

**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

Date of Application: 6 January 2011

Date of Decision: 18 February 2011, 13 May 2011

Date of Notification *JS* July 2011  
of Decision:

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

**Introduction**

1. Christchurch Casinos Limited (the "**Applicant**" or "**CCL**") applied for approval of a new Annex A to its operator's licence, under conditions 9 and 10 of CCL's operator's licence. CCL proposes for Annex A to include:
  - (a) six new game mixes AV-BA; and
  - (b) automatic shufflers on all of its Poker and Black Jack tables.

**Licence conditions**

2. The relevant licence conditions are 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.
10. The approval of the Commission is required prior to the introduction into the Gambling Area of any electronic version of the game types specified in condition 9 above or electronic aids or enhancements or changes to table game rules which create new wagering opportunities.



**Applicant's submissions**

3. The Applicant submitted that:

- (a) It wants to deploy automatic shufflers on its Poker and Black Jack tables across all of its game mixes, including on its benchmark game mix.
- (b) It also wants six additional game mixes to provide it with the flexibility it believes will be necessary to meet patrons' demands during the Rugby World Cup and the New Zealand Poker Championships.
- (c) Commission decision GC17/10 provided additional information to help in the clarification of the rates of play for the various approved table games. It has applied this information to new calculations of its existing and proposed game mixes. The calculated opportunities for casino gambling in the additional game mixes remain under the regulatory benchmark, even allowing for the automatic shufflers on all Poker and Black Jack tables.
- (d) In decision 17/10, the Commission states at paragraph 49, with respect to the use of automatic shufflers, that:

The Commission is of the view that the correct starting position is whatever constraints affect the benchmark (or, if it is not specified, what was permitted in September 2003).

- (e) While the Auckland casino had a 50% restriction with respect to its Black Jack tables and the use of automatic shufflers, CCL did not have a game mix associated with its licence. It is therefore of the view that it was permitted to operate automatic shufflers on all of its Black Jack tables in September 2003.
- (f) For expedience, it has assessed its new benchmark based on 50% of the Black Jack tables having automatic shufflers, but invites the Commission to consider if it is more appropriate for the new benchmark to be calculated as if all 14 Black Jack tables had automatic shufflers.
- (g) CCL provided various calculations and amendments to calculations relating to rates of play, notional player spaces and overall calculated opportunities figures.

**Secretary's submissions**

4. The Secretary submitted that:

- (a) He does not support the submission that CCL did not have a restriction with the use of automatic shufflers on its Black Jack tables on 19 September 2003. In

2001 the Casino Control Authority ("CCA") approved the operation of automatic shufflers on 50% of Black Jack tables in all New Zealand casinos.

- (b) Moreover, he is aware that automatic shufflers were not operated on any of CCL's Black Jack tables when the Act came into effect. As such, he opposes CCL's suggestion that the Commission should access CCL's benchmark as if all 14 Black Jack tables had automatic shufflers.

*Automatic shufflers and the regulatory benchmark*

- (c) The figures submitted by CCL show the Poker and Mini Baccarat tables in the Commission benchmark having automatic shufflers. However CCL has not explained why these tables operating with automatic shufflers should apply to the benchmark game mix, and neither has it previously applied for the Commission's consideration of this matter. In reply CCL accepted that this was an error.

*Application of new rate of play data*

- (d) CCL has applied the rate of play data from decision GC17/10 to calculate the opportunities associated with each game mix. Irrespective of the methodology used by CCL, he has calculated the gambling opportunities for each game mix by applying the following formula:

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

- (e) When this formula is applied, all of CCL's approved and proposed game mixes (with all Poker tables operating with automatic shufflers) represent fewer gambling opportunities compared to the benchmark game mix. However, this is only the case when dealing Style B is deployed on at least 50% of the operational Midi Baccarat tables (in the same way the "Version 3" data was accepted by the Commission in decision GC17/10).

**Applicant's submissions in reply**

5. In reply, CCL submitted as follows:

- (a) The Secretary does not support the submission that the benchmark should provide for automatic shufflers on all of CCL's Black Jack tables because of the CCA's approval applying to 50% of Black Jack tables. In its view, this is the minimum position.
- (b) It nevertheless seeks approval to increase its benchmark as if all 14 Black Jack tables had automatic shufflers, with its submission based upon several

Commission decisions which state that the benchmark must include the theoretical maximum gambling opportunities that existed or were approved as at 19 September 2003. The gazetted game rules in place on 19 September 2003 provide for the unrestricted use of automatic shufflers, so it is entitled to enjoy the benefit of this.

- (c) Further, paragraph 49 of decision GC17/10 confirms the Commission's interpretation with respect to the use of automatic shufflers; namely that the correct starting position is to consider what constraints affect the benchmark or if none are specified, what was permitted in September 2003. It is on this basis that it is entitled to operate automatic shufflers on all of its Black Jack tables and this should be reflected in its benchmark.
- (d) It acknowledges that it made an error in its original submission by including automatic shufflers on its Poker and Mini Baccarat tables in its game mix. Its corrected benchmark figures are as follows:

Game mix	No. of rounds per hour	Player spaces	Overall opportunities
A – Existing benchmark	900	718	646,200
A – Proposed benchmark	916	718	657,508.5

- (e) When checking all its game mix figures, it also noted an error in game mix AX. The corrected figures are as follows:

Game mix	No. of rounds per hour	Player spaces	Overall opportunities
AX	798	638	509,124

## Analysis

### *CCL's benchmark*

6. CCL has applied to introduce automatic shufflers on the Black Jack and Poker tables across all of its approved game mixes, including its benchmark game mix. CCL was motivated to make this application following comments made by the Commission in several of its decisions to the effect that a licence holder's opportunities should be represented by what was available to it when the Act came into effect on 19 September 2003.

7. CCL submitted that it did not have a game mix associated with its licence and as such, the CCA approval allowing the use of automatic shufflers on up to 50% of open Black Jack tables did not apply to it. The natural consequence of this, in CCL's view, is that its regulatory benchmark will increase.
8. As the Commission has noted in numerous previous decisions, the benchmark game mix for each casino is set and imposed by the Commission for the purposes of controlling opportunities for casino gambling, a requirement of the Gambling Act 2003 but not its predecessor. The Commission's approach has been to start by making an assessment of what the relevant casino was permitted to do on 19 September 2003 when the Act containing prohibitions on increasing opportunities for casino gambling came into effect. As opportunities were not restricted under the prior legislation, this often involves a degree of interpretation. The Commission aims to set benchmarks which are realistic and fair across the industry. It has developed some rules of thumb to help in achieving that aim, including assessment based principally on authorisation rather than utilisation.
9. These principles, however, are not applied uncritically and irrespective of outcome and the benchmark assessment also involves the Commission standing back and making a real world assessment in the round.
10. Benchmark assessments will also depart from the September 2003 position to reflect subsequent permanent changes in the casino layout or operation.
11. There are several flaws in the reasoning underlining CCL's application. CCL was not entitled to deploy automatic shufflers on all of its Black Jack tables on 19 September 2003 because the 2001 CCA approval constrained all licence holders from doing so. The approval provided that licence holders may operate automatic shufflers on no more than 50% of open Black Jack tables. The opportunity to deploy automatic shufflers on all of its open Black Jack tables was therefore not available to CCL on 19 September 2003.
12. CCL is incorrect in thinking that the CCA approval was limited to the Auckland casino; it applied to all casinos in the country. The CCA agenda papers and minutes relating to this matter clearly show this, and indeed the CCA received a demonstration on automatic shufflers from representatives of both the Christchurch and Dunedin casinos before the approval was granted.
13. In addition, CCL has previously expressly accepted and acknowledged that it is subject to the restriction in that particular CCA approval. In decision GC01/10, CCL applied for approval of new game mixes. In his submissions, the Secretary reminded the Commission that Christchurch's game mixes should be amended expressly to include the

restrictions in the CCA approval. In its submissions in reply, CCL concurred with the Secretary's submission.

14. Similarly, in GC05/10, CCL applied to lift the 50% limitation of shufflers on its open Black Jack tables. In making this application, CCL clearly recognised the existence of the approval and its application to CCL.
15. The Commission considers that CCL's regulatory benchmark should remain unaltered from that set by the Commission in decision GC11/09 (and clarified by GC05/10).

*Application for approval of new game mixes*

16. CCL sought approval of six new game mixes AV-BA. Game mixes B-AU have already been approved by the Commission but it approved them in June 2010 and before it had the benefit of later information on casino gambling opportunities which the Commission approved in July 2010. The Commission wanted to reconsider game mixes B-AU to be sure that they did not inadvertently increase opportunities for casino gambling as happened with three game mixes for the Dunedin casino (see decision GC13/11).
17. Before considering the individual game mixes, the Commission wants to state clearly that it was troubled by CCL's approach to this matter. In its letter of application, CCL submitted that the opportunities associated with its operational game mixes were "well under" its benchmark game mix, but did not state how it came to this conclusion or provide any analysis to support the submission. CCL attached a series of tables setting out information about the player spaces, rounds per hour and overall opportunities associated with each game mix and left it to the Commission to form its own view that this information supported CCL's submission.
18. As the Commission has stated in numerous previous decisions, the sort of information provided by CCL is of limited value and is never considered by the Commission to be determinative in applications of this nature (see decision GC17/10 – paragraphs 25-32, 40, 42, 46-48). Rather, the Commission approaches these matters by making a commonsense comparison of what is proposed with the regulatory benchmark and forming a view, in the round, on whether the proposal offers more casino gambling opportunities.
19. Despite these repeated messages, CCL provided the abovementioned data as if it was determinative and sufficient to satisfy the Commission that approval should be granted. It is not. In addition, the data provided by CCL contained numerous errors.

20. Further, CCL did not make it clear that game mixes B-AU differed from what the Commission has previously approved. Proposed game mixes B-AU all include between one and three Midi Baccarat tables which will deploy only dealing Style B. Previously the Midi Baccarat tables were assessed on the basis that they all deployed dealing Style A. Dealing Style B is significantly slower than dealing Style A so CCL's proposed amendment is significant and should have been drawn to the Commission's attention.
21. As a result of the issues identified in paragraphs 17 to 20 above, the Commission could have rejected CCL's application on the grounds that poor and/or insufficient information had been provided; that CCL did not make changes explicit and clear to the Commission; or that CCL's assumptions are fundamentally flawed. It did not do so; instead the Commission conducted its own analysis and reached a conclusion on the application.
22. However with this decision, the Commission puts all casino operators on notice that if in making their applications they provide insufficient information and analysis, or do not make proposed changes evident, it is likely that the Commission will reject the applications until such detail is provided.

*Will the game mixes increase opportunities for casino gambling?*

23. The Commission's usual approach is to compare a proposal with the regulatory benchmark and form a view, in the round, on whether the proposal will increase opportunities for casino gambling. As noted above, the assessment is not an arithmetical comparison based on the calculations of the type annexed to the application, although regard is had to them. If, in the Commission's assessment, the proposal will increase opportunities, the Commission cannot approve it.
24. The Commission compared game mixes B-BA with CCL's regulatory benchmark. In making the comparisons, the Commission noted as follows:
- Although the Commission has already approved a version of game mixes B-AU, it approved them in June 2010 and before it had the benefit of later information on casino gambling opportunities which the Commission approved in July 2010. The Commission wanted to be sure that game mixes B-AU did not inadvertently increase opportunities as a result of earlier inaccurate information. The Commission was so satisfied.
  - Game mixes B-BA would permit automatic shufflers on all Poker and Black Jack tables, in effect removing the restriction imposed by the CCA in 2001. The Commission has previously heard a similar application in respect of the Auckland casino (see decision GC11/07) which resulted in the Commission removing the



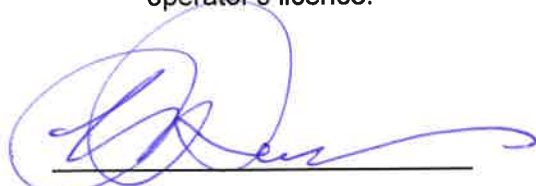
restriction at that casino for the operational game mixes. For the reasons recorded in that decision, the Commission allowed CCL to seek approval for operational game mixes which permit the use of automatic shufflers on all of its Black Jack tables. However, the restriction on the use of automatic shufflers will continue to apply to the regulatory benchmark mix.

- CCL will deploy dealing Style A on a maximum of one Midi Baccarat table per game mix in game mixes B-BA.
- The Commission has previously approved CCL deploying an automatic shuffler on its Mini Baccarat table.

25. The Commission was satisfied that game mixes B-BA would not increase opportunities for casino gambling compared to CCL's regulatory benchmark, game mix A. Approval was granted on the basis that no game mix can deploy more than the stated maximum number of Midi Baccarat tables with dealing Style A.

#### Decision

26. The Commission approved new Annex A (**attached**) under licence condition 9 of CCL's operator's licence.



Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

28 July 2011



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



- Electronic Roulette – 1 game
- F. Roulette – 8 games  
7-Box Black Jack – 8 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 7 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- G. Roulette – 8 games  
7-Box Black Jack – 6 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- H. Roulette – 8 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- I. Roulette – 8 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game
- J. Roulette – 8 games  
7-Box Black Jack – 7 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 9 games  
Electronic Roulette – 1 game
- K. Roulette – 8 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games



- Midi Baccarat – 6 games
- Money Wheel – 1 game
- Poker – 5 games
- Tai Sai – 1 game
- Electronic Roulette – 1 game
  
- L. Roulette – 8 games
- 7-Box Black Jack – 10 games
- 5-Box Black Jack – 2 games
- Caribbean Stud Poker – 3 games
- Midi Baccarat – 4 games
- Mini Baccarat – 1 game
- Money Wheel – 1 game
- Poker – 5 games
- Tai Sai – 1 game
- Electronic Roulette – 1 game
  
- M. 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
  
- N. 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
  
- O. 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
  
- P. 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

Q. 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

R. 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

S. 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

T. 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

U. 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

V. 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

W. 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

X. 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

Y. 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

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



AF. 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  
Ultimate Texas Hold-em – 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

AG. 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  
Ultimate Texas Hold-em – 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

AH. 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  
Ultimate Texas Hold-em - 1 game  
Midi Baccarat – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game

AI. 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

AJ. 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  
Ultimate Texas Hold-em - 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games



- Electronic Roulette – 1 game
- AK. 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  
Ultimate Texas Hold-em – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game
- AL. 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  
Ultimate Texas Hold-em - 1 game  
Midi Baccarat – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game
- AM. 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  
Ultimate Texas Hold-em – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game
- AN. 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  
Ultimate Texas Hold-em - 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
- AO. Roulette – 7 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Ultimate Texas Hold-em - 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

AP. 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

AQ. 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  
Ultimate Texas Hold-em - 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Electronic Roulette – 1 game

AR. Roulette – 7 games  
7-Box Black Jack – 9 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Ultimate Texas Hold-em – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Electronic Roulette – 1 game

AS. 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

AT. 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
- AU. Roulette – 7 games  
7-Box Black Jack – 6 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Ultimate Texas Hold-em – 1 game  
Midi Baccarat – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 9 games  
Electronic Roulette – 1 game
- AV. 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
- AW. 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
- AX. 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
- AY. 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

AZ. 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

BA. 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

#### **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- BA; and
  - its Mini Baccarat table on game mixes B-BA.
3. The Electronic Roulette table in game mix A comprises 14 terminals and one manual table. The Electronic Roulette table in game mixes B-BA 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-BA.