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February 12, 2024

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Sent via Electronic Mail

Michael Keelon
Regulatory Compliance Manager
Live! Casino Pittsburgh
5260 Route 30
Greensburg, PA 15601

RE: Live! Casino Pittsburgh DJ Wild Stud Poker

Dear Mr. Keelon:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence and waiver request dated February 6, 2024. Stadium Casino Westmoreland RE, LLC, d/b/a Live! Casino Pittsburgh ("Live!"), is requesting waivers covering two aspects of DJ Wild Stud Poker (Chapter 687a.): 1. Two-Way Bad Beat Bonus Wager and 2. Progressive Bonus Wager payable. Specifically, Live! asserts that the language governing when a Two-Way Bad Beat Bonus Wager shall be considered a winning and losing wager [58 Pa. Code § 687a.11(f)(3)] reflects a single way bad beat style wager rather than the two-way bad beat wager intended. Additionally, Live! seeks to have the payable for the Progressive Bonus Wager under DJ Wild Stud Poker [58 Pa. Code § 687a.12(c)] expressed in odds in an x for 1 format, rather than the present x to 1 format.

Upon review, the language under § 687a.11(f)(3) reflects a Single-Way Bad Beat Wager rather than the Two-Way Bad Beat Wager contemplated. PGCB appreciates you bringing this to our attention, and we are proceeding with making corrections to the regulatory language. In the meantime, Live! may offer the Two-Way Bad Beat Bonus Wager under the following provisions, in lieu of the terms published under 58 Pa. Code § 687a.11(f)(3):

- (3) For the Two-Way Bad Beat Bonus Wager:
- (i) If the player's highest ranking DJ Wild Stud Poker hand and the dealers highest ranking DJ Wild Stud Poker hand are not both three-of-a-kind or better, or the player's and dealer's highest ranking hands tie being a three-of-a-kind or better as provided in § 687a.6(f), the dealer shall collect the losing Two-Way Bad Beat Bonus Wager.
 - (ii) If the player's highest ranking DJ Wild Stud Poker hand is three-of-a-kind or better and loses to the dealer's higher ranking hand, as provided in § 687a.6(f), the dealer shall pay the winning Two-Way Bad Beat Bonus Wager in accordance with § 687a.12(e).

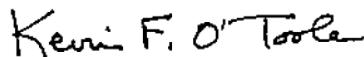
- (iii) If the dealer's highest ranking DJ Wild Stud Poker hand is three-of-a-kind or better and loses to the players highest ranking hand, as provided in § 687a.6(f), the dealer shall pay the winning Two-Way Bad Beat Bonus Wager in accordance with § 687a. 12(e).

Additionally, Live! asserts that the progressive payable language under § 687a.12(c), when compared with other progressive wager paytables under PGCB regulations, represents an inconsistency. The DJ Wild Stud Poker progressive paytables are expressed in an x to 1 rather than an x for 1 format. PGCB appreciates you bringing this to our attention, and we will work to make corrections to the regulatory language. In the meantime, Live! may offer the Progressive Bonus Wager under DJ Wild Stud Poker with payout odds expressed in the x for 1 style rather than the published x to 1. For example, Progressive Paytable 1 under §687a.12(c) may be offered as follows:

Progressive Paytable 1; \$1 Wager; \$2,000 seed and re-seed		
Hand	Pay	Envy
Royal flush	100% of meter	\$1,000
Straight flush	10% of meter	\$300
Four-of-a-kind	300 for 1	
Full house	50 for 1	
Flush	40 for 1	
Straight	30 for 1	
Three-of-a-kind	9 for 1	

Once regulatory language addressing Two-Way Bad Beat Bonus Wagers and the Progressive Wager payout odds under DJ Wild Stud Poker are adopted by the Board and published in the Pennsylvania Bulletin, this waiver will expire. If you have any questions, please contact Robert Wood, Assistant Chief Counsel 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, iGaming Compliance Operations, PGCB
Gregg Hazzouri, Director, Bureau of Casino Compliance, PGCB
Heather Worner, Director, Office of Gaming Laboratory Operations, PGCB
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