

**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)  
L M Hansen  
R D Bell  
D C Matahaere-Atariki

Date of Application: 26 September 2014

Date of Decision: 7 November 2014

Date of Notification of Decision: 17 November 2014

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

**Introduction**

1. Christchurch Casinos Limited ("CCL") applied to the Commission, under condition 9 of CCL's operator's licence, for approval of a new game mix Annex with 20 new game mixes, L-AE.

**Licence condition**

2. The relevant licence condition is as follows:

**CCL's operator's licence**

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

**CCL's submissions**

3. CCL submitted that:
  - (a) It wants to introduce the game of Lunar Poker to the Christchurch casino.
  - (b) When considering how best to incorporate Lunar Poker, it determined that it needs 20 new game mixes, with 17 of its current game mixes now being redundant. If the new game mixes are approved, it will have 31 approved game mixes. The new game mixes will be labelled L-AE.

- (c) Although not definitive, the method employed to calculate theoretical gambling opportunities is to take the decision rate and multiply it by the potential or assessed player spaces for each game type. It generated a table of data which applied this methodology and demonstrates that the new game mixes are below its theoretical maximum gambling opportunities.
- (d) While completing its analysis for this application, it detected an error that has previously been applied when calculating opportunities. It noted that:

The previous spreadsheet calculation multiplied the number of tables by the decision rate to get the total decisions. We then multiplied the player spaces at each table by the number of tables to get the total player spaces. Finally we multiplied the total player spaces by the total decisions to get a mathematical calculation of the gambling opportunities. While the first two individual steps are accurate to determine the total number of decisions and then the total number of player spaces when they are in turn multiplied together as the third step it has the net effect of using the number of tables twice in the calculation.

The correct assessment is to multiply the player spaces available per table by the rate of play, with the resulting figure multiplied by the number of those tables.

- (e) While the error makes a significant difference to the figures relied upon, there does not appear to have been a problem complying with section 11 of the Gambling Act as the error was applied consistently to both the benchmark and the proposed game mixes.

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

4. The Secretary submitted that, in the round, the proposed game mixes will not increase opportunities for casino gambling. He noted that the significant difference between the proposed game mixes and the regulatory benchmark is a reduction in the number of Black Jack and Midi Baccarat Style A games.

#### **Analysis**

5. CCL applied for approval of a new game mix Annex in order to introduce the game of Lunar Poker. CCL also took the opportunity to remove a number of game mixes which it will no longer deploy. The Commission noted CCL's submission regarding the error in calculating opportunities, but as it has noted in previous decisions, calculations of the type discussed by CCL are of limited assistance to the Commission when considering applications of this nature. The Commission's usual approach is to compare a proposal with the approved game mix which provides the most opportunities for casino gambling and form a view, in the round, on whether that proposal will increase opportunities for casino gambling. The Commission makes the assessment on a commonsense basis, rather than by calculating opportunities based upon a formula, or upon tables of data.

6. Game mix A is the approved game mix that provides the most opportunities for casino gambling at the Christchurch casino. The Commission compared proposed game mixes L-AE with game mix A and was satisfied that, in the round, they would not increase opportunities for casino gambling.

**Decision**

7. The Commission approved games mixes L-AE, under condition 9 of CCL's operator's licence. CCL's new Annex A is **attached**.



Lisa Hansen  
Gambling Commissioner

for and on behalf of the  
Gambling Commission

17

November 2014



## ANNEX A

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

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



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



- K. Roulette – 9 games  
 7-Box Black Jack – 10 games  
 5-Box Black Jack – 2 games  
 Caribbean Stud Poker – 3 games  
 3-Card Poker – 1 game  
 Midi Baccarat – 5 games  
 Money Wheel – 1 game  
 Poker – 3 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- L. Roulette – 8 games  
 7-Box Black Jack – 10 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Lunar Poker – 1 game  
 Midi Baccarat – 6 games  
 Money Wheel – 1 game  
 Poker – 5 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- M. Roulette – 8 games  
 7-Box Black Jack – 11 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Lunar Poker – 1 game  
 Midi Baccarat – 6 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- N. Roulette – 8 games  
 7-Box Black Jack – 11 games  
 Caribbean Stud Poker – 2 games  
 Lunar Poker – 1 game  
 Midi Baccarat – 6 games  
 Money Wheel – 1 game  
 Poker – 5 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- O. Roulette – 8 games  
 7-Box Black Jack – 10 games  
 Caribbean Stud Poker – 2 games  
 Lunar Poker – 1 game  
 Midi Baccarat – 5 games  
 Money Wheel – 1 game  
 Poker – 8 games  
 Electronic Roulette – 1 game



- P. Roulette – 8 games  
7-Box Black Jack – 9 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Lunar Poker – 1 game  
Midi Baccarat – 5 games  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game
- Q. Roulette – 8 games  
7-Box Black Jack – 11 games  
Caribbean Stud Poker – 2 games  
Lunar Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game
- R. Roulette – 8 games  
7-Box Black Jack – 10 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Lunar Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game
- S. Roulette – 8 games  
7-Box Black Jack – 11 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Lunar Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 5 games  
Electronic Roulette – 1 game
- T. Roulette – 8 games  
7-Box Black Jack – 10 games  
Caribbean Stud Poker – 3 games  
3-Card Poker – 1 game  
Lunar Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game



- U.
  - Roulette – 8 games
  - 7-Box Black Jack – 10 games
  - Caribbean Stud Poker – 3 games
  - Lunar Poker – 1 game
  - Midi Baccarat – 6 games
  - Money Wheel – 1 game
  - Poker – 5 games
  - Electronic Roulette – 1 game
  - Tai Sai – Single – 1 game
  
- V.
  - Roulette – 8 games
  - 7-Box Black Jack – 12 games
  - Caribbean Stud Poker – 2 games
  - Lunar Poker – 1 game
  - Midi Baccarat – 5 games
  - Money Wheel – 1 game
  - Poker – 5 games
  - Electronic Roulette – 1 game
  - Tai Sai – Single – 1 game
  
- W.
  - Roulette – 8 games
  - 7-Box Black Jack – 12 games
  - Caribbean Stud Poker – 2 games
  - 3-Card Poker – 1 game
  - Lunar Poker – 1 game
  - Midi Baccarat – 5 games
  - Money Wheel – 1 game
  - Poker – 4 games
  - Electronic Roulette – 1 game
  - Tai Sai – Single – 1 game
  
- X.
  - Roulette – 8 games
  - 7-Box Black Jack – 11 games
  - Caribbean Stud Poker – 2 games
  - 3-Card Poker – 1 game
  - Lunar Poker – 1 game
  - Midi Baccarat – 5 games
  - Money Wheel – 1 game
  - Poker – 6 games
  - Electronic Roulette – 1 game
  
- Y.
  - Roulette – 8 games
  - 7-Box Black Jack – 10 games
  - Caribbean Stud Poker – 2 games
  - 3-Card Poker – 1 game
  - Lunar Poker – 1 game
  - Midi Baccarat – 7 games
  - Money Wheel – 1 game
  - Poker – 4 games
  - Electronic Roulette – 1 game
  - Tai Sai – Single – 1 game



- Z. Roulette – 9 games  
7-Box Black Jack – 10 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Lunar Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
- AA. Roulette – 9 games  
7-Box Black Jack – 11 games  
Caribbean Stud Poker – 2 games  
Lunar Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
- AB. Roulette – 9 games  
7-Box Black Jack – 11 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Lunar Poker – 1 game  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 3 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
- AC. Roulette – 8 games  
7-Box Black Jack – 11 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
Lunar Poker – 2 games  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 3 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
- AD. Roulette – 9 games  
7-Box Black Jack – 11 games  
Caribbean Stud Poker – 2 games  
Lunar Poker – 2 games  
Midi Baccarat – 6 games  
Money Wheel – 1 game  
Poker – 3 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game



- AE. Roulette – 8 games  
7-Box Black Jack – 11 games  
Caribbean Stud Poker – 2 games  
Lunar Poker – 2 games  
Midi Baccarat – 7 games  
Money Wheel – 1 game  
Poker – 3 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 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-AE; and
  - its Mini Baccarat table in game mixes B-AE.
3. The Electronic Roulette table in game mix A comprises 14 terminals and one manual table. The Electronic Roulette table in game mixes B-AE 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-AE.

