



PENNSYLVANIA GAMING CONTROL BOARD

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HARRISBURG, PENNSYLVANIA

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Chairman

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Sent via Electronic Mail

Mr. Roman Rubas

Technical Compliance, BetMGM

Harborside Plaza 3

210 Hudson Street

Jersey City, NJ 07302

Re: Blackjack Charlie 7 Waiver Request

Dear Mr. Rubas:

On behalf of the Pennsylvania Gaming Control Board ("Board"), I have reviewed BetMGM's request for a waiver in order to offer the "7-Card Charlie" payout in its interactive gaming version of Blackjack. A copy of BetMGM's waiver request is attached. At this time, I approve the implementation of the 7-card Charlie 1-to-1 payout being deployed on BetMGM's interactive Blackjack game. It is our view that the 7-card Charlie payout does not negatively impact the integrity of interactive gaming in the Commonwealth and benefits players by offering a player the possibly of increased odds of return to the player without requiring an additional wager to be placed.

If you have any additional questions or concerns on this matter, please do not hesitate to contact Assistant Chief Counsel Chad Zimmermann at [REDACTED].

Sincerely,

Kevin F. O'Toole

Kevin F. O'Toole

Executive Director

Attachment

KFO/cwz

cc: R. Douglas Sherman, Chief Counsel, PGCB
Claire Yantis, Administrative Director, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Heather Worner, Director, Office of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Assistant Chief Counsel, PGCB