

**IN THE MATTER** of the Gambling Act 2003

AND on an application by  
**CHRISTCHURCH CASINOS  
LIMITED** for approval of new game  
mixes

**BEFORE THE GAMBLING COMMISSION**

Members: L M Hansen (Chief Gambling Commissioner)  
D C Matahaere-Atariki  
W N Harvey  
S C L Pearson

Date of Application: 24 February 2021

Date of Decision: 9 April 2021

Date of Notification of Decision: 15 April 2021

**DECISION ON AN APPLICATION BY CHRISTCHURCH CASINOS LIMITED  
FOR APPROVAL OF NEW GAME MIXES**

**Introduction**

1. Christchurch Casinos Limited (“**CCL**”) applied to the Commission, under condition 9 of its operator’s licence, for approval to amend the game mix Annex for the Christchurch casino. CCL applied to introduce six new game mixes which will allow for the simultaneous deployment of Electronic Baccarat and Electronic Roulette.

**Licence conditions**

2. The relevant licence conditions are as follows:

**CCL’s operator’s licence**

6. The number of gaming tables in the Gambling Area shall not exceed 36.
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.

**CCL’s submissions**

3. CCL submitted, in summary, as follows:
  - (a) It wants to add six new game mixes, CC-CH, to its game mix Annex.

- (b) The new game mixes allow for the simultaneous deployment of Electronic Roulette and Electronic Baccarat.
- (c) It has mathematically compared the proposed game mixes with its benchmark game mix, game mix A, and concluded that, in the round, the proposed game mixes all offer fewer casino gambling opportunities.
- (d) Although the mathematical calculations are not definitive, they are a strong indicator of the opportunities available pursuant to each game mix. New game mixes, and the benchmark game mix, are as follows:

<b>Game mix</b>	<b>Player spaces</b>	<b>Overall opportunities</b>
A	718	19214
CC	654	14294
CD	668	14173
CE	683	14819
CF	676	14741
CG	704	15566
CH	698	15902

#### **The Secretary's submissions**

- 4. The Secretary submitted that he has no regulatory concerns with this application.

#### **Analysis**

- 5. CCL currently has approval to deploy game mixes A-CB at the Christchurch casino and now seeks approval to deploy six new game mixes, CC-CH.
- 6. The Commission's general approach for approving new game mixes is to compare what is proposed with what is currently permitted, including the approved game mix which provides the most opportunities for casino gambling, and to form a view, in the round, on whether they will increase opportunities for casino gambling. The Commission makes an assessment in the round, on a common-sense comparative basis, rather than by calculating opportunities based upon a formula, or tables of data. Game mix A is the approved game mix that provides the most opportunities at Christchurch casino.
- 7. Proposed game mixes CC-CH all offer considerably fewer player spaces and overall opportunities than game mix A.
- 8. Game mixes CC-CH all propose to deploy both Electronic Baccarat and Electronic Roulette from a single physical table. As the Commission has noted in decisions GC17/20 and GC25/20, doing so raises no issues of regulatory concern provided that CCL deploys 35 physical tables (rather than the licence condition maximum of 36) and its

game mixes stipulate the 36 table games that will be available for play (as Electronic Baccarat and Electronic Roulette will both be deployed from the same table). Consistent with the abovementioned two Commission decisions, CCL's proposal does this.

### **Decision**

9. The Commission approved new game mixes CC-CH, under condition 9 of CCL's operator's licence for Christchurch casino. The new Annex is **attached**.

### **Right of appeal**

10. Pursuant to section 235 of the Act, a person affected by this decision may appeal that decision to the High Court. An appeal must be made within 15 working days of the date of notice of the Commission's decision, or any longer period that the High Court may allow.



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Lisa Hansen  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

15 April 2021



## 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:

- A.
  - Roulette – 10 games
  - Black Jack – 14 games
  - Caribbean Stud Poker – 3 games
  - Midi Baccarat Style A – 3 games
  - Mini Baccarat – 1 game
  - Money Wheel – 1 game
  - Poker – 2 games
  - Tai Sai – 1 game
  - Electronic Roulette – 1 game
  
- B.
  - Roulette – 8 games
  - 7-Box Black Jack/Pontoon – 11 games
  - Caribbean Stud Poker – 3 games
  - 3-Card Poker – 1 game
  - Midi Baccarat Style A – 1 game
  - Midi Baccarat Style B – 5 games
  - Money Wheel – 1 game
  - Poker – 4 games
  - Tai Sai – 1 game
  - Electronic Roulette/Baccarat – 1 game
  
- C.
  - Roulette – 8 games
  - 7-Box Black Jack/Pontoon – 11 games
  - Caribbean Stud Poker – 2 games
  - 3-Card Poker – 1 game
  - Midi Baccarat Style A – 1 game
  - Midi Baccarat Style B – 5 games
  - Money Wheel – 1 game
  - Poker – 6 games
  - Electronic Roulette – 1 game
  
- D.
  - Roulette – 9 games
  - 7-Box Black Jack/Pontoon – 11 games
  - Caribbean Stud Poker – 2 games
  - 3-Card Poker – 1 game
  - Midi Baccarat Style A – 1 game
  - Midi Baccarat Style B – 5 games
  - Money Wheel – 1 game
  - Poker – 4 games
  - Electronic Roulette – 1 game
  - Tai Sai – Single – 1 game
  
- E.
  - Roulette – 8 games
  - 7-Box Black Jack/Pontoon – 12 games
  - Caribbean Stud Poker – 2 games
  - 3-Card Poker – 1 game
  - Midi Baccarat Style A – 1 game
  - Midi Baccarat Style B – 5 games
  - Money Wheel – 1 game
  - Poker – 4 games
  - Electronic Roulette – 1 game
  - Tai Sai – Single – 1 game

- F. Roulette – 8 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 5 games  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game
- G. Roulette – 8 games  
7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 4 games  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game
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7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 5 games  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
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7-Box Black Jack/Pontoon – 11 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 4 games  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
- J. Roulette – 8 games  
7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 4 games  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game

- K. Roulette – 9 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – Single – 1 game  
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- L. Roulette – 9 games  
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Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
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Money Wheel – 1 game  
Poker – 4 games  
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3 Card Poker – 1 game  
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Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
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Money Wheel – 1 game  
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3 Card Poker – 1 game  
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Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game  
Casino War – 1 game

- P.     Roulette – 9 games  
       7-Box Black Jack/Pontoon – 9 games  
       Caribbean Stud Poker – 2 games  
       3 Card Poker – 1 game  
       Midi Baccarat Style A – 1 game  
       Midi Baccarat Style B – 6 games  
       Mini Baccarat – 1 game  
       Money Wheel – 1 game  
       Poker – 4 games  
       Electronic Roulette – 1 game  
       Casino War – 1 game
- Q.     Roulette – 8 games  
       7-Box Black Jack/Pontoon – 11 games  
       Caribbean Stud Poker – 2 games  
       3 Card Poker – 1 game  
       Midi Baccarat Style A – 1 game  
       Midi Baccarat Style B – 4 games  
       Money Wheel – 1 game  
       Poker – 6 games  
       Electronic Roulette – 1 game  
       Casino War – 1 game
- R.     Roulette – 9 games  
       7-Box Black Jack/Pontoon – 10 games  
       Caribbean Stud Poker – 2 games  
       3 Card Poker – 1 game  
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       Midi Baccarat Style B – 4 games  
       Mini Baccarat – 1 game  
       Money Wheel – 1 game  
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       Tai Sai – Single – 1 game  
       Electronic Roulette – 1 game  
       Casino War – 1 game
- S.     Roulette – 8 games  
       7-Box Black Jack/Pontoon – 9 games  
       Caribbean Stud Poker – 2 games  
       3 Card Poker – 1 game  
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       Mini Baccarat – 1 game  
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       Tai Sai – Single – 1 game  
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       3 Card Poker – 1 game  
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       Money Wheel – 1 game  
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       7-Box Black Jack/Pontoon – 9 games  
       Caribbean Stud Poker – 1 game  
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       3-Card Poker – 1 game  
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Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
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Money Wheel – 1 game  
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Caribbean Stud Poker – 1 game  
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Money Wheel – 1 game  
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Caribbean Stud Poker – 1 game  
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- BH. Roulette – 6 games  
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Money Wheel – 1 game  
Poker – 12 games  
Ultimate Texas Holdem – 1 game

- BI. Roulette – 8 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
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Money Wheel – 1 game  
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Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BJ. Roulette – 7 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 7 games  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BK. Roulette – 7 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 7 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Casino War – 1 game  
Ultimate Texas Holdem – 1 game
- BL. Roulette – 7 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 7 games  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Casino War – 1 game  
Tai Sai – Single – 1 game

- BM. Roulette – 7 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Casino War – 1 game  
Ultimate Texas Holdem – 1 game
- BN. Roulette – 8 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 7 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Ultimate Texas Holdem – 1 game
- BO. Roulette – 8 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 8 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BP. Roulette – 7 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 8 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 7 games  
Money Wheel – 1 game  
Poker – 4 games  
Snake eyes – 1 game  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game

- BQ. Roulette – 7 games  
Electronic Roulette/Baccarat – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 7 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BR. Roulette – 7 games  
Electronic Roulette/Baccarat – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BS. Roulette – 7 games  
Electronic Roulette – 1 game  
7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BT. Roulette – 7 games  
Electronic Roulette/Baccarat – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game

- BU. Roulette – 8 games  
Electronic Roulette/Baccarat – 1 game  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BV. Roulette – 7 games  
Electronic Roulette/Baccarat – 1 game  
7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BW. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BX. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 8 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game

- BY. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- BZ. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
Casino War – 1 game  
Ultimate Texas Holdem – 1 game
- CA. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 7 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game
- CB. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Casino War – 1 game  
Tai Sai – Single – 1 game  
Ultimate Texas Holdem – 1 game

- CC. Roulette – 5 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 8 games  
Ultimate Texas Holdem – 1 game
- CD. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 8 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 8 games  
Ultimate Texas Holdem – 1 game
- CE. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 8 games
- CF. Roulette – 7 games  
Electronic Roulette/Baccarat – 2 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 2 games  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
Ultimate Texas Holdem – 1 game

- CG. Roulette – 7 games  
 Electronic Roulette/Baccarat – 2 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 1 game  
 3-Card Poker – 2 games  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 7 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Casino War – 1 game  
 Ultimate Texas Holdem – 1 game
- CH. Roulette – 7 games  
 Electronic Roulette/Baccarat – 2 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 1 game  
 3-Card Poker – 2 games  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 6 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Casino War – 1 game  
 Ultimate Texas Holdem – 1 game

### Notes

1. The Licence Holder is permitted to change between the above table game mixes, subject to providing the Inspectorate with weekly advice of the table game mix to be used for the forthcoming week, and five working days' notice of any change from one approved game mix to another.
2. The Licence Holder is permitted to operate automatic shufflers on:
  - 50% of open Black Jack tables specified in Game Mix A;
  - all Black Jack and Poker tables specified in Game Mixes B-CH; and
  - its Mini Baccarat table in game mixes B-CH.
3. The Electronic Roulette table in game mix A comprises 14 terminals and one manual table. The Electronic Roulette table in game mixes B-CH comprises up to 20 terminals and no manual table.
4. Each Tai Sai table is a single table.
5. The Licence Holder is permitted to deploy dealing Style A on a maximum of one Midi Baccarat table per game mix in game mixes B-CH.