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Attorney General

State of California  
DEPARTMENT OF JUSTICE



DIVISION OF LAW ENFORCEMENT  
Bureau of Gambling Control  
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Subject: Banked Card Games

This letter serves as a reminder to all gambling establishments regarding statutory provisions relating to banked card games.

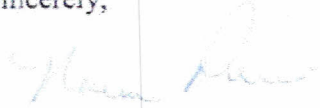
Among prohibited games specified under Penal Code Section 330 are any banking games played with cards, dice, or any device. Penal Code section 330.11, further provides:

"Banking game or banked game does not include a controlled game if the published rules of the game feature a player-dealer position and provide that the position must be continuously and systematically rotated amongst each of the participants during the play of the game, ensure that the player-dealer is able to win or lose only a fixed and limited wager during the play of the game, and preclude the house, another entity, a player or an observer from maintaining or operating as a bank during the course of the game. For purposes of this section it is not the intent of the Legislature to mandate acceptance of the deal by every player if the division finds that the rules of the game render the maintenance of or operation of a bank impossible by other means. The house shall not occupy the player-dealer position."

It is the view of the Bureau of Gambling Control (Bureau) that the foregoing requirements and conditions apply to all games featuring a player-dealer position, including any bonus component attached to the base game.

Should you have any questions in this area, please contact the Bureau's Cardroom Licensing Manager, Chris Davis, at (916) 263-5779 or at [chris.davis@doj.ca.gov](mailto:chris.davis@doj.ca.gov).

Sincerely,

  
NORM PIERCE, Assistant Bureau Chief  
Bureau of Gambling Control

For EDMUND G. BROWN JR.  
Attorney General