |
| Royal Flush     | 250  | 250  | 250  |
| Straight Flush  | 75   | 75   | 75   |
| Four of a Kind  | 50   | 50   | 50   |
| Full House      | 20   | 20   | 20   |
| Flush           | 7    | 7    | 8    |
| Straight        | 5    | 4    | 4    |
| Three of a Kind | 3    | 3    | 3    |
| Two Pair        | 1    | 1    | 1    |

**Mini Pai Gow Bonuw bet Pay Table with Community Bonus (Only this pay table is available with Community Bonus option)**

| Hand            | Players Hand | Community Bonus |
|-----------------|--------------|-----------------|
| Five Aces       | 1000         | \$1000          |
| Royal Flush     | 250          | \$200           |
| Straight Flush  | 100          | \$50            |
| Four of a Kind  | 50           | \$15            |
| Full House      | 15           | \$5             |
| Flush           | 6            |                 |
| Straight        | 4            |                 |
| Three of a Kind | 3            |                 |
| Two Pair        | 1            |                 |

**NOTE:**

Minimum Bonus wager **MUST** be \$1.00; maximum Bonus wager is at Casino discretion.  
Maximum aggregate is also at casino discretion.

**Mini Pai Gow Player/Banker Option**

**PLAYER/BANKER PROCEDURE (If allowed in Jurisdiction)**

If Player banks, game is dealt in its normal course.

- 1) Dealer sets his hand first
- 2) Dealer then settles Banker hand next.
- 3) At this time, Dealer burns his hand, brings Banker hand in front of the money tray then proceeds to settle all other player's hands as well as Bonus wager.
- 4) All Bonus wagers are paid or collected by the house only.
- 5) All Mini Pai Gow wagers are paid and collected by Dealer using Banker money.
- 6) **NOTE: When there is a Player/Banker, the house takes a 5% commission on winning wagers.**



# MINI PAI GOW

**DOUBLE DOWN  
NO COMMISSION**

DOUBLE DOWN WAGER PLAYS  
AGAINST PAIR OF 8s OR BETTER

1st HIGHEST  
2nd HIGHEST  
3rd HIGHEST

DOUBLE DOWN  
NO COMMISSION

DOUBLE DOWN WAGER PLAYS  
AGAINST PAIR OF 8s OR BETTER

1st HIGHEST  
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1st HIGHEST  
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DOUBLE DOWN WAGER PLAYS  
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1st HIGHEST  
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