



PENNSYLVANIA GAMING CONTROL BOARD
303 WALNUT STREET, COMMONWEALTH TOWER
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KEVIN F. O'TOOLE
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January 10, 2023

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Sent via Electronic Mail

Jeffrey Yancey
Technical Compliance Project Manager (US)
PT Services (Delaware)
100N. West Street, Suite 1200
Wilmington, DE 19801

RE: Buffalo Blitz Slot Machine and Trivia Contest Promotion

Dear Mr. Yancey:

The Pennsylvania Gaming Control Board ("Board") staff has received your e-mail of November 10, 2022 requesting a waiver on behalf of PT Services (Delaware) LLC d/b/a Playtech to offer an interactive slot machine at its live gaming studio called Buffalo Blitz as well as a Live Trivia promotion in which players answer multiple choice questions for a chance to win free spins.

Please be advised that Board staff have determined there is no need for a waiver of Board regulations to offer either of the aforementioned products. Based on the information provided, Board staff have no objection in concept to either Buffalo Blitz or Live Trivia.

Prior to offering Buffalo Blitz for play, the game must be submitted to the Bureau of Gaming Laboratory Operations for review and approval as an authorized non-peer-to-peer interactive game which simulates slot machines. The game is subject to interactive gaming tax as prescribed in 4 Pa.C.S. § 13B52(a)(3).

Prior to offering Live Trivia in the live gaming studio, interactive gaming operators that partner with Playtech must submit the terms and conditions to Board staff as required by 58 Pa. Code § 813a.3. Further, free spins offered as prizes may not be used on live studio table games. They may only be used on Buffalo Blitz and Playtech's other random-number-generator ("RNG") non-peer-to-peer interactive games that simulate slot machines and table games.

Feel free to contact Paul Resch, Director of the Bureau of Gaming Operations, via email at presch@pa.gov if you have any questions.

Sincerely,

Kevin F. O'Toole
Executive Director

KFO:pr

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
Christopher Schroder, Director, Bureau of Casino Compliance, PGCB
Heather Worner, Director, Bureau of Gaming Laboratory Operations, PGCB
Kevin Kile, Director of Sports Wagering, PGCB
Robert Wood, Assistant Chief Counsel, PGCB