



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

June 22, 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

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

RE: IGT's Kirin and Phoenix Baccarat Side Wagers Waiver Request

Dear Mr. Wood:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence dated June 8 and June 12, 2023, regarding IGT's regulatory waiver request concerning your Kirin and Phoenix Baccarat side wagers. IGT seeks approval to offer these side wagers and asserts the Kirin and Phoenix operate consistent with other Baccarat side wagers approved as part of the Board regulations.

IGT represents that Kirin is a side wager which shall win when the Player hand has a winning hand consisting of three cards with a point count of 8. This means that Kirin is the same fundamental side wager as Panda 8 (see 58 Pa. Code §§ 627a. Minibaccarat, 629a. Midibaccarat, and 631a. Baccarat) and Moon 8 (see 58 Pa. Code § 631b.8 Rising Phoenix Baccarat). Accordingly, IGT is permitted to offer its Kirin side wager consistent with the regulations covering the Panda 8 and Moon 8 side wagers, including the Board's approved payout odds of 25 to 1 [see 58 Pa. Code §§ 627a.12(g), 629a.12(g), 631a.13(g) and 631b.8(h)(2)].

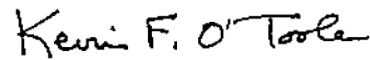
IGT represents that Phoenix is a side wager which shall win when the Banker hand has a winning hand consisting of three cards with a point count of 7. This means that Phoenix is the same fundamental side wager as Dragon 7 (see 58 Pa. Code §§ 627a. Minibaccarat, 629a. Midibaccarat, and 631a. Baccarat) and Sun 7 (see 58 Pa. Code § 631b.8 Rising Phoenix Baccarat). Accordingly, IGT is permitted to offer its Phoenix side wager consistent with the regulations covering the Dragon 7 and Sun 7 side wagers, including the Board's approved payout odds of 40 to 1 [see 58 Pa. Code §§ 627a.12(f), 629a.12(f), 631a.13(f) and 631b.8(h)(2)].

At this time, I approve IGT's request to offer its Kirin and Phoenix side wagers, so long as they are offered in accordance with side wagers already approved by the Board, and only on Board approved Baccarat, Minibaccarat, or Midibaccarat games. Be aware, this waiver does not authorize Kirin or Phoenix to be offered with different payout odds than those approved under the Board's regulations for Panda 8/Moon 8, or Dragon 7/Sun 7. Additionally, IGT's waiver references the Kirin and Phoenix side wagers are to be offered with

“Dynasty Baccarat,” but does not request waiver consideration for the “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, 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. This waiver does not authorize for play in Pennsylvania “Dynasty Baccarat.” Absent further consideration, “Dynasty Baccarat” shall not be offered for play in Pennsylvania until such time as it has been granted Board approval.

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
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