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**VIA EMAIL & FEDERAL EXPRESS**

Susan A. Yocum  
Assistant Chief Counsel  
Pennsylvania Gaming Control Board  
303 Walnut Street, Strawberry Square  
P.O. Box 69060  
Harrisburg, PA 17106-9060

**RE: Public Comment on Regulation # 125-175**

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Dear Ms. Yocum:

Greenwood Gaming & Entertainment, Inc. ("GGE") is a table games operation certificate holder and the holder of a Category 1 slot machine license that authorize GGE to operate Parx Casino in Bensalem, Pennsylvania. GGE respectfully submits the following comments and objections to the Pennsylvania Gaming Control Board (the "Board") in connection with the Board's proposed rulemaking, as captioned above, which was published in the Pennsylvania Bulletin at 43 Pa.B. 6764, on November 16, 2013.

The rulemaking at issue proposes several regulatory modifications, including (i) relocating the employee wagering prohibitions; (ii) increasing the percentage an institutional investor may own before triggering licensing requirements; (iii) increasing the renewal period for nongaming employees; and (iv) clarifying the circumstances for the reverification of a patron's credit file. GGE endorses nearly all of these changes and believes several of these modifications significantly assist casino licensees. However, GGE opposes one (1) proposed amendment that deals with the game of Craps. Specifically, GGE objects to proposed regulation 58 Pa. Code 623a.4(c)(1) and its inclusion of the word "wagered" in the regulation.

According to proposed regulation 58 Pa. Code 623a.4(c)(1), casino licensees would be explicitly excluded from allowing a patron to wager the Pass Bet after the come out point has been established. See 58 Pa. Code 623a.4(c)(1) (*Proposed Rulemaking*, 43 Pa. B. 6764). GGE believes patrons should have the option of wagering the Pass Bet after the come out point has been established. As a result, GGE respectfully requests that the Board modify Proposed Rulemaking No. 125-175 and eliminate the inclusion of the term "wagered" from subsection 623a.4(c)(1). Moreover, GGE respectfully request that the Board amend 58 Pa. Code 623a.3(a)(1) for consistency.

Currently, section 623a.3 provides that "[t]he following wagers are authorized in the games of Craps and Mini-Craps . . . A Pass Bet placed on the Pass Line of the layout **immediately prior** to the come out roll." 58 Pa. Code 623a.3(a)(1)(emphasis added). This section, while not as explicit as Proposed Rulemaking

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No. 125-175, also appears to prevent casino licensees from allowing patrons to wager a Pass Bet after the come out point has been established. GGE believes the patron, not the casino or the Board, is best suited to make a decision regarding the wagering of a Pass Bet before or after the come out point has been established. GGE acknowledges that the odds for a Pass Bet significantly increase in favor of the casino after a come out point has been established. However, the regulation fails to take into account the patron's desire to join the Craps game in progress and place a wager (Pass Bet) that typically coincides with the Craps shooter and the other patrons at the Craps table.

This desire to join the game in progress, place a similar wager as other patrons at the table and root for the come out point is a vital component in the game of Craps and its profitability. Moreover, several other gaming jurisdictions, including Nevada, allow a patron to decide whether or not he or she will place a Pass Bet after the come out point has been established. Based on the preceding issues, GGE objects to proposed regulation 623a.4(c)(1) with the addition of the term "wagered" and respectfully request that the Board consider the following suggested language for 58 Pa. Code 623a.3(a)(1):

*(a) The following wagers are authorized in the games of Craps and Mini-Craps:*

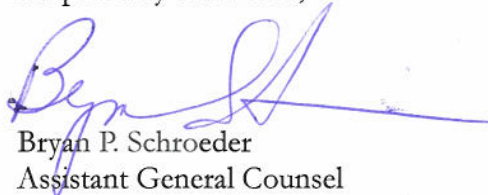
*(1) A Pass Bet placed on the Pass Line of the layout. A winning or losing Pass Bet shall be determined as follows:*

\* \* \* \* \*

GGE respectfully requests that the Board review the preceding objection to Proposed Rulemaking #125-175, remove the inclusion of the term "wagered" in 58 Pa. Code 623a.4(c)(1) and consider the proposed alternative language for 58 Pa. Code 623a.3(a)(1).

Thank you for considering the comments of GGE in connection with the proposed regulation. GGE will be happy to answer any questions that the Board may have on these comments.

Respectfully submitted,



Bryan P. Schroeder  
Assistant General Counsel  
Greenwood Gaming & Entertainment, Inc.

cc: Silvan B. Lutkewitte, III, Chairman, Independent Regulatory Review Commission  
Thomas C. Bonner, Esq.