

**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: G L Reeves (Chief Gambling Commissioner)  
P J Stanley  
L M Hansen  
R D Bell  
A K Foote

Date of Application: 7 February 2012

Date of Decision: 16 March 2012

Date of Notification of Decision: 22 March 2012

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

**Introduction**

1. Christchurch Casinos Limited ("CCL") applied for approval of two new game mixes, under condition 9 of its operator's licence, AN and AO.

**Licence condition**

2. The relevant licence condition is as follows:

**CCL's 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.

**CCL's submissions**

3. CCL submitted that:
  - (a) It has identified two new game mixes that it wants to deploy, AN and AO. These mixes will provide for an additional Black Jack table at the expense of a Midi Baccarat or Tai Sai table, and are to accommodate VIP play.



- (b) The new game mixes represent a reduction in the theoretical opportunities compared to its regulatory benchmark.
- (c) One of the methods that the Commission has accepted for calculating theoretical gambling opportunities is to take the decision rate and multiply it by the potential or assessed player spaces for each game type. The table below applies this methodology and confirms the new game mixes are approximately 5% and 8% below the theoretical mathematical maximum gambling opportunities represented by the approved benchmark.

Game mix	No. of rounds per hour	Player spaces	Overall opportunities
A	904	718	115,464.75
AN	774	667	105,693.75
AO	795	670	108,087.75

- (d) No changes would be required to its approved floor plan.

#### Secretary's submissions

4. The Secretary submitted that:

- (a) CCL has presented calculations within its application in an attempt to calculate the opportunities associated with each game mix. Irrespective of the methodology used by CCL in its application, the gambling opportunities associated with each mix are determined by applying the following formula:

$$\text{Rate of play} \times \text{number of tables} \times \text{number of player spaces per table} = \text{opportunity for casino gambling}$$

- (b) CCL's proposed game mixes represent fewer total gambling opportunities compared to the benchmark game mix.

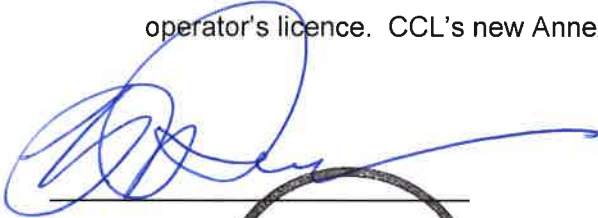
#### Analysis

5. As a preliminary point, CCL submitted that one of the methods that the Commission has accepted for calculating theoretical gambling opportunities is to take the decision rate and multiply it by the player spaces for each game type. This produces an overall opportunities figure which, CCL submitted, can be compared to the benchmark game mix to provide a conclusion on whether a proposal will increase opportunities for casino gambling.
6. As the Commission has said in numerous previous decisions, the assessment of opportunities is not arithmetical and definitive conclusions cannot be reached solely upon calculations of the type submitted by CCL.

- 7. The Commission's approach with applications of this nature is to compare a proposal with the approved game mix which provides the most opportunities for casino gambling and form a view, in the round, on whether that proposal will increase opportunities for casino gambling. The Commission makes the assessment on a commonsense basis, rather than by calculating opportunities based upon a formula.
- 8. While calculations may offer some guidance, they are far from definitive and only ever form part of the Commission's in the round assessment.
- 9. Game mix A is the approved game mix that provides the most opportunities for casino gambling at the Christchurch casino.
- 10. The Commission compared game mixes AN and AO with game mix A and was satisfied that, in the round, they would not increase opportunities for casino gambling.

**Decision**

- 11. The Commission approved new game mixes AN and AO, under condition 9 of CCL's operator's licence. CCL's new Annex A is **attached**.



Graeme Reeves  
Chief Gambling Commissioner  
for and on behalf of the  
Gambling Commission



22 March 2012



## 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 – 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 – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 4 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- C. Roulette – 8 games  
7-Box Black Jack – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 4 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Electronic Roulette – 1 game
- D. Roulette – 8 games  
7-Box Black Jack – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 4 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- E. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 4 games  
Mini Baccarat – 1 game



Money Wheel – 1 game  
Poker – 5 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

F. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

G. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

H. Roulette – 8 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

I. Roulette – 8 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 6 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

J. Roulette – 8 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games



Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game

K. Roulette – 8 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 7 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

L. Roulette – 8 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 7 games  
Electronic Roulette – 1 game

M. Roulette – 8 games  
7-Box Black Jack – 6 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

N. Roulette – 8 games  
7-Box Black Jack – 6 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game

O. Roulette – 8 games  
7-Box Black Jack – 6 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game



- Poker – 9 games  
Electronic Roulette – 1 game
- P. Roulette – 8 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 4 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 9 games  
Electronic Roulette – 1 game
- Q. Roulette – 8 games  
7-Box Black Jack – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 3 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- R. Roulette – 8 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- S. Roulette – 8 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game
- T. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Electronic Roulette – 1 game



- U. Roulette – 7 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game
- V. Roulette – 7 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 9 games  
Electronic Roulette – 1 game
- W. Roulette – 8 games  
7-Box Black Jack – 11 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 3 games  
Electronic Roulette – 1 game
- X. Roulette – 6 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 9 games  
Electronic Roulette – 1 game
- Y. Roulette – 6 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 10 games  
Electronic Roulette – 1 game



- Z. Roulette – 6 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 10 games  
Electronic Roulette – 1 game
- AA. Roulette – 7 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 1 game  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 10 games  
Electronic Roulette – 1 game
- AB. Roulette – 6 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 5 games  
Money Wheel – 1 game  
Poker – 10 games  
Electronic Roulette – 1 game
- AC. Roulette – 8 games  
7-Box Black Jack – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 3 games  
Electronic Roulette – 1 game
- AD. Roulette – 8 games  
7-Box Black Jack – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 3 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- AE. Roulette – 8 games  
7-Box Black Jack – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games



Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 3 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

AF. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game

AG. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

AH. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Electronic Roulette – 1 game

AI. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 5 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game

AJ. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game



- AK. Roulette – 8 games  
 7-Box Black Jack – 8 games  
 5-Box Black Jack – 2 games  
 Caribbean Stud Poker – 3 games  
 3-Card Poker – 1 game  
 Midi Baccarat – 6 games  
 Money Wheel – 1 game  
 Poker – 6 games  
 Electronic Roulette – 1 game
- AL. Roulette – 8 games  
 7-Box Black Jack – 8 games  
 5-Box Black Jack – 2 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat – 6 games  
 Money Wheel – 1 game  
 Poker – 6 games  
 Electronic Roulette – 1 game
- AM. Roulette – 8 games  
 7-Box Black Jack – 10 games  
 5-Box Black Jack – 2 games  
 Caribbean Stud Poker – 3 games  
 3-Card Poker – 1 game  
 Midi Baccarat – 6 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game
- AN. Roulette – 8 games  
 7-Box Black Jack – 10 games  
 5-Box Black Jack – 2 games  
 Caribbean Stud Poker – 3 games  
 3-Card Poker – 1 game  
 Midi Baccarat – 5 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- AO. Roulette – 8 games  
 7-Box Black Jack – 10 games  
 5-Box Black Jack – 3 games  
 Caribbean Stud Poker – 3 games  
 3-Card Poker – 1 game  
 Midi Baccarat – 5 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 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-AO; and
  - its Mini Baccarat table in game mixes B-AO.
3. The Electronic Roulette table in game mix A comprises 14 terminals and one manual table. The Electronic Roulette table in game mixes B-AO 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-AO.

