



PENNSYLVANIA GAMING CONTROL BOARD
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Sent via Electronic Mail

Interactive Gaming Certificate Holders and Operators
Interactive Gaming Manufacturers

**RE: Industry Guidance 2025-04
Guidelines for Virtual Dealer Interactive Table Games**

Dear Operators and Manufacturers:

The Pennsylvania Gaming Control Board ("Board") has established guidelines for interactive gaming operators and manufacturers that offer virtual dealer interactive table games. These guidelines are intended to ensure transparency and compliance with Board regulations by establishing requirements for game categorization, disclaimers and player notifications.

Virtual dealer games are interactive games that simulate the play of table games that replicate a live casino experience using pre-recorded video footage of dealers, computer-generated imagery and green screen technology. These games do not feature a live dealer, and all outcomes are determined by an approved and independently tested random number generator ("RNG"), rather than physical gaming devices.

To maintain compliance with Board standards, the following requirements apply:

- Game categorization: Operators are prohibited from listing virtual dealer games under the "Live Dealer" category on any gaming platform.
- Disclaimers: Clear disclaimers must be displayed both on the game loading screen and within the game rules, informing players that the dealer video is pre-recorded, and all outcomes are determined by an RNG.
- Acknowledgment pop-up: Upon the initial launch of each virtual dealer game, a message must be displayed on the loading screen requiring players to check an acknowledgment box before proceeding. The message must include the following or substantially similar language:

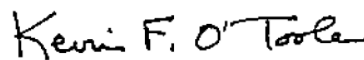
"This game features pre-recorded video footage of dealers. All game results are generated by an approved and independently tested random number generator."

- Game rules notice: The following or similar language must appear at the top of the game rules/help screen:
“Virtual dealer table games are designed to replicate a live casino experience. They combine virtual computer-generated imagery with green screen technology and pre-recorded video footage of dealers. Game outcomes are determined by an approved and independently tested random number generator, rather than by physical table game devices like roulette wheels.”

These requirements are effective immediately for games that have not been approved by the Board, including those currently pending review by the PGCB Gaming Lab or in the process of being tested by an independent testing lab. Games that have been approved by the PGCB—including those currently offered on interactive gaming platforms—must comply with these requirements, including testing and approval by the Board, by August 20, 2025.

If you have any questions or would like additional information, please contact Lee Copello, Director of iGaming Compliance, at (717) 210-8603 or via email at lcopello@pa.gov.

Sincerely,



Kevin F. O'Toole
Executive Director

KFO:pr

cc: Steve Cook, Chief Counsel, PGCB
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