



PENNSYLVANIA GAMING CONTROL BOARD  
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November 21, 2025

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**Delivered Via Electronic Mail**

Mr. Tomasso Di Chio  
Chief Legal and Compliance Officer  
Bragg Gaming  
50 West Liberty Street, Suite 405  
Reno, NV 89511

**RE: Spin Games' Blackjack—Three Card Poker Wager Waiver Request**

Dear Mr. Di Chio:

The Pennsylvania Gaming Control Board ("PGCB" or "Board") is in receipt of your correspondence regarding Spin Games LLC's ("Spin") regulatory waiver requests concerning the Blackjack side wager Three Card Poker. Spin seeks to offer the Three Card Poker Wager with an alternative payable configuration than what is published in the Board's regulations.

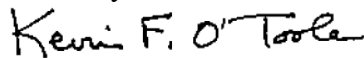
Specifically, Spin represents that the Three Card Poker Wager shall continue to follow the rules and procedures as outlined under 58 Pa. Code § 633a. (relating to Blackjack) but requests the following payable modification:

| Three Card Poker Paytable<br><i>See 58 Pa. Code § 633a.13(k)</i> |             | Spin's Proposed Paytable |             |
|------------------------------------------------------------------|-------------|--------------------------|-------------|
| Hand                                                             | Payout Odds | Hand                     | Payout Odds |
|                                                                  |             | Suited three-of-a-kind   | 100 to 1    |
| Straight flush                                                   | 30 to 1     | Straight flush           | 35 to 1     |
| Three-of-a-kind                                                  | 20 to 1     | Three-of-a-kind          | 33 to 1     |
| Straight                                                         | 10 to 1     | Straight                 | 10 to 1     |
| Flush                                                            | 5 to 1      | Flush                    | 5 to 1      |

After review, it is our conclusion that the modified payable does not negatively impact the integrity of gaming. The proposed payable provides for a higher return-to-player ("RTP") percentages and payouts for players who chose to place the optional Three Card Poker Wager. Therefore, at this time, I approve the requested waiver to authorize Spin Games to offer the Three Card Poker Wager with the above outlined payable configuration. All other aspects of the Three Card Poker wager shall be offered consistently with the rules and procedures as provided in 58 Pa. Code § 633a. (relating to Blackjack).

At such time that Regulations incorporating the waiver issued pursuant to this letter 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 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  
Gregg Hazzouri, Director, Bureau of Casino Compliance, PGCB  
Chad Zimmermann, Deputy Chief Counsel, PGCB  
Robert Wood, Assistant Chief Counsel, PGCB