



PENNSYLVANIA GAMING CONTROL BOARD  
303 WALNUT STREET, COMMONWEALTH TOWER  
HARRISBURG, PENNSYLVANIA  
17101

KEVIN F. O'TOOLE  
*Executive Director*  
303 Walnut Street  
Commonwealth Tower, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
Phone: (717) 346-8300  
Fax: (717) 346-8350  
Email: [REDACTED]  
Website: [gamingcontrolboard.pa.gov](http://gamingcontrolboard.pa.gov)

April 22, 2025

*Chair*  
DENISE J. SMYLER

*Commissioners*  
FRANK DERMODY  
SHAWN DILLON  
GEORGE DUNBAR  
SARA MANZANO-DÍAZ  
NEDIA RALSTON  
FRANCES J. REGAN

*Ex-Officio Members*  
PAT BROWNE  
STACY GARRITY  
RUSSELL C. REDDING

**Sent via Electronic Mail**

Mark Roy  
Senior Product Compliance Manager  
Games Global USA Inc.  
1515 South Federal Highway, Suite 407  
Boca Raton, Florida 33432

**RE: Terminator 2 Roulette Waiver Request**

Dear Mr. Roy:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your waiver request and correspondence on behalf of Games Global USA Inc. ("Games Global"), in which Games Global is requesting a waiver relating to the payout odds enhancements for Lightning Roulette under 58 Pa. Code § 617c.3(g) (relating to Lightning Roulette possible payout odds) and to reduce the potential number of Lucky Numbers under 58 Pa. Code § 617c.3(d), to accommodate its Terminator 2 Roulette game's configuration.

Specifically, Games Global's Terminator 2 Roulette waiver request ask for the following considerations:

1. Games Global be authorized to add 449 to 1 odds to the list of possible payout odds listed in 58 Pa. Code § 617c.3(g); and
2. Games Global be authorized to reduce the potential Lucky Numbers which may appear from between one and five as is provided in 58 Pa. Code § 617c.3(d), to between one and four Lucky Numbers.

In a letter dated January 3, 2025, Games Global was granted waiver permission relative to 617c.3 Lightning Roulette to include 449 to 1 as a potential payout under 633c.3(g). Games Global therefore remains able to offer its games as Lightning Roulette variations with the payouts authorized in the January 3, 2025, waiver:

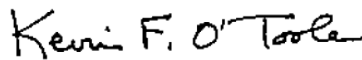
| Possible Payouts |
|------------------|
| 499 to 1         |
| 449 to 1         |
| 399 to 1         |
| 349 to 1         |
| 299 to 1         |
| 249 to 1         |
| 199 to 1         |
| 149 to 1         |
| 99 to 1          |
| 49 to 1          |

Games Global represents that a reduction in total potential Lucky Numbers when paired with the addition of 449 to 1 payout odds will result in the Return to Player ("RTP") percentage remaining comparable to the RTPs of roulette games. Therefore, I grant Games Global's waiver request relative to 58 Pa. Code § 617c.3(d) to allow for between one (1) and four (4) Lucky Numbers to be selected. This waiver authorization is conditioned upon the overall game's RTP remaining equal to or greater than the RTP of Lightning Roulette as authorized under the Board's regulations.

The remaining aspects of Terminator 2 Roulette shall follow the rules and procedures governing play of Lightning Roulette, as provided in 58 Pa. Code §§ 617c.3 (relating to Lightning Roulette) and 617b.6(b) (relating to Lightning Roulette—additional allowances for single or double zero wheel).

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, Senior Counsel via email at [REDACTED].

Sincerely,



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