



PENNSYLVANIA GAMING CONTROL BOARD
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March 25, 2024

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Sent via Electronic Mail

Nino Gulashvili
Live Certification Projects Team Leader
PT Services (Delaware) LLC
Vanemuise 7, 51004 Tartu
Estonia

RE: Playtech's Commission-Free Baccarat Lucky Six Side Wager Request

Dear Mr. Gulashvili:

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence and waiver request dated February 16, 2024. Playtech is requesting permission to offer the Lucky Six side wager authorized under Commission-Free Baccarat in §§ 627b.2(c)(3) (relating to Commission-Free Mini Baccarat), 629b.2(c)(3) (relating to Commission-Free Midi Baccarat), and 631b.5(c)(3) (relating to Commission-Free Baccarat) under the name Super Six, with an increased payout. Under PGCB's regulations, the Lucky Six wager shall pay 20 to 1 odds when the Banker's hand wins while containing three cards with a point count of six [see §§ 627b.2(k)(2) (relating to Commission-Free Mini Baccarat), 629b.2(k)(2) (relating to Commission-Free Midi Baccarat), and 631b.5(k)(2) (relating to Commission-Free Baccarat)]. Playtech seeks to pay 28 to 1 when the Banker's hand wins while containing three cards with a point count of six.

Based upon the information that you have provided, Playtech's Super Six side wager operates consistently with the Lucky Six side wager authorized under Commission-Free Minibaccarat, Commission-Free Midi Baccarat, and Commission-Free Baccarat [see §§ 627b.2(c)(3) (relating to Commission-Free Mini Baccarat), 629b.2(c)(3) (relating to Commission-Free Midi Baccarat), and 631b.5(c)(3) (relating to Commission-Free Baccarat)]. The alternative name, Super Six, proposed by Playtech does not alter the rules and procedures of the Lucky Six side wager, and therefore can proceed without waiver or special consideration from the Board.

However, Playtech's proposed 28 to 1 when the Banker's hand wins while containing three cards with a point count of six, departs from the existing authorized payout odds. Upon review, the Board has determined that the proposed increased payout odds reflect a higher return to player percentage. At this time, Playtech is authorized to offer the requested payout odds as follows:

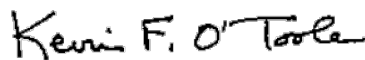
Commission-Free Mini Baccarat: A winning Lucky Six Wager consisting of a winning Banker's hand comprised of three cards with a point count of six, may be paid at odds of 28 to 1 rather than the 20 to 1 stated under 58 Pa. Code § 627b.2(k)(2).

Commission-Free Midi Baccarat: A winning Lucky Six Wager consisting of a winning Banker's hand comprised of three cards with a point count of six, may be paid at odds of 28 to 1 rather than the 20 to 1 stated under 58 Pa. Code § 629b.2(k)(2).

Commission-Free Baccarat: A winning Lucky Six Wager consisting of a winning Banker's hand comprised of three cards with a point count of six, may be paid at odds of 28 to 1 rather than the 20 to 1 stated under 58 Pa. Code § 631b.5(k)(2).

Once regulatory language addressing the 28 to 1 payout odds under Commission-Free Mini Baccarat, Commission-Free Midi Baccarat, and Commission-Free Baccarat 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
Chad Zimmermann, Deputy Chief Counsel, PGCB
Robert Wood, Assistant Chief Counsel, PGCB