

IN THE MATTER of the Gambling Act 2003

AND on an application by **SKYCITY CASINO MANAGEMENT LIMITED** for approval of new game mixes for the Auckland casino

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: 28 June 2013

Date of Decision: 8 August 2013

Date of Notification
of Decision: *26th* August 2013

**DECISION ON AN APPLICATION BY SKYCITY CASINO MANAGEMENT LIMITED
FOR APPROVAL OF NEW GAME MIXES FOR THE AUCKLAND CASINO**

Introduction

1. SKYCITY Casino Management Limited ("**SCML**") applied to the Commission for approval, under condition 9 of SCML's operator's licence for the Auckland casino, to vary its game mixes.

Licence condition

2. The relevant licence condition is as follows:

SCML's operator's licence (Auckland)

9. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in Annex A attached to this Licence. As an alternative to Annex A, the Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in any additional annex approved by the Commission and attached to this Licence. The Licence Holder must give the Inspectorate prior notification before it commences operation under a different annex. The game types and game mixes specified in an annex can only be changed by the Commission.

SCML's submissions

3. SCML submitted, in summary, as follows:



- (a) It has four approved game mix Annexes for the Auckland casino; A-D. Annexes A-C are no longer required and may be discarded. Annex D will be relabelled "Annex A". The Annex has a number of amendments, for which approval is sought.
- (b) The changes proposed affect the game mixes in the VIP salons 88 and 81, the gaming area known as Eight and the MGF.
- (c) It wants two additional game mixes for each of salons 88 and 81. These mixes are a variation on existing games played in those areas.
- (d) It also wants to add seven game mixes to Eight. The new game mixes provide for the deployment of one Electronic Roulette game, the introduction of up to four 7-box Midi Baccarat games, together with a range of other variations.
- (e) The version of the Electronic Roulette it wants to deploy allows wagers to be placed via electronic terminals or directly at the table layout. The rules for Electronic Roulette allow for this. This means player spaces include the wagering terminals (x 30) and the persons who could theoretically place wagers at the table (which has been notionally set at 21 as a guide consistent with previous applications). Thus this game provides 51 theoretical player spaces.
- (f) Christchurch casino has previously deployed an Electronic Roulette game using a similar configuration (but fewer terminals), but the arrangement has not previously been used at the Auckland casino. Similarly 7-box Midi Baccarat games have not previously been deployed (standard games have 9 boxes).
- (g) The proposed changes to the MGF are the most significant and involve the addition of 38 new game mixes. The new game mixes provide for the introduction of one Electronic Roulette game (where players are also offered the option of placing wagers on the table layout), the introduction of up to eight Black Jack tables where the number of players that may wager on any 1 box is limited to two, the expansion of the number of 5-box Black Jack games together with a range of other variations to the mix of existing games in that area.
- (h) In order to accommodate the new variations without exceeding the gambling opportunities associated with the regulatory benchmark, gambling opportunities associated with some games have had to be reduced. As noted above, this involves the proposed deployment of a number of Midi Baccarat games with 7 rather than 9 boxes, the introduction of additional 5-box Black Jack games, and the introduction of some Black Jack games where restrictions are placed on the



number of players that may wager per box. The game rules provide operators with the discretion to effect these changes which are clearly denoted on the table layouts.

- (i) Seven box Midi Baccarat is in principle no different to 5-box Black Jack which has been played for some time. It was first approved in decision GC11/07. No compliance issues have arisen over the period the game has been played, nor is there any reason to expect any. The available wagering positions are clearly shown on the layout. Based on experience with 5-box Black Jack, it would not expect any compliance or enforcement issues to arise from the deployment of 7-box Midi Baccarat.
- (j) Placing restrictions on the number of players that may wager per box on a casino game was recently approved as part of the game mix at the SKYCITY Hamilton casino (decision GC02/13). A similar approach had earlier been approved by the Commission in relation to a Midi Baccarat game at Wharf casino in GC10/06. Both situations involved a small number of games – one in the case of decision GC10/06 and two in the case of decision GC02/13. In decision GC02/13 the Commission indicated that its decision related to the particular circumstances of the application, including its scale and should not be taken as endorsing a position that no substitution of player spaces could ever constitute an increase in the opportunities for casino gambling regardless of scale or differences between the type of player spaces.
- (k) The issues relating to the deployment of games involving restrictions on the number of players that may wager per box have been thoroughly canvassed in decision GC02/13 and it is not proposed to repeat earlier submissions in support of the deployment of such games. Suffice to say, that it does not envisage such deployment causing any compliance or enforcement issues and the reduction in the number of players that may wager at such tables constitutes a real reduction in casino gambling opportunities.
- (l) A comparative table is attached to its application which sets out rate of play information. The game mixes with the most player spaces and opportunities are within the regulatory benchmark; the player numbers are the same but there are fewer overall opportunities.
- (m) The Commission has made clear in previous decisions that a numerical assessment is not determinative and it must approach each assessment in the round. SCML acknowledges the Commission's position in this regard. Even



putting aside the fact that the new game mixes represent over 6,000 fewer notional opportunities than those associated with the regulatory benchmark, as a matter of common sense and overall impression none of the game mixes featured in the revised Annex would increase casino gambling opportunities. It does not propose to increase the number of tables or EGMs, but rather to create variations to the types of tables that may be deployed. The balance is such that, taken as a whole, the revised game mixes do not increase casino gambling opportunities.

The Secretary's submissions

4. The Secretary submitted, in summary, as follows:
 - (a) SCML seeks approval for a single game mix Annex, with a number of variations from what is currently approved.
 - (b) By counting the number of player spaces associated with each mix, none of the proposed game mixes appear to provide more player spaces than the benchmark game mix. Including an analysis of rates of play, it seems that the proposed game mixes represent fewer opportunities than the benchmark game mix.
 - (c) Although SCML's arithmetical calculations seem accurate, the Commission has consistently held that such calculations are not determinative and that it reaches its view on whether or not a proposal constitutes an increase in opportunities on the basis of an overall, or "in the round", assessment. For the reasons elaborated on below, it would not be unreasonable for the Commission to determine that, as a matter of common sense and overall impression, this application would constitute an increase in opportunities for casino gambling.

Proposal to deploy "Combined" Electronic/Manual Roulette

- (d) The proposed new game mixes for Eight provide for the deployment of one Electronic Roulette game where players may place wagers at the table layout or on terminals. The proposed changes to the MGF also provide for the introduction of a 'combined' Roulette table. This means that the proposal includes the introduction of up to two combined Roulette tables.
- (e) Currently SCML operates Electronic Roulette and manual Roulette separately. Each is a separate table game representing one of the 110 permitted tables it is licensed to operate. SCML is now proposing to merge an Electronic Roulette game with a game of manual Roulette – effectively merging two distinct table games into one 'combined' table. If approved, the proposal would, in effect,



enable SCML to introduce two additional table games without breaching licence condition 6 (which permits a maximum of 110 tables).

- (f) The Commission has previously ruled on the status of a combined Roulette game, which is now included in the benchmark game mix for the Christchurch Casino. That combined table comprises a manual Roulette table and 14 appended Electronic Roulette terminals. In decision GC04/09, the Commission ruled the combined table "constitutes a single table game which permits the playing of a form of roulette using a combination of terminals and manually placed wagers". There was no finding in GC04/09 that the combined table could be seen to represent two tables; rather the focus was on the number of player spaces that should reasonably be assigned to that table. As a distinct question, this was important in terms of setting a benchmark that recognised the total number of spaces possible as at 19 September 2003.
- (g) In this instance, there is an application to effectively combine two existing tables into one. The proposal to operate combined Electronic/manual Roulette tables on the same basis as in GC04/09 is not technically contrary to condition 6 of SCML's operator's licence. On this logic the proposal does not increase the number of table games, so should not present any issues with regard to sub-section 12(2)(b) of the Act.
- (h) However, it is open to the Commission to give wider consideration to what constitutes an increase in casino gambling opportunities than just the numbers of gaming machines, table games and player spaces. It is not unreasonable to argue that SCML's proposal may have section 12 consequences. While the manual and electronic forms of Roulette expressed in this proposal use a single wheel and, therefore, a single point of wager determination, the implication of the application is to make space for additional tables to that which operated previously.
- (i) The question this raises is whether the ability to provide an additional standalone means of engaging in gambling on table games, irrespective of other consequences such as player spaces mixed with rate of play, constitutes an increase in opportunities. That is, while there may not be an increase from the benchmark in theoretical opportunities when looking at the traditional indicators, the effect of the proposal is to allow for the manual Roulette and Electronic Roulette market to be catered for by an alternative table type. It is arguable that an "in the round" consideration of the proposal could conclude that it constitutes an increase in casino gambling opportunities.



Proposal to place Back-Betting Restrictions on Black Jack

- (j) The proposed changes to the game mixes for the MGF, without any other compensating changes, would mean that the gambling opportunities associated with these particular mixes would exceed the regulatory benchmark. In order to accommodate the new variations, SCML proposes to reduce the gambling opportunities associated with some of its other games. This involves the proposed deployment of a number of Midi Baccarat games which have 7 rather than 9 boxes, the introduction of additional 5-box Black Jack games and the introduction of some Black Jack tables where restrictions are placed on the number of players that may wager per box ("restricted Black Jack").
- (k) He does not support the proposal to introduce restricted Black Jack, especially considering it appears that this aspect of the proposal has been designed to facilitate the introduction of the combined Roulette discussed above.
- (l) This part of the proposal appears to entail the substitution of back-betting wagering positions (from Black Jack) for frontline positions (Electronic Roulette). He is aware of at least three previous decisions in which the Commission noted the distinction between frontline and back-betting positions at table games. In the most recent decision, GC02/13, the Commission decided on an application for the Hamilton casino when SCML applied for back-betting restrictions on two of its Black Jack tables, to allow for an increased number of terminals on an Electronic Roulette table. The Commission approved that application, reaching the conclusion overall that none of the proposed game mixes would increase the opportunities for casino gambling.
- (m) However, in coming to decision GC02/13, the Commission warned that the decision related to the particular circumstances of the application, including its scale, and was not to be taken as endorsing SCML's submission that no substitution of player spaces can ever constitute an increase in the opportunities for casino gambling regardless of scale or differences between the type of player spaces. A similar view was expressed by the Commission in previous decisions; in decision GC10/06, the Commission indicated that all player spaces, including frontline and back-betting positions, may not be considered as effectively offering an equivalent opportunity in all circumstances.
- (n) Another key consideration for the Commission has been that, as in decision GC10/06, the proposed changes involve player spaces only, with no increase in the number of tables or gaming machines. This notion is in contrast to the current



application, considering that the practical effect of the application is to allow for the introduction of two additional table games.

- (o) As such, and as a matter of overall impression, the result of this application could constitute an increase in opportunities for casino gambling. The application proposes to dispose of back-betting positions at Black Jack (with lower opportunity value) in order to introduce frontline positions at Electronic Roulette (with higher opportunity value). Moreover, those frontline positions at Electronic Roulette are not intended to be operated as individual games (as is currently the case), but are intended to be appended to two manual Roulette games. The practical effect of this proposal is to allow SCML to introduce more table games to the Auckland casino than is currently the case. He further notes that the proposed game mixes also offer significantly more frontline spaces compared to the regulatory benchmark.

Harm minimisation

- (p) SCML notes that the version of Electronic Roulette it proposes to operate allows wagers to be placed via electronic terminals or directly at the table layout. This means that this game provides for up to 51 player spaces.
- (q) He agrees that the game rules allow for this scenario, so there is no problem with this arrangement on a technical level. However, there may be harm minimisation implications relating to the potential for a larger number of patrons to play at each game. The combined Roulette game allows for significantly more players per table game compared to any of the other table games that are currently operated at the Auckland casino. Specifically, concerns with this feature relate to the potential for diminished interaction between the patrons and the dealer, the diminished ability of the dealer to monitor individual players, and the potential for increased anonymity of play afforded to players.
- (r) As the Commission is aware, a number of harm prevention and minimisation requirements are in place in casinos; casino operators have problem gambler identification policies, host responsibility programmes, and staff training in harm prevention and minimisation. One of the primary responsibilities of a dealer at any table is the monitoring of players in line with their responsibilities under regulation 12 of the Harm Prevention and Minimisation Regulations. Dealers are in the unique position, compared to other staff, to monitor the length and level of play, and the demeanour of players. With a greater number of players participating in a single game, this ability is diminished.



Placement of Terminals

- (s) A final concern relates to the potential for electronic terminals to operate at a separate location from the main manual table. To this end, should the application be approved, he recommends continued regulation of the placement of both the manual table, as well as the appended terminals, to help ensure the table is only offered (and experienced) as a single game, and prohibit the connected terminals from being remotely operated from a separate location.

SCML's submissions in reply

5. SCML submitted in reply as follows:

Proposal to deploy combined electronic/manual roulette

- (a) The Secretary submits that SCML is effectively combining two existing tables into one, and concludes that it would not be unreasonable to argue that this proposal may have section 12 consequences.
- (b) What is in fact proposed is to introduce games of Electronic Roulette into the game mixes in a manner that the Secretary-approved game rules provide for. The Rules in question were approved in May 2003 long before the section 12 provisions took effect. The effect of allowing persons on an Electronic Roulette game to place wagers on the table layout as well as on electronic terminals (rather than only on the terminals) is to increase the player spaces associated with that particular game.
- (c) The Commission has previously recognised that Electronic Roulette using the implementation that SCML has applied for constitutes a single table game. There is nothing in this application which might suggest that the Commission should revisit its position.

Proposal to place back-betting restrictions on Black Jack

- (d) The Secretary has not commented on the proposal to deploy a number of 7-box Midi Baccarat games, nor SCML's proposal to introduce additional 5-box Black Jack games, so presumably he has no objections to either of these proposals.
- (e) He does however object to SCML's proposal to introduce a number of Black Jack tables where restrictions are placed on the number of players that may wager per box (restricted Black Jack). His objections appear to relate the proposed substitutions of 'back-betting' positions for 'frontline' positions. The Secretary's submissions suggest that back-betting positions have a lower opportunity value

than frontline positions. No evidence is presented to support this claim and SCML questions the basis upon which such assertions are made.

- (f) As stated in the past, the substitution of more accessible frontline positions for back-betting positions cannot constitute an increase in opportunities within sections 11 and 12 whether the substitution is of one or many positions.

Harm minimisation

- (g) The Secretary's concerns in this area appear to relate primarily to the number of players that might participate in the game and SCML's ability to monitor those players in the context of its harm minimisation obligations.
- (h) The Secretary's analysis attaches considerable weight to the responsibility of dealers in monitoring players for indicators of harm. That responsibility lies with casino staff and systems and processes that SKYCITY has developed, and is continuing to develop, to assist in identifying at risk gamblers. There is in fact more scope to monitor players who use electronic terminals for signs of harm because game protection is no longer a focus for those providing oversight. Allowing players the option of placing manual wagers at a table will not compromise its ongoing commitment and efforts to monitor all casino customers in accordance with its PGIP.
- (i) More generally, it is perplexed with regard to the Secretary's submissions in this area. The Secretary approved an amendment to the Electronic Roulette Rules in 2011 allowing the permitted number of terminals attached to this game to increase to 30. This amendment was made in the context of the existing rules which allow casino operators to offer players the option of placing wagers on the table layout. What the Secretary appears to be saying is that the rules he approved may create difficulties for dealers in fulfilling a casino operator's harm minimisation obligations. SCML can only presume that the same issue was canvassed and dismissed by the Secretary when the rules were approved in 2011. To approve rules which provide for the conduct of a game and then submit that the Commission should be wary about approving a game mix which provides for the operation of that same game on the basis of harm minimisation concerns is difficult to fathom. The Secretary has not provided any evidence to suggest that the environment has changed since his 2011 decision, or that the rules have created difficulties in their current form. Nor has he sought to amend further or revoke these rules which he has the power to do under section 367 of the Act.



- (j) The location of terminals is an issue determined by the Commission in response to applications for approval of floor layouts. The Commission initiates a consultation process before any decision to approve such applications. The issue of terminal location has no bearing on the application for approval of a game mix.

Analysis

6. SCML has sought Commission approval for a new game mix Annex for the Auckland casino. The changes sought relate to the game mixes for three areas at the casino; namely, the VIP salons, Eight and the MGF.
7. The most significant changes sought are for the MGF where SCML wants to deploy an Electronic Roulette game, at which patrons can wager on the table or on the associated electronic terminals, together with restrictions on the number of player spaces available on some Black Jack and Midi Baccarat games.
8. SCML wants to deploy the same type of Electronic Roulette game in Eight, also with restrictions on the number of player spaces available on some Midi Baccarat tables.

Electronic Roulette

9. The Secretary submitted that the Electronic Roulette game that SCML wants to deploy could be seen to represent two tables, a manual Roulette and an Electronic Roulette, and as such it is arguable that the deployment of this game in the manner proposed by SCML would allow it to introduce two additional table games, with consequential section 12 implications. The Commission does not agree that the proposal should be considered in that way.
10. SCML's proposal is to deploy two single tables of Electronic Roulette. The game rules for Electronic Roulette clearly provide that the game shall be played with a table with a Roulette wheel and up to 30 associated Roulette terminals, and that players may place their wagers either on the table layout or on any of the associated terminals.
11. It is true that the Auckland casino has not offered Electronic Roulette in that proposed configuration previously and that the proposed Electronic Roulette tables would provide gambling opportunities to a larger number of patrons (up to 30 players on the terminals and no limit on the table) compared to a table of manual Roulette or Electronic Roulette without provision for placing bets manually on the table, but that is utilising the approved game rules to effect an increase in player spaces at each table, not an increase in the number of tables. The proposal involves an increase in the number of player spaces but not in the number of table games.



Restrictions on table games

12. SCML acknowledged that the introduction of the proposed Electronic Roulette tables would be likely to generate casino gambling opportunities that exceed the opportunities associated with the benchmark game mix for the Auckland casino. SCML proposed to address this by reducing opportunities elsewhere by:
- (a) introducing up to four 7-box Midi Baccarat games in Eight (rather than the usual 9-box Midi Baccarat);
 - (b) introducing additional 5-box Black Jack games on the MGF; and
 - (c) introducing up to eight Black Jack tables where the number of players that may wager on any one box is limited to two (ie only one back-better per position is permitted, rather than the usual two).
13. The Commission has previously considered the types of restrictions outlined in (a) and (b); initially expressing concern about the imposition of limited restrictions (for reasons relating to complexity, customer confusion and difficulties with compliance and enforcement). However the Commission's concerns have been reduced in the course of subsequent applications and the reported experience, and it has been prepared to permit the restriction of frontline player spaces at gaming tables provided that doing so raises no issues of regulatory concern for patrons or the Secretary. Game rules must also permit any such restriction.
14. In this instance, SCML stated that the layouts will clearly denote the available playing spaces, and that similar restrictions applied elsewhere have not caused any compliance issues; a submission not challenged by the Secretary. Further, game rules for Midi Baccarat and Black Jack both provide operators with the discretion to deploy player spaces "up to" a permitted maximum. The Commission was satisfied that this aspect of the proposal would not raise any issues of regulatory concern
15. The position in relation to restricting back-betting positions is potentially more contentious because, contrary to the submission by SCML, the Commission has not been prepared to conclude that opportunities offered by a front-betting position are necessarily "proportionate" (to use the word in section 12(2)(c)) to the opportunities offered by a back-betting position in the same game. Game rules for Black Jack permit a restriction of the type proposed (stating that an operator may permit "up to" 3 players to wager on any 1 box) but it may become necessary for the Commission to determine whether swapping front-betting positions for back-betting positions is a proportionate exchange of gambling opportunities when assessing the opportunities for casino gambling on a proposal.



16. It is unlikely to be an issue if the overall difference in opportunities between the proposal and the benchmark is significant, but it may be very important if the difference is only slight.
17. The Commission last considered this matter in decision GC02/13; an application by SCML for approval of new game mixes for the Hamilton casino. In that matter, SCML sought approval for new game mixes which included a back-betting restriction on two Black Jack tables. The Commission has also approved restricted back-betting on one Midi Baccarat table at the Wharf casino in decision GC10/06. The current proposal relates to eight Black Jack tables (in a much larger casino with 110 gaming tables).
18. The Commission compared SCML's proposal against the approved game mix which provides the most opportunities for casino gambling, game mix A. In doing so, the Commission identified the game mix for each Gambling Area at the Auckland casino which offer the most opportunities, combined them, and compared the combination with game mix A. The Commission was satisfied, in the round, that SCML's proposal offered significantly fewer overall opportunities than game mix A when regard was had to the player spaces, including the number of games with unlimited player spaces, and the relative speeds of the substituted games. The arithmetical opportunity calculations put forward by SCML were of little value in this comparison because of the extent to which the underlying test assumptions fail to reflect the actual opportunities involved.
19. As the overall difference in opportunities was significant, it was unnecessary to assess the extent of the proportionality of the opportunities provided by front-betting and back-betting positions; the Commission considered that the difference would not alter the overall outcome.

Harm minimisation

20. The Secretary raised an issue in relation to harm minimisation on the Electronic Roulette games that SCML wants to deploy, submitting that the ability of the dealer to monitor players is diminished as a result of the potentially large number of players who could participate concurrently with a single dealer. The Commission is surprised to receive a submission that playing a game in accordance with rules made by the Secretary (using a power conferred on him by the Gambling Act) is inherently a cause for concern about harm. The Commission expects the Secretary to have exercised his power to make, amend and revoke game rules in accordance with the purposes of the Act, which include preventing and minimising gambling harm and facilitating responsible gambling.
21. The Commission has imposed a licence condition on casinos which allow it to control deployment of changes such as changes to, or new implementations of, game rules



which may undermine earlier opportunity assessments and for cases where there may be something in the specific local deployment which raises unique concerns. The Secretary's concerns appear to be generic however and, if justified, seem to the Commission to be something for him to address by amending the game rules or seeking harm minimisation regulations relating to the concentration of gambling positions. The Secretary identified no basis for specific concern about deployment at the Auckland casino to make this a proper issue for approval of a game mix.

Placement of tables and terminal

22. Finally, the Secretary raised an issue in relation to the placement of terminals and the manual table, suggesting that, if the application is approved, the terminals should be located adjacent to the manual table to ensure that Electronic Roulette is experienced as a single game. The point is valid and the matter will be considered when SCML submits relevant floor plans for approval.

Decision

23. The Commission approved the amended Annex A under condition 9 of SCML's operator's licence for the Auckland casino. Annex A is **attached**.



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

26th August 2013



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ANNEX A

GAME MIX A

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

Black Jack/Pontoon	44 games
Roulette	24 games
Electronic Roulette	1 game
Caribbean Stud Poker	10 games
Midi Baccarat	17 games
Mini Baccarat	7 games
Pai Gow	4 games
Tai Sai (double side)	1 game
Tai Sai (single side)	1 game
Money Wheel (double side)	1 game

Notes for Game Mix A

1. The Licence Holder is permitted to operate automatic shufflers on 50% of open Black Jack tables, and all Caribbean Stud Poker and Baccarat tables.
2. The Electronic Roulette table comprises up to 14 player spaces and no manual table.

ALTERNATIVE GAME MIXES

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

In gaming salon 82 to the south of the elevators on level 5, any one of the following two table game mixes:

	A1	B1	C1	D1	E1	F1	G1	H1	I1	J1	K1	L1
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1	0
Black Jack	0	0	1	1	0	2	1	0	0	1	0	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1	0
Poker	0	0	0	0	0	0	0	0	0	0	0	2
Total	2	2	2	2	2	2	2	2	2	2	2	2

Together with
**GAMBLING
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In gaming salon 86 to the south of the elevators on level 5, any one of the following two table game mixes:

	A2	B2	C2	D2	E2	F2	G2	H2	I2	J2	K2	L2
Midi Baccarat	2	1	0	0	0	0	0	1	0	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1	0
Black Jack	0	0	1	1	0	2	1	0	0	1	0	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1	0
Poker	0	0	0	0	0	0	0	0	0	0	0	2
Total	2	2	2	2	2	2	2	2	2	2	2	2

together with

In gaming salon 88 to the south of the elevators on level 5, any one of the following six table game mixes:

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3	P3	Q3	R3	S3	T3	U3	V3	W3	X3
Midi Baccarat	6	5	4	4	4	4	2	2	2	2	2	3	4	4	5	3	4	3	3	2	2	2	3	2
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1	0	1	0	1	2	0	2	2
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2	0	0	1	1	0	2	1	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0	0	0	0	0	0	0	0	0
Poker	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2	2	2	2	0	0
Total	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6

In the gaming salon 81 to the north of the elevators on level 5, any one of the following four table game mixes:

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4	K4	L4	M4	N4	O4	P4	Q4	R4
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3	1	1	1
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0	1	2	1
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0	2	1	2
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0
3 Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0	0	0
Total	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4



In the area designated as Eight to the north of the elevators on level 5, any one of the following eighteen table game mixes:

	A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5	M5	N5	O5	P5	Q5	R5	S5	T5	U5	V5
Midi Baccarat (9 box)	10	10	10	10	10	9	9	9	10	9	10	10	9	10	9	10	10	7	8	7	7	7
Midi Baccarat (7 box)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	4	3	3	3	4
Roulette	4	3	3	3	3	4	4	4	3	4	4	3	4	2	3	3	2	2	1	2	1	1
Electronic Roulette	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0	0	0	0	0
Electronic Roulette (inc Manual Table)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	0
Blackjack (7 Box)	3	2	2	3	4	2	2	2	2	3	2	3	3	0	1	0	0	0	0	0	1	1
Blackjack (5 Box)	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	2	2	2	3	2	2	2
Pai Gow	0	2	1	0	0	2	1	1	1	0	0	1	1	2	2	1	1	1	1	2	2	2
Mini Baccarat	0	0	1	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Caribbean Stud Poker	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
3 Card Poker	0	0	0	0	0	0	0	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0
Total	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18

together with



In all Gambling Areas other than the four gaming salons on level 5 and the VIP area known as 'Eight' on level 5, any one of the following 78 table game mixes:

	A6	B6	C6	D6	E6	F6	G6	H6	I6	J6	K6	L6	M6	N6	O6	P6	Q6	R6	S6	T6	U6	V6	W6	X6	Y6	Z6
Money Wheel (double side)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Money Wheel (single side)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Tai Sai (single side)	0	0	0	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Pai Gow	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5	6	7	5	6	7	5	5	5	5	5	6	5	5	5	5	6
Midi Baccarat	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
Poker	9	9	9	9	9	9	11	11	11	9	9	9	9	11	11	9	9	9	9	9	9	9	9	9	9	9
Electronic Roulette	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	3	3	3	3	3	3	3	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	7	6	7	6	7	6	7	6	7
Roulette	17	19	17	19	17	19	16	15	17	16	16	16	16	16	16	14	16	16	16	16	16	16	16	16	16	16
Black Jack (7 Box)	24	22	23	21	22	20	24	25	23	23	24	24	24	23	22	25	21	20	20	20	21	19	23	22	22	23
Black Jack (5 Box)	0	0	0	0	0	0	0	0	0	3	1	0	1	0	0	3	3	3	3	1	1	3	2	2	2	0
3 Card Poker	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Ultimate Texas Hold'em	2	2	2	2	2	2	1	1	1	1	1	1	2	1	1	1	1	1	1	1	1	1	1	1	1	1
Casino War	0	0	1	1	2	2	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	1	0	0	1	0
Total	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78



	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO	AP	AQ	AR	AS	AT	AU	AV	AW	AX	AY	AZ
Money Wheel (double side)	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
Money Wheel (single side)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Tai Sai (single side)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Pai Gow	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	6	5	5	5	5	6	6	5	5	5	5	6	6	5	5	5	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
Poker	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
Electronic Roulette	2	2	3	3	3	3	3	3	2	2	2	2	2	2	2	2	2	3	4	4	4	4	4	4	4	4
Mini Baccarat	6	7	6	7	6	7	6	7	6	7	6	7	6	7	6	6	6	6	6	6	6	6	6	6	6	6
Roulette	16	16	14	14	14	14	14	14	14	14	14	14	14	14	16	16	14	14	13	13	14	14	12	12	12	12
Black Jack (7 Box)	23	21	23	22	22	23	23	21	25	24	24	25	25	23	19	19	19	20	17	19	16	17	18	19	22	23
Black Jack (5 Box)	0	2	3	3	3	1	1	3	2	2	2	0	0	2	5	4	5	2	7	3	8	5	8	5	6	3
3 Card Poker	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Ultimate Texas Hold'em	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Casino War	1	1	0	0	1	0	1	1	0	0	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
Total	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78



	BA	BB	BC	BD	BE	BF	BG	BH	BI	BJ	BK	BL	BM	BN	BO	BP	BQ	BR	BS	BT	BU	BV	BW	BX	BY	BZ
Money Wheel (double side)	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
Money Wheel (single side)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	0	0	1	1	1	1	1	1	1	1	0	0	0	0	1	1	1	1	1	1	1	1	0	0	1	1
Tai Sai (single side)	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Pai Gow	1	1	1	1	1	1	2	2	2	2	2	2	1	1	1	1	2	2	2	2	2	2	1	1	1	1
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	4	4	4	4	4	4	4	4	4	4
Midi Baccarat	10	10	10	10	8	8	8	8	8	8	10	10	10	10	10	10	8	8	8	8	8	8	10	10	10	10
Poker	9	11	9	11	9	11	9	11	9	11	9	11	9	11	9	11	9	11	9	11	9	11	9	11	9	11
Electronic Roulette	4	4	4	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	4	4	4	4	4	4	4	4
Electronic Roulette (inc Manual Table)	0	0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0	0
Mini Baccarat	6	6	7	7	7	7	6	6	8	8	6	6	7	7	8	8	6	6	6	6	6	6	6	6	7	7
Roulette	14	14	12	12	13	13	13	13	11	11	13	13	13	13	11	11	14	14	14	14	14	12	14	14	12	12
Black Jack (7 Box)	13	14	14	16	14	15	14	15	14	15	10	11	10	11	11	13	19	20	16	17	18	19	13	14	14	16
Black Jack (7 Box - 2 Backbets)	6	3	4	2	0	0	0	0	0	0	8	5	8	5	7	5	0	0	0	0	0	0	6	3	4	2
Black Jack (5 Box)	5	5	6	4	10	7	10	7	10	7	6	6	6	6	6	4	5	2	8	5	8	5	5	5	6	4
3 Card Poker	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Ultimate Texas Hold'em	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2	2	2	2	2	2	2	2	2	2
Casino War	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78	78



	CA6	CB6	CC6	CD6	CE6	CF6	CG6	CH6	CI6	CJ6	CK6	CL6
Money Wheel (double side)	1	1	1	1	1	1	1	1	1	1	1	1
Money Wheel (single side)	1	1	1	1	1	1	0	0	0	0	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1	1	1
Tai Sai (single side)	1	1	1	1	1	1	0	0	0	0	0	0
Pai Gow	1	1	2	2	2	2	2	2	1	1	1	1
Caribbean Stud Poker	4	4	4	4	4	4	4	4	4	4	4	4
Midi Baccarat	8	8	8	8	8	8	10	10	10	10	10	10
Poker	9	11	9	11	9	11	9	11	9	11	9	11
Electronic Roulette	3	3	3	3	3	3	3	3	3	3	3	3
Electronic Roulette (inc Manual Table)	1	1	1	1	1	1	1	1	1	1	1	1
Mini Baccarat	7	7	6	6	8	8	6	6	7	7	8	8
Roulette	13	13	13	13	11	11	13	13	13	13	11	11
Black Jack (7 Box)	14	15	14	15	14	15	10	11	10	11	11	13
Black Jack (7 Box - 2 Backbets)	0	0	0	0	0	0	8	5	8	5	7	5
Black Jack (5 Box)	10	7	10	7	10	7	6	6	6	6	6	4
3 Card Poker	2	2	2	2	2	2	2	2	2	2	2	2
Ultimate Texas Hold'em	2	2	2	2	2	2	2	2	2	2	2	2
Casino War	0	0	0	0	0	0	0	0	0	0	0	0
Total	78	78	78	78	78	78	78	78	78	78	78	78



Notes for the alternative game mixes:

1. The Licence Holder is permitted to change game mixes subject to providing the Inspectorate with prior notification.
2. The Licence Holder is permitted to operate automatic shufflers on each of the Black Jack, Caribbean Stud Poker, Baccarat, Poker, 3-Card Poker, Ultimate Texas Hold'em and Casino War tables.
3. At least 50% of the total number of Midi Baccarat games shall be conducted in accordance with dealing style B, as set out in the rules of Baccarat.
4. Electronic roulette comprises up to 30 player terminals and no wagers may be placed directly at the table.
5. Electronic roulette (inc manual table) comprises up to 30 player terminals and wagers may be placed directly at the table.
6. The number of player spaces at Poker tables (other than Caribbean Stud Poker and 3-Card Poker) may not exceed 10, even if game rules provide for more.

