



PENNSYLVANIA GAMING CONTROL BOARD
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August 17, 2023

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Delivered Via Electronic Mail

Robert W. Wood
Regional Manager Product Compliance
IGT
403 Westcoat Road
Egg Harbor Township, NJ 08234

RE: IGT's Dynasty Baccarat Waiver Request

Dear Mr. Wood:

On behalf of the Pennsylvania Gaming Control Board ("PGCB"), I have reviewed your correspondence dated June 30, 2023, regarding IGT's regulatory waiver request concerning your Dynasty Baccarat game. The Dynasty Baccarat game, which IGT has submitted to the PGCB Gaming Lab for review, is a Baccarat variation similar to Commission-free Baccarat (see 58 Pa Code § 631b.5), except that Dynasty Baccarat provides that when a Banker hand wins with a three-card hand with a point count of 7, the bet on the Banker's hand is returned. IGT seeks approval to offer Dynasty Baccarat in Pennsylvania.

After review, it is our view that the modification requested by IGT do not negatively impact the integrity of gaming, as the proposed variation results in a higher return-to-player ("RTP") percentage for the Dynasty Baccarat game compared to Commission-free Baccarat. Therefore, at this time, I approve the requested variations outlined above, and permit IGT to offer its Dynasty Baccarat as follows:

Dynasty Baccarat shall be offered and played consistent with the rules and procedures of Commission-free Baccarat (see 58 Pa Code § 631b.5), except that Dynasty Baccarat shall disregard the provisions of 58 Pa Code § 631b.5(i) in favor of: A winning wager made on the Banker's Hand shall be paid at odds of 1 to 1, except if the Banker's Hand wins with a hand consisting of three cards with a Point Count of 7, then the wager on the Banker's Hand shall be returned.

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

KFO/rmw

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