



PENNSYLVANIA GAMING CONTROL BOARD
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KEVIN F. O'TOOLE
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July 30, 2025

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Sent via Electronic Mail

Mr. Mathew Sydney-Smith
Director – Gaming Operations
Wind Creek Bethlehem, LLC
77 Wind Creek Boulevard
Bethlehem, Pennsylvania 18015

RE: Wind Creek Casino Bethlehem 5 Treasures Wagers on Midi Baccarat

Dear Mr. Sydney-Smith:

The Pennsylvania Gaming Control Board (“Board”) is in receipt of your July 24, 2025 letter requesting permission on behalf of Wind Creek Bethlehem, LLC (“Wind Creek”) to be permitted to offer the 5 Treasures wagers on Midi Baccarat games. Wind Creek further states that offering this wager on Midi Baccarat tables is designed to increase player engagement without altering the rules or integrity of the base game.

Pursuant to 58 Pa. Code § 631b.3, 5 Treasure Baccarat wagers are permitted to be offered on Baccarat. Please let this letter serve as notice that Board staff has reviewed your request and found no issues that would negatively compromise the Pennsylvania Race Horse Development and Gaming Act, the Board’s regulations, or the safety of HCM’s patrons. As such, your proposal is hereby approved subject to the following conditions:

- 1) Wind Creek shall comply with the requirements set out in 58 Pa. Code § 631b.3 for Midi Baccarat; and
- 2) Wind Creek shall submit and obtain approval of an amended Rules Submission Form for Midi Baccarat to include the offerings of the 5 Treasures wagers; and
- 3) Wind Creek shall submit and obtain approval of new layouts that include the separate area designated for the placement of the 5 Treasures wagers for Midi Baccarat; and
- 4) Wind Creek shall submit and obtain approval of amended gaming guides for Midi Baccarat.

Please contact the Bureau of Casino Compliance if you have any questions or concerns.

Sincerely,

Kevin F. O'Toole
Executive Director

July 30, 2025

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KFO/pag

cc: Michael Magazzu, Corporate Director – Regulatory Compliance & Risk Management, WCB
Gregg Hazzouri, Director, Bureau of Casino Compliance, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Robert Wood, Assistant Chief Counsel, PGCB
Patricia Gustavson, Senior Supervisor, Bureau of Casino Compliance, PGCB
Lauren Sposato, Supervisor, Bureau of Casino Compliance, PGCB