

**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  
R D Bell  
A K Foote

Date of Application: 6 August 2011

Date of Decision: 14 September 2012

Date of Notification of Decision: 17 September 2012

**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, under condition 9 of CCL's operator's licence, of nine new game mixes, AP-AX.

**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 deploy nine new game mixes, AP-AX. The new game mixes will increase the maximum number of Roulette tables, and allow it to offer Roulette at lower play limits.



- (b) The accepted method for calculating theoretical gambling opportunities is to take the decision rate and multiply it by the potential or assessed player spaces for each game type. All of the new game mixes are below its maximum theoretical gambling opportunities, as shown by the table below.

Game mix	No. of rounds per hour	Player spaces	Overall opportunities
A	903	718	115,464.75
AP	704	635	76,016.25
AQ	758	687	100,821.75
AR	759	684	100,454.25
AS	779	678	110,618.25
AT	736	673	89,103.75
AU	734	674	90,777.75
AV	776	687	108,675.75
AW	706	652	77,505.75
AX	726	646	84,813.75

### Secretary's submissions

4. The Secretary submitted that an assessment of gambling opportunities for each proposed game mix would suggest that they offer fewer total gambling opportunities than the benchmark game mix.

### Analysis

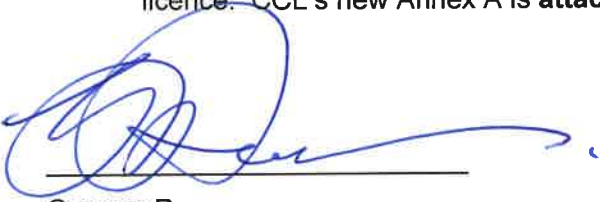
5. As a preliminary point, CCL submitted that the accepted method for calculating theoretical gambling opportunities is to take the decision rate and multiply it by the player spaces for each game type.
6. As the Commission has said in numerous previous decisions, the assessment of opportunities is not arithmetical and definitive conclusions cannot be reached solely upon calculations of the type submitted by CCL.
7. The Commission's approach with applications of this nature 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.
8. While calculations may offer some guidance, they are far from definitive and only ever form part of the Commission's in the round assessment.
9. Game mix A is the approved game mix that provides the most opportunities for casino gambling at the Christchurch casino.



10. The Commission compared proposed game mixes AP-AX with game mix A and was satisfied that, in the round, none of them would increase opportunities for casino gambling.

**Decision**

11. The Commission approved game mixes AP-AX, under condition 9 of CCL's operator's licence. CCL's new Annex A is **attached**.



Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

17 September 2012



## 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 – 4 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 – 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
  
- D. 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



- E. 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
- F. 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
- G. 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
- H. 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
- I. 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



- J. 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
- K. 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
- L. 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
- M. 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
- N. 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



- O. 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
- P. 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
- Q. 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
- R. 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
- S. 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



- T. 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
- U. 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
- V. 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  
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- W. Roulette – 8 games  
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5-Box Black Jack – 2 games  
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3-Card Poker – 1 game  
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Money Wheel – 1 game  
Poker – 3 games  
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5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
3-Card Poker – 1 game  
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Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 9 games  
Electronic Roulette – 1 game



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  - 5-Box Black Jack – 2 games
  - Caribbean Stud Poker – 1 game
  - 3-Card Poker – 1 game
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  - Mini Baccarat – 1 game
  - Money Wheel – 1 game
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  - 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
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  - 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
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  - 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
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  - 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



- AD. Roulette – 8 games  
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Caribbean Stud Poker – 3 games  
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Midi Baccarat – 6 games  
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7-Box Black Jack – 10 games  
5-Box Black Jack – 2 games  
Caribbean Stud Poker – 2 games  
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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  
Electronic Roulette – 1 game
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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  
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- AH. 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  
Mini Baccarat – 1 game  
Money Wheel – 1 game  
Poker – 5 games  
Electronic Roulette – 1 game



- AI. 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 – 5 games  
Tai Sai – 1 game  
Electronic Roulette – 1 game
- AJ. 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
- AK. 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  
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- AL. 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 – 6 games  
Money Wheel – 1 game  
Poker – 6 games  
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- AM. 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



- AN. 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
- AO. 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
- AP. 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  
Money Wheel – 1 game  
Poker – 9 games  
Electronic Roulette – 1 game
- AQ. 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
- AR. 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



- AS. 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
- AT. Roulette – 9 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 – 4 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
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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
- AV. 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 – 6 games  
Money Wheel – 1 game  
Poker – 4 games  
Electronic Roulette – 1 game  
Tai Sai – Single – 1 game
- AW. 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 – 6 games  
Money Wheel – 1 game  
Poker – 8 games  
Electronic Roulette – 1 game



- AX. 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  
Money Wheel – 1 game  
Poker – 8 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- 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.

