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June 18, 2024

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Delivered Via Electronic Mail

LNW Gaming, Inc.
C/O Joe Casole
Odds On Compliance
7957 N. University Drive, Suite 251
Parkland, FL 33076

RE: LNW Gaming, Inc.'s TriLux Bonus and TriLux Super 3 Blackjack Wagers Waiver Request

Dear Mr. Casole:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence regarding LNW Gaming, Inc. ("LNW") regulatory waiver request. LNW seeks modified paytables for its TriLux Bonus wager, LNW's styled TriLux Deluxe wager (see 58 Pa. Code §633b.11) offered in conjunction with Blackjack games. Additionally, LNW seeks authorization to offer their TriLux Super 3 wager, a Top 3 wager, (see 58 Pa. Code §633b.7) with modifications to the base wager configuration and payable.

With regards to the TriLux Deluxe wager regulations, LNW seeks a waiver of 58 Pa. Code §633b.11 (relating to TriLux Deluxe wager) generally, to allow for the addition of a mini-royal hand configuration of a suited Ace, King, Queen combination to become the top potential payout in LNW's TriLux Bonus wager. In coordination with the mini-royal, LNW seeks a waiver relative to § 633b.11(i) (relating to TriLux Deluxe payout odds) to incorporate the mini-royal combination and make other payable alterations. LNW is requesting that PGCB approve the offering of the following paytables:

Hand	LNW 4	LNW 6	LNW 7
Mini-royal (suited A,K,Q)	n/a	100 to 1	50 to 1
Straight flush	30 to 1	30 to 1	30 to 1
Three-of-a-kind	20 to 1	20 to 1	20 to 1
Straight	10 to 1	10 to 1	10 to 1
Flush	5 to 1	5 to 1	5 to 1

PGCB has reviewed your proposed payable configurations and has determined that they would not negatively impact the integrity of gaming. Therefore, I approve LNW's waiver request for the paytables above, denoted as LNW 4, LNW 6, and LNW 7, for use with the TriLux Bonus wager option offered with the game of Blackjack. These paytables shall be authorized for play in Blackjack games, which utilize 4 or more decks of cards. All other aspects of the TriLux Bonus wager shall follow the rules and procedures as outlined under 58 Pa. Code § 633b.11 (relating to TriLux Deluxe wager).

Additionally, LNW seeks waivers relative to 58 Pa. Code § 633b.7 (relating to Top 3 wager) to authorize its TriLux Super 3 wager to be offered. LNW asserts that its TriLux Super 3 wager operates consistently with § 633b.7 except that TriLux Super 3 requires the patron to place a TriLux Bonus wager rather than the Three Card Poker wager noted in § 633b.7(c). LNW therefore is seeking a general waiver of § 633b.7 to authorize its TriLux Super 3 wager as presented by reading references to the “Three Card Poker wager” in § 633b.7 as “TriLux Bonus wager.” Additionally, LNW is seeking PGCB approval of the following payable, in addition to those already authorized under § 633b.7(e):

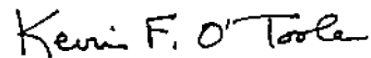
Hand	LNW C
Three-of-a-kind Suited	500 to 1
Straight flush	150 to 1
Three-of-a-kind	75 to 1

PGCB has reviewed your TriLux Super 3 requests and has determined that they would not negatively impact the integrity of gaming. Therefore, I approve LNW’s TriLux Super 3 waiver request as follows:

1. References to the “Three Card Poker” wager under 58 Pa. Code §633b.7 shall be read as “TriLux Bonus wager” for purposes of LNW’s TriLux Super 3 wager.
2. The payable above, denoted as LNW C, shall be authorized in addition to Paytable A and Paytable B under 58 Pa. Code §633b.7(e) for LNW’s TriLux Super 3 wager.
3. All other aspects of the TriLux Super 3 wager shall follow the rules and procedures of the Top 3 Wager, as outlined in 58 Pa. Code § 633b.7.

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