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State of New Jersey
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF GAMING ENFORCEMENT
1300 ATLANTIC AVENUE
ATLANTIC CITY, NJ 08401

MATTHEW J. PLATKIN
Attorney General

MARY JO FLAHERTY
Interim Director

August 21, 2024

Joseph R. Dougherty, Esq
5409 Winchester Avenue
Ventnor, NJ 08401

Re: Six to Five Payout Odds in Blackjack
Approval of Test Period

Dear Joseph Dougherty:

The Division of Gaming Enforcement (Division) has reviewed the request you have submitted on behalf of the Casino Association of New Jersey to conduct a test on the game of blackjack wherein patrons who achieve blackjack will be paid at the odds of six to five rather than at the odds set forth in the regulations of three to two (hereinafter "6-5 blackjack"). The Division hereby approves a test of blackjack with the six to five payout odds for the period of 12:01 AM September 1, 2024 through 11:59 PM on January 2, 2025. The test is subject to the following conditions **(some of which vary from the conditions proposed in your letter of August 19, 2024).**

6-5 blackjack, dealt from a dealing shoe, shall be permitted only at: (1) tables that have a \$25 or less minimum bet; and (2) no more than 50% of the blackjack tables **open and available for patron play on a casino floor;**

Notwithstanding the provisions of *N.J.A.C. 13:69E-1.19(b)(2)*, when dealing 6-5 blackjack from a dealing shoe or continuous/automated shuffler device, a property shall do so in accordance with the general provisions of *N.J.A.C. 13:69E-1.19*;

The use of a device which automatically shuffles cards under the provisions of *N.J.A.C. 13:69E-1.19(c)* shall be permitted at tables dealing 6-5 blackjack;

The number of decks used in dealing 6-5 blackjack shall be limited to **not more than eight, regardless of the capacity of a dealing shoe or automated shuffling device;**



The 6-5 odds shall be displayed on any table offering 6-5 blackjack on a separate placard next to the min/max wager placard and on layouts. The signage shall provide the message: "Blackjack Pay 6-5";

6-5 blackjack may be offered and dealt from a dealing shoe at any time during the test period which shall begin on September 1, 2024 and end on January 2, 2025 unless further extended by the Division;

Any property intending to offer 6-5 blackjack during the test period shall notify the Division at least 48 hours prior to first offering the game and such notification shall include a confirmation that the property acknowledges, and shall comply with, the above limitations/requirements. A property shall also notify the Division if, at any time during the test period, it determines to discontinue offering 6-5 blackjack dealt from a dealing shoe;

None of the limitations/provisions above shall affect a property's ability to offer 6-5 blackjack dealt from a dealer's hand as permitted under *N.J.A.C. 13:69E-1.19(b)(2)*;

Each participating casino shall produce and send to the Director of the Division, not later than January 10, 2025, financial reports comparing the hold percentage and gross revenue of blackjack tables that were offering six to five payout odds to patrons achieving blackjack with those tables that were using the standard three to two payout so that the effectiveness of the change in payout odds may be properly evaluated by the Division.

Should you have any questions regarding the financial report that is required, please contact Chief of Investigations Christopher Glaum via email at Christopher.Glaum@NJUDGE.gov. Should you have questions about any other issue set forth in this conditional approval, please contact Deputy Chief of Investigations Vicki Maioriello at Vicki.Maioriello@NJUDGE.gov or the undersigned.

Very truly yours,

Charles F. Kimmel

Charles F. Kimmel
Deputy Attorney General

c: Casino Counsel
Mary Jo Flaherty, Director
Louis Rogacki, Deputy Director
Christopher Glaum, Chief of Investigations
Vicki Maioriello, Deputy Chief of Investigations