



DEPARTMENT OF JUSTICE
DIVISION OF LAW ENFORCEMENT
BUREAU OF GAMBLING CONTROL

January 15, 2019

Regulations Workshop: ROTATION OF THE PLAYER-DEALER POSITION

AGENDA

a. Topic issues

In an effort to focus discussion on certain issues that will be addressed in the regulations, the Bureau asks that, in addition to general comments, attendees focus some of their comments on the following three issues:

1. Discussion of how the mere offer of the player-dealer position may or may not satisfy the requirement that the "position must be continuously and systematically rotated amongst each of the participants during the play of the game".
2. Discussion of what the game rules should provide if during the play of a game no one accepts the player-dealer position.
3. Discussion of what it means to maintain or operate a bank.

Information related to the topic issues:

Penal Code section 330.11 provides as follows: "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 this 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.

b. General comments