



PENNSYLVANIA GAMING CONTROL BOARD  
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July 11, 2024

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**Sent via Electronic Mail**

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

**RE: Free Bet Blackjack Waiver Request**

Dear Mr. Patchen:

On behalf of the Pennsylvania Gaming Control Board ("Board"), I have reviewed your correspondence and waiver request in which Evolution US, LLC ("Evolution") is requesting permission to offer the Perfect Pairs side wager and Bust-O-Rama wager in conjunction with Free Bet Blackjack games. Evolution proposes to offer the Perfect Pairs and Bust-O-Rama side wagers consistent with the rules and procedures outlined under 58 Pa Code §§ 633b.1 (Perfect Pairs wager) and 633b.13 (Buster Blackjack wager).

Upon review, the request to offer the Perfect Pairs side wager does not negatively impact the integrity of gaming and therefore is approved. Evolution may offer the Perfect Pairs wager on Free Bet Blackjack game varieties consistent with the rules and procedures outlined under 58 Pa. Code § 633b.1 Perfect Pairs wager.

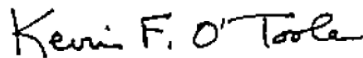
Further, the request to offer Bust-O-Rama does not negatively impact the integrity of gaming and therefore is approved subject to the following requirement: Bust-O-Rama shall conform to the rules and procedures outlined under 58 Pa Code § 633b. 13 Buster Blackjack wager. This shall include the instances of a Dealer 22 constituting a winning hand for purposes of the Bust-O-Rama wager, regardless of how a Dealer 22 is treated with regards to the base Free Bet Blackjack game. Additionally, Evolution is authorized to offer Bust-O-Rama with the following payable, which was previously granted approval for usage with Bust-O-Rama on Blackjack games offered under 58 Pa. Code § 633a.

| Dealer Busts with |          |
|-------------------|----------|
| 8 or more cards   | 250 to 1 |
| 7 cards           | 100 to 1 |
| 6 cards           | 50 to 1  |
| 5 cards           | 9 to 1   |
| 4 cards           | 2 to 1   |
| 3 cards           | 1 to 1   |

The waiver 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,

A handwritten signature in black ink that reads "Kevin F. O'Toole". The signature is written in a cursive, slightly slanted style.

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