

FLORIDA GAMING CONTROL COMMISSION
CARDROOM DISCUSSION WORKSHOP

PRESENT:

Peter Cuderman, Commissioner
Alana Zimmer, Executive Director
Brandon McCaffery, Deputy Executive Director
Joe Dillmore, Director of Pari-Mutuel Wagering
Elina Valentine, General Counsel
Marc Taupier, Deputy General Counsel
William Crafts, Chief of Slot Operations

Public Speakers:

Gary Rutledge, Esquire
Jonathan Zachel, Esquire
Steve Calabro, Hialeah Park Casino
Jesse Hollander, bestbet St. Augustine
Noah Carbone, Palm Beach Kennel Club
Frank Famiano, Harrah's Pompano Beach
Michael Manchester, Harrah's Pompano Beach

DATE: Thursday, May 7, 2026
TIME: 3:04 p.m. - 3:47 p.m.
PLACE: Marriott Fort Lauderdale Airport
166 North Compass Way
Dania Beach, Florida 33004

Stenographically Reported by:
Thomas N. Sevier, RPR, FPR-C

Job No. 1544088

1 Thereupon,
2 the following proceedings began at 3:04 p.m.:

3 MS. ZIMMER: Good afternoon, everyone. Thanks
4 for being back with us this afternoon. This is the
5 third and final cardroom discussion we've had over
6 the last few months starting in Tallahassee in --
7 it looks like March we were in Tallahassee, April
8 in Orlando, and here we are today for our last
9 discussion.

10 We'll start out, we will give you an overview
11 of some of the things that we've already discussed,
12 some language that's been shared, and then you can
13 add to any discussion points and items you'd like
14 to add.

15 So Elina.

16 MS. VALENTINE: Good afternoon, everybody. We
17 have had a lot of suggestions in the last two
18 weeks.

19 And just to do a brief overview of some of the
20 important ones that we've received in the past
21 include for -- I believe there were some
22 discussions about introducing or implementing
23 cashless at cardrooms; to avoid publishing the home
24 addresses of licensees, which is not in our rule,
25 but it is on the DBPR website; the replacement of

1 damaged card and use of automatic shufflers;
2 amending our jackpot rules to both allow for an
3 administrative fee to be taken out of jackpot funds
4 and to authorize private getaways; removing the
5 requirement that a list of individuals employees be
6 identified outside of the security room and --

7 MR. DILLMORE: Surveillance room.

8 MS. VALENTINE: Surveillance room and
9 counting.

10 MR. DILLMORE: Different access areas.

11 MS. VALENTINE: Yes. I think those are the
12 big ones. But if anybody wants to speak to any of
13 those changes or any other additions, please come
14 to the podium now.

15 MR. RUTLEDGE: Good afternoon. For those of
16 us that were here like yourselves, everybody up
17 here, up front at least, has been here since 9:00
18 or earlier. So I thought I'd go ahead and get my
19 comments out of the way.

20 Gary Rutledge of Rutledge Ecenia on behalf of
21 a number of permit holders in North, Central, and
22 South Florida. We appreciate the opportunity to
23 provide comments.

24 We did not provide verbal comments at the
25 prior workshops, but wanted to touch on a few

1 things that your general counsel just touched on
2 that were brought up previously, as well as a few
3 other things. And then we look forward to
4 providing specific written comments at the
5 conclusion of this within the time period that you
6 choose to utilize for same.

7 One or two things that I want to talk about at
8 the beginning that are not specifically on the
9 rules, and one or two of them I've talked to the
10 Commission as a body about previously, including
11 the last Commission Meeting.

12 And first thing has to do with administrative
13 actions against licensees for various violations,
14 including cardrooms; since that's the predominant
15 product that's being offered in the state,
16 everywhere in the state with the exception of one
17 facility in Central Florida. So it gives rise to
18 the most cases to the Commission.

19 As I mentioned at the last Commission Meeting
20 in Tallahassee, it's become rather burdensome. I
21 wouldn't suggest that it's not a fair process, but
22 I think that there's a more economic kind way to
23 handle many of those actions before us.

24 I've spoken to General Counsel, the Executive
25 Director in passing about this before. And we,

1 basically, would recommend that a process be
2 established -- alternatively we'd be glad to give
3 comments about this, even though it's not within
4 the purview specifically of the rules -- that one
5 of two things could take place.

6 One would be the mechanisms -- like the
7 Division of Hotels and Restaurants and the Division
8 of Alcoholic Beverages and Tobacco and your former
9 predecessor agency, Business and Professional
10 Regulations realized -- where particularly for the
11 minor violations, 90 percent of them, that there
12 would be prescribed penalties over periods of time
13 for such violations.

14 Warnings, small fees, fines, I should say,
15 kind of larger fines over a period of time
16 depending on aggravation and so forth; so that
17 people would know what the penalties are for those.

18 The other option would be to somehow modify
19 the predecessor process; which was when complaints
20 were filed, the Commission, through legal and
21 otherwise, would provide what they thought was an
22 appropriate penalty for the permit holder, and we
23 could respond to that and the Commission would
24 choose to adopt that or not.

25 It's a little difficult now, because the

1 process is such that when the complaints come
2 forward, we've got to throw a dart at the board in
3 terms of what we expect the Commission would take
4 in terms of a settlement; a warning, \$500, \$5,000,
5 or whatever.

6 And I use the analogy in that regard; when I
7 get pulled over for a traffic citation, the officer
8 doesn't ask me, do you think a warning would be
9 okay or I should pay you \$200. It's just a little
10 burdensome and the number of times that they have
11 to go to the Commission.

12 So we applaud the action that you've been
13 taking through the General Counsel and the staff to
14 try to bring reasonableness and fairness to the
15 process as it goes forward. But we think one or
16 two of those combinations would be more efficient,
17 more economic, and would be fair to the industry.

18 And we'll be glad to reduce those comments in
19 writing. They're not specifically as part of these
20 rules. But they could be included in the rules
21 that otherwise do deal with pari-mutuel wagering,
22 as well as slots for that matter, the same
23 indication.

24 The second overall comment that I wanted to
25 provide, which is a particular issue in Central

1 Florida and in North Florida, is the ability of
2 people to obtain licensure, you know, promptly,
3 timely.

4 A lot of these positions that people have in
5 these areas, particularly in the Panhandle and
6 Central Florida, throughout the state for that
7 matter; they have situations arise where if the
8 person can't start to work there within a day or
9 two or a week, they're not going to be; whether
10 they're in the kitchen, on the floor, maintenance,
11 whatever the positions may be.

12 And over the course of time, what previously
13 was allowed was the Commission had people at all
14 facilities, basically, during their operational
15 season. Well, most of them don't have live
16 performances with a very few exceptions now.

17 So all they have are their cardrooms, at least
18 outside of South Florida. And that's imposed a
19 real burden on these facilities, because you don't
20 have somebody at these facilities routinely that is
21 handling licensure.

22 And we would urge consideration, and I've
23 touched on this before, we would urge consideration
24 that some more efficient, streamlined version could
25 occur at facilities; whether it's to designate

1 certain days of the week, but every week to have a
2 State employee there to handle that licensure;
3 whether or not it's a situation for whether people
4 that are not routinely doing licensure could do it
5 as a part of their job responsibilities that are
6 there.

7 Just to be specific, I've gotten calls from
8 clients in Sarasota and Tampa and Tampa Bay Downs.
9 And the people that are in Sarasota are having to
10 go all the way to Tampa Bay Downs to get their
11 license if they're doing this in person. For those
12 of you that are familiar with that distance,
13 you know, it's about an hour drive for somebody to
14 go there to get their license application.

15 Director Dillmore has been great to encourage
16 and has talked to me in the past about doing some
17 of these online. I understand there's some real
18 problems in that regard; not so much with just
19 doing them online, but it's my understanding
20 temporary licenses may be an issue in terms of
21 whether or not you could obtain them online.

22 So I'm not here to come up with anything other
23 than a plea really in these places in the state,
24 North and Central Florida specifically, where you
25 don't have people in the facilities like you may do

1 in South Florida on a regular basis to assisting
2 these people. Because I routinely hear about those
3 issues, and I know you're very concerned about
4 that. And we look forward to working with you
5 further about that.

6 I know that there are other State offices,
7 such as Division of Alcoholic Beverages and Tobacco
8 and Hotel and Restaurants and your predecessor
9 sister agency, that may be able to help as well in
10 certain areas. And I think I suggested that at a
11 prior meeting. So those are brief comments,
12 although those may be longer than my other
13 comments.

14 I just wanted to touch -- your General Counsel
15 touched on a few things, and I just want to
16 reiterate on behalf of my clients a number of
17 things that we share with in terms of particular,
18 you know, support.

19 One of the things that's come up, and you've
20 had a lot of administrative violations for
21 facilities around the state in the past, the
22 various listing of people in the secure areas of
23 the facility and they're not on there, they're
24 there one day and they're out.

25 We don't really see a great deal of need for

1 that, so long as there's an adequate system in
2 there either limiting the people there or
3 otherwise. But to have somebody that is signing
4 off in the money room or otherwise that wasn't
5 there that day or there's a new hire and to have
6 some, it's an administrative burden, I know.

7 It's like a lot of cases, they may have been
8 de minimis in terms of the penalties that occurred,
9 you know, from them. But I think you've heard this
10 from other people, other facilities, and we want to
11 reiterate our support for that particular
12 situation.

13 We want to reiterate the support that gaming
14 cards could be replaced in card games individually,
15 as opposed to the entire decks from a cost saving
16 or otherwise purpose. That wouldn't mean that the
17 damaged cards wouldn't still need to be segregated
18 and identified and kept track. But replacements
19 would seem to be in order as an alternative.

20 MR. DILLMORE: Mr. Rutledge, can I ask you a
21 quick question?

22 MR. RUTLEDGE: Yes.

23 MR. DILLMORE: The damaged cards. And there's
24 been quite a discussion on cards. And just so I
25 understand it, if -- and, again, this is from

1 people who deal with it on a daily basis like you
2 here.

3 If you just replace a single card and the card
4 has been used, is it not going to be visually
5 different just by the normal wear and tear on a
6 card. Like the color on the back is a little more
7 faded and then you bring in -- I guess 7 of
8 diamonds get damaged and you bring in a brand new
9 7 of diamonds to an existing deck, is that going to
10 be noticeable to players?

11 And you don't have to address me now. But
12 when you come up and make your comments, if someone
13 could, you know, touch on that. Because, you know,
14 that's the thing that we would be concerned about.
15 But you guys see, you're the ones replacing the
16 decks all the time.

17 And I would love to hear your feedback if
18 that's just a real concern or not. So when you
19 come up, if you could talk to us, that would be
20 great. I'd be interested to hear your comment as
21 well, Mr. Rutledge.

22 MR. RUTLEDGE: Yeah. I'm going to leave it to
23 the experts. I saw a lot of head shaking that it
24 wasn't a problem. Let them identify themselves and
25 come forward to speak. I do hope that they'll do

1 that. I don't know that everybody would choose to
2 do that. Once again, it would be an option for
3 them to do so.

4 The other issue that came up in some previous
5 comments was the shuffling of the cards. I'm not
6 sure if you had mentioned that or before whether or
7 not we would allow for alternative shuffling of
8 decks, which is typically utilized in poker games
9 and card games, casinos all over the country.

10 They may have automatic shufflers, but
11 sometimes those break and they hand shuffle. Or
12 they have multiple shufflers to maintain the speed
13 and play the game not to do that. So we would hope
14 that that could be altered.

15 There's some interest as an option that
16 plastic cards could be substituted in some
17 instances for paper cards. We certainly would
18 support that as an option.

19 I thought one of the things that was most
20 interesting -- it's not a big dollar item, but it
21 would be good for the players, the Commission, and
22 the industry -- is to allow for interest-bearing
23 accounts where money is being held such as for
24 jackpots. Currently that's prohibited.

25 And there's no reason, so as long as that

1 money, we believe, is continued to be segregated,
2 to occur interest if like the underlying monies,
3 that money would be returned to players in the
4 jackpots. It's just lost money to everybody
5 involved, because of not being able to have an
6 interest-bearing account regardless of what purview
7 you have for requiring all of that.

8 Or there have been some other options that
9 have been discussed previously, I know, such as
10 allowing some modest fee to be taken from that.
11 But regardless of where you go with that direction,
12 there's no reason not to allow for an
13 interest-bearing account, in our opinion.

14 I know there's some discussion about rotating
15 the button in a manner other than clockwise or
16 counterclockwise. I don't think it matters so long
17 as you offer the button to be, you know, rotated to
18 the different players.

19 Lastly, I know we had had a couple of people
20 speak about the retirement of poker chips. There
21 are occasions where after some years due to
22 marketing or availability, the poker chips need to
23 be retired.

24 And we would like to have a mechanism for
25 those that after some due public notice, 30 days,

1 60 days, whatever the time frame may be, that they
2 can cash them before they're no longer capable of
3 being utilized.

4 I wish I have would have gotten that notice
5 for casinos that I've been to in Las Vegas that are
6 out of business now, and I've still got some chips
7 back at the house that couldn't be cashed. But you
8 get the situation that I think some mere providing
9 of notice after the retirement of chips and
10 replacement of chips be allowed.

11 I see Director Dillmore. Yes, sir.

12 MR. DILLMORE: Yes. On the retirement chips.
13 So, I mean, there's nothing in the rule now that is
14 preventing from retiring or setting any kind of
15 deadline now. Are you asking that we establish a
16 time frame in a rule?

17 MR. RUTLEDGE: I think that it would be
18 advisable. There could be an issue otherwise due
19 to completely unrelated statutes that you're
20 dealing with -- specifically Chapter 717 Florida
21 Statutes, which is the unclaimed property
22 provision -- that it's possible that our CFO could
23 designate in the unclaimed property provision that
24 those are unclaimed property.

25 So when you went through when you had \$50,000

1 in chips and you could only account for, you know,
2 45,000 that there's \$5,000 in unclaimed property
3 that would have to be disposed of. There's some
4 very complicated procedures utilized, I've
5 practiced in that area extensively, for how to deal
6 with that.

7 But I think it's a protection to some degree,
8 Joe, for those facilities to know if they could
9 retire that somebody comes in the next year with a
10 bunch of \$100 chips that they can't cash and sort
11 of protect them. I'll let you grill some of my
12 friends in the industry about some of the other
13 comments.

14 And we appreciate the opportunity and look
15 forward to providing some written comments
16 accordingly. Thank you all very much.

17 MS. ZIMMER: Thank you.

18 MR. ZACHEM: Good afternoon. Jon Zachem, for
19 the record. Just a couple quick points. Some of
20 them are for clarity, and some of them actually
21 piggyback off what Mr. Rutledge just said. He was
22 inspiring some thought as he was saying certain
23 things.

24 Currently in rule you have a section in 2.021
25 that talks about aggravating and mitigating

1 circumstances. Maybe if there was some kind of
2 development that how that applies towards cardroom
3 or if you thought about it towards slots, that
4 would be a little helpful. It could be tailored a
5 little bit more towards those areas.

6 And some of the suggestions Mr. Rutledge had,
7 that might be able to help bring some of the
8 clarity he's looking for. I think that -- the list
9 was done very well. But that seems to apply, my
10 understanding, is for your pari-mutuel operations
11 as opposed to cardroom and slots.

12 So you already have it in rule. It might need
13 to be modified and, like I said, tailored a little
14 differently. But I think it might be a little
15 helpful for some of the administrative complaints
16 to just be able to make things flow a little easier
17 for an understanding to come out.

18 Also, I want to point to -- you know, you got
19 a lot of subject matter folks here that are much
20 better to listen today than me. You hear from me
21 way too much. But there is one section that,
22 I think, some clarity needs to be offered. And
23 that is in the card section.

24 When you talk about 11.014 for cards, there's
25 a subcategory for paren (4), and it talks about

1 each dealer assigned to a card table shall inspect
2 cards and what the assigned dealer must do. The
3 list that follows afterwards doesn't look like it
4 should be assigned to the dealer. So it creates a
5 little bit of a challenge in understanding what is
6 the dealer's responsibility and what is the
7 facility's responsibility.

8 For instance, if you look down under (4), it
9 ends up talking about that, sub (b)(4) says, all
10 damaged cards shall be retained for at least 14
11 days from the date of withdrawal from play.
12 Clearly, you don't intend the dealer to hold on to
13 cards for 14 days. So that probably needs to be
14 flushed out a little bit more for some clarity as
15 far as whose responsibility it is for compliance.

16 And Mr. Rutledge raises a very interesting
17 point as far as some kind of penalty schedule or
18 something of that nature. I don't know if it's out
19 of bounds for today's discussion or not. Other
20 boards and commissions normally will have a
21 prosecutor come up with some suggestions as far as
22 a penalty that goes along with something, and they
23 look at what has been done before.

24 I prosecuted at the Department of Health. And
25 we had settlement agreements that would come up

1 before. We would look at three prior violations of
2 something similar, so that we can educate -- it was
3 the Board of Medicine at that time -- but you-all
4 in this process that here's what we've done
5 previously and what fines were associated with it.

6 All violations are different to some levels.
7 But it at least gives you a starting off point.
8 And that discussion can be had before it comes to
9 you; so that there is a little bit of work through
10 the process, so we're not having as much back and
11 forth and confusion. Just a thought maybe to
12 clarify a little bit. Thank you all.

13 MR. CALABRO: Steve Calabro, Hialeah Park
14 Casino. I had one point, but I have a couple
15 things I want to piggyback with Mr. Rutledge.

16 So on the concept of consent orders,
17 violations, we're partners. The slot and the poker
18 rooms are partners with the State of Florida,
19 you know. As a matter of fact, in slots you get
20 35 percent. It's a pretty good margin. Our margin
21 is a little less than that. So we are truly
22 partners.

23 So in that concept of being a partner,
24 I think, and I've seen this in other jurisdictions,
25 the warning process is really something that we

1 should start to talk about with the Commission to
2 use that. Because think about this just in a
3 logical sense.

4 If we are truly partners and you're trying to
5 help our industry, and we're trying to make sure we
6 deliver a clean game and a good business for the
7 customers, if we happen to make -- we're not
8 perfect. We make mistakes. If we make a mistake
9 and we get a warning, well, then we learn from that
10 warning. It's almost like a counseling.

11 Now, if we do it a second time, well, then
12 I guess, you know, penalties, financial penalties
13 make sense to me. But for a one-time thing, it
14 just seems to me that many of the violations --
15 like if you had whatever, pick whatever violation
16 you want, particularly some of the routine stuff --
17 I think there should be, the warning letter should
18 be more used in the process both in slots and
19 poker.

20 I know this is poker. But it happens to be --
21 I'm asking for both. So that's one point, concept.
22 And it is very popular in other gaming
23 jurisdictions. Because just like in Florida, in
24 many states the Commission is, in fact, a partner
25 to the industry and they want to -- in Nevada they

1 might be more than partner.

2 You know, they really, really -- that
3 Commission really looks out for the industry,
4 because it's just a big economic driver in that
5 state. But we're still a pretty big economic
6 driver, and our partnership is pretty real too.
7 So that's what would I say about the consent order
8 thing.

9 I also would agree at the highest level
10 standardization. You can never get in trouble if
11 you're consistent. If you're consistent, it's
12 great.

13 And what happens is, think about it, as
14 Commissioners -- you're not all Commissioners --
15 but as the Commission changes and as the staff
16 changes, literally one year somebody could get
17 fined \$1,000; and maybe three years later it's a
18 different staff member, different Commission, and
19 you get fined 5,000. It seems like that doesn't
20 make sense.

21 So if we standardize -- if you look at the
22 history of the last five years of the consent
23 orders, there's probably about 70 percent of them
24 are very, very common things. And we just go
25 through them, the Commission would go through them,

1 or a prosecutor as Mr. Rutledge said, or maybe that
2 Mr. Zachem said, and then we'd just come up with
3 standards.

4 You do this wrong, you get a warning letter
5 first. And then you if do it wrong a second time,
6 it's a \$500 fine. You do this, it's a \$1,000 fine
7 and this is a \$1,500 fine. Because other than
8 that, you're sort of grabbing at air.

9 And I'm just -- I don't think it's -- it
10 doesn't make sense from a Commission regulatory
11 standpoint either to be doing that. So that's what
12 I would talk about just piggybacking on what
13 Mr. Rutledge and Zachem said.

14 On the concept of cards, when poker cards are
15 about three-months-old, perhaps even as young as
16 two-months-old; if you put in a new card, there's a
17 chance that you might see a difference between,
18 you know, 52 cards and 51 of them are
19 three-months-old and one is new.

20 There is some kind of time frame. You're
21 going to have to research as to what. We can give
22 you some input into exactly what would be a safe
23 haven. But at three months, I think, you'd start
24 to get into problematic.

25 And the last thing is somewhat minor, but I

1 have a solution for it. They touched on it in
2 terms of those lists. And I think those lists --
3 think about what happens. You go into -- you know,
4 there's a couple of areas -- into the cage or the
5 count room or the vault or the surveillance room,
6 there's these little lists.

7 Now, probably there was a rule in the '70s,
8 right, or '60s, right. But we've progressed a
9 little. And what a lot of facilities have are card
10 access systems. They're about as accurate as you
11 can get.

12 And, by the way, you'd also have surveillance
13 too if you want to verify that, which is sort of a
14 cousin to each. So for the properties that have a
15 card access system, we don't need the list. It's
16 kind of almost like silly to have a list.

17 Now, I understand that some properties
18 throughout the state, or poker rooms throughout the
19 state, maybe don't have the luxury of buying,
20 you know, card access systems. You do have an
21 expense, a couple hundred thousand dollar expense.
22 So maybe they have to go -- so you would have the
23 option to have a list if you don't have the card
24 access system.

25 If you have a card access system, you would

1 merely just not need to have that list that has to
2 be administratively, oh, wow, we didn't, we forgot
3 one person's name out of the 15. That's kind of
4 almost like, it's a little odd. You know, it's a
5 little odd to even in 2026 be saying that that's a
6 rule.

7 And we have this quarter million dollar card
8 access system that can track everybody going in and
9 out of that sensitive area. So the language should
10 just be, if access is not controlled via a badge
11 access system, then -- and we'll send it in writing
12 to you. That's sort of a no-brainer. And that's
13 the fourth thing that I have.

14 Any questions? Thank you.

15 MS. ZIMMER: I know previously there were
16 heads shaking and nodding either that the cards
17 were affected by age or were not. We saw both of
18 those responses.

19 Would anybody else care to elaborate on that?

20 MR. CALABRO: So there's a reason why some
21 were saying yes, some were saying no. Because it
22 really depends on the length of time. Like if a
23 deck has only been in use for a short period of
24 time, you're not going to tell.

25 I happen -- it's my opinion -- and I'm sure

1 that there could be people that disagree with me
2 and I respect that -- at the three-month mark, you
3 might start to see the difference, in my opinion,
4 in my opinion. I don't know, you know, what
5 exactly the mark is. But I know at three months,
6 I believe you'd see it in some decks.

7 MS. ZIMMER: Okay.

8 MR. HOLLANDER: Jesse Hollander, bestbet,
9 Jacksonville, Florida. I do agree the three-month
10 time is going to be too late to replace a card.
11 However, most jurisdictions you are allowed to
12 replace a single card into a deck. The cards are
13 all together to begin with. So they all start out,
14 basically, the same age and they sort of age
15 together.

16 So we would never put a brand new card in a
17 deck that's been out for three months. We
18 generally don't have decks that are out for three
19 months anyway. We tend to replace the whole batch
20 of them sooner than that. But the cards are aging
21 together, basically, you know. So they're old
22 cards being replaced.

23 They're being replaced anyway, just not right
24 at the table. So it's kind of the same thing.
25 You're just doing it off the table. So it could be

1 done, one single card, as long as you're not doing
2 a brand new deck into an existing allotment.

3 MS. ZIMMER: Just to go back on a quick
4 question I had here also. Some of you represent
5 more of the rural cardrooms across the state and
6 some of them in the bigger cities.

7 But can I get a general idea of how many
8 people don't have those card access systems?

9 MR. CALABRO: So I know Hialeah Park has it.
10 I know Pompano has it. I'm saying the people that
11 do have it. Put it this way. In Dade and Broward
12 County, my thoughts are that they all have it.
13 Because they have to have it, because it's related
14 to the slot rules. So that would be pretty safe to
15 say.

16 It would be interesting to see -- West Palm.
17 Yeah. So West Palm is a very big room, very
18 productive and, you know, vibrant room and they
19 don't have it. So they have to have an
20 availability to have the list.

21 MS. ZIMMER: Sure. Okay. I'm just curious
22 kind of what we're dealing with.

23 MR. MCCAFFERY: Who else was --

24 MR. CALABRO: Does bestbet have one?

25 MR. HOLLANDER: Yes, we do have it.

1 MR. MCCAFFERY: Do you have a question?

2 MR. DILLMORE: I do. Thank you. I don't know
3 if this ties in. 'Cause there was also a
4 discussion about allowing -- the three month, the
5 wear and tear, is that for plastic cards?

6 'Cause there has also been a discussion that
7 some facilities would like to go away from, that we
8 don't specify the use of plastic cards. I don't
9 know what the other term is, but the other type.
10 And with that -- so kind of balance that, the
11 90 days and replacing the single card.

12 If the Commission considered getting away from
13 plastic cards and allowing whatever type they are,
14 would that wear and tear even go faster? And then
15 is there a huge -- so the Commission can
16 understand, is there a huge cost differential? I'm
17 guessing there's a bigger cost on plastic cards.

18 But at the same time I imagine they last
19 longer and maybe, I'm not sure, are less
20 susceptible to maybe marking or cheating. I'm not
21 sure. So if anybody would like to speak to that, I
22 would be very interested to hear.

23 MR. HOLLANDER: There is a massive cost
24 difference between plastic cards. The other ones
25 are paper. And you would not use them for three

1 months. You would probably use them for a matter
2 of hours, if not just a single day.

3 But there's really no reason that anybody sees
4 why we should be restricted from only using plastic
5 cards. I don't know that we would ever use paper
6 cards or anything. But if you do use paper cards,
7 it's typically for a matter of hours or maximum a
8 day.

9 MR. DILLMORE: So reading that -- and if the
10 Commission changed the rule to allow paper cards,
11 you wouldn't want to replace a single card with a
12 paper card? Like at that point you would --

13 MR. HOLLANDER: No. You would replace a whole
14 deck in paper cards.

15 MR. DILLMORE: Got it.

16 MR. HOLLANDER: Every time. But you probably
17 -- yeah, they're only used for a matter of hours.

18 MS. VALENTINE: I have a quick question as
19 well. You had mentioned that typically one card is
20 replaced, it would be replaced in a way that it's
21 wear and tear is similar to the wear and tear of
22 the existing deck.

23 Should the Commission wish to look at those
24 rules language that says, you know, you have to
25 replace the damaged card with a card of similar

1 degradation or wear and tear as the existing deck;
2 would that be something that would make sense in
3 practice or no?

4 MR. HOLLANDER: I suppose, yeah. I mean,
5 we're never going to put a brand new card into an
6 old deck.

7 MR. CARBONE: We'd ask that it be
8 differentiated. There is language in there. No
9 cardroom in Palm Beach -- there's language that
10 says it has to be differentiated. As long as that
11 matches, which is swapping a card, I think that --

12 MR. HOLLANDER: That's what they do -- most
13 jurisdictions they just replace a single card at
14 the table, good, bad, or indifferent. You know,
15 they show the front, show the back, put it in,
16 you know. So the bad one, good one, switch them.

17 MS. VALENTINE: Thank you.

18 MS. ZIMMER: Anybody else like to speak on any
19 of the previous topics or bring up any new ones?

20 MR. FAMIANO: Hello, Commission. Frank
21 Famiano, Harrah's Pompano. Just regarding the
22 possibility of even thinking about going to a paper
23 version of the playing cards, easily marked, big
24 problem.

25 Humidity gets involved with them very quickly.

1 You're going to get yourself into a situation where
2 you're going to have real integrity issue with your
3 cards. So I implore you, please do not bring paper
4 decks involved. Thank you.

5 MS. ZIMMER: Thank you. I know we received
6 feedback --

7 MR. CALABRO: Two more things I forgot. Steve
8 Calabro from Hialeah Park. This one is the
9 infamous -- and maybe there -- I heard one story
10 there is and one story there isn't. The list of
11 approved DP games.

12 So my question to you is, is there a list and
13 is it limited to that list? And like all things in
14 life things evolve. So people -- that there should
15 be some mechanism where that list can be updated.

16 So right now there's like X amount of -- is
17 there a list? Are we following a list, are we not
18 following a list of DP games that are approved in
19 the State of Florida?

20 MR. DILLMORE: So the list that was created
21 reflects the statute. It's a list of games that
22 were in the cardroom applications.

23 MR. MCCAFFERY: What year?

24 MR. CALABRO: 2021.

25 MR. DILLMORE: 2018.

1 MR. CALABRO: Oh, '18. 2018.

2 MR. DILLMORE: Yes. And then the two
3 subsequent years. So, yes, that list has been
4 compiled. And it's not that we approve those
5 games. That's just what the statute says. Those
6 games are good to go.

7 MR. CALABRO: So could there be a mechanism
8 added where additional games can be added to the
9 list?

10 For instance, maybe, you know, a game that is
11 not on the list, you know, it all of a sudden
12 becomes very popular in the poker community outside
13 of Florida. We'd like to, you know, participate in
14 offering that game to guests. And so that's really
15 the question.

16 And there's some games -- you know, that list
17 was sort of made 2018 or whatever year it was made.
18 I'm not sure what year it was. But I'm sure there
19 were some games that are out there that
20 manufacturers had that didn't make the list for
21 some reason.

22 You know, it just, maybe it wasn't really that
23 popular or maybe it wasn't in their offering at
24 that time. So we'd like to be able to offer the --
25 we want that list to be adjusted to have new games.

1 Like, for instance, there are some games on
2 that list -- that are not on that list that the
3 manufacturers offer, and we've seen them played in
4 poker rooms outside of Florida and -- I don't want
5 to say anything, but I have seen them elsewhere.
6 I'll just say that. So we just want to have that
7 whole list.

8 MS. VALENTINE: Florida law, unfortunately,
9 prohibits the addition of any new games to the
10 designated player card game list.

11 MR. CALABRO: That's what I was fearful of.
12 But think of how like a little bit archaic that is,
13 right. It would be like that's it. Anything new
14 that gets invented, sorry, we can't participate.
15 Maybe some day if there's ever a legislative
16 change, and you could throw that in as a simple,
17 simple request that isn't really that demanding.

18 Next thing, it might be also a Florida law, is
19 progressives on poker games. Many of the poker
20 manufacturers of these designated player games
21 offer progressive components where the customer
22 bets a side bet, and there's a meter on the game
23 and it causes a progressive jackpot.

24 What happened, to my recollection, is there
25 was this letter sent out. And, basically, there

1 were some people in some of the rooms in Florida
2 that were offering progressive and then they were
3 told -- the letter came out and said, hey, you
4 can't do progressives.

5 What's the chances of us being -- us, the
6 Florida poker rooms -- being able to offer
7 progressive jackpots on the DP games? Is there a
8 viable opportunity for that to occur? 'Cause
9 that -- remember, we're partners. That would
10 enable us to grow our business.

11 That would all of a sudden, that would attract
12 new players, because they might like -- there's
13 some players that just like to play for that
14 progressive, and particularly as the progressive
15 grows. Any possibilities?

16 MS. VALENTINE: I think that would depend on
17 the facts and circumstances of a particular game.
18 And cardrooms and slot machine facilities are
19 always welcome to submit additions for declaratory
20 statements outlining specifically what it is that
21 the facility would like to do.

22 And then the Commission would be able to offer
23 any formal opinion. It would be presented in front
24 of the Commissioners and the Commissioners would
25 decide.

1 MR. CALABRO: Okay. So we have the
2 opportunity to --

3 MS. VALENTINE: Yes.

4 MR. CALABRO: -- meet with the manufacturers,
5 look at a progressive game. If we feel that it
6 would be advantageous to our business, we can
7 present it in a declaratory statement and maybe the
8 Commission would embrace. Great. Thank you.

9 MS. ZIMMER: So she's not saying it's out of
10 the question.

11 MR. CALABRO: That's a good thing. That's a
12 good thing. Thank you.

13 MR. MANCHESTER: Michael Manchester, Harrah's
14 Pompano Beach. I received the same letter. It
15 said no progressive jackpots and no secondary
16 drawings. I want to address the secondary
17 drawings.

18 It would really be a fun idea if, you know,
19 somebody hit a high hand tied to a hand, and we
20 give them a drawing ticket and they can go win a
21 car or something like that. Currently with those
22 rules we're not allowed to. I would like also, can
23 we get that in there as well?

24 MS. VALENTINE: Under Florida law currently, a
25 secondary drawing that would depend on something

1 other than the specific combination of cards would
2 likely not be authorized.

3 But I think our response is also the same,
4 that if there's, again, a particular offering or a
5 particular way that you would like to offer a
6 jackpot; if you would like an opinion on it, again,
7 the declaratory statement process, I think, would
8 be a really good avenue for that.

9 Because, again, it would depend on the facts
10 and circumstances of the particular event that
11 you're considering.

12 MR. MANCHESTER: Okay. Thank you.

13 MS. ZIMMER: Okay. Would anybody else like to
14 comment on any of the previously discussed topics,
15 either from this current session or the two prior
16 to this in February and March -- or sorry -- March
17 and April?

18 Okay. Our next step here, you do have time to
19 submit your written comments within 14 days to the
20 Commission, 14 days, calendar days.

21 And if you have any other questions, at any
22 time if you have questions, you can always reach
23 out and ask us things. They don't have to be
24 necessarily, you know, a formal setting of
25 questions. Call us. Our information is there.

1 After this we will compile all the information
2 for each of the cardroom sessions and put all that
3 together. And we'll take all the written
4 statements that you've given us, any language that
5 you've provided, and then have that accessible to
6 everyone.

7 We also have a list of the recorded meetings
8 from the last two -- we'll have them for this
9 also -- that you should have received a transcript
10 if you're on our list, so that you can see
11 everything that was discussed and give you any
12 information.

13 If you're not on that, again, just let us
14 know. We'll make sure we get you added to that.
15 You're privy to all that information as well.

16 MR. ZACHEM: With that transcript, can you
17 include other people's submissions? So if there
18 were any transcripts taken care of and we see what
19 other people have submitted, so that we have an
20 idea also. So whether or not they were appended to
21 the previous one. We can either strengthen them.
22 They might have inspired some other ideas too.

23 MS. ZIMMER: Well, since this next one, we'll
24 have everything available.

25 MR. ZACHEM: Okay. Thank you.

1 MS. ZIMMER: Okay. Well, thank you, guys,
2 especially for you that all traveled here and had
3 to enjoy this horrible weather. Thank you for
4 coming and we do appreciate your partnership.

5 (Thereupon, the proceedings concluded at
6 3:47 p.m.)

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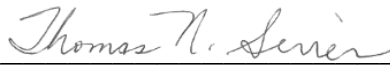
REPORTER CERTIFICATE

STATE OF FLORIDA

COUNTY OF BROWARD

I, THOMAS N. SEVIER, Registered Professional Reporter, Florida Professional Reporter, certify that I was authorized to and did stenographically report the foregoing proceedings and that the transcript is a true and complete record of my stenographic notes.

Dated this 25th day of May, 2026.



THOMAS N. SEVIER, RPR, FPR-C

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