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September 1, 2015

VIA EMAIL & FEDERAL EXPRESS

Susan A. Yocum
Assistant Chief Counsel
Pennsylvania Gaming Control Board
303 Walnut Street, Strawberry Square
P.O. Box 69060
Harrisburg, PA 17106-9060

RE: Public Comment on Regulation # 125-188

Dear Ms. Yocum:

Greenwood Gaming & Entertainment, Inc. ("GGE") is a table games operation certificate holder and the holder of a Category 1 slot machine license that authorize GGE to operate Parx Casino in Bensalem, Pennsylvania. GGE respectfully submits the following comments and requests to the Pennsylvania Gaming Control Board (the "Board") in connection with the Board's proposed rulemaking, as captioned above, which was published in the Pennsylvania Bulletin at 45 Pa.B. 4185, on August 1, 2015.

The rulemaking at issue proposes several regulatory modifications, including (i) transitioning nine (9) temporary table game chapters into permanent regulations; (ii) adding a new table game (i.e., Go Fore It); (iii) updating various surveillance requirements; and (iv) modifying the dealer minimum training requirements. GGE endorses many of these changes; however, GGE proposes three (3) additional modifications to the proposed rulemaking.

I. Criss-Cross Poker Dealing Procedures – 58 Pa. Code 674a.10

According to proposed regulation 58 Pa. Code 674a.10(b), which governs the procedures for dealing the cards from an automated dealing shoe in Criss-Cross Poker, casino licensees would be explicitly required to deal the cards in one specific order. The licensee's dealer would deal the first stack of five cards dispensed by the automated dealing shoe face down to the area designated for the placement of the community cards. 58 Pa. Code 674a.10(b) (*Proposed Rulemaking*, 45 Pa. B. 4185). Then, the dealer would spread the stack within the designated area to form a cross with the top card placed in the box furthest from the dealer, the next three cards are placed in the middle row and the bottom card placed in the box closest to the dealer. *Id.* The preceding requirements conflict with the proposed regulation 58 Pa. Code 674a.8(d) (manual shoe) and 58 Pa. Code 674a.9(b) (hand

dealing). GGF would respectfully request that proposed section 674a.10(b) be modified to the language of sections 674a.8(d) and 674a.9(b).

While section 674a.10(b) dictates the order that the community cards are distributed, the other sections appear to provide licensee with discretion to distribute the cards. To that end, GGF requests the following modification to 58 Pa. Code 674a.10(b):

(b) The dealer shall deliver the first stack of five cards dispensed by the automated dealing shoe face down to the area designated for the placement of the community cards. The dealer shall spread the stack within the designated area to form a cross with one card in the box furthest from the dealer, three cards in the second row and one card in the box closest to the dealer. After dealing the five community cards, starting with the player farthest to the dealer's left and continuing around the table in a clockwise manner, the dealer shall deliver a stack of two cards face down to each of the players who has placed the two required Ante Wagers in accordance with § 674a.7(d) (relating to wagers).

This minor modification allows the Board to have consistent regulations for dealing Criss-Cross Poker through any medium—manual shoe, automated shoe or by hand. GGF also be aware that surrounding jurisdictions also provides some flexibility to their casinos. The New Jersey Division of Gaming Enforcement (“DGE”) does not dictate the specific distribution order of the community cards for Criss-Cross Poker. Rather, the DGE simply provides that “[t]he dealer will deliver the first stack of five cards dispensed by the automated dealing shoe face down in cross formation to be used as community cards.” N.J.A.C. 13:69F-40.9(c); see also N.J.A.C. 13:69F-40.7(c) (manual show); N.J.A.C. 13:69F-40.8(c) (by hand). The DGE does not dictate where the first card is placed or the last card is placed. With the preceding information, GGF respectfully request that section 674a.10(b) be modified to parallel the flexible requirements of sections 674a.8(d) and 674a.9(b).

II. Criss-Cross Poker Payout Odds – 58 Pa. Code 674a.12

Criss-Cross Poker payouts are governed by 58 Pa. Code 674a.12, which provides three (3) different pay out odds table for various wagers. GGF respectfully requests a maximum amount that is payable to a player on a single hand of Criss-Cross Poker similar to other Board approved games: Let It Ride Poker (58 Pa. Code 643a.12(g)); Pai Gow Poker (58 Pa. Code 645a.12(c)); Texas Hold'em Bonus Poker (58 Pa. Code 647a.12(c)); Ultimate Texas Hold'em Poker (58 Pa. Code 653a.12(f)); Mississippi Stud (58 Pa. Code 655a.12(b)); and Asia Poker (58 Pa. Code 659a.12(c)). As demonstrated by the preceding citations, there are six (6) different table games that have a \$50,000 maximum payout. With the other Board approved table games regulations as guidance, GGF requests the following addition to 58 Pa. Code 674a.12:

(d) Notwithstanding the payout odds in subsections (b) and (c), a certificate holder may, in its Rules Submission under § 601a.2, establish a maximum amount that is payable to a player on a single hand. The maximum payout amount shall be at least \$50,000 or the maximum amount that one player could win per round when betting the minimum permissible wager, whichever is greater.

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This minor addition mirrors other Board approved table games for consistency. Moreover, a surrounding jurisdiction also provides a \$50,000 maximum payout for Criss-Cross Poker as well. The New Jersey DGF provides the following regulatory language for Criss-Cross Poker in connection with its payout odds: “[n]otwithstanding the payout odds set forth in (b) through (e) above, the aggregate payout limit for a player on any hand shall be \$50,000 or the maximum amount that one patron could win per round when betting the minimum wager, whichever is greater.” N.J.A.C. 13:69F-40.11(c). GGE believes it is necessary and fair to allow Pennsylvania casino licensees the same discretion that it has in other table games as well as the ability that its competitors have in New Jersey.

GGE respectfully requests that the Board review the preceding modifications to Proposed Rulemaking #125-188, revised 58 Pa. Code 674a.10(b) to be consistent with the other dealing procedures and add a \$50,000 maximum payout for Criss-Cross Poker. Thank you for considering the comments of GGE in connection with the proposed regulation. GGE will be happy to answer any questions that the Board may have on these comments.

Respectfully submitted,



Bryan P. Schroeder
Assistant General Counsel
Greenwood Gaming & Entertainment, Inc.

cc: John F. Mizner, Esq., Chairman, Independent Regulatory Review Commission