



July 26, 2010



Susan Yocum

Director of Regulatory Review  
Pennsylvania Gaming Control Board  
303 Walnut Street, Strawberry Square  
5<sup>th</sup> Floor, Verizon Tower  
Harrisburg, PA 17101

HARRAH'S  
CHESTER CASINO  
& RACETRACK

777  
Harrah's  
Boulevard

Chester,  
Pennsylvania  
19013

TEL  
800  
480  
8020

Re: **Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack  
Comments on Proposed Rulemaking Regulation No. 125-123**

Dear Ms. Yocum:

On behalf of Chester Downs and Marina, LLC d/b/a Harrah's Chester Casino and Racetrack ("Harrah's"), Harrah's respectfully submits these comments to the Pennsylvania Gaming Control Board's ("Board") Temporary Table Game Rulemaking No. 125-123. Harrah's would like to thank the Board for the opportunity to comment toward the Board's temporary rules, and respectfully requests the Board take into consideration the following suggestions.

**I. COMMENTS FOR PROPOSED RULEMAKING NO. 125-123**

**§526.1. – Definitions**

The Board's temporary regulations at §526.1 define a counter check as a form provided to a patron who receives a credit advance which contains the account information for the personal checking account designated in the patron's credit application. Section 526.16 (a) (*relating to deposit of counter checks and personal checks substituted for counter checks*) of the Board's temporary regulations establishes time periods based on the amount of the counter check by which substituted counter check shall be deposited. When considering sections §526.1 and §526.16(a) together, a counter check with the patron's bank account information will be problematic in instances where a customer draws a counter check and may change their bank prior to that counter check being presented for deposit once the counter



check holding period has expired. The counter check will therefore be undepositable and subsequently returned by the bank.

Harrah's believes that adding the following or similar language, "a form provided to a patron which at the time of deposit..." to the counter check definition would adequately address the period of time in which the patron's bank account information may not be present on the counter check.

§526.3 (c)(4)(vii) – Application and verification procedures for granting credit.

Section §526.3 (c), identifies procedures a credit clerk must perform prior to a patron's credit limit being approved by a certificate holder. Specifically, subpart (c) (4) (vii) requires the name and title of the person from the banking institution supplying information to the credit clerk be documented as part of the credit application verification process.

It is important to note that many large banking institutions provide bank verification services via an automated hotline. As such, under this particular method of banking verification, there would not be an opportunity to obtain the name and title of an individual as required under this subpart. Harrah's believes the requirement for obtaining the name or title of the person supplying the patron banking verification be omitted or additional language such as "if applicable" be added to this subpart to provide relief to certificate holders in those instances where banking verification is done through an automated bank verification hotline or similar service.

§526.5 (d) – Derogatory information; reduction or suspension of credit.

In §526.5 (d), it is noted that a patron having a check returned to any certificate holder unpaid by the patron's bank shall have his credit privileges suspended at all licensed facilities until the returned check has been paid in full.

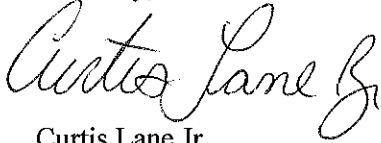
As the Board may be aware, there are risks that certificate holders will inevitably take on as a result of issuing casino credit to be used for gaming play to patrons. One common risk is on those occasions when a personal check presented for approval is denied as the amount written on the check exceeds the available balance in the patron's account. Harrah's is appreciative of the Board promulgating regulations which would hopefully mitigate those instances in which a patron knowingly writes a personal check that cannot be honored because sufficient funds are not available in the patron's bank account.

However, there will be instances beyond the patron's control (i.e. clerical errors made by certificate holders during credit application processing, banking institution closures, etc...) in which a dishonored check may occur unintentionally. Therefore, Harrah's believes that further clarity is needed as to how the provision set forth at §526.5 (d) will be enforced.

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Harrah's wishes to thank the Board for requesting input on these matters and hope our comments are helpful for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Curtis Lane Jr.".

Curtis Lane Jr.

Regulatory Compliance Manager

Harrah's Chester Casino and Racetrack