



PENNSYLVANIA GAMING CONTROL BOARD
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May 3, 2023

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Delivered Via Electronic Mail

Mr. Jeff Patchen
Head of Compliance, North America
Evolution US, LLC
1500 Spring Garden Street
Philadelphia, PA 19130

RE: Evolution's First Person Top Card Waiver Request

Dear Mr. Patchen:

On behalf of the Pennsylvania Gaming Control Board ("Board"), I have reviewed your April 25, 2023, correspondence, regarding Evolution Gaming's request to offer First Person Top Card, an RNG version of your Top Card game. Evolution's request seeks to extend the waiver granted on December 28, 2022, for its Live Dealer version of Top Card to also include the First Person RNG based version of Top Card.

At this time, I approve the expansion of the December 28, 2022, Live Dealer Top Card waiver to include your First Person/ RNG Top Card game. As noted in the December 28, 2022 waiver, Evolution is being granted a waiver of 58 Pa. Code § 651a.2(b)(2) (relating to designated place for War wager), §651a.9(c)(2)-(h) (relating to procedures for War wagers), and § 651a.10(3) (relating to War wager payout odds), to allow for Top Card hands resulting in a tie to be settled without the additional War wager. In the event of a tie, non-tie wagers shall be settled consistent with 58 Pa. Code § 651a.9 (c)(1) (relating to surrender on tied hands). Additionally, Evolution is being granted a waiver of 58 Pa. Code § 651a.10(2) (relating to payout odds) to allow a winning tie wager to be paid at odds of 11 to 1. All other aspects of Top Card shall be played consistent with 58 Pa. Code § 651a. (Casino War).

Once Temporary Regulations covering Top Card are adopted by the Board and published in the Pennsylvania Bulletin, this waiver will expire. If you have any questions or concerns on this matter, please do not hesitate to contact Assistant Chief Counsel, Robert Wood, via email at [REDACTED].

Sincerely,

Kevin F. O'Toole

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 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