

**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  
D M A Matahaere-Atariki  
S C L Pearson

Date of Application: 21 August 2019

Date of Decision: 11 October 2019

Date of Notification of Decision: 15 October 2019

**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 its operator's licence, for approval to amend the game mix Annex for 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, as follows:
  - (a) It wants to add eight new game mixes, BI-BP, to its game mix Annex. The proposed new game mixes have been created to accommodate the game "Snake Eyes".

- (b) Previous game mixes have included Snake Eyes, but the game was removed because the game developers took too long to organise the leasing arrangements. The game has now been licensed to Shuffle Master, which the casino deals with frequently, so it is confident of achieving suitable licensing terms with that company.
- (c) 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 casino gambling opportunities.
- (d) Although the mathematical calculations are not definitive, they are a strong indicator of the opportunities available pursuant to each game mix. New game mixes, and the benchmark game mix, are set out below:

<b>Game mix</b>	<b>Player spaces</b>	<b>Overall opportunities</b>
A	718	19214
BI	704	15179
BJ	694	15019
BK	703	15808
BL	701	15035
BM	683	15514
BN	699	15107
BO	688	15208
BP	680	14389

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

4. The Secretary submitted that he has no regulatory concerns with CCL's proposal.

#### **Analysis**

5. CCL has approval to deploy game mixes A-BH at the Christchurch casino and now seeks approval to deploy eight new game mixes, BI-BP.
6. The Commission's general approach for approving new game mixes is to compare the proposed game mixes with the approved game mix which provides the most opportunities for casino gambling and form a view, in the round, on whether they 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 at Christchurch casino. The Commission compared each new game mix with game mix A

and was satisfied that, in the round, none of them will increase opportunities for casino gambling. The proposed game mixes raised no other issues of regulatory concern.

### Decision

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

### Right of appeal

9. Pursuant to section 235 of the Act, a person affected by this decision may appeal that decision to the High Court. An appeal must be made within 15 working days of the date of notice of the Commission's decision, or any longer period that the High Court may allow.



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Graeme Reeves  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

15 October 2019



## 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
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 7-Box Black Jack/Pontoon – 10 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
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 Midi Baccarat Style B – 4 games  
 Money Wheel – 1 game  
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 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
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 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 – 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
- L. 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  
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Money Wheel – 1 game  
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Caribbean Stud Poker – 2 games  
3 Card Poker – 1 game  
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3 Card Poker – 1 game  
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Money Wheel – 1 game  
Poker – 6 games  
Electronic Roulette – 1 game  
Casino War – 1 game



- P. 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  
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- Q. Roulette – 8 games  
 7-Box Black Jack/Pontoon – 11 games  
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- S. Roulette – 8 games  
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 Caribbean Stud Poker – 2 games  
 3 Card Poker – 1 game  
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 Poker – 4 games  
 Tai Sai – Single – 1 game  
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 Money Wheel – 1 game  
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 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 7 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Casino War – 1 game  
 Ultimate Texas Holdem – 1 game
- BO. Roulette – 8 games  
 Electronic Roulette – 1 game  
 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 – 6 games  
 Mini Baccarat – 1 game  
 Money Wheel – 1 game  
 Poker – 4 games  
 Snake Eyes – 1 game  
 Casino War – 1 game  
 Tai Sai – Single – 1 game  
 Ultimate Texas Holdem – 1 game
- BP. Roulette – 7 games  
 Electronic Roulette – 1 game  
 7-Box Black Jack/Pontoon – 8 games  
 Caribbean Stud Poker – 2 games  
 3-Card Poker – 1 game  
 Midi Baccarat Style A – 1 game  
 Midi Baccarat Style B – 7 games  
 Money Wheel – 1 game  
 Poker – 4 games  
 Snake eyes – 1 game  
 Casino War – 1 game  
 Tai Sai – Single – 1 game  
 Ultimate Texas Holdem – 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-BP; and
  - its Mini Baccarat table in game mixes B-BP.
3. The Electronic Roulette table in game mix A comprises 14 terminals and one manual table. The Electronic Roulette table in game mixes B-BP 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-BP.

