



PENNSYLVANIA GAMING CONTROL BOARD

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October 26, 2023

Delivered Via Electronic Mail

Joe Casole
Vice President, Legal & Regulatory Affairs
Odds On Compliance
7987 N. University Dr.
Suite 251
Parkland, FL 33067

RE: LNW Gaming, Inc.'s RUYI Baccarat

Dear Mr. Casole,

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence dated October 6, 2023, regarding LNW Gaming, Inc.'s RUYI Baccarat product. Odds On Compliance, on behalf of LNW Gaming Inc., asserts that RUYI is "merely a rebranded, near-identical, variation of the existing commission free and EZ baccarat games" authorized under the Board's regulations. Additionally, LNW's RUYI has optional side wagers Gold 7, Jade 8, and Ruby 9. Gold 7 wins if the Banker's hand wins with a three-card hand totaling 7 points. Jade 8 wins if the Player's hand wins with a three-card hand totaling 8 points. Ruby 9 wins if the Player's hand, Banker's hand, or both, has a three-card hand totaling 9 points.

Upon review, LNW's RUYI is Commission-free Baccarat (see 58 Pa. Code § 631b.5), except that RUYI provides that when a Banker hand wins with a three-card hand with a point count of 7, the bet on the Banker's hand shall push. PGCB issued a waiver dated August 17, 2023, to allow the push on a Banker three-card 7 in Commission-free Baccarat, instead of a three-card 6 stated in the regulatory language. Therefore, LNW's RUYI shall also be permitted to operate with a Banker three-card 7 push. Otherwise, LNW's RUYI should operate consistent with the rules of Commission-free Baccarat/Minibaccarat/Midibaccarat as outlined in 58 Pa. Code §§ 627b.2, 629b.2, and 631b.5.

Additionally, it has been determined that the Gold 7, Jade 8, and Ruby 9 side wagers, and their associated payout odds, operate consistently with the Fortune 7 Bonus Wager, the Golden 8 Bonus Wager, and the Heavenly 9 Bonus Wager, as described under the 5 Treasures Baccarat

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wagers (58 Pa. Code § 631b.3). PGCB, through waivers dated October 20, 2023, extended the 5 Treasures Baccarat wagers to allow 5 Treasures to be offered on Minibaccarat and Midibaccarat games, consistent with the rules and procedures of 5 Treasures Baccarat wagers outlined in 58 Pa. Code §631b.3. Therefore, LNW would be permitted to offer its Gold 7, Jade 8, and Ruby 9 side wagers consistent with the rules and procedures outlined under the 5 Treasures Baccarat wagers (58 Pa. Code § 631b.3).

Based upon the representations you have submitted for RUYI Baccarat, and the Gold 7, Jade 8, and Ruby 9 side wagers, no waivers are needed. Approval of RUYI Baccarat, Gold 7, Jade 8, and Ruby 9 to commence play remains subject to the successful completion of the usual approval process for table games products.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Wood", written in a cursive style.

Robert Wood
Assistant Chief Counsel

cc: Steve Cook, Chief Counsel, PGCB
Claire Yantis, Administrative Director, PGCB
Paul Resch, Director, Bureau of Gaming Operations, PGCB
Lee Copello, Director of iGaming Compliance, PGCB
Heather Worner, Director of Gaming Laboratory Operations, PGCB
Chad Zimmermann, Deputy Chief Counsel, PGCB