

Charlie Liem, Secretary

Rick Scott, Governor

April 25, 2011

Mr. Dennis Hone
Cardroom Manager
Ebro Greyhound Park
6558 Dog Track Road
Ebro, Florida 32437-1142

Dear Mr. Hone:

On behalf of the division, I would like to thank you for the time you spent coming to Tallahassee to demonstrate the game of Double Hand/Pai Gow Poker.

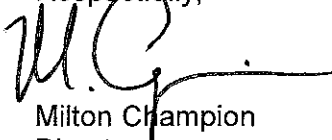
An authorized game is defined by Section 849.086, Florida Statutes, as a game of poker or dominoes played in a nonbanking manner. While the house does not actively participate in the game you demonstrated, the game you demonstrated on behalf of the cardroom uses a player's (or player's) funds to establish a bank against which the players play. Thus, the game which was demonstrated constitutes a banking game as that term is defined by Section 849.086(2)(b), Florida Statutes, which defines "banking game" as follows:

"Banking game" means a game in which the house is a participant in the game, taking on players, paying winners, and collecting from losers or in which the cardroom establishes a bank against which participants play.

A game in which the designated Dealer/Player plays heads up against other players is a common element of banking games that are prohibited by Section 849.086(12)(a), Florida Statutes, and the Dealer/Player holds the advantage commonly associated with the house in casino gaming. Therefore, the division has determined that the playing or dealing of this game would violate Section 849.086(12)(a), Florida Statutes, which prohibits the conduct of any banking game. A violation under Section 849.086, Florida Statutes, could result in a fine, suspension, or revocation of your cardroom license.

This letter constitutes final agency action. If you wish to challenge this decision, you must file a petition within 21 days in accordance with Rule 28-106.201, Florida Administrative Code, with Rhonda Bryan, Agency Clerk, Department of Business and Professional Regulation; 1940 North Monroe Street, Tallahassee, Florida, 32399.

Respectfully,


Milton Champion
Director

MC/lm

cc: Stockton Hess, President
Ebro Greyhound Park