



PENNSYLVANIA GAMING CONTROL BOARD

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Delivered Via Electronic Mail

Andrew Maloney
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RE: LNW Gaming, Inc.'s Run'em Twice Poker

Dear Mr. Maloney,

On behalf of the Pennsylvania Gaming Control Board ("Board" or "PGCB"), I have reviewed your correspondence regarding LNW Gaming, Inc.'s Run'em Twice Poker game. Odds On Compliance, on behalf of LNW Gaming Inc., asserts Run'em Twice Poker plays exactly like the approved Criss Cross Poker (58 Pa. Code § 674a.), and that all but one of the side wagers in Run'em Twice Poker are already approved under Criss Cross Poker. You point out that the side wager not presently authorized under Criss Cross Poker is the Ultimate Pairs Bonus, which is under PGCB review with the Stadium Ultimate Texas Hold'em lab submission. Odds On Compliance, on behalf of LNW Gaming Inc. is requesting Run'em Twice Poker be approved to operate consistent with Criss Cross Poker regulations (58 Pa. Code § 674a.) with the Ultimate Pairs Bonus wager disabled.

Upon review, the Run'em Twice Poker base game is Criss-Cross Poker authorized under 58 Pa. Code § 674a., with the exception that Run'em Twice Poker uses an alternative naming convention. For example, Criss-Cross Poker has the Ante Across and Ante Down Wagers and the Across, Down and Middle Bets. Run'em Twice Poker has named the Ante Across wager as the 1st Ante, the Ante Down Wager as the 2nd Ante, the Across Bet as the 1st Run Bet, the Down Bet as the 2nd Run Bet, and the Middle Bet as the Center Bet. The alternative naming conventions of Run'em Twice Poker does not alter the rules, procedures, or outcomes of the game as compared to Criss-Cross Poker.

Where Run'em Twice Poker materially differs from Criss-Cross Poker is the Ultimate Pair Bonus Wager. The Ultimate Pairs Bonus Wager is a proposed optional side wager in which a winning outcome depends upon the two cards dealt to the player's hand constituting a winning combination. Neither the Ultimate Pairs Bonus Wager nor a comparable optional side wager have been authorized by the Board for play with Criss-Cross Poker. Odds On Compliance has communicated that LNW intends to disable the Ultimate Pairs Bonus Wager until the Ultimate Pairs Bonus Wager is granted approval for play with Criss-Cross Poker/Run'em Twice Poker.

Based upon the information you have submitted, the alternative naming conventions of Run'em Twice Poker does not alter the rules, procedures, or outcomes of the base game as compared to Criss-Cross Poker. Therefore, Run'em Twice Poker would be allowed to operate consistent with the regulations governing Criss-Cross Poker, 58 Pa. Code §674a. However, the Ultimate Pair Bonus Wager is not authorized as an optional side wager under the Criss-Cross Poker regulations and therefore cannot be offered until regulations have been adopted relative to Criss-Cross Poker.

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