

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

**AND** on an application by **SKYCITY CASINO MANAGEMENT LIMITED** for approval of new game mixes for the Auckland casino and to amend a licence condition

**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: 16 March 2012

Date of Decision: 13 April 2012

Date of Notification  
of Decision: 16 May 2012

**APPLICATION BY SKYCITY CASINO MANAGEMENT LIMITED  
FOR APPROVAL OF NEW GAME MIXES FOR THE AUCKLAND CASINO AND TO  
AMEND A LICENCE CONDITION**

**Introduction**

1. SKYCITY Casino Management Limited ("**SCML**") applied to the Commission:
  - (a) for approval to amend its game mixes, under condition 9 of SCML's operator's licence for the Auckland casino. SCML wants to replace its existing Annex C and to introduce a new Annex D; and
  - (b) to amend condition 9 of its operator's licence, under section 139(1)(d) of the Gambling Act 2003 (the "**Act**"). The amendment, if approved, would:
    - (i) allow SCML to seek Commission approval to vary its game mix Annexes without the need to vary condition 9; and
    - (ii) remove the need for SCML to provide 10 working days advance notice of its intention to change Annexes; and
    - (iii) remove the need for SCML to provide the Commission with notification when SCML changes between Annexes.



### Relevant licence condition

2. The relevant licence condition, with the proposed variations in mark-up, is as follows:

#### SCML's operator's licence (Auckland)

9. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in Annex A attached to this Licence. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in any additional Annexes either Annex B, or Annex C attached to this Licence provided that it gives the Commission and the Inspectorate prior notification ~~a minimum of 10 working days notice in writing of its intention to do so~~. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.

### Relevant section of the Act

3. The relevant section of the Act is as follows:

#### Gambling Act 2003

##### 139 Conditions of casino licence

- (1) The Gambling Commission may specify the conditions of a casino licence or vary or revoke the conditions of a casino licence in the following circumstances:
- (a) on granting a casino operator's licence;
  - (b) on renewing a casino venue licence;
  - (c) on approving a casino venue agreement or an amendment to it;
  - (d) on application by the holder of the casino licence;
  - (e) on its own initiative or on the request of the Secretary.
- (2) A condition of a casino licence specified under subsection (1)—
- (a) must be consistent with this Act; and
  - (b) must contribute to achieving the purposes of this Act; and
  - (c) must contribute to the efficient and effective administration of this Act; and
  - (d) must not permit an increase in the opportunities for casino gambling; and
  - (e) may relate to any matter, including the matters specified in Schedule 1, within the confines of paragraphs (a) to (d).

### Submissions by SCML

4. SCML submitted, in summary, as follows:
- (a) It currently has applications before the Commission to amend Annexes A and B. (The Commission has since approved these – see decision GC09/12).
  - (b) The replacement Annex C is similar to the Annex A just approved by the Commission in that it relates to the four international salons, but it provides for the operation of two additional tables in the room 'Eight' and two fewer tables in the remaining gambling areas. This involves the addition of one Roulette game and one Midi Baccarat game to 'Eight' and the removal of two Black Jack tables from the remaining gambling areas.



- (c) The new Annex D is similar to the Annex B just approved by the Commission in that it relates to the four international salons, but provides for the operation of two additional tables in 'Eight' and two fewer tables in the remaining gambling areas. Again, this involves the addition of one Roulette game, and one Midi Baccarat game to 'Eight' and the removal of two Black Jack games from the remaining gambling areas.
- (d) Annexes A and B will not change.
- (e) In terms of assessing overall rates of play, it has used figures derived from earlier trials which have been considered by the Commission.
- (f) It has assessed the impact of each of the game mixes on player spaces and overall gambling opportunities. For those games where the maximum number of player positions is not fixed by game rules, it has applied the same theoretical maximum that it has applied in previous applications.
- (g) The new Annex C will not increase opportunities for casino gambling as the number of player spaces and overall gambling opportunities are fewer than those offered by the regulatory benchmark. To demonstrate this it has combined the five game mixes from Level 5 that offer the most opportunities, with the game mix that offers the most opportunities from the rest of the casino. The overall player spaces and opportunities from these combined mixes are shown below.

	Salon	Game mix	Player spaces	Opportunity
Level 5 South Side	82	A	54	1,593
	86	A	54	1,593
	88	A	108	3,186
Level 5 North Side	81	A	108	3,186
	Eight	D	424	12,144
Rest of casino	Levels 2+3	A	1,511	39,606
<b>Total</b>			<b>2,259</b>	<b>61,308</b>

- (h) The combined game mixes produce fewer player spaces and overall opportunities than the regulatory benchmark, as follows:

Game mix	Player spaces	Opportunity
Combined	2,259	61,308
Benchmark	2,262	68,363

- (i) The new Annex D will not increase opportunities for casino gambling as the overall gambling opportunities are fewer than those offered by the regulatory benchmark. To demonstrate this it has combined the five game mixes from Level 5 that offer the most opportunities, with the game mix that offers the most opportunities from the rest of the casino. The overall player spaces and opportunities from these combined mixes are shown below.

	Salon	Game mix	Player spaces	Opportunity
Level 5 South Side	82	A	54	1,593
	86	A	54	1,593
	88	A	162	4,779
Level 5 North Side	81	A	108	3,186
	Eight	D	424	12,144
Rest of casino	Levels 2+3	A	1,460	37,998
<b>Total</b>			<b>2,262</b>	<b>61,293</b>

- (j) The combined game mixes produce fewer overall opportunities than the regulatory benchmark, as follows:

Game mix	Player spaces	Opportunity
Combined	2,262	61,293
Benchmark	2,262	68,363

- (k) As it is proposing changes to its Annexes, an amendment to licence condition 9 is necessary.
- (l) In the future it is likely that it will no longer have the need for all of the approved Annexes, but it would not be possible to discard them without first seeking an amendment to the licence condition. It is equally likely that in the future it may wish to seek approval for additional alternative Annexes and, again, it could not do so without first seeking approval for a variation to the licence conditions.
- (m) By removing the alphabetical labels in the licence condition, but continuing to provide for the use of multiple Annexes, it can apply to the Commission for approval of a new Annex from time to time, or notify it of a redundant Annex, without having to seek a variation to the condition. This will ensure a more efficient process for the management of the Annexes.
- (n) Condition 9 presently requires it to provide both the Commission and the Inspectorate with a minimum of 10 days notice if it intends to adopt an alternative Annex. It is not clear what this notice period is designed to achieve.
- (o) It is currently permitted to change game mixes specified in an approved Annex subject to providing the Inspectorate with prior notification. It believes the prior notification requirement should also apply to the adoption of a new Annex without the 10 day notification period.
- (p) It may be superfluous to provide prior notification to both the Inspectorate and the Commission, and accordingly it proposes to remove the requirement to notify the Commission.

- (q) The proposed amendments are consistent with requirements of section 139 of the Act.

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

5. The Secretary submitted, in summary, as follows:
- (a) SCML presents calculations showing the gambling opportunities associated with the proposed game mixes. The calculations are accurate and suggest that the new game mixes should not lead to an increase in the opportunities for casino gambling.
- (b) He has no concerns with the proposal to remove reference to the annexes' alphabetical titles.
- (c) SCML proposes to remove the requirement to notify the Commission when it intends to adopt an (approved) alternate game mix, and also to reduce the required period of notification to the Inspectorate. Historically, Inspectors have not found changes to the operational game mixes to be problematic. Therefore, he is not opposed to reducing the notification period, so long as the casino is required to notify the Inspectorate as soon as reasonably practicable before such changes occur.
- (d) The licence condition should specify "any single additional annex" rather than the proposed wording ("any additional annex") to avoid a potential interpretation which allows game mixes across several annexes to be operated at the same time. In reply SCML submitted that it would be comfortable with the revised wording if the Commission thinks it has merit.

### **Analysis**

#### *Game mix Annexes*

6. SCML sought Commission approval for two new game mix Annexes, C and D. The Commission's approach, when considering whether a proposal will increase opportunities for casino gambling, is to compare what is proposed against what is currently approved and form a view, in the round, on whether the proposal will increase opportunities.
7. In this case, it was convenient for the Commission to start by identifying the changes to the combination of game mixes which would be affected by Annex C and Annex D compared with the combinations already approved in Annexes A and B. Annexes C and D both involve the substitution of one Roulette table and one Midi Baccarat table for two Black Jack tables.



8. The calculations offered by SCML as set out in paragraph 4 above are of little value in the comparing the effect of that change. They address the content of each entire annex, rather than focusing on the specific changes proposed, and the calculations themselves make a number of assumptions which do not necessarily reflect the true position. One of those assumptions is that the replacement games have a fixed number of player spaces. However, the rules of the replacement games do not limit the number of players, in contrast to the replaced game which does.
9. The Commission considered the potential for an increase in opportunities for casino gambling arising from a change from a limited number of players to a technically unlimited number of player spaces against the information which it has on the relative game speed of each affected game. Its assessment overall leaves it satisfied that the substitutions involved in the proposed annexes would not, in the round, increase opportunities for casino gambling over those offered by Annexes A and B.

*Amendment of licence condition*

10. SCML sought to amend condition 9 of its operator's licence in several ways, the most significant of which being to allow SCML to seek Commission approval of game mix Annexes without the need to vary condition 9, on the basis that doing so would provide a more efficient process to manage its Annexes.
11. The Commission was of the view that this submission overstated any efficiency gain that would ensue from the proposal because regardless of whether an application was to amend a licence condition or for an approval under a licence condition, SCML would still need to seek approval for new game mix Annexes and make full submissions as to why the proposal would not increase opportunities for casino gambling. Indeed, the bulk of the analysis on these types of applications is in relation to casino gambling opportunities rather than on the amendment of the licence condition.
12. The real efficiency gain for SCML is that it will be saved the filing fee which it currently incurs each time it applies to vary condition 9.
13. Nevertheless, the Commission was of the view that the proposal raised no issues of regulatory concern. The Commission's concern is to ensure that it has adequate oversight of game mixes/annexes in order to be satisfied that changes will not increase opportunities for casino gambling. The Commission was of the view that it will be able to maintain this oversight on SCML's proposal because, as mentioned above, SCML will still require Commission approval for any new game mixes/Annexes.



*Other amendments*

14. The Secretary's Inspectors were not opposed to the removal of the 10 day notification period so long as SCML notifies the Inspectorate as soon as reasonably practicable before each change occurs. The Commission noted that the proposal requires SCML to provide the Inspectorate with prior notification of changes to game mixes, so was satisfied that the Inspectorate would be fully informed.
15. The Commission was of the view that it (the Commission) did not need to receive prior notification of changes between approved game mix Annexes.
16. Finally, the Secretary proposed the insertion of the word "single" into condition 9 to ensure that there is no misinterpretation about which game mixes from which Annex can be deployed.
17. The intent of condition 9 is to permit SCML to operate under Annex A, or any other alternative annex which the Commission may approve from time to time. Each Annex consists of a mix of game types and game mixes. It should be obvious as a matter of logic that only one Annex may be in operation at any one time but, in the light of the Secretary's submission, the Commission has amended the proposed variation to make the intent explicit. Condition 9 (with amendments shown in mark-up) now reads as follows:

9. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in Annex A attached to this Licence. As an alternative to Annex A, ~~¶~~The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in any additional ~~a~~Annexes either Annex B, or Annex C approved by the Commission and attached to this Licence, ~~provided that it~~The Licence Holder must give the Inspectorate prior notification a minimum of 10 working days notice in writing of its intention to do ~~so~~before it commences operation under a different annex. ~~The Licence Holder shall obtain the prior approval of the Commission for any change to~~ The game types and game mixes specified in an annex can only be changed by the Commission.

**Decision**

18. The Commission:
  - (a) approved new Annexes C and D, under condition 9 of SCML's operator's licence for the Auckland casino.
  - (b) amended condition 9 of SCML's operator's licence for the Auckland casino, pursuant to section 139(1)(d) of the Act. Condition 9 now reads as follows:
    9. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in

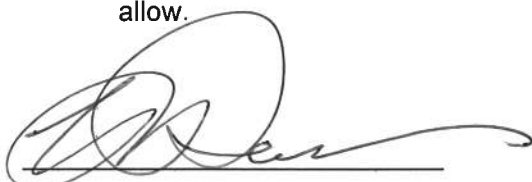


Annex A attached to this Licence. As an alternative to Annex A, the Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in any additional annex approved by the Commission and attached to this Licence. The Licence Holder must give the Inspectorate prior notification before it commences operation under a different annex. The game types and game mixes specified in an annex can only be changed by the Commission.

19. Approved Annexes A, B, C and D are **attached**.

**Right of appeal**

20. 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.



Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

16 May 2012



## ANNEX A

### GAME MIX A

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

Black Jack/Pontoon	44 games
Roulette	24 games
Electronic Roulette	1 game
Caribbean Stud Poker	10 games
Midi Baccarat	17 games
Mini Baccarat	7 games
Pai Gow	4 games
Tai Sai (double side)	1 game
Tai Sai (single side)	1 game
Money Wheel (double side)	1 game

#### Notes for Game Mix A

1. The Licence Holder is permitted to operate automatic shufflers on 50% of open Black Jack tables, and all Caribbean Stud Poker and Baccarat tables.
2. The Electronic Roulette table comprises up to 14 player spaces and no manual table.

### ALTERNATIVE GAME MIXES

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

**In gaming salon 82 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A1	B1	C1	D1	E1	F1	G1	H1	I1	J1	K1
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>

together with

**In gaming salon 86 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A2	B2	C2	D2	E2	F2	G2	H2	I2	J2	K2
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>



together with

**In gaming salon 88 to the south of the elevators on level 5, any one of the following four table game mixes:**

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3	P3
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3	1
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>

together with

**in the gaming salon 81 to the north of the elevators on level 5, any one of the following four table game mixes:**

	A4	B4	C4	D4	E4	F3	G4	H4	I4	J4	K4	L4	M4	N4	O4	P4
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3	1
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>

together with

**in the area designated as Eight to the north of the elevators on level 5, any one of the following sixteen table game mixes:**

	A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5	M5
Midi Baccarat	9	9	9	9	9	8	8	8	9	8	9	9	8
Roulette	3	2	2	2	2	3	3	3	2	3	3	2	3
Blackjack	3	2	2	3	4	2	2	2	2	3	2	3	3
Pai Gow	0	2	1	0	0	2	1	1	1	0	0	1	1
Mini Baccarat	0	0	1	1	0	0	1	0	0	0	0	0	0
CSP	1	1	1	1	1	1	1	1	1	1	1	1	1
3 Card Poker	0	0	0	0	0	0	0	1	1	1	1	0	0
<b>Total</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>

together with

**in all Gambling Areas other than the four gaming salons on level 5 and the VIP area known as 'Eight' on level 5, any one of the following 82 table game mixes:**

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4
Money Wheel (double side)	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1
Tai Sai (single side)	0	0	0	0	0	0	0	1	0	1
Pai Gow	2	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	6	6
Poker	9	9	9	9	9	9	9	9	11	11
Rapid Roulette	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	6	6
Roulette	17	17	19	17	19	17	19	16	17	16
Black Jack	30	28	26	27	25	26	24	30	28	28
3 Card Poker	2	3	3	3	3	3	3	2	2	2
Ultimate Texas Hold'em	1	2	2	2	2	2	2	1	1	1
Casino War	0	0	0	1	1	2	2	0	0	0
<b>Total</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>	<b>82</b>

**Notes for the alternative game mixes:**

1. The Licence Holder is permitted to change game mixes subject to providing the Inspectorate with prior notification.
2. The Licence Holder is permitted to operate automatic shufflers on each of the Black Jack, Caribbean Stud Poker, Baccarat, Poker, 3-Card Poker, Ultimate Texas Hold'em and Casino War tables.
3. At least 50% of the total number of Midi Baccarat games shall be conducted in accordance with dealing style B, as set out in the rules of Baccarat.
4. All electronic roulette tables comprise up to 21 player spaces and no manual table.
5. The number of player spaces at poker tables (other than Caribbean Stud Poker and 3-Card Poker) may not exceed 10, even if game rules provide for more.



## ANNEX B

### GAME MIX A

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

Black Jack/Pontoon	44 games
Roulette	24 games
Electronic Roulette	1 game
Caribbean Stud Poker	10 games
Midi Baccarat	17 games
Mini Baccarat	7 games
Pai Gow	4 games
Tai Sai (double side)	1 game
Tai Sai (single side)	1 game
Money Wheel (double side)	1 game

#### Notes for Game Mix A

1. The Licence Holder is permitted to operate automatic shufflers on 50% of open Black Jack tables, and all Caribbean Stud Poker and Baccarat tables.
2. The Electronic Roulette table comprises up to 14 player spaces and no manual table.

### ALTERNATIVE GAME MIXES

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

**In gaming salon 82 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A1	B1	C1	D1	E1	F1	G1	H1	I1	J1	K1
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>

together with

**In gaming salon 86 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A2	B2	C2	D2	E2	F2	G2	H2	I2	J2	K2
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>

together with

**In gaming salon 88 to the south of the elevators on level 5, any one of the following six table game mixes:**

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3	P3
Midi Baccarat	6	5	5	4	4	4	2	2	2	2	2	3	4	4	5	3
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>

together with

**In the gaming salon 81 to the north of the elevators on level 5, any one of the following four table game mixes:**

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4	K4	L4	M4	N4	O4	P4
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3	1
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>

together with

**in the area designated as Eight to the north of the elevators on level 5, any one of the following sixteen table game mixes:**

	A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5	M5
Midi Baccarat	9	9	9	9	9	8	8	8	9	8	9	9	8
Roulette	3	2	2	2	2	3	3	3	2	3	3	2	3
Blackjack	3	2	2	3	4	2	2	2	2	3	2	3	3
Pai Gow	0	2	1	0	0	2	1	1	1	0	0	1	1
Mini Baccarat	0	0	1	1	0	0	1	0	0	0	0	0	0
Caribbean Stud Poker	1	1	1	1	1	1	1	1	1	1	1	1	1
3 Card Poker	0	0	0	0	0	0	0	1	1	1	1	1	0
<b>Total</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>	<b>16</b>

together with

**in all Gambling Areas other than the four gaming salons on level 5 and the VIP area known as 'Eight' on level 5, any one of the following 80 table game mixes:**

	A6	B6	C6	DF6	E6	F6	G6	H6	I6
Money Wheel (double side)	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1
Tai Sai (single side)	0	0	0	0	0	0	1	0	1
Pai Gow	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	6
Poker	9	9	9	9	9	9	9	11	11
Rapid Roulette	2	2	2	2	2	2	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	6
Roulette	17	19	17	19	17	18	16	17	16
Black Jack	26	24	25	23	24	22	28	26	26
3 Card Poker	3	3	3	3	3	3	2	2	2
Ultimate Texas Hold'em	2	2	2	2	2	2	1	1	1
Casino War	0	0	1	1	2	2	0	0	0
<b>Total</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>

**Notes for the alternative game mixes:**

1. The Licence Holder is permitted to change game mixes subject to providing the Inspectorate with prior notification.
2. The Licence Holder is permitted to operate automatic shufflers on each of the Black Jack, Caribbean Stud Poker, Baccarat, Poker, 3-Card Poker, Ultimate Texas Hold'em and Casino War tables.
3. At least 50% of the total number of Midi Baccarat games shall be conducted in accordance with dealing style B, as set out in the rules of Baccarat.
4. All electronic roulette tables comprise up to 21 player spaces and no manual table.
5. The number of player spaces at poker tables (other than Caribbean Stud Poker and 3-Card Poker) may not exceed 10, even if game rules provide for more.

## ANNEX C

### GAME MIX A

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

Black Jack/Pontoon	44 games
Roulette	24 games
Electronic Roulette	1 game
Caribbean Stud Poker	10 games
Midi Baccarat	17 games
Mini Baccarat	7 games
Pai Gow	4 games
Tai Sai (double side)	1 game
Tai Sai (single side)	1 game
Money Wheel (double side)	1 game

#### Notes for Game Mix A

1. The Licence Holder is permitted to operate automatic shufflers on 50% of open Black Jack tables, and all Caribbean Stud Poker and Baccarat tables.
2. The Electronic Roulette table comprises up to 14 player spaces and no manual table.

### ALTERNATIVE GAME MIXES

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

**In gaming salon 82 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A1	B1	C1	D1	E1	F1	G1	H1	I1	J1	K1
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>

together with

**In gaming salon 86 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A2	B2	C2	D2	E2	F2	G2	H2	I2	J2	K2
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>



together with

**In gaming salon 88 to the south of the elevators on level 5, any one of the following four table game mixes:**

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3	P3
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3	1
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>

**In gaming salon 81 to the north of the elevators on level 5, any one of the following four table game mixes:**

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4	K4	L4	M4	N4	O4	P4
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3	1
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>

together with

**In the area designated as 'Eight' to the north of the elevators on level 5, any one of the following eighteen table game mixes:**

	A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5	M5
Midi Baccarat	10	10	10	10	10	9	9	9	10	9	10	10	9
Roulette	4	3	3	3	3	4	4	4	3	4	4	3	4
Blackjack	3	2	2	3	4	2	2	2	2	3	2	3	3
Pai Gow	0	2	1	0	0	2	1	1	1	0	0	1	1
Mini Baccarat	0	0	1	1	0	0	1	0	0	0	0	0	0
Caribbean Stud Poker	1	1	1	1	1	1	1	1	1	1	1	1	1
3 Card Poker	0	0	0	0	0	0	0	1	1	1	1	0	0
<b>Total</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>

together with

**in all Gambling Areas other than the four gaming salons on level 5 and the VIP area known as 'Eight' on level 5, any one of the following 80 table game mixes:**

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4
Money Wheel (double side)	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1
Tai Sai (single side)	0	0	0	0	0	0	0	1	0	1
Pai Gow	2	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	6	6
Poker	9	9	9	9	9	9	9	9	11	11
Rapid Roulette	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	6	6
Roulette	17	17	19	17	19	17	19	16	17	16
Black Jack	28	26	24	25	23	24	22	28	26	26
3 Card Poker	2	3	3	3	3	3	3	2	2	2
Ultimate Texas Hold'em	1	2	2	2	2	2	2	1	1	1
Casino War	0	0	0	1	1	2	2	0	0	0
<b>Total</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>

**Notes for the alternative game mixes:**

1. The Licence Holder is permitted to change game mixes subject to providing the Inspectorate with prior notification.
2. The Licence Holder is permitted to operate automatic shufflers on each of the Black Jack, Caribbean Stud Poker, Baccarat, Poker, 3-Card Poker, Casino War and Ultimate Texas Hold'em tables.
3. At least 50% of the total number of Midi Baccarat games shall be conducted in accordance with dealing style B, as set out in the rules of Baccarat.
4. All electronic roulette tables comprise up to 21 player spaces and no manual table.
5. The number of player spaces at poker tables (other than Caribbean Stud Poker and 3-Card Poker) may not exceed 10, even if game rules provide for more.



## ANNEX D

### GAME MIX A

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

Black Jack/Pontoon	44 games
Roulette	24 games
Electronic Roulette	1 game
Caribbean Stud Poker	10 games
Midi Baccarat	17 games
Mini Baccarat	7 games
Pai Gow	4 games
Tai Sai (double side)	1 game
Tai Sai (single side)	1 game
Money Wheel (double side)	1 game

#### Notes for Game Mix A

1. The Licence Holder is permitted to operate automatic shufflers on 50% of open Black Jack tables, and all Caribbean Stud Poker and Baccarat tables.
2. The Electronic Roulette table comprises up to 14 player spaces and no manual table.

### ALTERNATIVE GAME MIXES

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

**In gaming salon 82 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A1	B1	C1	D1	E1	F1	G1	H1	I1	J1	K1
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>

together with

**In gaming salon 86 to the south of the elevators on level 5, any one of the following two table game mixes:**

	A2	B2	C2	D2	E2	F2	G2	H2	I2	J2	K2
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
<b>Total</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>



together with

**In gaming salon 88 to the south of the elevators on level 5, any one of the following six table game mixes:**

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3	P3
Midi Baccarat	6	5	5	4	4	4	2	2	2	2	2	3	4	4	5	3
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>

**In the gaming salon 81 to the north of the elevators on level 5, any one of the following four table game mixes:**

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4	K4	L4	M4	N4	O4	P4
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3	1
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
<b>Total</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>

together with

**in the area designated as Eight to the north of the elevators on level 5, any one of the following eighteen table game mixes:**

	A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5	M5
Midi Baccarat	10	10	10	10	10	9	9	9	10	9	10	10	9
Roulette	4	3	3	3	3	4	4	4	3	4	4	3	4
Blackjack	3	2	2	3	4	2	2	2	2	3	2	3	3
Pai Gow	0	2	1	0	0	2	1	1	1	0	0	1	1
Mini Baccarat	0	0	1	1	0	0	1	0	0	0	0	0	0
Caribbean Stud Poker	1	1	1	1	1	1	1	1	1	1	1	1	1
3 Card Poker	0	0	0	0	0	0	0	1	1	1	1	0	0
<b>Total</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>	<b>18</b>

together with

**in all Gambling Areas other than the four gaming salons on level 5 and the VIP area known as 'Eight' on level 5, any one of the following 78 table game mixes:**

	A6	B6	C6	DF6	E6	F6	G6	H6	I6
Money Wheel (double side)	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1
Tai Sai (single side)	0	0	0	0	0	0	1	0	1
Pai Gow	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	6
Poker	9	9	9	9	9	9	9	11	11
Rapid Roulette	2	2	2	2	2	2	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	6
Roulette	17	19	17	19	17	19	16	17	16
Black Jack	24	22	23	21	22	20	26	24	24
3 Card Poker	3	3	3	3	3	3	2	2	2
Ultimate Texas Hold'em	2	2	2	2	2	2	1	1	1
Casino War	0	0	1	1	2	2	0	0	0
<b>Total</b>	<b>78</b>	<b>78</b>	<b>78</b>	<b>78</b>	<b>78</b>	<b>78</b>	<b>78</b>	<b>78</b>	<b>78</b>

**Notes for the alternative game mixes:**

1. The Licence Holder is permitted to change game mixes subject to providing the Inspectorate with prior notification.
2. The Licence Holder is permitted to operate automatic shufflers on each of the Black Jack, Caribbean Stud Poker, Baccarat, Poker, 3-Card Poker, Ultimate Texas Hold'em and Casino War tables.
3. At least 50% of the total number of Midi Baccarat games shall be conducted in accordance with dealing style B, as set out in the rules of Baccarat.
4. All electronic roulette tables comprise up to 21 player spaces and no manual table.
5. The number of player spaces at poker tables (other than Caribbean Stud Poker and 3-Card Poker) may not exceed 10, even if game rules provide for more.