



PENNSYLVANIA GAMING CONTROL BOARD
HARRISBURG, PENNSYLVANIA
17106-9060

PAUL RESCH
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June 7, 2012

Chairman
WILLIAM H. RYAN, JR.

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Sent via Electronic and U.S. Mail

Mr. Doug Niethold
VP of Finance
Sands Bethworks, LLC
77 Sands Blvd
Bethlehem, PA 18015

Re: Submission of Internal Controls Related to Poker Room Massage Services

Dear Mr. Niethold:

At its April 11, 2012 meeting, the Pennsylvania Gaming Control Board decided a matter before it relating to the gaming service provider registration for Chip and a Chair Massage Therapy, LLC. In approving the registration, the Board imposed certain conditions on Chip and a Chair Massage Therapy and the delivery of massage services at the Commonwealth's licensed facilities, including the following:

- The services of the company can only be provided in the poker room areas of the gaming floors in Commonwealth casinos;
- All employees performing massage services must be licensed under the PA Massage Therapy Law and must comply with State Board of Massage Therapy regulations; and
- All employees performing massage services must be registered with the Board as directed by the Bureau of Licensing.

The Board also directed staff to require table game certificate holders that engage Chip and a Chair Massage Therapy, or any subsequently registered company performing similar services, to submit appropriate internal controls for the redemption of value chips received as payment for massage services or as personal gratuities.

Consistent with 58 Pa. Code § 603a.10(l) relating to the acceptance of value chips, gaming service provider employees who perform massage services in the poker room areas may be authorized to receive value chips as payment for services and as personal gratuities. Gaming service provider employees who are authorized to receive value chips as payment for services and as personal gratuities shall redeem the chips at the poker room cashier's cage or other cashier's cage as approved by the Board prior to leaving the licensed facility.

Pursuant to 4 Pa.C.S. §§ 1322 and 13A25, the Pennsylvania Gaming Control Board may require a slot machine licensee to submit as part of its internal controls any item that it may require in its discretion. Consistent with the aforementioned statutory authority, licensees that contract with a gaming service provider to offer its patrons massage services must submit an internal control amendment via the Board's internal controls and table games online submission form to address the redemption of gaming chips received as payment for services consistent with the authority cited above. Procedures should be submitted as an amendment to Internal Control Section 603a.10 – Permissible wagering; exchange and redemption of gaming chips and plaques.

If you have any questions, please contact Compliance Manager Patricia Gustavson at (717) 214-9290.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Resch", with a stylized flourish at the end.

Paul Resch
Director of Gaming Operations

cc: Kevin O'Toole, Executive Director, PGCB
R. Douglas Sherman, Chief Counsel, PGCB
Cyrus Pitre, Chief Enforcement Counsel, PGCB
Gerald Stoll, Director of Casino Compliance, PGCB
Patricia Gustavson, Compliance Manager, PGCB