

**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  
W N Harvey

Date of Application: 29 August 2017

Date of Decision: 6 October 2017

Date of Notification of Decision:  October 2017

**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 10 new game mixes, AO-AX at the Christchurch Casino.

**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, in summary, that:
  - (a) In decision GC07/17, the Commission approved 10 new game mixes, some of which incorporated the game "Snake Eyes". This current request arises primarily because Snake Eyes was developed by SKYCITY, who has now indicated it wishes to licence its use.



- (b) CCL has retained Snake Eyes in its game mixes because, dependent on SKYCITY's requirements, it may still be an option in the future.
- (c) It also wants to introduce the game Casino War and have the flexibility to incorporate the table game Pontoon as interchangeable with Black Jack.
- (d) It has linked Black Jack and Pontoon on one line because they are such similar games; they have the same game rates and player spaces. It believes this to be a common sense approach. The alternative to combining the two games on the one line would require submission of double the number of game mixes for approval.
- (e) It has mathematically compared the proposed game mixes with its benchmark game mix, game mix A, and concluded that, in the round, the proposed game mixes all offer fewer gambling opportunities.
- (f) Although the mathematical calculations are not definitive, they are a strong indicator of the opportunities available pursuant to each game mix. They are set out below:

Game mix	Player spaces	Overall opportunities
A	718	19214
AO	705	14718
AP	704	14738
AQ	714	15276
AR	695	14558
AS	692	14451
AT	714	15507
AU	705	15327
AV	693	15390
AW	680	15123
AX	693	15621

#### Secretary's submissions

4. The Secretary submitted that he does not have any regulatory concerns in relation to the application.

#### Analysis

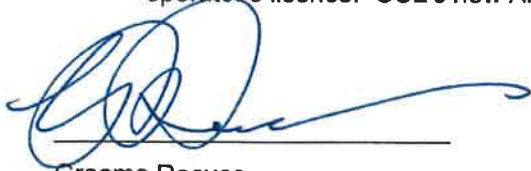
5. CCL already has approval to deploy game mixes A–AN, and now seeks approval to introduce 10 new game mixes into the casino, AO–AX.
6. The Commission's general approach for approving new game mixes is to compare the proposal with the approved game mix which provides the most opportunities for casino gambling and form a view, in the round, on whether the proposal will increase

opportunities for casino gambling. The Commission makes the assessment on a common sense basis, rather than by calculating opportunities based upon a formula, or tables of data.

7. Game mix A is the approved game mix that provides the most opportunities for casino gambling at the Christchurch casino. The proposed game mixes all generate less player spaces and less theoretical opportunities than game mix A.
8. Having compared each game mix with game mix A, the Commission was satisfied that, in the round, none of the game mixes to be introduced will increase opportunities for casino gambling.

#### Decision

9. The Commission approved the new game mix Annex under condition 9 of CCL's operator's licence. CCL's new Annex is **attached**.



Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

12<sup>th</sup> October 2017



## 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 Style A – 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/Pontoon – 11 games  
 Caribbean Stud Poker – 3 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Tai Sai – 1 game  
 Electronic Roulette – 1 game
- C. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 11 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 6 games  
 Electronic Roulette – 1 game
- D. Roulette – 9 games  
 7-Box Black Jack/Pontoon – 11 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- E. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 12 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game



- F. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 8 games  
 Electronic Roulette – 1 game
- G. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
 Poker – 8 games  
 Electronic Roulette – 1 game
- H. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 6 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- I. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 11 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
 Poker – 6 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- J. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 1 game  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
 Poker – 8 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game



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



- P.     Roulette – 8 games  
       7-Box Black Jack/Pontoon – 11 games  
       Caribbean Stud Poker – 2 games  
       3-Card Poker – 1 game  
       Midi Baccarat Style A – 1 game  
       Midi Baccarat Style B – 4 games  
       Money Wheel – 1 game  
       Poker – 6 games  
       Snake Eyes – 1 game  
       Electronic Roulette – 1 game
- Q.     Roulette – 8 games  
       7-Box Black Jack/Pontoon – 9 games  
       Caribbean Stud Poker – 2 games  
       3-Card Poker – 1 game  
       Midi Baccarat Style A – 1 game  
       Midi Baccarat Style B – 5 games  
       Money Wheel – 1 game  
       Poker – 8 games  
       Electronic Roulette – 1 game
- R.     Roulette – 8 games  
       7-Box Black Jack/Pontoon – 11 games  
       Caribbean Stud Poker – 2 games  
       3-Card Poker – 1 game  
       Lunar Poker – 1 game  
       Midi Baccarat Style A – 1 game  
       Midi Baccarat Style B – 4 games  
       Money Wheel – 1 game  
       Poker – 6 games  
       Electronic Roulette – 1 game
- S.     Roulette – 8 games  
       7-Box Black Jack/Pontoon – 9 games  
       Caribbean Stud Poker – 1 game  
       3-Card Poker – 1 game  
       Midi Baccarat Style A – 1 game  
       Midi Baccarat Style B – 5 games  
       Money Wheel – 1 game  
       Poker – 8 games  
       Snake Eyes – 1 game  
       Electronic Roulette – 1 game
- T.     Roulette – 8 games  
       7-Box Black Jack/Pontoon – 9 games  
       Caribbean Stud Poker – 1 game  
       3-Card Poker – 1 game  
       Midi Baccarat Style A – 1 game  
       Midi Baccarat Style B – 6 games  
       Money Wheel – 1 game  
       Poker – 8 games  
       Electronic Roulette – 1 game



- U. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 9 games  
 Snake Eyes – 1 game  
 Electronic Roulette – 1 game
- V. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 1 game  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 9 games  
 Electronic Roulette – 1 game
- W. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Lunar Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Mini Baccarat – 1 game  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- X. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 8 games  
 Caribbean Stud Poker – 1 game  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 10 games  
 Electronic Roulette – 1 game
- Y. Roulette – 9 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Lunar Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 6 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Tai Sai – Single – 1 game  
 Electronic Roulette – 1 game



- Z. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 8 games  
 Caribbean Stud Poker – 2 games  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 10 games  
 Electronic Roulette – 1 game
- AA. Roulette – 9 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 3 games  
 3-Card Poker – 1 game  
 Lunar Poker – 1 game  
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 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single 1 - game
- AB. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Lunar Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 6 games  
 Mini Baccarat – 1 game  
 Money Wheel – 1 game  
 Poker – 4 games  
 Electronic Roulette – 1 game  
 Tai Sai – Single – 1 game
- AC. Roulette – 8 games  
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 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Lunar Poker – 1 game  
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 Mini Baccarat – 1 game  
 Money Wheel – 1 game  
 Poker – 6 games  
 Electronic Roulette – 1 game
- AD. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 8 games  
 Caribbean Stud Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 10 games  
 Snake Eyes – 1 game  
 Electronic Roulette – 1 game



- AE. Roulette – 9 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 3 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Snake Eyes – 1 game  
 Tai Sai – Single – 1 game  
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- AF. Roulette – 9 games  
 7-Box Black Jack/Pontoon – 8 games  
 Caribbean Stud Poker – 3 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 6 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Snake Eyes – 1 game  
 Tai Sai – Single – 1 game  
 Electronic Roulette – 1 game
- AG. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 9 games  
 Caribbean Stud Poker – 2 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 5 games  
 Money Wheel – 1 game  
 Poker – 7 games  
 Snake Eyes – 1 game  
 Electronic Roulette – 1 game
- AH. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 2 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
 Poker – 7 games  
 Snake Eyes – 1 game  
 Electronic Roulette – 1 game
- AI. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 2 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
 Poker – 8 games  
 Electronic Roulette – 1 game



- AJ. Roulette – 8 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Tai Sai – Single – 1 game  
Electronic Roulette – 1 game
- AK. Roulette – 9 games  
7-Box Black Jack/Pontoon – 11 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 4 games  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Tai Sai – Single – 1 game  
Electronic Roulette – 1 game
- AL. Roulette – 9 games  
7-Box Black Jack/Pontoon – 11 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 4 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Snake Eyes – 1 game  
Electronic Roulette – 1 game
- AM. Roulette – 8 games  
7-Box Black Jack/Pontoon – 8 games  
Caribbean Stud Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 5 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 9 games  
Snake Eyes – 1 game  
Electronic Roulette – 1 game



- AN. Roulette – 9 games  
7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – Single – 1 game  
Electronic Roulette – 1 game
- AO. Roulette – 9 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – Single – 1 game  
Electronic Roulette – 1 game  
Casino War – 1 game
- AP. Roulette – 9 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
Snake Eyes – 1 game  
Casino War – 1 game
- AQ. Roulette – 9 games  
7-Box Black Jack/Pontoon – 10 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
Casino War – 1 game



- AR. Roulette – 8 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – Single – 1 game  
Electronic Roulette – 1 game  
Snake Eyes – 1 game  
Casino War – 1 game
- AS. Roulette – 8 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game  
Casino War – 1 game
- AT. Roulette – 9 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
Casino War – 1 game
- AU. Roulette – 8 games  
7-Box Black Jack/Pontoon – 9 games  
Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
Midi Baccarat Style A – 1 game  
Midi Baccarat Style B – 6 games  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 4 games  
Tai Sai – Single – 1 game  
Electronic Roulette – 1 game  
Casino War – 1 game



- AV. Roulette – 9 games  
 7-Box Black Jack/Pontoon – 11 games  
 Caribbean Stud Poker – 2 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Tai Sai – Single – 1 game  
 Electronic Roulette – 1 game  
 Casino War – 1 game
- AW. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 11 games  
 Caribbean Stud Poker – 2 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
 Poker – 6 games  
 Electronic Roulette – 1 game  
 Casino War – 1 game
- AX. Roulette – 9 games  
 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 2 games  
 3 Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 4 games  
 Mini Baccarat – 1 ame  
 Money Wheel – 1 game  
 Poker – 4 games  
 Tai Sai – Single – 1 game  
 Electronic Roulette – 1 game  
 Casino War – 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-AX; and
  - its Mini Baccarat table in game mixes B-AX.
3. The Electronic Roulette table in game mix A comprises 14 terminals and one manual table. The Electronic Roulette table in game mixes B-AX 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-AX.

