



PENNSYLVANIA GAMING CONTROL BOARD
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October 24, 2025

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Delivered Via Electronic Mail

Ms. Susan Christie
Senior Manager Compliance Americas – Interactive
IGT
6355 S. Buffalo Drive
Las Vegas, Nevada 89113

RE: IGT's Any Pairs Baccarat Waiver Request

Dear Ms. Christie:

The Pennsylvania Gaming Control Board ("PGCB" or "Board") is in receipt of your correspondence regarding IGT's regulatory waiver requests concerning Baccarat. IGT is requesting a waiver to authorize its Any Pair side wager configuration to be offered in association with Baccarat games. Specifically, IGT's Any Pairs wager is comprised of three independent wager options: Player Pair, Banker Pair, and Any Pair. Player Pair and Banker Pair pays 11 to 1, while Any Pair pays 5 to 1.

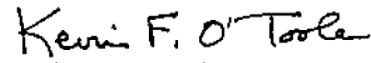
The Board's regulations authorize the Player Pair and Banker Pair wagers under 58 Pa. Code § 631b.8(g)(4)(xix)-(xx) with the 11 to 1 payout odds [see §631b.8(h)(2)]. However, § 631b.8 does not include the Any Pair wager and payout.

At this time, I grant IGT's waiver request to add the Any Pairs wager in conjunction with the Player Pair and Banker Pair wagers under 58 Pa. Code § 631b.8 Rising Phoenix Baccarat. Specifically, "Any Pair" shall be an authorized wager §631b.8(g)(4) (relating to optional bonus wagers) and shall be authorized with payout odds of 5 to 1. The remaining aspects of the rules and procedures shall follow those outlined in 58 Pa. Code § 631b.8.

At such time that Regulations incorporating the waiver issued pursuant to this letter are adopted by the Board and published in the *Pennsylvania Bulletin*, this waiver shall become null and void.

If you have any questions or concerns on this matter, please do not hesitate to contact Senior Counsel, Robert Wood, 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
Gregg Hazzouri, Director, Bureau of Casino Compliance, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Assistant Chief Counsel, PGCB