

IN THE MATTER of the Gambling Act 2003

AND on an application by **DUNEDIN CASINOS MANAGEMENT LIMITED** for approval of three new game mixes

BEFORE THE GAMBLING COMMISSION

Members: P Chin (Chief Gambling Commissioner)
M M Lythe
P J Stanley
G L Reeves
M J Richardson

Date of Application: 22 September 2009

Date of Decisions: 13 November 2009, 19 February 2010

Date of Notification
of Decision: 5 March 2010

**DECISION ON APPLICATION BY DUNEDIN CASINOS MANAGEMENT LIMITED
FOR APPROVAL OF THREE NEW GAME MIXES**

Introduction

1. Dunedin Casinos Management Limited ("**DCML**") applied to the Commission for approval of a new Annex A, incorporating three new game mixes "M", "N" and "O", under condition 9 of DCML's operator's licence.
2. The relevant licence condition is as follows:

DCML Operator's Licence

 9. The Licence Holder may operate on casino gaming tables the game types and game mixes specified in Annex A attached to this Licence. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.
3. The Commission considered DCML's application at its 13 November 2009 meeting and noted that, unlike other New Zealand casinos, Dunedin casino does not have a clearly defined regulatory benchmark against which new game mixes can be assessed in terms of opportunities for casino gambling.
4. By letter dated 17 November 2009, the Commission sought submissions to assist it to determine DCML's benchmark from the Secretary for Internal Affairs (the "**Secretary**"), Problem Gambling Foundation ("**PGF**"), Gambling Helpline ("**GH**"), Salvation Army ("**SA**") and DCML. The Commission received submissions from DCML and the Secretary.

Initial submissions by DCML on the application for approval of three new game mixes

5. DCML stated that it has nine approved game mixes (A-L) and wants to introduce three new game mixes, M, N and O. It submitted that:

- (a) The new game mixes will not increase opportunities for casino gambling as they all generate fewer rounds per hour and fewer overall opportunities than game mix C, which is the casino's regulatory benchmark
- (b) Game mix N has six more player spaces than game mix C but this is offset by it generating fewer rounds per hour. This is demonstrated by game mix N having fewer overall gambling opportunities as follows:

Game mix	C	M	N	O
Player spaces	239	217	245	234
Rounds per hour	567	469	543	494
Overall opportunities	11,861	9,407	11,615	10,388

The Secretary's initial submissions on the application for approval of three new game mixes

6. The Secretary submitted that:

- (a) Game mix C is not the regulatory benchmark for Dunedin casino. In decision GC24/05 the Commission indicated that while it had difficulty ascertaining the true regulatory benchmark, it eventually determined that DCML can provide up to 267 player spaces at table games. This figure (plus the casino's 180 gaming machines) forms DCML's regulatory benchmark.
- (b) A game mix was not generated to show the 267 player spaces, but it would provide clarity if one was established. GC24/05 relays an unwritten understanding between DCML and the Secretary that DCML's game mix is to be inferred from the shapes of the tables shown on a floor plan approved by the CCA in March and April 2004, together with DCML's use of flip-top tables. As such the following game mix should be adopted as the approved regulatory benchmark:

	Rate	Proposed benchmark	Player spaces	Opportunities
Roulette	34	3	63	2142
Black Jack	67	6	126	8442
Midi Baccarat	43	2	54	2322
Tai Sai	36	1	24	864
Total			267	13770

In determining this game mix, Black Jack and Tai Sai have been preferred over other games as the flip-top options, as they represent games with greater play rates.

- (c) Game mixes M, N and O would not increase opportunities for casino gambling as there is a large gap in opportunities between them and the game mix he proposes as the regulatory benchmark.

DCML's initial submissions in reply on the application for approval of three new game mixes

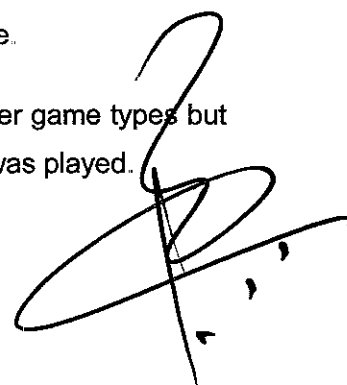
7. DCML submitted in reply:

- (a) The Secretary is correct that DCML's true regulatory benchmark is provided by the floor plan approved by the CCA in 2004, comprising 267 player spaces and 13,770 opportunities to gamble.
- (b) It concurs with the Secretary's submission that it would be prudent to create a game mix that reflects its regulatory benchmark.

DCML's submissions in response to the Commission's letter seeking clarification on its regulatory benchmark

8. DCML submitted that:

- (a) The floor plan that was in place on 19 September 2003 is dated 5 September 2003. This forms the basis from which the maximum number of opportunities can be calculated.
- (b) This plan depicts 12 tables with the games played at each determined by the shape of the table.
- (c) Each of the eight Black Jack shaped tables can accommodate Black Jack, Caribbean Stud Poker or Midi Baccarat. For the purposes of calculating a maximum configuration, each of those tables must be treated as if it were being operated at its maximum opportunity. Based on accepted player spaces and rates of play, Black Jack provides the greatest number of opportunities compared to Mini Baccarat or Caribbean Stud Poker.
- (d) The two Roulette shaped tables can only accommodate Roulette.
- (e) The single Midi Baccarat shaped table could accommodate other game types but the unique shape of the table indicates that only Midi Baccarat was played.

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- (f) The Money Wheel shaped table could accommodate Money Wheel or Tai Sai. The Money Wheel that Dunedin casino used was double-sided.
- (g) The Commission's letter seeking submissions noted that DCML always operated one Caribbean Stud Poker game. While this is true, it was always able to flip that table into a Black Jack game if it so desired.
- (h) Its regulatory benchmark should be recorded as the following game mix in Annex A:

American Roulette – 2 games
Black Jack – 8 games
Midi Baccarat – 1 game
Money Wheel (double-sided) – 1 game.

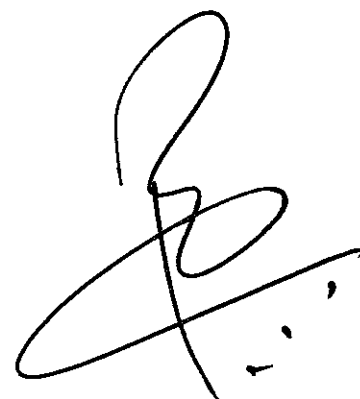
The Secretary's submissions in response to the Commission's letter seeking clarification on DCML's regulatory benchmark

9. The Secretary submitted that:

- (a) The Commission's letter seeking submissions discussed two approaches to setting DCML's regulatory benchmark. The second approach was to set a benchmark taking into account the changes that have taken place at the Dunedin casino since 19 September 2003, and are common to all currently approved game mixes. This approach would leave open the possibility of a future application seeking to increase the regulatory benchmark. That is, if the benchmark does not reflect what was in place at 19 September 2003, DCML may, in future, seek a fresh determination in line with the methodology adopted for other casino operators.
- (b) The Commission's first approach was to set the benchmark according to the 2002 and 2003 floor plans and, as a matter of construction, identify the likely game mix that was in operation on 19 September 2003. This is his preferred approach.
- (c) The Commission suggested that, based upon the 2002, 2003 and 2004 floor plans, the following game mix can be inferred:

Roulette – 2 games
Black Jack – 6 games
Midi Baccarat – 1 game
Mini Baccarat – 1 game
Caribbean Stud Poker – 1 game
Tai Sai/Money Wheel – 1 game.

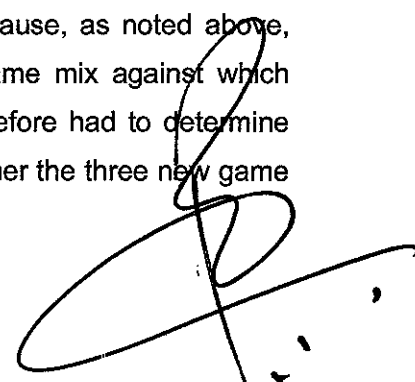
He concurs with this assessment.

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- (d) DCML has provided him with the table management system reports from 17 to 20 September 2003. These reports show which tables were operating on 19 September. The reports accord with the Commission's inferred benchmark above.
- (e) DCML has informed him that the Money Wheel used at Dunedin casino was double-sided, although only one side was used. He has been unable to confirm this but it equates with an explanation DCML provided in a 2005 application leading to decision GC24/05.
- (f) While he accepts that the flip-top procedure was in place as at 19 September 2003, the question is whether that procedure creates a legitimate consideration in establishing benchmark opportunities.
- (g) The Commission needs to determine whether a theoretical maximum that existed at 19 September 2003 by way of the flip-top procedure, but was never implemented, can be said to represent the opportunities that existed at the time. That is, the Commission must determine whether it should accept what theoretically could have been in place at that time or what was actually in place at that time.
- (h) If DCML had the foresight to amend its layout on 18 September 2003 to encompass eight Black Jack tables, this matter may have been dealt with earlier. However DCML did not, and it appears that the table layout used at that time was well established and in accordance with the 2002 plan.
- (i) While he does not offer a definitive view on the issue, a benchmark based on a snapshot of what was deployed on 19 September 2003 appears to be available.

Analysis

10. DCML applied for Commission approval of three new game mixes, M, N and O, in addition to its 12 existing approved game mixes, A-L. The Commission's usual procedure when considering whether to approve new game mixes is to compare what is proposed with the approved game mix which provides the greatest opportunities for casino gambling and which the Commission regards as the benchmark mix. With this application, the Commission was initially not able to do this because, as noted above, Dunedin casino does not have a clearly defined benchmark game mix against which proposed game mixes can be assessed. The Commission therefore had to determine DCML's true regulatory benchmark, before it could consider whether the three new game mixes could be approved.

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11. The Commission last considered Dunedin casino's regulatory benchmark, in decisions GC24/05 and GC28/05. In GC24/05, relying on submissions made by DCML and supported the Secretary, the Commission held that the benchmark was provided by the number of tables and machines DCML was permitted under its licence conditions to operate in the casino (12 tables and 180 machines); the table game floor plan approved by the CCA on 9 March 2004 (the "2004 plan"); and a "flip top" procedure approved by the CCA on 10 January 2002 (now forming part of the Minimum Operating Standards for Dunedin casino). The Commission accepted that DCML could flip table tops but, amongst other things, required DCML to submit a revised floor plan specifying game mixes with no more than 12 table games, and to identify on those plans, or on an appendix to them, which table games it proposed should be "flip top" and which games it proposed to play on those tables.
12. Following decision GC24/05, DCML submitted a revised table games floor plan and a schedule specifying 12 game mixes for approval. DCML provided no information on what tables had been previously designated for flipping, or what games could be played on those tables.
13. In decision GC28/05, the Commission approved game mixes A-L, and a table games floor plan, which specified where the tables could be positioned and which tables could be flipped between which games. The tables and games depicted on the table games floor plan are as follows:
- Roulette – 3
 Black Jack/Mini Baccarat – 2
 Black Jack/Poker – 1
 Black Jack – 2
 Poker/Midi Baccarat – 1
 Poker – 1
 Midi Baccarat – 1
 Caribbean Stud Poker – 1
14. The Commission recorded game mixes A-L in schedule A of decision GC28/05. The specifically approved game mixes were preceded by the following passage:

Subject to the specific game mix requirements set out below, Dunedin casino may operate no more than 12 Table Games made up of the following:

American Roulette – up to 3
 Black Jack – up to 5
 Midi Baccarat – up to 2
 Mini Baccarat – up to 2
 CSP – 1
 Poker – up to 3
 Tai Sai – 1
 Money Wheel – 1



15. It appears that the rationale for setting out a range of options, rather than a specific game mix, was to preserve DCML's maximum gambling opportunities, which were thought, on the basis of the 2004 plan, to be higher than the maximum opportunities allowed for by any of the then approved operational game mixes.
16. However, the Commission's decision regarding DCML's benchmark is not consistent with what it has done in all other casino licences – other licences all contain a specific benchmark game mix (not a range of game types) representing the maximum permitted opportunity against which future proposals are assessed. The currently expressed range lacks sufficient certainty to provide a reference point for comparison with any proposed game mix.
17. It is now common ground that DCML's regulatory benchmark should be expressed as a single game mix, the same as it is for other casinos. Expressing the regulatory benchmark as a game mix would not only be consistent with the approach the Commission has taken elsewhere, it is necessary if the game mix is to provide a proper basis for comparison against which the current and future applications for game mixes can be assessed, the very reason for having a benchmark mix.

Establishing DCML's benchmark game mix

18. As noted above, the Commission previously approved a range of games for DCML based upon the 2004 plan. For the current application, DCML initially submitted that game mix C was its regulatory benchmark. The Secretary did not agree with DCML's submission, and referred to decision GC24/05, in which the Commission accepted that DCML could provide up to 267 player spaces, but without identifying the game mix which produces 267 spaces, a position confirmed by decision GC28/05. The Secretary also referred to an "unwritten understanding", referred to in decision GC24/05, between DCML and the Secretary, that the game mix was to be inferred from the distinct shapes of the tables shown in the last floor plan approved by the Casino Control Authority ("CCA") on the 2004 plan.
19. The Commission rejected both submissions as they proposed a benchmark based upon a floor plan approved by the CCA in March 2004. Section 11 of the Gambling Act 2003 (the "Act"), which provides that no party can increase opportunities for casino gambling, came into effect on 19 September 2003. The 2004 floor plan, having been approved by the CCA in March 2004, cannot have been in place on 19 September 2003 and cannot, therefore, form the basis from which DCML's benchmark game mix is established.
20. Commission Secretariat identified three plans to assist in the identification of DCML's true regulatory benchmark as at 19 September 2003 – a plan approved by the CCA on

12 April 2002 (the “2002 plan”), a plan approved by the CCA on 5 September 2003 (the “2003 plan”) and the 2004 plan.

21. The Commission considered these plans at its November 2009 meeting and concluded that the floor plan that was in place on 19 September 2003 was the 2003 plan.

22. The 2003 plan depicts 12 tables of four different shapes. There are no games written on the tables, nor is there a legend to show which games are played at which tables. The 2003 plan has the same combination of table shapes, however, as the 2002 plan. The 2002 plan includes the name of the relevant game on the depiction of each table as follows:

Roulette – 2 games
Black Jack – 6 games
Midi Baccarat – 1 game
Mini Baccarat – 1 game
Caribbean Stud Poker – 1 game
Tai Sai/Money Wheel – 1 game

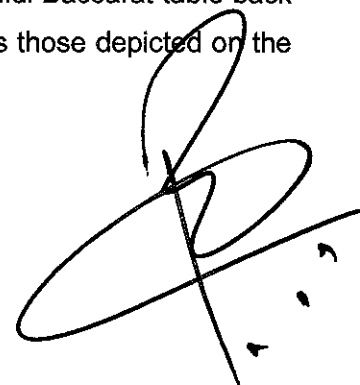
23. The table shapes for the tables Black Jack, Mini Baccarat and Caribbean Stud Poker are the same. With the exception of Tai Sai and Money Wheel, each table on the 2002 plan is shown as being specifically for a particular game.

24. The only difference between the 2002 plan and the 2003 plan is that the Money Wheel/Tai Sai table was moved from being between two groups of four Black Jack/Mini Baccarat/Caribbean Stud Poker tables in the 2002 plan to being in between a group of six Black Jack/Mini Baccarat/Caribbean Stud Poker and another group of two Black Jack/Mini Baccarat/Caribbean Stud Poker tables.

25. Given the date of its approval, 5 September 2003, it is likely that the 2003 plan was the current plan as at 19 September 2003. This seems particularly likely in light of identified correspondence from DCML accompanying its application for approval of the 2004 plan. In a letter to the CCA dated 4 March 2004, DCML wrote, in part, as follows:

The change to the game mix consists of swapping a Black Jack table and a Mini Baccarat table for a Roulette table and a Midi Baccarat table. We consider the opportunities to gamble to be equal between those two game mixes and therefore the changes to be consistent with the Gambling Act.

26. If one takes the 2004 plan, and swaps a Black Jack table and a Midi Baccarat table back to a Mini Baccarat table, one is left with the same mix of tables as those depicted on the 2002 and 2003 plans.

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27. In any event, in his submissions on DCML's benchmark, the Secretary stated that he had obtained copies of DCML's table management records showing that the game mix in place on 19 September 2003 did indeed comprise games outlined above in paragraph 22.

Flip top procedure

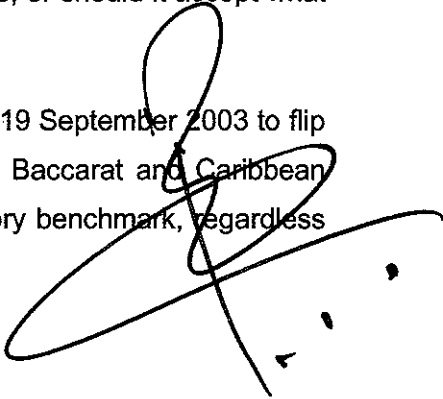
28. In its second set of submissions, DCML referred to its "flip top" procedure, approved by the CCA in 2002 and 2004. That procedure provides, in part, as follows:

C-1.12 Flip Top Tables

The Casino Operator reserves the right to designate the game and change the game in relation to flip top tables.

Only the gaming shift manager or above can authorise a change of game. In such case, the following procedures will be followed:

- (a) In the event of a change of game, a sign will be placed on the table 20 minutes prior to the change ...

29. The remainder of the procedure sets out exactly what must take place prior to the flip top procedure being implemented.
30. DCML submitted that the effect of the flip top procedure was that each of its flippable tables should be treated as the game on that table which offers the most casino gambling opportunities. That is, the eight tables of Black Jack/Mini Baccarat/Caribbean Stud Poker should be treated as Black Jack as Black Jack provides more opportunities for casino gambling than Mini Baccarat or Caribbean Stud Poker.
31. DCML also submitted that the two Roulette tables can only accommodate Roulette, the shape of the Midi Baccarat table clearly indicates that only Midi Baccarat is played on it, while the Tai Sai/Money Wheel can accommodate either game.
32. The Secretary submitted that, although DCML had an approved procedure for flipping tables which it might have used to maximise its opportunities as at 19 September 2003, it did not do so, so the actual game mix in place at that time is the benchmark, namely the game mix outlined above at paragraph 22.
33. The questions that the Commission considered were – what effect should the existence of the flip top procedure have on DCML's regulatory benchmark? Should the Commission accept what might have been in place as at 19 September 2003, or should it accept what was actually in place at that time?
34. The Commission is of the view that, if DCML was permitted on 19 September 2003 to flip all of its Black Jack shaped tables between Black Jack, Mini Baccarat and Caribbean Stud Poker, then this ought to be reflected in DCML's regulatory benchmark, regardless
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of whether DCML was actually using its ability to flip the tables. DCML's maximum gambling opportunities should be represented by what was available to it, rather than what it availed itself of.

35. The difficulty for the Commission is knowing exactly what DCML was permitted to do at that time. DCML provided no evidence of what tables were designated for flipping as at 19 September 2003, nor what games were available on those tables.
36. The Commission accepts that the CCA approved a flip top procedure, which sets out the procedure for the flipping of tables, but it has no evidence about what tables could be flipped, nor what was playable on them. The Commission was not satisfied that procedure was intended by the CCA to apply to all tables, and it expected that the CCA would have had to identify the tables to which the procedure potentially applied. However, even if that is not correct, formal designation by the casino was required. If that had occurred, the Commission would have expected that to be recorded somewhere – such as on contemporary floor plans. DCML proffered no evidence on this.
37. The earlier decisions on DCML's game mixes did not assist the Commission. In decision GC24/05, the Commission referred to the lack of clarity regarding which tables could be flipped and which tables could not. At paragraph 25 of that decision, the Commission stated that:

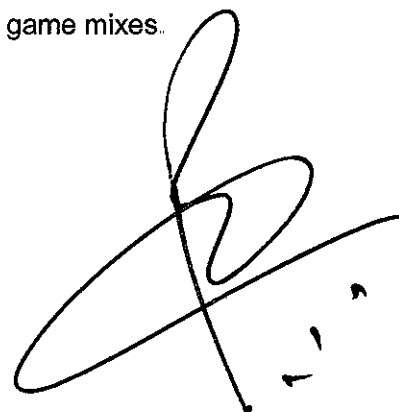
... neither the floor plans nor the Standards identify which tables at the Casino can be flipped and the games which can be substituted

38. That decision also recorded a disagreement between DCML and the Secretary about the number of tables that could be flipped – the casino claimed that it could flip all tables other than the Roulette table, and that it could unscrew and remove whole table tops and swap them with other games. The Secretary's understanding was that the flipping was limited to the six tables depicted on the approved floor plan other than Roulette, Midi Baccarat and Money Wheel/Tai Sai.
39. Having regard to the limitations of the evidence on this application, and the misinformation on the earlier applications, the Commission was not prepared to conclude that DCML could flip any tables on 19 September 2003. The Commission considered that the game mix that was in place on 19 September 2003 (without the ability to flip) was:

Roulette – 2 games
 Black Jack – 6 games
 Midi Baccarat – 1 game
 Mini Baccarat – 1 game
 Caribbean Stud Poker – 1 game
 Money Wheel – 1 game

Amending the game mix in place on 19 September 2003

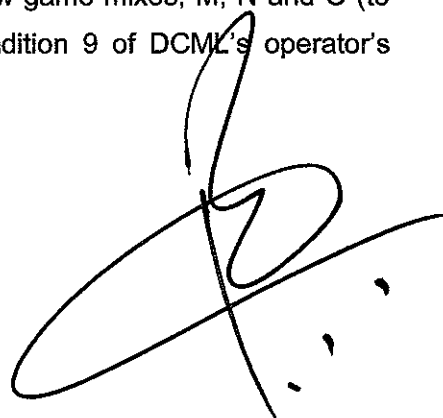
40. In its letter to parties dated 17 November 2009, the Commission discussed two approaches to setting DCML's regulatory benchmark. The first approach was simply to identify the likely game mix that was in operation on 19 September 2003. The second approach was to set a benchmark based upon the 19 September 2003 game mix, but amending it to take into account the changes which have taken place at Dunedin casino since that time and which are common to all currently approved game mixes, and so interpret them in such a way that they reflect the current deployment of tables without increasing opportunities for casino gambling compared to what was in place on 19 September 2003. For example, all current and proposed game mixes include three Roulette tables and no Tai Sai/Money Wheel table, but the game mix in place on 19 September 2003 provides for only two tables of Roulette and one Tai Sai/Money Wheel table.
41. Neither party supported the second approach; the Secretary's rationale being that by setting a game mix that is other than that which was were available to DCML in 2003, but which instead reflects their equivalent in the current deployment of tables, would leave open the possibility of future applications seeking to increase the benchmark. The Commission disagrees. The very point of setting a new benchmark is that the Commission will cease to use the 19 September 2003 game mix as a reference point and will thereafter assess applications solely against the new game mix. No increase in opportunities above what the new benchmark mix allows can or will be approved.
42. Although the parties expressed a preference for the first option, the Commission considered that its second option is preferable from an operational point of view. A modified game mix will allow the Commission, and the parties, to be able to better assess future opportunities against that game mix, which includes three Roulette tables and no Tai Sai/Money Wheel table. It appears that, for the foreseeable future at least, all of DCML's game mixes will have three Roulette tables and no Tai Sai/Money Wheel. The Commission considers it preferable to set a benchmark now which recognises this, than to have to assess the effect of proposed future changes against a benchmark which does not reflect current or recent practice, and which would necessarily involve the addition (with the need for offsetting substitution) of a game with no limit on player numbers, namely Roulette, in assessing all likely future applications for game mixes.

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43. The Commission has therefore substituted a Roulette table for the Tai Sai/Money Wheel table on the basis that, in the round, it offers sufficiently similar opportunities for casino gambling to represent a fair benchmark mix. DCML's benchmark game mix is accordingly fixed as follows:
- Roulette – 3 tables
Black Jack – 6 tables
Midi Baccarat – 1 table
Mini Baccarat – 1 table
Caribbean Stud Poker – 1 table
44. The Commission compared current game mixes A-L against this benchmark and was satisfied that they provided fewer opportunities for casino gambling.
45. The Commission compared game mixes M-O against the benchmark and was similarly satisfied that they will not increase opportunities for casino gambling above those permitted by the benchmark mix.
46. Finally, the Commission notes its own observations from decision GC26/09, in which it stated that approved game mixes should refer to automatic shufflers operating no more than 50% of *open* Black Jack tables and that it would need it to ensure that other casinos were also subject to this requirement. Accordingly, the Commission amends the footnotes to Annex A to include this requirement.

Decision of the Commission

47. The Commission decided:
- (a) that DCML's regulatory benchmark is:
- Roulette – 3 tables
Black Jack – 6 tables
Midi Baccarat – 1 table
Mini Baccarat – 1 table
Caribbean Stud Poker – 1 table
- This game mix will be named Game Mix A.
- (b) to approve a new Annex A (**attached**) (which incorporates existing game mixes A-L (to be called game mixes B-M), and three new game mixes, M, N and O (to be called game mixes N, O and P)), under condition 9 of DCML's operator's licence;



(c) to include in Annex A the word "open" in relation to automatic shufflers at footnote



Peter Chin
Chief Gambling Commissioner

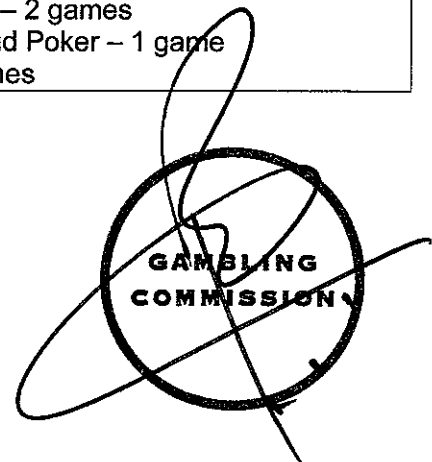
for and on behalf of the
Gambling Commission

5 March 2010

ANNEX A

Pursuant to condition 9 the following game mixes may be operated by the Licence Holder on casino gaming tables subject to the following conditions and requirements:

<p>Game Mix A</p> <p>Roulette – 3 games Black Jack – 6 game Midi Baccarat – 1 game Mini Baccarat – 1 game Caribbean Stud Poker – 1 game</p>	<p>Game Mix B</p> <p>American Roulette – 3 games Black Jack – 5 games Midi Baccarat – 1 game Caribbean Stud Poker – 1 game Poker – 2 games</p>
<p>Game Mix C</p> <p>American Roulette – 3 games Black Jack – 4 games Midi Baccarat – 1 game Caribbean Stud Poker – 1 game Poker – 3 games</p>	<p>Game Mix D</p> <p>American Roulette – 3 games Black Jack – 5 games Midi Baccarat – 2 games Caribbean Stud Poker – 1 game Poker – 1 game</p>
<p>Game Mix E</p> <p>American Roulette – 3 games Black Jack – 4 games Midi Baccarat – 2 games Caribbean Stud Poker – 1 game Poker – 2 games</p>	<p>Game Mix F</p> <p>American Roulette – 3 games Black Jack – 4 games Midi Baccarat – 1 game Mini Baccarat – 1 game Caribbean Stud Poker – 1 game Poker – 2 games</p>
<p>Game Mix G</p> <p>American Roulette – 3 games Black Jack – 3 games Midi Baccarat – 1 game Mini Baccarat – 1 game Caribbean Stud Poker – 1 game Poker – 3 games</p>	<p>Game Mix H</p> <p>American Roulette – 3 games Black Jack – 4 games Midi Baccarat – 2 games Mini Baccarat – 1 game Caribbean Stud Poker – 1 game Poker – 1 game</p>
<p>Game Mix I</p> <p>American Roulette – 3 games Black Jack – 3 games Midi Baccarat – 2 games Mini Baccarat – 1 game Caribbean Stud Poker – 1 game Poker – 2 games</p>	<p>Game Mix J</p> <p>American Roulette – 3 games Black Jack – 3 games Midi Baccarat – 1 game Mini Baccarat – 2 games Caribbean Stud Poker – 1 game Poker – 2 games</p>



<p>Game Mix K</p> <p>American Roulette – 3 games Black Jack – 2 games Midi Baccarat – 1 game Mini Baccarat – 2 games Caribbean Stud Poker – 1 game Poker – 3 games</p>
<p>Game Mix M</p> <p>American Roulette – 3 games Black Jack – 2 games Midi Baccarat – 2 games Mini Baccarat – 2 games Caribbean Stud Poker – 1 game Poker – 2 games</p>
<p>Game Mix O</p> <p>American Roulette – 3 games Black Jack – 4 games Midi Baccarat – 3 games Caribbean Stud Poker – 1 game Poker – 1 game</p>

<p>Game Mix L</p> <p>American Roulette – 3 games Black Jack – 3 games Midi Baccarat – 2 games Mini Baccarat – 2 games Caribbean Stud Poker – 1 game Poker – 1 game</p>
<p>Game Mix N</p> <p>American Roulette – 3 games Black Jack – 3 games Midi Baccarat – 2 games Caribbean Stud Poker – 1 game Poker – 3 games</p>
<p>Game Mix P</p> <p>American Roulette – 3 games Black Jack – 3 games Midi Baccarat – 3 games Caribbean Stud Poker – 1 game Poker – 2 games</p>

Note

- (a) The Licence Holder must comply with the notification, and other, requirements specified in MOS C-C 1.12 when changing the game mix by “flipping” tables. Otherwise the Licence Holder is permitted to change between the above table game mixes, subject to providing the Inspectorate and the Commission with a minimum of five working days notice in writing of its intention to do so.
- (b) For the avoidance of doubt, the Promotional Wheel may be used only for promotional purposes in accordance with the Act, and must not be used to conduct casino gambling.
- (c) The Licence Holder is permitted to operate automatic shufflers on no more than 50% of open Black Jack games specified in game mixes A, B, C, D, E, F, G, H, I, J, K, L, M, N, O and P.

