



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

November 15, 2024

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Delivered Via Electronic Mail

LNW Gaming, Inc.
C/O Joe Casole
IC 360
2470 Saint Rose Parkway, Suite 214
Henderson, NV 89074

RE: LNW Gaming, Inc.'s TriLux Bonus and TriLux Deluxe 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 further waiver of PGCB regulations 58 Pa. Code § 633c.11 (relating to TriLux Deluxe wager). PGCB previously granted LNW a waiver dated June 18, 2024, relating to 58 Pa. Code § 633b.11 authorizing LNW to utilize additional paytables, so long as game play followed the rules and procedures of the Board's regulations.¹

LNW now returns to PGCB with the present waiver request, seeking to expand the scope of the June 18, 2024 waiver. Specifically, LNW seeks permission to disregard references to "TriLux Deluxe Press" which serves to allow patron the option to take TriLux Deluxe side wager winnings and cap their base blackjack wager with them. LNW asserts that this request has no impact on the game's previously provided mathematical analyses, which underpinned PGCB's June 18, 2024 waiver consideration.

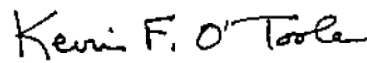
PGCB has reviewed LNW's request and will not be granting a waiver. PGCB's review rejects LNW's conclusion that the present request bears no impact on the game's analysis which underpinned the issuance of the June 18, 2024 waiver. Rather, PGCB's review finds that a player's optimal strategy may at times be to choose TriLux Deluxe Press. Removal of this option would therefore constitute a negative patron impact.

Although PGCB is denying the present waiver request, LNW may still make a table games submission to the Office of Gaming Laboratory Operations for review and testing for its desired TriLux Deluxe configuration. If approved as a new side wager variation, regulations would be required before the game could be offered in Pennsylvania. In the meantime, the June 18, 2024 waiver shall remain in effect. LNW may continue to offer its TriLux Deluxe wager consistent with the June 18, 2024 waiver and associated TriLux wager regulations (58 Pa. Code § 633c.11), which requires the option for TriLux Deluxe Press.

¹ At the time of issuance of the June 18, 2024 waiver, the TriLux Deluxe wager rules were not yet updated in the Pennsylvania Bulletin to move into final form regulation status under the "c" subchapter.

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
Lee Copello, Director of iGaming Compliance, PGCB
Heather Worner, Director of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Senior Counsel, PGCB