



PENNSYLVANIA GAMING CONTROL BOARD
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Delivered Via Electronic Mail

Mr. Jeffrey Yancey
US Technical Compliance Project Manager
PT Services of New Jersey
820 Bear Tavern Road
Trenton, NJ 08628

RE: Playtech Side Wagers on Blackjack and Baccarat Offerings on Playtech's Interactive Gaming Platform

Dear Mr. Yancey:

On behalf of the Pennsylvania Gaming Control Board ("Board"), I have reviewed your correspondence regarding Playtech's request to offer four side wagers on various Blackjack and Baccarat offerings on its live interactive gaming platform: 21+3 on Blackjack, Perfect Pairs on Blackjack, Buster Blackjack, and Perfect Pairs on Baccarat.

21+3 on Blackjack:

The 21+3 side wager on Blackjack, referred to the Board's regulations as Three Card Poker side wager, operates similarly to the side wager that has been reviewed and approved by the Board. However, while the procedures for Playtech's 21+3 side wager are the same as the currently approved side wager, the payable and payouts that Playtech wishes to offer are different than what are provided in the Board's regulations. Specifically, the proposed modification to the 21+3 side wager is as follows:

PGCB approved payable (see 58 Pa. Code §633a.13(k))			Playtech's proposed payable	
Hand	Paytable A	Paytable B		
Straight Flush	9 to 1	30 to 1	Suited three of a kind	100 to 1
Three of a Kind	9 to 1	20 to 1	Straight Flush	40 to 1
Straight	9 to 1	10 to 1	Three of a Kind	30 to 1
Flush	9 to 1	5 to 1	Straight	10 to 1
			Flush	5 to 1

After review, it is our conclusion that the modified payable does not negatively impact the integrity of interactive gaming, as the proposed payable provides for higher return-to-player ("RTP") percentages and payouts for players who chose to place the proposed wager.

Perfect Pairs on Blackjack:

The Perfect Pairs side wager on Blackjack presented by Playtech operates similarly to the Perfect Pairs side wager that has been reviewed and approved by the Board (see 58 Pa. Code §633b.1). While the payable and payouts match those provided for as the currently approved side wager, the procedure Playtech wishes to use differ than what are provided for in the Board's regulations. Specifically, the Board approved Perfect Pairs side wager provides each player the option to wager on whether their initial two cards are a winning combination. Playtech wishes to expand the side wager into two distinct bet positions: to allow for the player to wager on whether their initial two cards are a winning combination (Player Perfect Pairs), or to allow the player to wager on whether the dealer's initial two cards are a winning combination (Dealer Perfect Pairs).

It is our view that your proposed Player Perfect Pairs side wager matches that provided in 58 Pa. Code §633b.1, and no waiver is needed. With regards to the offer of a Dealer Perfect Pairs side wager, upon review, it is our view that the modified Perfect Pairs wager does not negatively impact the integrity of interactive gaming, as the proposed bet has adopted an accepted payable and would provide an identical RTP as the Player Perfect Pairs authorized under Board regulation.

Buster Blackjack:

The Buster Blackjack side wager on Blackjack, operates similarly to the Buster Blackjack side wager that has been reviewed and approved by the Board (see 58 Pa. Code §633b.13). However, while the procedures for Playtech's Buster Blackjack side wager are the same as the currently approved side wager, the payable and payouts that Playtech wishes to offer are different than what are provided in the Board's regulations. Specifically, the proposed modification to the Buster Blackjack side wager is as follows:

<u>PGCB approved payable (see 58 Pa. Code §633b.13(h))</u>				<u>Playtech's proposed payable</u>	
<i>Dealer Busts with</i>	<i>Paytable A</i>	<i>Paytable B</i>	<i>Paytable C</i>	<i>Dealer Busts with</i>	
8 or more cards	250 to 1	200 to 1	250 to 1	8 or more cards & Blackjack	2,000 to 1
7 cards	50 to 1	50 to 1	50 to 1	7 cards & Blackjack	800 to 1
6 cards	15 to 1	15 to 1	12 to 1	8 or more cards	250 to 1
5 cards	4 to 1	4 to 1	4 to 1	7 cards	50 to 1
4 cards	2 to 1	2 to 1	2 to 1	6 cards	18 to 1
3 cards	2 to 1	2 to 1	2 to 1	5 cards	4 to 1
<i>Dealer Busts with</i>	<i>Paytable D</i>	<i>Paytable E</i>	<i>Paytable F</i>	4 cards	2 to 1
8 or more cards	200 to 1	250 to 1	250 to 1	3 cards	2 to 1
7 cards	50 to 1	50 to 1	50 to 1		
6 cards	12 to 1	12 to 1	20 to 1		
5 cards	4 to 1	3 to 1	8 to 1		
4 cards	2 to 1	2 to 1	2 to 1		
3 cards	2 to 1	2 to 1	1 to 1		

After review, it is our view that the modified payable does not negatively impact the integrity of interactive gaming, as the proposed payable provides for higher RTP percentages and payouts for players who chose to place the proposed wager.

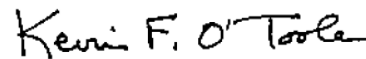
Perfect Pairs on Baccarat:

After review, it has been determined that your Perfect Pairs side wager on Baccarat and its rules do not correspond to the approved Perfect Pairs side wager on Baccarat in 58 Pa. Code §631b.1. Your requested rules and payable have been found to provide for lower RTP percentages than what are provided in the regulations. As such, implementation of this side wager for play in this Commonwealth is not approved at this time.

At this time, I approve the of the requested waivers, permitting Playtech to offer the 21+3 (Three Card Poker), the Perfect Pairs, and Buster Blackjack side wagers on Playtech's Live Blackjack interactive game. The side wagers must be offered in accordance with the provisions of 58 Pa.Code § 633a.6(e)(9), § 633a.7(g)(8), § 633a.13(k), §633b.1, and §633b.13. All other provisions of the Blackjack game must operate in accordance with the provisions of Chapter 633a unless additional regulatory waivers are or have been requested and granted. 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 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
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, iGaming Compliance, Bureau of Gaming Operations, PGCB
Heather Worner, Director, Office of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Assistant Chief Counsel, PGCB