

IN THE MATTER of the Gambling Act 2003

AND of an application by **OTAGO CASINOS LIMITED** for approval of an alternative game mix, and to introduce the Perfect Pairs wagering option to its Black Jack tables

BEFORE THE GAMBLING COMMISSION

Members Present: P Chin (Chief Gambling Commissioner)
K M Ford
M M Lythe
P J Stanley
G L Reeves

Date of Application: 15 August 2007

Date of Decision: 14 September 2007

Date of Notification
of Decision: **24** September 2007

DECISION

**ON AN APPLICATION BY OTAGO CASINOS LIMITED FOR APPROVAL OF AN
ALTERNATIVE GAME MIX, AND TO INTRODUCE THE PERFECT PAIRS WAGERING
OPTION TO ITS BLACK JACK TABLES**

Application

- 1 Otago Casinos Limited (the "Applicant") applied to the Commission for approval:
 - (a) of an alternative game mix, game mix C, under condition 2.1 of its venue licence; and
 - (b) to introduce the Perfect Pairs wagering option on its Black Jack tables
- 2 If game mix C is approved, the following game mixes would be available:

Game Mix and Floor Plan	Table Numbers		
	A	B	C
Black Jack	3	3	0
Roulette	1	1	0
Poker	0	0	4
Flip-Top Table - Black Jack/Mini Baccarat	2	1	0
Flip-Top Table - Poker/Midi Baccarat (up to 18 player spaces)	0	1	1
Flip-Top Table - Poker/Black Jack	0	0	1

Licence condition

- 3 Licence condition 2 1 of the Applicant's venue licence provides as follows:

- 2.1 **Approval of specifications for security and surveillance installation**
 Subject to paragraph 2.2, the Licence Holder shall submit to the Commission for approval all drawings and specifications relating to:
- (a) gambling area floor layouts showing gaming tables, gaming machines and closed circuit television cameras;
 - (b) any viewing panels;
 - (c) cashier cages, count rooms, security areas, and access thereto;
 - (d) areas for government inspectors and surveillance staff;
 - (e) electrical installations, telephone installations, auxiliary power; and
 - (f) the master key system or access control system

Submissions by the Applicant

Alternative game mix

- 4 The Applicant stated that it is considering hosting a Poker tournament as part of the Asia Pacific Poker Tour. It sought the Commission's approval for a new game mix, game mix C, to allow it to do this, and to run similar tournaments in the future.

- 5 The Applicant submitted that game mix C would not increase opportunities for casino gambling, as:

- (a) game mix C, which comprises four dedicated Poker tables and two flip top tables which flip between Poker and Black Jack, and Poker and Midi Baccarat, has fewer player spaces than its existing game mixes;
- (b) the rate of play for the game mix C is slower than the rate of play for the existing game mixes, as Poker's rate of play is slower than Black Jack, Roulette and Baccarat.

- 6 The Applicant also submitted that the Poker tables at the Wharf casino accommodate only 10 players (rather than 11, which is the maximum permissible under Game Rules) and that its Midi Baccarat table is limited to 18 player spaces, rather than 27, following Commission Decision GC10/06.

Perfect Pairs

- 7 The Applicant stated that it wants to introduce the Perfect Pairs wagering option on its Black Jack tables. It submitted that this option would not increase opportunities for casino gambling as the time taken by dealers to collect losing wagers, pay winning wagers and provide customers with the additional chip changes associated with the Perfect Pairs option would reduce the number of Black Jack hands played per hour.

Submissions by the Secretary

- 8 The Secretary had no objection to proposed game mix C, and agreed with the Applicant's submission that it would not increase opportunities for casino gambling
- 9 In relation to the introduction of the Perfect Pairs wagering option, the Secretary noted that the Commission determined, in decision GC17/05, that the deployment of the Perfect Pairs option on Baccarat would not increase opportunities for casino gambling and he considered that this would also be valid for the Perfect Pairs option on Black Jack

Analysis

- 10 In order to assess whether the proposal would give rise to an increase in opportunities for casino gambling, the Commission compared the proposed game mix (game mix C) with the game mix on Plan A, which represents the greatest level of opportunities for casino gambling
- 11 Compared with game mix A, game mix C has 42 fewer player spaces and, based upon data from the review carried out by the Christchurch casino, has a slower rate of play than game mix A. The Commission was therefore satisfied that game mix C would not increase opportunities for casino gambling
- 12 In making its calculations, the Commission noted the Applicant's submission that its Poker tables accommodate 10 players, rather than 11, which is the maximum provided for under game rules. However, unlike its Midi Baccarat table, the Applicant did not, seek to impose a restriction on the number of player spaces for Poker and as such, the Commission considered the proper approach is to calculate player spaces for Poker at 11 player spaces. The Commission notes the Applicant's intention regarding the use of the Poker tables, but does not see it as being necessary in this case to specify a maximum number of 10 players for Poker, given the overall reduction in player spaces between game mix A and game mix C
- 13 The Commission has previously determined that the introduction of the Perfect Pairs wagering option would not constitute an increase in opportunities for casino gambling in terms of section 12 of the Act. The Black Jack game rules also provide for the Perfect Pairs wagering option to be exercised. As such, it was not necessary for the Applicant to obtain Commission approval to introduce the Perfect Pairs wagering option on its Black Jack tables

Decision

14 The Commission decided to:

- (a) Approve, under condition 2.1 of the Applicant's venue licence, the **attached** floor plan (to be called "Plan C") The following games may be operated under Plan C:

Poker	Up to 4 games
Poker/Black Jack	Up to 1 game
Poker/Midi Baccarat (up to 18 player spaces, no more than two players per wagering area)	Up to 1 game

- (b) The foregoing list refers to manual versions and does not extend to or permit the introduction of any electronic versions or new electronic aids or enhancements. If electronic versions, aids or enhancements are sought to be introduced, an application is required by the Licence Holder for approval of a revised game mix;
- (c) The Licence Holder is permitted to change between the existing plans (plans A and B) and Plan C, subject to providing the Commission and the Inspectorate with a minimum of five working days notice in writing of its intention to do so, unless a shorter notice period is agreed with the Inspectorate on a case by case basis;
- (d) The Licence Holder must comply with the notification and other requirements specified in the casino's Minimum Operating Standards for flip top tables when

flipping tables.

GAMBLING
COMMISSION

Peter Chin
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

24 September 2007

Plan C

Lasseters Wharf Casino Floor Plan

Legend -----

AR - Roulette
BJ - Blackjack
FT - Flip Top
PK - Poker
MD - Midi Baccarat
(18 player spaces)
() = current tables

Floor Layout ---

