



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, Strawberry Sq.
Harrisburg, PA 17101
Phone: (717) 346-8300
Fax: (717) 346-8350
Email: [REDACTED]
Website: gamingcontrolboard.pa.gov

July 24, 2024

Chair
DENISE J. SMYLER

Commissioners
FRANK DERMODY
SHAWN DILLON
DAVID S. HICKERNELL
SARA MANZANO-DÍAZ
NEDIA RALSTON
FRANCES J. REGAN

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

Sent via Electronic Mail

Ms. Tina Kelly
Director of Interactive Compliance
AGS
5475 S. Decatur Boulevard, Suite 100
Las Vegas, Nevada 89188

RE: AGS Blackjack Waiver Requests

Dear Ms. Kelly:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence and waiver request in which AGS is requesting three waiver items relating to 58 Pa. Code §633 Blackjack: 1. A modification to the paytables approved for the Bet the Set 21 wager under §633a.13(g), 2. A modification to the payable approved for the Three Card Poker wager under § 633a.13(k), and 3. A modification to the Match-the-Dealer wager under § 633a.6(e)(2).

Regarding the Bet the Set 21 wager, AGS' waiver request noted the two approved paytables under §633a.13(g)(3) (if four or more decks are being used) and seeks permission to offer an increased payout of 18 to 1 for suited pairs. Upon review, the request for the Bet the Set 21 payable modification does not negatively impact the integrity of gaming. AGS may offer the Bet the Set 21 wager with the following payable, given four or more decks of cards are being used:

Hand	
Suited Pairs	18 to 1
Pairs	10 to 1

All other aspects of the Bet the Set 21 wager and the base Blackjack game, shall operate consistent with the rules and procedures outlined in §633a.

Regarding the Three Card Poker wager, AGS' waiver request noted the approved payable under §633a.13(k) and seeks permission to offer an additional hand of 3 Fives to become the top potential payout at 200 to 1 odds. Upon review, the request for the Three Card Poker modification does not negatively impact the integrity of gaming. AGS may offer the Three Card Poker wager with the following payable:

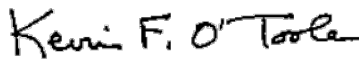
Hand	
3 Fives	200 to 1
Straight Flush	30 to 1
Three-of-a-kind	20 to 1
Straight	10 to 1
Flush	5 to 1

All other aspects of the Three Card Poker wager and the base Blackjack game, shall operate consistent with the rules and procedures outlined in §633a.

Finally, AGS has sought a waiver regarding the Match-the-Dealer wager. Under 58 Pa. Code §633a.6(e)(2), the Match-the-Dealer wager is an optional wager a patron may place that wagers on whether either of the player's initial two cards will match the dealer's up card. AGS seeks permission to offer its Match Super Bonus wager, a variation of the Match-the-Dealer wager, that allows for the wager to be based upon the dealer's down card. AGS has communicated that its preference is to be able to allow each operator to be able to configure the Match Super Bonus wager to decide which dealer card to use, or in the alternative to configure the Match Super Bonus to be based upon the Dealer's down card. At this time, I decline to grant the requested waiver to allow Match-the-Dealer to be based upon the dealer's down card, as the rules and procedures to execute play would represent a significant departure from those of Match-the-Dealer. Therefore, the request for permission to offer Match Super Bonus with operator specific configuration is also denied. This waiver denial does not preclude AGS from submitting Match Super Bonus through the normal new table games submission process.

The waivers issued pursuant to this letter shall expire at such time that regulations are adopted by the Board and published in the *Pennsylvania Bulletin*. If you have any questions, please contact Robert Wood, Assistant Chief Counsel, via email at [REDACTED].

Sincerely,



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, Assistant Chief Counsel, PGCB