



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

October 13, 2023

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

Delivered Via Electronic Mail

Jessica Jercinovic
Compliance Analyst
Galaxy Gaming, Inc.
6480 Cameron Street
Suite 305
Las Vegas, NV 89118

RE: Galaxy Gaming 21+3 and Dealer Envy Waiver Requests

Dear Ms. Jercinovic:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence dated July 27, 2023, and revised waiver requests. Galaxy Gaming is requesting permission to offer the Three Card Poker Wager authorized 58 Pa. Code §633a.6(e)(9) under the name of 21+3, and the associated paytables for the Three Card Poker Wager under 58 Pa. Code §633a.13(k) as 21+3 Classic in lieu of Paytable A, and 21+3 Xtreme in lieu of Paytable B. Additionally, Galaxy Gaming seeks a waiver to §633a.13(k) Paytable B to add Dealer Envy payouts, which would result in the Dealer winning a tip when the player's wager wins.

With regards to Galaxy Gaming's request to offer the Three Card Poker Wager under the name 21+3, with the associated payable name variation, the Board does not object, so long as the wager follows all rules and procedures of the Three Card Poker Wager and the underlying payout odds remain unchanged from those published in the Board's regulations.

With regards to Galaxy Gaming's second request, seeking to use additional paytables, which add a "built-in" Dealer Envy for the Three Card Poker/21+3 Wager, I decline to grant Galaxy Gaming's waiver request. 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

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
Heather Worner, Director of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Assistant Chief Counsel, PGCB