



PENNSYLVANIA GAMING CONTROL BOARD
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May 19, 2023

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Delivered Via Electronic Mail

TO: All Interactive Gaming Certificate Holders,
Interactive Gaming Operators, and
Interactive Gaming Manufacturers

RE: Splitting Hands in Random Number Generator Based Blackjack

Dear Licensees:

The Pennsylvania Gaming Control Board ("Board") has received requests for clarification and input following the letter sent on May 4, 2023, regarding splitting hands in random number generated ("RNG") based interactive blackjack games.

As noted in that letter, the Board's regulations provide when a blackjack hand is split, it is to be split horizontally, creating a left and right hand. The dealer shall then deal a card and complete the player's decisions with respect to the first hand (dealer's left/player's right), prior to proceeding to deal any cards to the second hand (dealer's right/player's left). See 58 Pa. Code §§ 633a.11 (Blackjack), 635a.11 (Spanish 21), 655a.11 (Double Attach Blackjack), 672a.10 (Free Bet Blackjack), 673a.11 (Double Blackjack), and 685a.10 (Down Under Blackjack).

To clarify the Board's position regarding splitting hands in RNG based blackjack, the Board does not object to splitting hands horizontally or vertically in RNG based blackjack games. However, the process by which cards are to be split (horizontally or vertically) should be included in the rules and procedures submitted as part of the Board review and approval process. The requirement of horizontal splitting shall remain in effect in all blackjack games and variations in which a Dealer is dealing cards.

If you have any questions or concerns on this matter, please do not hesitate to contact Assistant Chief Counsel, Robert Wood, via email at rmwood@pa.gov.

Sincerely,

Kevin F. O'Toole
Executive Director

KFO/rmw

cc: Stephen S. Cook, Chief Counsel, PGCB
Claire Yantis, Administrative Director, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Lee Copello, Director of iGaming Compliance, PGCB
Christopher Schroder, Director, Bureau of Casino Compliance, PGCB
Heather Worner, Director of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Assistant Chief Counsel, PGCB