



PENNSYLVANIA GAMING CONTROL BOARD
303 WALNUT STREET, COMMONWEALTH TOWER
HARRISBURG, PENNSYLVANIA
17101

KEVIN F. O'TOOLE
Executive Director
303 Walnut Street
Commonwealth Tower, 5th Floor
Harrisburg, PA 17101
Phone: (717) 346-8300
Fax: (717) 346-8350
Email: [REDACTED]
Website: gamingcontrolboard.pa.gov

June 8, 2026

Chair
DENISE J. SMYLER

Commissioners
SHAWN DILLON
GEORGE DUNBAR
EDWARD C. GAINES
CHRISTOPHER W. HUFFMAN
SARA MANZANO-DÍAZ
MARIA D. QUINONES SÁNCHEZ

Ex-Officio Members
PAT BROWNE
STACY GARRITY
RUSSELL C. REDDING

Delivered via Electronic Mail

Ms. Koneda Jackson
US Compliance Manager, Playtech
PT Services (Delaware)
100N. West Street, Suite 1200
Wilmington, Delaware 19801

RE: Playtech's All Bets Blackjack Cashout Waiver Request

Dear Ms. Jackson:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence regarding PT Services (Delaware) LLC, d/b/a Playtech ("Playtech") seeking approval by waiver for a Cashout feature in Playtech's All Bets Blackjack Live game. Specifically, Playtech seeks a waiver relative to 58 Pa. Code § 633a.9 Surrender, which provides players, after receiving their first two cards may elect to surrender at a cost of ½ of the player's Blackjack wager (half the wager is returned to the player). Playtech proposes an alternative "Cashout" feature which "dynamically calculated return based upon the player's cards, the dealer's visible card, and the remaining deck composition at the moment the [Cashout] option is exercised". Playtech contends that the Cashout feature could be a supplement to the § 633a.9 Surrender option and would be available to players at every player decision point. Finally, Playtech asserts that integration of its proposed Cashout feature would increase the Return to Player ("RTP") percentage by 0.1% as compared to Blackjack offered in alignment with 58 Pa. Code § 633a and thereby warrants the issuance of a waiver.

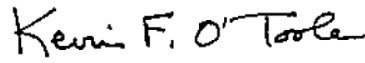
At this time, Playtech's waiver request is denied. The limited information which Playtech has provided in its waiver request demonstrate a significant rules of play and procedural variation from Blackjack under 58 Pa. Code § 633a Blackjack.

Please be advised, the present Playtech waiver is viewed as an effort to circumvent the normal table games submission and review process. A Cashout integration into Blackjack games would require rules and procedure regulatory language supplementation to outline exact player decision points and define Cashout versus Surrender interactions and conflicts. Furthermore, Playtech's ask amounts to a request for PGCB to waive review of mathematical models, algorithms, software, and potentially hardware systems based on an unsubstantiated Playtech assertion of 0.1% increased RTP. PGCB must adhere to its statutory obligation of review and certification of games, devices, or equipment, and its responsibility in establishing and maintaining the standards and rules governing the conduct of table games, including the promulgation of regulations.

Should Playtech wish to have the Cashout feature evaluated, Playtech must make a normal table games submission to the Board's Office of Gaming Laboratory Operations. Only based upon a full lab submission and review process would PGCB be prepared to make a merits-based determination on Playtech's Cashout feature for Blackjack games.

If you have any questions or concerns on this matter, please do not hesitate to contact Senior Counsel, Robert Wood, via email at [REDACTED]

Sincerely,

A handwritten signature in black ink that reads "Kevin F. O'Toole". The signature is written in a cursive, slightly slanted style.

Kevin F. O'Toole
Executive Director

KFO/rmw

cc: Steve Cook, Chief Counsel, PGCB
Claire Yantis, Administrative Director, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Lee Copello, Director, iGaming Compliance Operations, PGCB
Gregg Hazzouri, Director, Bureau of Casino Compliance, PGCB
Heather Worner, Director, Office of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Senior Counsel, PGCB