

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

Date of Application: 3 July 2009

Date of Decision: 14 August 2009

Date of Notification of Decision: 18 August 2009

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

Introduction

1. Christchurch Casinos Limited ("**CCL**") applied to the Commission for approval of a new Annex A (which incorporates 32 new game mixes, O-AT) under condition 9 of CCL's operator's licence. 31 of the 32 proposed game mixes include a new game, 3-Card Poker.

Licence condition

2. The relevant licence condition is as follows:

Operator's licence

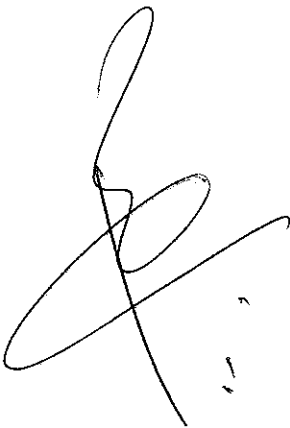
- 9 The Licence Holder may operate on casino gaming tables the game types and game mixes specified in Annex A attached to this Licence. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.

Submissions by CCL

3. CCL stated that:

- (a) It wants to revise its game mix to meet its business needs,


- (b) It seeks approval of 32 new game mixes, most of which incorporate a new game, 3-Card Poker.
 - (c) It is the first casino in New Zealand to implement 3-Card Poker and limited information is available regarding the number of rounds per hour that this game generates
4. CCL submitted, in summary, that:
- (a) 3-Card Poker generates approximately 40 rounds per hour, based upon:
 - (i) information obtained from the game's distributor, Shuffle Master, which suggests that it generates 40 rounds per hour;
 - (ii) information obtained from SKYCITY Adelaide, which suggests that it generates between 45 and 50 rounds per hour;
 - (iii) its own trials of the game, which suggest a game speed of between 32 and 36 rounds per hour;
 - (iv) one of its dealers has dealt 3-Card Poker overseas and that dealer believes that it generates slightly more than 40 rounds per hour.
 - (b) Proposed game mixes O-AT have fewer gambling opportunities than game mix A, its regulatory benchmark, as follows:

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| Game mix | No. of rounds per hour | Player spaces |
|----------|------------------------|---------------|
| A | 1691 | 718 |
| O | 1586 | 676 |
| P | 1608 | 673 |
| Q | 1590 | 671 |
| R | 1600 | 676 |
| S | 1559 | 662 |
| T | 1584 | 679 |
| U | 1576 | 682 |
| V | 1535 | 668 |
| W | 1527 | 671 |
| X | 1517 | 666 |
| Y | 1478 | 660 |
| Z | 1468 | 655 |
| AA | 1429 | 649 |
| AB | 1419 | 644 |
| AC | 1411 | 647 |
| AD | 1435 | 641 |
| AE | 1386 | 630 |
| AF | 1369 | 636 |
| AG | 1592 | 693 |
| AH | 1582 | 688 |
| AI | 1574 | 691 |
| AJ | 1551 | 679 |
| AK | 1525 | 680 |
| AL | 1483 | 660 |
| AM | 1434 | 658 |
| AN | 1385 | 647 |
| AO | 1429 | 655 |
| AP | 1633 | 690 |
| AQ | 1641 | 704 |
| AR | 1624 | 684 |
| AS | 1631 | 699 |
| AT | 1674 | 704 |

The Secretary's submissions

5. The Secretary submitted, in summary, that:
- (a) CCL has presented calculations on the gambling opportunities associated with the new game mixes compared to those associated with game mix A.
 - (b) He noted the Commission's comments in decision GC11/09 where it expressed dissatisfaction with the available evidence on gambling opportunities and emphasised that more reliable data is required to support applications to vary game mixes. To date, more reliable data has not been developed, so he cannot submit, based solely on CCL's calculations, that the proposed new game mixes would not increase opportunities for casino gambling. In reply, CCL submitted



that in the absence of better data, or a better method to assess gambling opportunities, the information relied upon is the most accurate currently available.

- (c) The Commission also observed in decision GC11/09 that although the current information on wagering opportunities may not be determinative, it can be of assistance.
- (d) CCL has ascribed a value of 40 rounds per hour for 3-Card Poker, which does not seem unreasonable
- (e) As each of the new game mixes includes no more than one table of 3-Card Poker, the speed of 3-Card Poker would have to be considerably faster than the proposed 40 rounds per hour in order to exceed the regulatory benchmark, and even if a rate of play of 90 rounds per hour were attributed to 3-Card Poker, all but one of the proposed game mixes would still present less opportunities per hour than game mix A.
- (f) An assessment of wagering opportunities is not an exact science, but the calculations supplied indicate that there is a significant gap between game mix A and the new game mixes in terms of the opportunities they provide for casino gambling. Taking everything into account, CCL's new game mixes will not increase opportunities for casino gambling.

Analysis

- 6. CCL has applied for approval of 32 new game mixes which, except for proposed game mix O, all include one game of 3-Card Poker.
- 7. The Commission's approach when determining whether a new game mix will result in an increase in opportunities for casino gambling is to compare what is proposed against the game mix that provides the greatest level of opportunities for casino gambling. Game mix A provides the greatest level of opportunities.
- 8. The Commission compared the 32 proposed game mixes with game mix A, and considered that approving the new game mixes would not increase opportunities for casino gambling.
- 9. CCL provided information on the wagering opportunities generated by 3-Card Poker which was far from definitive. However, considering CCL's application in the round, the Commission was satisfied that the new game mixes would not increase opportunities for casino gambling compared to game mix A.

Decision of the Commission

10 The Commission decided to approve Annex A (**attached**) with new game mixes O-AT, under condition 9 of CCL's operator's licence.

Peter Chin
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

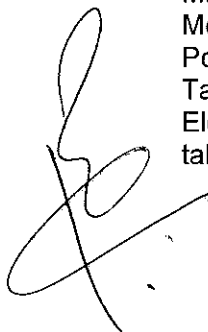


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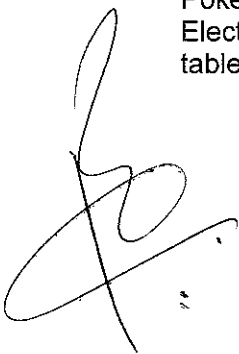
ANNEX A

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:

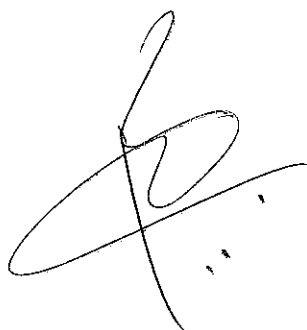
- A. Roulette – 10 games
Black Jack – 14 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 3 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 2 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising 14 terminals and 1 manual table)
- B. Roulette – 8 games
Black Jack – 13 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 3 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- C. Roulette – 8 games
Black Jack – 12 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- D. Roulette – 8 games
Black Jack – 11 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 5 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- E. Roulette – 8 games
Black Jack – 10 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 6 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)



- F. Roulette – 8 games
Black Jack – 9 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 7 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- G. Roulette – 8 games
Black Jack – 10 games
Caribbean Stud Poker – 2 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 7 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- H. Roulette – 8 games
Black Jack – 8 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 8 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- I. Roulette – 8 games
Black Jack – 9 games
Caribbean Stud Poker – 2 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 8 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- J. Roulette – 8 games
Black Jack – 9 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 (comprising a maximum of 20 terminals and no manual table)

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a cursive name, possibly 'John'.

- K. Roulette – 8 games
Black Jack – 9 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 (comprising a maximum of 20 terminals and no manual table)
- L. Roulette – 8 games
Black Jack – 9 games
Caribbean Stud Poker – 2 games
Midi Baccarat – 5 games
Money Wheel – 1 game
Poker – 10 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- M. Roulette – 8 games
Black Jack – 11 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 6 games
Money Wheel – 1 game
Poker – 5 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- N. Roulette – 9 games
Black Jack – 11 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- O. Roulette – 8 games
Black Jack – 12 games
Caribbean Stud Poker – 3 games
Midi Baccarat – 4 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 5 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

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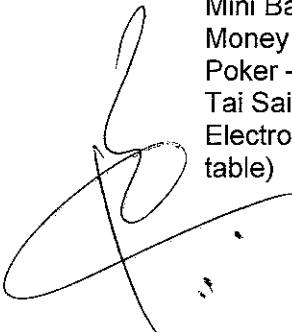
P. Roulette – 8 games
Black Jack – 12 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Midi Baccarat – 4 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

Q. Roulette – 8 games
Black Jack – 12 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 (comprising a maximum of 20 terminals and no manual table)

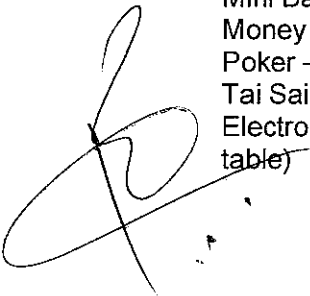
R. Roulette – 8 games
Black Jack – 12 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 4 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 5 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

S. Roulette – 8 games
Black Jack – 11 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

T. Roulette – 8 games
Black Jack – 11 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

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- U. Roulette – 8 games
Black Jack – 11 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- V. Roulette – 8 games
Black Jack – 10 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- W. Roulette – 8 games
Black Jack – 10 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- X. Roulette – 8 games
Black Jack – 10 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 (comprising a maximum of 20 terminals and no manual table)
- Y. Roulette – 8 games
Black Jack – 9 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

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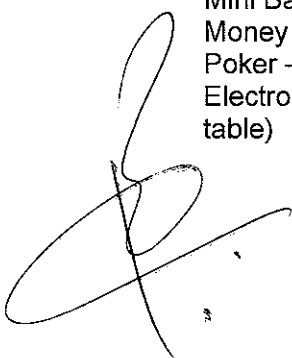
Z. Roulette – 8 games
Black Jack – 9 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 7 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AA. Roulette – 8 games
Black Jack – 8 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

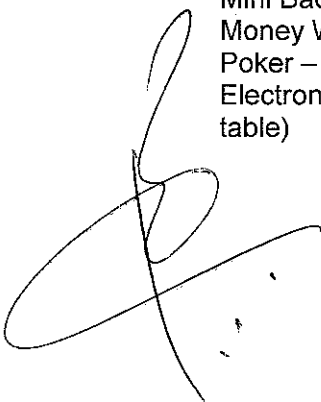
AB. Roulette – 8 games
Black Jack – 8 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 8 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AC. Roulette – 8 games
Black Jack – 8 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 (comprising a maximum of 20 terminals and no manual table)

AD. Roulette – 8 games
Black Jack – 9 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 (comprising a maximum of 20 terminals and no manual table)

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- AE. Roulette – 8 games
Black Jack – 8 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 4 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 10 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- AF. Roulette – 8 games
Black Jack – 8 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 (comprising a maximum of 20 terminals and no manual table)
- AG. Roulette – 9 games
Black Jack – 11 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- AH. Roulette – 9 games
Black Jack – 11 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
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)
- AI. Roulette – 9 games
Black Jack – 11 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
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

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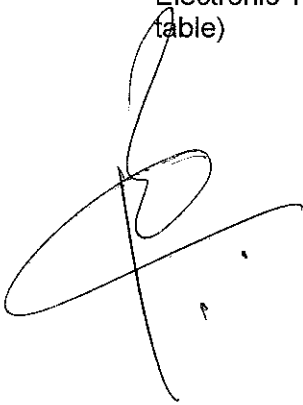
AJ. Roulette – 9 games
Black Jack – 10 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 4 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AK. Roulette – 9 games
Black Jack – 10 games
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3-Card Poker – 1 game
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Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AL. Roulette – 9 games
Black Jack – 10 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Money Wheel – 1 game
Poker – 7 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AM. Roulette – 9 games
Black Jack – 9 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Money Wheel – 1 game
Poker – 8 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AN. Roulette – 9 games
Black Jack – 8 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Money Wheel – 1 game
Poker – 9 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

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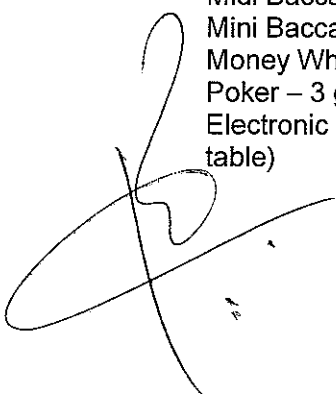
AO. Roulette – 9 games
Black Jack – 9 games
Caribbean Stud Poker – 2 games
Midi Baccarat – 4 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 9 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AP. Roulette – 8 games
Black Jack – 12 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 (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AQ. Roulette – 9 games
Black Jack – 12 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 3 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

AR. Roulette – 9 games
Black Jack – 12 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Midi Baccarat – 4 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 3 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

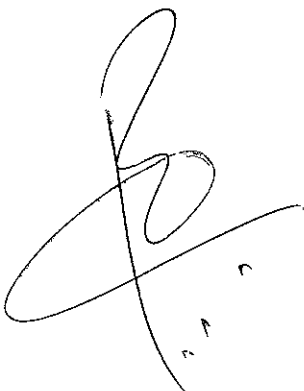
AS. Roulette – 9 games
Black Jack – 12 games
Caribbean Stud Poker – 3 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 3 games
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)



- AT. Roulette – 8 games
Black Jack – 13 games
Caribbean Stud Poker – 2 games
3-Card Poker – 1 game
Midi Baccarat – 5 games
Mini Baccarat – 1 game
Money Wheel – 1 game
Poker – 3 games
Tai Sai (single) – 1 game
Electronic Roulette – 1 game (comprising a maximum of 20 terminals and no manual table)

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 no more than 50% of the Black Jack games specified in game mixes A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AB, AC, AD, AE, AF, AG, AH, AI, AJ, AK, AL, AM, AN, AO, AP, AQ, AR, AS and AT.

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