

IN THE MATTER of the Gambling Act 2003

AND on an application by **SKYCITY CASINO MANAGEMENT LIMITED** to vary conditions 6A and 9 of SCML's operator's licence for the Auckland casino

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
P J Stanley
R D Bell
A K Foote

Date of Application: 5 September 2011

Date of Decision: 14 October 2011

Date of Notification
of Decision: *25* November 2011

**DECISION ON AN APPLICATION BY SKYCITY CASINO MANAGEMENT LIMITED
TO VARY CONDITIONS 6A AND 9 OF SCML'S OPERATOR'S LICENCE
FOR THE AUCKLAND CASINO**

Introduction

1. SKYCITY Casino Management Limited ("**SCML**") applied, pursuant to section 139(1)(d) of the Gambling Act 2003, to vary conditions 6A and 9 of its operator's licence for the Auckland casino. The proposed amendments would allow SCML to operate substitute tables on level 5 (as well as levels 2 and 3), and to introduce new game mixes.

Relevant licence conditions

2. The relevant licence conditions, with the proposed variations in mark-up, are as follows:

SCML's operator's licence

6A. In addition to the gaming tables specified in condition 6, the Licence Holder may install up to eight 42 gaming tables on levels 2, and 3, and/or 5 of the Gambling Area to be used as substitutes for the gaming tables ("substitute tables") when an individual gaming salon on the south side of a level 5 of the Gambling Area is, when some or all of the level 5 tables are not in use (each a "salon"). The location of the substitute tables will be defined in approved floor plans (as may be amended from time to time by agreement of the Licence Holder and Commission). The substitute tables are subject to the following requirements:

- (a) they must be clearly identified and defined as "substitute tables" in the approved floor plans for levels 2, or 3 and/or 5 (as may be amended from time to time by agreement of the Licence Holder and Commission);

- (b) the maximum number of substitute tables that may be opened for play at any one time must not exceed the number of gaming tables in the salon that is not in use at that time each must be matched or paired with a table of the same design on level 5 for which it may be substituted;
 - (c) the each substitute tables that may only be opened for play may only provide for casino type games that form part of the approved game mixes for the purposes of the salon that is not in use at that time when the paired table of the same type is closed on level 5; and
 - (d) they must be entered on the SGM system as "substitute tables".
9. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in Annex DA attached to this Licence. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in either Annex B or Annex C attached to this Licence subject to providing the Commission and the Inspectorate a minimum of 10 working days notice in writing of its intention to do so. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.

Submissions by SCML

3. SCML stated, in summary, as follows:

- (a) Condition 9 currently allows it to operate the game types and game mixes specified in Annexes A, B, C and D. It is now reliant on Annex D and has no need for the others. Annex D provides for the operation of a range of game mixes specific to one of four locations in the casino – the salons on the south side of level 5 (eight tables), the salon on the north side of level 5 (four tables), the VIP Room on level 5 (which is now called "Eight") (16 tables) and the remainder of the casino (levels 2 and 3) (82 tables).
- (b) It has an application before the Commission to revise the game mixes specified in Annex D and to remove redundant Annexes A, B and C.
- (c) Since lodging that application, the Commission has released decision GC24/11, which varied conditions 5, 6, 6A and 7 of its operator's licence and allows it to install 12 additional gaming tables on levels 2 and 3 to be used as substitutes for the tables on level 5 when some or all of those tables are not in use.
- (d) Decision 24/11, together with the volume of international business generated in the south side salons on level 5, and feedback from local VIP customers following the opening of the north side of level 5, has led it to review its VIP arrangements on level 5. It wants to plan for the possibility of converting the salon on the north side of level 5 from an international VIP gaming salon into a local VIP gaming salon.



- (e) Using the north side salon for locals rather than for international visitors does not have any regulatory implications. However a local gaming salon would not be as suitable for pairing with substitute tables on levels 2 and 3, as condition 6A currently provides. It therefore wants to amend condition 6A to allow it to position some of the substitute tables on level 5, and to reduce the number of substitute tables from 12 to a maximum of eight. Having up to eight Substitute tables will align with the number of tables in the salons on the south side of level 5.
- (f) The Commission has approved a range of alternative game mixes to be used in the south side gaming salons, which are currently grouped together as an eight table game mix applicable to all three salons. It regularly changes the game mix in these salons to satisfy the demands of visiting guests.
- (g) Under condition 6A it can install additional tables on levels 2 and 3 which must be paired with a table of the same design in the level 5 gaming salons. The additional tables can be substituted for the tables on level 5 when the level 5 tables are not in use. However it is not clear from the wording of condition 6A whether the pairing relates to the physical tables located in the salons, or whether it relates to the game mixes that have been approved for those salons. If the substitute tables had to be paired to tables physically deployed in the salons at any one time, each time it changed the mix of games in the salons, it would also have to change the mix of substitute tables for no apparent purpose.
- (h) On the other hand if the substitute tables provided for casino type games that form part of the approved game mixes for the purposes of the salons not in use, it could potentially deploy substitute tables that differed to the actual tables located in the gaming salons. Such an arrangement would not increase opportunities for casino gambling because the mixes of games in operation would always be an approved mix. It has proposed amendments to condition 6A to address this.
- (i) It also seeks approval of three new Annexes – A, B and C. The proposed Annex A contains three changes to the current Annex D. First, rather than treating the three south side salons as one combined location for game mixes, it has identified game mixes for each of the three salons to provide greater transparency and clarity. Secondly, it has included additional game mixes for the three south side salons. Thirdly, it has included additional game mixes for the north side salon. There are no changes to the remaining parts of the Annex.
- (j) If it chooses to retain the north side salon as an international gaming salon, then it will rely on Annex A.



- (k) The proposed new Annex B includes the same mix of games for the level 5 south side salons as Annex A, but merges the north side gaming salon with the north side VIP gaming area "Eight" to form one location with a mix of 20 tables.
- (l) The proposed new Annex C includes the same mix of games for the level 5 south side salons as Annex A, but merges the north side gaming salon with "Eight" to form one location with a mix of 22 tables. It will do this by adding a Roulette and Black Jack table to each of the game mixes in "Eight" and removing a Roulette and Black Jack table from each of the levels 2 and 3 game mixes.

4. SCML submitted, in summary, as follows:

- (a) It has assessed the impact of each of the game mixes featured in the three proposed Annexes on player spaces and overall rate of play. For those games where the maximum number of player positions is not fixed by game rules, it has applied the same theoretical maximum that it has applied in previous applications.
- (b) In terms of assessing overall opportunities, it has used figures derived from the trial data considered by the Commission in decision GC17/10.
- (c) Annex A will not increase opportunities for casino gambling as the overall gambling opportunities are lower than those offered by the regulatory benchmark. To demonstrate this it has combined the game mixes with the highest number of player spaces and opportunities from each of the casino locations and compared that with the regulatory benchmark as follows:

	Salon	Game mix	Player spaces	Opportunity
Level 5 South Side	82	A	54	1,593
	86	A	54	1,593
	88	A	108	3,186
Level 5 North Side	81	A	108	3,186
	Eight	D	376	10,593
Rest of casino	Levels 2 & 3	I	1,655	45,731
			2,355	65,882

- (d) The combined game mix produces more player spaces but fewer overall opportunities than the regulatory benchmark, as follows:

Game mix	Player spaces	Opportunity
Combined	2,355	65,882
Benchmark	2,262	68,363

- (e) Annex B will not increase opportunities for casino gambling as the combination of game mixes with the most opportunities from across the casino offers fewer overall opportunities than the regulatory benchmark, as follows:

	Salon	Game mix	Player spaces	Opportunity
Level 5 South Side	82	A	54	1,593
	86	A	54	1,593
	88	A	108	3,186
Level 5 (20 tables)	North Side	D	484	13,779
Rest of casino (82 tables)	Levels 2 & 3	I	1,655	45,731
			2,355	65,882

- (f) Combining these game mixes produces more player spaces, but fewer overall gambling opportunities, than the regulatory benchmark, as follows:

Game mix	Player spaces	Opportunity
Combined	2,355	65,882
Benchmark	2,262	68,363

- (g) Annex C will not increase opportunities for casino gambling as the combination of game mixes with the most opportunities from across the casino offers fewer overall opportunities than the regulatory benchmark, as follows:

	Salon	Game mix	Player spaces	Opportunity
Level 5 South Side	82	A	54	1,593
	86	A	54	1,593
	88	A	108	3,186
Level 5 (22 tables)	North Side	D	526	14,829
Rest of casino (80 tables)	Levels 2 & 3	I	1,613	44,681
			2,355	65,882

- (h) Combining these game mixes produces more player spaces, but fewer overall gambling opportunities, than the regulatory benchmark, as follows:

Game mix	Player spaces	Opportunity
Combined	2,355	65,882
Benchmark	2,262	68,363

- (i) The arithmetic calculations and comparisons suggest that the new game mixes will not increase opportunities for casino gambling. It has no other "in the round" information to the contrary.
- (j) In the long term it is unlikely that it will need to retain multiple annexes. Once it has settled on its preferred operational strategy for the new facilities, it will rely on a single Annex.
- (k) A condition of the casino licence specified or varied under section 139(1) must comply with the requirements set out in section 139(2). The proposed amendments are consistent with those requirements.

The Secretary's submissions

5. The Secretary submitted, in summary, as follows:
 - (a) The Commission previously made a number of amendments to condition 6A in order to ensure control and oversight of tables; certainty of deployment and opportunities for casino gambling and explained that they would contribute to the efficient and effective administration of the Act pursuant to section 139(2)(c). SCML has proposed to amend condition 6A. He has not identified any issues in respect of section 139(2)(c) which the amended condition will trigger. The amended conditions will be able to achieve equal certainty as the current conditions, especially as SCML must always comply with approved game mixes, and that the Substitute tables must be clearly depicted on the floor plan. His inspectorate is able to monitor these during its regular audit.
 - (b) In relation to the game mix amendments, SCML's mathematical calculations are accurate. Although the proposed game mixes could provide for up to 93 more player spaces compared to the regulatory benchmark, they appear to present fewer overall opportunities for casino gambling.

Analysis

Amendment of condition 6A

6. In decision GC24/11, the Commission varied a number of licence conditions to allow SCML to install 12 additional gaming tables on levels 2 and 3. The additional tables are allowed to be used as substitutes for tables in the level 5 salons when some or all of those tables are not in use. SCML now seeks to amend one of those conditions, condition 6A, to clarify the parameters of the substitution process, to reduce the number of Substitute tables and to allow Substitute tables to be introduced on level 5.
7. SCML stated that condition 6A is currently not clear in relation to the "pairing" of the Substitute tables with the level 5 tables, stating that it does not know whether the pairing must be with the physical tables located in the salons, or whether it can be with any of the game mixes that have been approved for the salons. SCML wants it to be the latter.
8. SCML's query tends to confuse game mixes (which usually contain no locational controls) with approved floor plans (which control table deployment and location). The confusion has arisen because the Auckland casino game mixes now have a locational element and because SCML has subsequently and separately sought a greater degree of floor plan flexibility (see GC31/11). The Commission confirms that its intention in decision GC24/11 was for the pairing to reflect the degree of locational control exercised by the approved



floor plans rather than either the physically installed table or an approved game mix. However, as a result of the recent flexibility included in the Auckland casino floor plans, the ultimate effect is closer to the latter than the former. The required pairing is to be with a table on the floor plan for Level 5. If the Level 5 floor plan limits the table to a specific type, the limitation applies to the matching substitute table; if the type of table is less controlled because of a "blank box" approved floor plan, the substitute table can be any table able to be deployed in the matched position on Level 5.

9. When the Commission approved the Substitute tables for levels 2 and 3, the intention was that they would be the equivalents of those tables on level 5, and provide a practical solution to difficulties which would have arisen from what otherwise would have been a need for constant physical relocation of tables. The tables in the level 5 salons were being used relatively infrequently by VIPs with the result that up to 12 tables could be inactive for extended periods of time unless they were physically relocated to another area of the casino in accordance with an approved floor plan. Rather than requiring the physical relocation of those 12 tables to other parts of the casino before they could be used, an additional 12 tables were permitted to be installed, with those tables becoming active and available for play only when the matching level 5 tables were closed. The arrangement was intended to be a substitute for a physical redeployment so that whatever was permitted on the 12 tables on level 5 would be permitted on the 12 Substitute tables located on levels 2 and 3. The "pairing" is not limited to whatever tables were actually deployed in the level 5 salons when they were closed – it is with the floor plans which apply to those tables (ie what could be deployed there).
10. The arrangement does not raise any issues in relation to increasing opportunities for casino gambling as SCML can also only deploy the Substitute tables in compliance with game mixes that have already been approved for the level 5 salons.
11. SCML's proposal to reduce the number of Substitute tables from 12 to eight and to allow the potential placement of Substitute tables on level 5 raises no issues of regulatory concern for the same reason. There will be no increase in opportunities because SCML must adhere to a previously approved game mix regardless of where the tables are located.
12. The only issue for consideration is whether the Inspectorate can maintain an adequate oversight of the Substitute tables across all three levels. The Secretary advised that the Inspectorate could do so.
13. The Commission therefore approves a new condition 6A, with the following amendments to SCML's proposal to clarify better the scope and intent of the condition:



- (a) The insertion of “the north side of level” to clarify precisely where on level 5 the substitute tables may be located.
- (b) The deletion of “as may be amended from time to time by agreement of the Licence Holder and Commission.” Floor plans are applied for by the Licence Holder and either approved or declined by the Commission. They are not agreed upon between the two.
- (c) The insertion of a requirement for substitute tables to be identified on floor plans by the letters “ST”, following decision GC 31/11.
- (d) The Substitute tables are paired with tables on the south side of level 5 in condition 6A(b) and (c).
- (e) A new condition 6A(d) is inserted, which varies SCML’s proposed condition 6A(c), confirming that the Substitute table is regarded as part of the Level 5 game mix regardless of its actual location.

Amendment of condition 9

- 14. SCML’s proposal to amend condition 9 would result in three approved game mix Annexes, with SCML able to deploy any one on providing the appropriate notification to the Inspectorate.
- 15. The proposed Annexes differ from the Annex currently approved in the manner set out at paragraph 4 above.
- 16. The Commission carried out a comparative assessment in the round of the combination of game mixes from Annex A (6 game mixes), Annex B (5 game mixes) and Annex C (5 game mixes) which appeared to offer the most opportunity, with the level of opportunity offered by the regulatory benchmark (Game mix A). The Commission was satisfied that the new annexes in combination would not increase opportunities for casino gambling over those offered by Game mix A.

Decision

- 17. The Commission amended licence conditions 6A and 9 of SCML’s operator’s licence, pursuant to section 139(1)(d) of the Act. Conditions 6A and 9 now reads as follows:

- 6A. In addition to the gaming tables specified in condition 6, the Licence Holder may install up to eight gaming tables on levels 2, 3 and/or the north side of level 5 to be used as substitutes for the tables in the gaming salons on the south side of level 5 when some or all of those tables are not in use. The location of the substitute tables will be defined in approved floor plans. The substitute tables are subject to the following requirements:



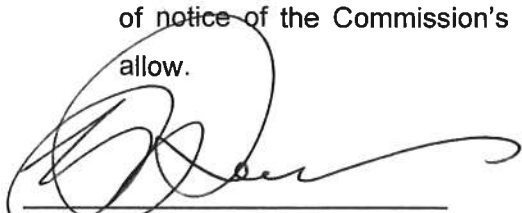
- (a) they must be clearly identified by the letters "ST" in the approved floor plans for levels 2, 3 and/or the north side of level 5;
- (b) each substitute table must be paired with a table shown in an approved floor plan for the south side of level 5 ;
- (c) a substitute table may only be opened for play may when the paired table is closed;
- (d) each substitute table can only deploy casino games in compliance with an approved game mix for the paired table that is not in use; and
- (e) they must be entered on the SGM system as substitute tables.

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. The Licence Holder may operate on casino gaming tables the game types and game mix(es) specified by the Commission in either Annex B or Annex C attached to this Licence provided that it gives the Commission and the Inspectorate a minimum of 10 working days notice in writing of its intention to do so. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.

18. Annexes A, B and C are **attached**.

Right of appeal

19. 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.



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

25 November 2009



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
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
Total	2	2	2	2	2	2	2	2	2	2	2

together with

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
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
Total	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 four table game mixes:

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0
Three Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1
Total	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4

together with

In 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
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0
Three Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1
Total	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4

together with

In the area designated as "Eight" to the north of the elevators on level 5, any one of the following 16 table game mixes:

	A5	B5	C5	D5	E5	F5	G5
Midi Baccarat	9	9	9	9	9	8	8
Roulette	3	2	2	2	2	3	3
Black Jack	3	3	2	3	4	3	2
Pai Gow	0	1	1	0	0	1	1
Mini Baccarat	0	0	1	1	0	0	1
Caribbean Stud Poker	1	1	1	1	1	1	1
Total	16	16	16	16	16	16	16

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 82 table game mixes:

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4	K4	L4	M4
Money Wheel (double side)	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
Pai Gow	2	2	2	2	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	4	5	5	4	5	5	5	4	4	4	4	4
Midi Baccarat	6	6	6	6	6	6	6	6	10	10	10	10	10
Poker	9	9	9	7	7	7	7	7	7	9	9	9	7
Rapid Roulette	2	2	2	2	2	2	2	2	1	1	1	1	1
Mini Baccarat	7	7	6	7	7	6	7	6	4	4	4	4	4
Roulette	17	17	17	17	17	17	17	17	15	15	15	15	15
Black Jack	29	29	30	31	31	32	32	33	37	35	32	31	34
3 Card Poker	2	2	2	2	2	2	1	1	0	0	2	2	2
Ultimate Texas Hold'em	1	2	1	1	2	1	1	1	0	0	1	2	1
Total	82	82	82	82	82	82	82	82	82	82	82	82	82



	N4	O4	P4	Q4	R4	S4	T4	U4	V4	W4	X4	Y4	Z4
Money Wheel (double side)	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
Pai Gow	2	2	2	2	2	2	2	2	2	2	1	1	1
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	8	8	8	8	8
Poker	4	4	4	4	4	4	4	4	5	5	5	5	5
Rapid Roulette	2	2	2	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	4	4	4	4	4
Roulette	18	19	18	19	18	19	18	19	17	18	17	18	17
Black Jack	35	34	34	33	33	32	32	31	32	31	36	35	35
3 Card Poker	2	2	3	3	2	2	3	3	3	3	2	2	3
Ultimate Texas Hold'em	0	0	0	0	2	2	2	2	2	2	0	0	0
Total	82	82	82	82	82	82	82	82	82	82	82	82	82

	AA4	AB4	AC4	AD4	AE4	AF4	AG4	AH4	AI4	AJ4
Money Wheel (double side)	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1
Pai Gow	1	1	1	1	1	1	1	1	1	1
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	8	8	8	8	8	8	8	8	8	8
Poker	5	5	5	4	4	4	4	4	4	4
Rapid Roulette	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	4	4	4	4	4	4	4	4	4	4
Roulette	18	17	18	17	18	18	19	17	18	18
Black Jack	34	34	33	37	36	35	34	35	34	33
3 Card Poker	3	2	2	2	2	3	3	2	2	3
Ultimate Texas Hold'em	0	2	2	0	0	0	0	2	2	2
Total	82	82	82	82	82	82	82	82	82	82

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 and Ultimate Texas Hold'em 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. All electronic roulette tables comprise up to 21 player spaces and no manual table.
5. 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.



ANNEX B

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 the three gaming salons 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
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
Total	2	2	2	2	2	2	2	2	2	2	2

together with

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
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
Total	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 four table game mixes:

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0
Three Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1
Total	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4

together with

In the area designated as “Eight” to the north of the elevators on level 5, any one of the following 20 table game mixes:

	A4	B4	C4	D4	E4	F4	G4
Midi Baccarat	13	13	13	13	13	12	12
Roulette	3	2	2	2	2	3	3
Black Jack	3	3	2	3	4	3	2
Pai Gow	0	1	1	0	0	1	1
Mini Baccarat	0	0	1	1	0	0	1
Caribbean Stud Poker	1	1	1	1	1	1	1
Total	20	20	20	20	20	20	20

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 82 table game mixes:

	A4	B4	C4	D4	E4	F4	G4	H4	I4	J4	K4	L4	M4
Money Wheel (double side)	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
Pai Gow	2	2	2	2	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	4	5	5	4	5	5	5	4	4	4	4	4
Midi Baccarat	6	6	6	6	6	6	6	6	10	10	10	10	10
Poker	9	9	9	7	7	7	7	7	7	9	9	9	7
Rapid Roulette	2	2	2	2	2	2	2	2	1	1	1	1	1
Mini Baccarat	7	7	6	7	7	6	7	6	4	4	4	4	4
Roulette	17	17	17	17	17	17	17	17	15	15	15	15	15
Black Jack	29	29	30	31	31	32	32	33	37	35	32	31	34
3 Card Poker	2	2	2	2	2	2	1	1	0	0	2	2	2
Ultimate Texas Hold'em	1	2	1	1	2	1	1	1	0	0	1	2	1
Total	82	82	82	82	82	82	82	82	82	82	82	82	82



	N4	O4	P4	Q4	R4	S4	T4	U4	V4	W4	X4	Y4	Z4
Money Wheel (double side)	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
Pai Gow	2	2	2	2	2	2	2	2	2	2	1	1	1
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	8	8	8	8	8
Poker	4	4	4	4	4	4	4	4	5	5	5	5	5
Rapid Roulette	2	2	2	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	4	4	4	4	4
Roulette	18	19	18	19	18	19	18	19	17	18	17	18	17
Black Jack	35	34	34	33	33	32	32	31	32	31	36	35	35
3 Card Poker	2	2	3	3	2	2	3	3	3	3	2	2	3
Ultimate Texas Hold'em	0	0	0	0	2	2	2	2	2	2	0	0	0
Total	82	82	82	82	82	82	82	82	82	82	82	82	82

	AA4	AB4	AC4	AD4	AE4	AF4	AG4	AH4	AI4	AJ4
Money Wheel (double side)	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1
Pai Gow	1	1	1	1	1	1	1	1	1	1
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	8	8	8	8	8	8	8	8	8	8
Poker	5	5	5	4	4	4	4	4	4	4
Rapid Roulette	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	4	4	4	4	4	4	4	4	4	4
Roulette	18	17	18	17	18	18	19	17	18	18
Black Jack	34	34	33	37	36	35	34	35	34	33
3 Card Poker	3	2	2	2	2	3	3	2	2	3
Ultimate Texas Hold'em	0	2	2	0	0	0	0	2	2	2
Total	82	82	82	82	82	82	82	82	82	82

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 and Ultimate Texas Hold'em 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. All electronic roulette tables comprise up to 21 player spaces and no manual table.
5. 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.



ANNEX C

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
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
Total	2	2	2	2	2	2	2	2	2	2	2

together with

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
Midi Baccarat	2	1	1	0	0	0	0	1	0	0	0
Roulette	0	1	0	1	2	0	0	0	0	0	1
Black Jack	0	0	1	1	0	2	1	0	0	1	0
Mini Baccarat	0	0	0	0	0	0	0	0	1	0	0
Pai Gow	0	0	0	0	0	0	0	0	1	1	0
Three Card Poker	0	0	0	0	0	0	1	1	0	0	1
Total	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 four table game mixes:

	A3	B3	C3	D3	E3	F3	G3	H3	I3	J3	K3	L3	M3	N3	O3
Midi Baccarat	4	3	3	2	2	2	0	0	0	0	0	1	2	2	3
Roulette	0	1	0	1	2	0	1	1	1	1	1	1	1	0	0
Black Jack	0	0	1	1	0	2	1	1	2	2	3	1	0	1	0
Mini Baccarat	0	0	0	0	0	0	1	2	0	1	0	0	0	0	0
Pai Gow	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0
Three Card Poker	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1
Total	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4

together with

In the VIP area designated as "Eight" to the north of the elevators on level 5, any one of the following 22 table game mixes:

	A4	B4	C4	D4	E4	F4	G4
Midi Baccarat	13	13	13	13	13	12	12
Roulette	4	3	3	3	3	4	4
Black Jack	4	4	3	4	5	4	3
Pai Gow	0	1	1	0	0	1	1
Mini Baccarat	0	0	1	1	0	0	1
Caribbean Stud Poker	1	1	1	1	1	1	1
Total	22	22	22	22	22	22	22

together with

In all Gambling Areas other than the three gaming salons on level 5 and the VIP area known as "Eight" on level 5, any one of the following 80 table game mixes:

	A5	B5	C5	D5	E5	F5	G5	H5	I5	J5	K5	L5	M5
Money Wheel (double side)	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
Pai Gow	2	2	2	2	2	2	2	2	2	2	2	2	2
Caribbean Stud Poker	5	4	5	5	4	5	5	5	4	4	4	4	4
Midi Baccarat	6	6	6	6	6	6	6	6	10	10	10	10	10
Poker	9	9	9	7	7	7	7	7	7	9	9	9	7
Rapid Roulette	2	2	2	2	2	2	2	2	1	1	1	1	1
Mini Baccarat	7	7	6	7	7	6	7	6	4	4	4	4	4
Roulette	16	16	16	16	16	16	16	16	14	14	14	14	14
Black Jack	28	28	29	30	30	31	31	32	36	34	31	30	33
3 Card Poker	2	2	2	2	2	2	1	1	0	0	2	2	2
Ultimate Texas Hold'em	1	2	1	1	2	1	1	1	0	0	1	2	1
Total	80	80	80	80	80	80	80	80	80	80	80	80	80

	N5	O5	P5	Q5	R5	S5	T5	U5	V5	W5	X5	Y5	Z5
Money Wheel (double side)	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
Pai Gow	2	2	2	2	2	2	2	2	2	2	1	1	1
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	6	6	6	6	6	6	6	6	8	8	8	8	8
Poker	4	4	4	4	4	4	4	4	5	5	5	5	5
Rapid Roulette	2	2	2	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	6	6	6	6	6	6	6	6	4	4	4	4	4
Roulette	17	18	17	18	17	18	17	18	16	17	16	17	16
Black Jack	34	33	33	32	32	31	31	30	31	30	35	34	34
3 Card Poker	2	2	3	3	2	2	3	3	3	3	2	2	3
Ultimate Texas Hold'em	0	0	0	0	2	2	2	2	2	2	0	0	0
Total	80	80	80	80	80	80	80	80	80	80	80	80	80



	AA5	AB5	AC5	AD5	AE5	AF5	AG5	AH5	AI5	AJ5
Money Wheel (double side)	1	1	1	1	1	1	1	1	1	1
Tai Sai (double side)	1	1	1	1	1	1	1	1	1	1
Pai Gow	1	1	1	1	1	1	1	1	1	1
Caribbean Stud Poker	5	5	5	5	5	5	5	5	5	5
Midi Baccarat	8	8	8	8	8	8	8	8	8	8
Poker	5	5	5	4	4	4	4	4	4	4
Rapid Roulette	2	2	2	2	2	2	2	2	2	2
Mini Baccarat	4	4	4	4	4	4	4	4	4	4
Roulette	17	16	17	16	17	17	18	16	17	17
Black Jack	33	33	32	36	35	34	33	34	33	32
3 Card Poker	3	2	2	2	2	3	3	2	2	3
Ultimate Texas Hold'em	0	2	2	0	0	0	0	2	2	2
Total	80	80	80	80	80	80	80	80	80	80

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 and Ultimate Texas Hold'em 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. All electronic roulette tables comprise up to 21 player spaces and no manual table.
5. 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.

