



PENNSYLVANIA GAMING CONTROL BOARD  
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July 28, 2025

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**Sent via Electronic Mail**

Ms. Violet Merchant  
Senior Product Compliance Analyst  
Galaxy Gaming  
6480 Cameron Street, Suite 305  
Las Vegas, NV 98118

**RE: Galaxy Gaming's Lucky Ladies Blackjack Waiver Requests**

Dear Ms. Merchant:

On behalf of the Pennsylvania Gaming Control Board ("PGCB"), I have reviewed your correspondence on behalf of Galaxy Gaming ("Galaxy"), in which Galaxy seeks a waiver to authorize the following five paytables relative to the Lucky Ladies Twenty Point Bonus Wager under 58 Pa. Code § 633a.13(c).

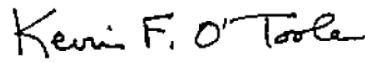
| Hand                  | Golden 4 Blackjack | Burst Blackjack | Paytable A | Paytable B | Paytable C |
|-----------------------|--------------------|-----------------|------------|------------|------------|
| Queen of hearts pairs | 100 to 1           | 100 to 1        | 100 to 1   | 100 to 1   | 100 to 1   |
| Matched 20            | 30 to 1            | 20 to 1         | 25 to 1    | 20 to 1    | 30 to 1    |
| Suited 20             | 10 to 1            | 10 to 1         | 10 to 1    | 10 to 1    | 10 to 1    |
| Any 20                | 3 to 1             | 2 to 1          | 3 to 1     | 3 to 1     | 3 to 1     |
| Any queen             | 1 to 1             | 1 to 1          | n/a        | n/a        | n/a        |
| One queen of hearts   | n/a                | n/a             | 2 to 1     | 2 to 1     | 1 to 1     |
| One queen             | n/a                | n/a             | 1 to 1     | 1 to 1     | 1 to 1     |

Upon review, Galaxy's proposed paytables broadly reduce payout odds for many hand combinations while eliminating the top hand payout for the Queen of hearts and dealer blackjack. Galaxy asserts that its proposed paytables represent higher return to player percentages through the addition of payouts for more frequent hand occurrences. However, Galaxy's paytables, in shifting payouts downward, represent a significant alteration from the published payable. Specifically, every payout odd with the exception of the Suited 20 (all paytables), and the Matched 20 (Paytable A), has been reduced. Therefore, at this time, PGCB will not be granting a waiver to authorize the usage of these five Galaxy paytables.

Although PGCB is denying the present waiver request, this denial does not bar Galaxy from pursuing consideration of these paytables through the normal table games submission process. If a table games submission is made, authorization for one or more of these paytables may only occur following successful lab review, and the adoption and publication of table games rules and regulations.

If you have any questions, please contact Robert Wood, Senior 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 stylized font.

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