

Susanne George,
Bureau of Gambling Control
P.O. Box 168024
Sacramento, CA 95816-8024

Notice: California-Style Blackjack & Draft Regulations

Dear Susanne George,

The proposed rules are appropriate. The Bureau of Gambling does have the right to impose such requirements. As the inventor of Party Craps I was sent a cease and desist orders on two different times to Hollywood Park Casino on an approved game to comply with a change in regulations. Card rooms have no leg to stand on. Since if I had to follow them so should card rooms. The game inventors have not done their due diligence on working on a solution to abide by the new regulations, status quo seems to be the stance.

The two blackjack type games I invented play to 31, Cal Blackjack and Blackjack X that are played in card rooms today.

I created a new blackjack type game "Blackjack v.31.21" that plays with a standard deck of cards, without a modified ace or 10-point card. The new game provides a way to follow the new regulations. Below are the rules that answer your question on how a California Blackjack type game can co-exist with the new regulations listed in 2074.

Below are the following rules as applied to Blackjack v.31.21, that I filed with the DOJ for game review on Feb 4, 2021.

Thank you,

Richard Godoy
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2074. Permissible Blackjack Variations; Required Rules.

Additions shown in underline; deletions shown in strikeout

Title 11, Division 3, Chapter 1, Article 7

Games

January 5, 2021

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A game that includes rules described in section 2073 may be approved only if it is consistent with the Gambling Control Act, these regulations, and any other provision of law governing the play of controlled games, and:

(a) The game rules do not have a “bust” feature by which a player immediately loses if the point count of the player’s hand exceeds the target point count, or will always lose against a player-dealer whose hand does not exceed the target point count. Whether a player wins or loses shall be determined solely by whether the total points of a player’s hand is closer to the target point count when compared with the total points of the player-dealer’s hand.

“This is accomplished by playing to hard 31 the top ranked hand throughout the game, so there is no bust; however, a hand with a point value between hard 22 thru hard 30 is frozen from taking another draw card and the hand is the lowest ranked hand. The second best hand is 21”.

(b) The game rules shall prescribe a target point count that is not 21, and that remains a number other than 21 on the initial deal and throughout the entire play of the game.

The points assigned to each card must remain constant throughout the play of the game.

“A game may play to thirty-one first throughout the game, then next to 21. A game can be played without a modified point value card. Present games provide a modified ace with 11.5 or 21 and with a modified 10-point card with a value of 10.5.

So an Ace + 9 = 20.5 that beats a 10 + Jack = 20. This will not work and is avoidable by playing to hard thirty-one. This is done by first hitting to hard twenty-one then taking another hit card and receiving a 10-point card for a total of Hard 31.”

(c) The game rules do not provide that a hand will automatically win if the player or the player-dealer receives an ace and a 10, jack, queen, or king on the initial deal.

“This is achievable with the following rules:

The player dealer has the option on both hard and soft 21 to stand or hit to get 31. If the player dealer is dealt an ace card and 10-point card on their first two cards the player dealer may stand and all hands are compared as to whether they win, lose or push. If the player dealer elects to continue then the player dealer hand has a point value of hard 11, and the game continues by allowing the players to stand, hit, double down or split. Player and player dealer push on Hard 17 thru hard 21 and hard 31.

If the player is dealt an Ace and a ten-point card, the hand will push on the player dealers two card 21 and push on the dealers 21 after the draw.

However if the players ace and ten-point card wins verse the player dealers hand, it is paid 6:5 (optional payout) otherwise a three or more card 21 pays 1:1.”

A game that complies with this Section, and that is approved by the Bureau, shall be referred to as a “California-style blackjack” game.