



PENNSYLVANIA GAMING CONTROL BOARD
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August 28, 2025

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Sent via Electronic Mail

Mr. Ron Chrzan
Director of Compliance
Mohegan Pennsylvania
1280 Highway 315
Wilkes-Barre, PA 18702

RE: Heavenly 9 Progressive Side Wager Minibaccarat/Midibaccarat Waiver Request

Dear Mr. Chrzan:

On behalf of the Pennsylvania Gaming Control Board ("Board"), I have reviewed your correspondence regarding Mohegan Pennsylvania's ("Mohegan") regulatory waiver request regarding the Heavenly 9 progressive baccarat wager. Mohegan seeks permission to implement the Heavenly 9 progressive baccarat wager on Minibaccarat and/or Midibaccarat offerings, consistent with the Heavenly 9 progressive baccarat wager regulation 58 Pa. Code §631b.2.

At this time, I approve the implementation of the requested waiver, permitting the Heavenly 9 progressive baccarat wager (58 Pa. Code § 631b.2) to be offered on Minibaccarat (58 Pa. Code §627a.) and Midibaccarat (58 Pa. Code § 629a.) game offerings. At such time that regulations incorporating Heavenly 9 progressive baccarat wager into Minibaccarat and Midibaccarat are adopted by the Board and published in the *Pennsylvania Bulletin*, this waiver shall become null and void.

If you have any questions or concerns on this matter, please do not hesitate to contact Senior Counsel, Robert Wood, via emails 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
Heather Worner, Director, Office of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Senior Counsel, PGCB