



Florida Gaming Control Commission

JULIE I. BROWN, VICE CHAIR
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MEMORANDUM

To: All Florida Cardroom Operators
From: Louis A. Trombetta, Executive Director
Re: Wagering on Progressive Jackpots
Date: March 18, 2024

It has come to the attention of the Florida Gaming Control Commission that certain cardroom operators are permitting patrons to make optional wagers on progressive jackpots for card games played in a designated player manner, with such wagers made separately from, and in addition to, the wagers that such patrons are required to make to participate in the underlying card game.

Please be advised that permitting such optional wagering on progressive jackpots in this manner may constitute a banking game in which the cardroom establishes a bank against which participants play.¹

Additionally, under Florida law, this type of wagering activity is not specifically authorized because a specific combination of cards does not solely determine the award of a jackpot.² Likewise, there is no provision that specifically authorizes a cardroom to require a patron to make an optional wager to qualify for such a jackpot.

By law, no person licensed to operate a cardroom may conduct any banking game or any game not specifically authorized.³

You must immediately correct any of your business practices that do not align with the law's requirements.

Please contact the Commission if you have any questions.

¹ See § 849.086(2)(b), Fla. Stat. (2023) (providing a definition for the term "banking game").

² "A cardroom operator may award giveaways, jackpots, and prizes to a player who holds certain combinations of cards specified by the cardroom operator." § 849.086(7)(d).

³ See § 849.086(12)(a), Fla. Stat. (2023)