

**STAFF AGENDA MEMORANDUM**

**TO:** Maryland Lottery and Gaming Control Commission

**FROM:** Jim Nielsen, Deputy Director / COO

**DATE:** December 2, 2021

**SUBJECT:** Proposed Amendment to Regulation  
Dealer Controlled Electronic Table Games

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**Summary:**

We are presenting a proposed amendment to regulations in the Table Games chapter and the Table Game Equipment subtitle to increase the maximum number of table game positions in operation for every dealer.

**COMAR 36.05.02.20.H Dealer Controlled Electronic Table Games – Requirements**

The proposed amendment to §H of COMAR 36.05.02.20 would increase the maximum number of permitted player positions from 14 to 28 for each dealer. The casinos indicate that they will be able to accommodate more players and have more flexible minimum wagers if they are able to add more positions while still having the game considered a table game for tax purposes. The limited number currently permitted prevents them from offering more positions at lower wagers and discourages some players, thereby reducing the tax revenue. This change brings Maryland closer to the limits in other jurisdictions.

**COMMISSION ACTION REQUESTED:**

- 1) After review and any discussion, approve the proposed amendment to COMAR 36.05.02.20.H.
- 2) Motion to delegate to Staff the authority to make any non-substantive changes to the approved regulation amendment that may be necessary to prepare it for publication in the *Maryland Register*.

**Staff Recommendation:** Staff recommends approval.