



PENNSYLVANIA GAMING CONTROL BOARD
P.O. Box 69060
HARRISBURG, PENNSYLVANIA
17106-9060

KEVIN F. O'TOOLE
Executive Director
303 Walnut Street
Commonwealth Tower
5th Floor, Strawberry Sq.
Harrisburg, PA 17101
Phone: (717) 346-8300
Fax: (717) 346-8350
Email: [REDACTED]
Website: gamingcontrolboard.pa.gov

July 21, 2021

Chair
DENISE J. SMYLER

Commissioners
FRANK DERMODY
OBRA S. KERNODLE, IV
SEAN LOGAN
T. MARK MUSTIO
NEDIA RALSTON
FRANCES J. REGAN

Ex-Officio Members
STACY GARRITY
C. DANIEL HASSELL
RUSSELL C. REDDING

Sent Via Electronic Mail

Mr. Jevgenijs Backovs
Evolution Latvia
Brivibas iela 151
Riga, LV-1012, Latvija

Re: Side Wagers on Various Blackjack Offerings on Interactive Gaming Platform

Dear Mr. Backovs:

On behalf of the Pennsylvania Gaming Control Board ("Board"), I have reviewed your correspondence regarding Evolution Gaming's request to offer four side wagers on various Blackjack offerings on its interactive gaming platform: 21+3, Any Pair, Bust-O-Rama, and Hot 3. The 21+3, Any Pair, and Bust-O-Rama side wagers each operate similarly to Blackjack side wagers that have been reviewed and approved by the Board, namely the Three Card Poker Blackjack wager, the Bet the Set 21 Blackjack wager, and the Buster Blackjack side wager, respectively. However, while the procedures for Evolution's three proposed side wagers are the same as the currently approved side wagers, the paytables and payouts that Evolution wishes to offer are different than what has been previously reviewed and approved by the Board.

Specifically, the proposed modifications to each side wager are as follows:

21+3 Side Wager

<u>PGCB approved payable</u>	<u>Evolution's proposed payable</u>
Straight Flush – 30 to 1	Suited trips – 100 to 1
Three of a kind – 20 to 1	Straight Flush – 40 to 1
Straight – 10 to 1	Three of a kind – 30 to 1
Flush – 5 to 1	Straight – 10 to 1
	Flush – 5 to 1

Any Pair Side Wager

<u>PGCB approved payable</u>			<u>Evolution's proposed payable</u>
<i>Hand</i>	<i>Paytable C</i>	<i>Paytable D</i>	<i>Hand</i>
Suited Pair	15 to 1	12 to 1	Suited Pair 25 to 1
Pair	10 to 1	10 to 1	Pair 8 to 1

Bust-O-Rama Side Wager

<u>PGCB approved payable</u>			<u>Evolution's proposed payable</u>	
<i>Dealer Busts with</i>	<i>Paytable A</i>	<i>Paytable B</i>	<i>Dealer Busts with</i>	
8 or more cards	250 to 1	200 to 1	8 or more cards	250 to 1
7 cards	50 to 1	50 to 1	7 cards	100 to 1
6 cards	15 to 1	15 to 1	6 cards	50 to 1
5 cards	4 to 1	4 to 1	5 cards	9 to 1
4 cards	2 to 1	2 to 1	4 cards	2 to 1
3 cards	2 to 1	2 to 1	3 cards	1 to 1
<i>Dealer Busts with</i>	<i>Paytable C</i>	<i>Paytable D</i>		
8 or more cards	250 to 1	200 to 1		
7 cards	50 to 1	50 to 1		
6 cards	12 to 1	12 to 1		
5 cards	4 to 1	4 to 1		
4 cards	2 to 1	2 to 1		
3 cards	2 to 1	2 to 1		
<i>Dealer Busts with</i>	<i>Paytable E</i>	<i>Paytable F</i>		
8 or more cards	250 to 1	250 to 1		
7 cards	50 to 1	50 to 1		
6 cards	12 to 1	20 to 1		
5 cards	3 to 1	8 to 1		
4 cards	2 to 1	2 to 1		
3 cards	2 to 1	1 to 1		

After review, it has been determined that Evolution may submit for testing and approval software that contains the 21+3, Any Pair, and Bust-O-Rama side wagers on its various Blackjack offerings on its interactive gaming platform. It is our view that the modified paytables do not negatively impact the integrity of interactive gaming, as the proposed paytables provide for higher return-to-player (RTP) percentages and payouts for players who chose to place the proposed wagers.

However, as the Hot 3 side wager and its rules do not correspond to any currently approved side wager available for play in the Commonwealth, implementation of that side wager is not approved at this time. The Hot 3 side wager and its rules may be submitted to the Office of Gaming Laboratory Operations for testing and approval as new Table Games Submission if Evolution Gaming wishes to offer it in the future.

You may provide a copy of this letter with your software submission that includes the 21+3, Any Pair, and Bust-O-Rama side wagers to an independent testing laboratory, if applicable. If you have any questions or concerns on this matter, please do not hesitate to contact Assistant Chief Counsel Chad Zimmermann at [REDACTED].

Sincerely,

Kevin F. O'Toole

Kevin F. O'Toole
Executive Director

KFO/cwz

cc: R. Douglas Sherman, Chief Counsel, PGCB
Claire Yantis, Administrative Director, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Heather Worner, Director, Office of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Assistant Chief Counsel, PGCB