

## A New Deal: Bruges Burghers and Venetian Merchants Invent Mercantile Gambling

David G. Schwartz  
University of Nevada Las Vegas

Today, professional gambling—lotteries, bingo, race and sports betting, and casinos—take in over \$1 trillion worldwide each year. Though gambling is as old as humanity, until the 15<sup>th</sup> century social gambling—games played among peers at equal odds—predominated. But around that time, paralleling the emergence of banks and modern finance, a new type of gambling emerged: mercantile gambling. Mercantile gamblers offered their customers games that featured a built-in discrepancy between true odds and payouts—a statistical imbalance that favored the house. These mercantile games (also known as bank games) started with the lottery but soon grew to include card and dice games. The pioneers of mercantile gambling unleashed a two-fold revolution: they made possible the pursuit of gambling as an honest profession, and they set the stage for public interest gambling, in which a portion of gambling revenues are redirected towards the public good. With the increasing growth—and government reliance on—gambling revenues, it is a particularly apt time to rediscover the origins of mercantile gambling.

### What is mercantile gambling?

Mercantile gambling is any form of gambling honestly conducted for a profit as a revenue source for an established business or government. In many ways, the invention of mercantile gambling mirrored the development of modern banking. The development of these “bank games” had as much importance for gambling as the rise of banks themselves did for

finance. Banknotes had circulated in China as early as the 7<sup>th</sup> century A.D., but did not become a regular feature of European life until the 18<sup>th</sup> century—around the same time that mercantile gambling became widespread. As investors were experimenting with joint stock companies and speculative ventures, gamblers began, increasingly, to view gambling games as business transactions rather than friendly contests between peers.

Social gambling made sense for people who gambled only in order to relieve tedium, or to enjoy special occasions. This is why ancient societies from China to Rome permitted gambling during year-end holidays, and why writers from Spanish king Alphonso X (late 13<sup>th</sup> century) to Girolamo Cardano (mid-16<sup>th</sup> century) condoned recreational social gambling as a fitting diversion, if indulged infrequently and according to prescribed rules. But there were always some who saw gambling not as a rare entertainment, but as a shortcut to wealth and leisure. Those who wished to extend their gambling from occasional recreation to habitual pursuit needed to possess both an unlimited income independent of unreliable gambling winnings and more free time than responsibilities. The only way to “earn” a living from gambling was to either accept stretches of poverty as the price of the game or to regularly cheat without scruple or detection.

The invention of mercantile gambling provided a way to legitimately make a living from gambling. It also freed players from the bonds of sociability—they could now gamble against professionals whenever they wished. At the same time, the games themselves changed, becoming far more direct as rules were simplified and game durations shortened. Social gamblers might want to while away the hours over sprawling games of *trappola* with their friends, but those looking for action in gambling houses wanted a quick fix: the turn of the card at bassett or faro, the spin of the roulette wheel, or a single throw of the dice.

With the introduction of bank games and the proliferation of professional gambling houses, a gambling mania swept over much of Europe. It hit different countries at slightly different times, but it is safe to say from 1650 and 1800 gambling's place in European society was far more prominent than before or since. There had always been gambling, but in these years it was universally common on a level never before seen. With the rise of mercantile capitalism, money circulated more freely and accumulations of wealth greater than before. During the same years that governments sponsored lotteries, all social classes gambled more. The emergence of mercantile gambling provided the catalyst for the increasing interest of governments in gambling.

#### Fortune's Merry Wheel: The Birth of Lotteries

Lotteries were the truly revolutionary gambling form of the 16<sup>th</sup> and 17<sup>th</sup> centuries, the first genuine form of institutionalized mercantile gambling. The basic idea of lotteries was already old at this time. Many ancient cultures used randomizing elements, be it the casting of lots or the divining of goat entrails, to apportion land or privileges. In the Roman Empire, both emperors and private citizens attempted to boost their popularity by means of drawings for prizes. Sometimes, these "lotteries" took place at lavish banquets; it was custom for the hosts at Saturnalia to give out prizes to all who attended. The *missila*, or lucky items shot into the crowd at the Circus Maximus, were another sort of lottery. Banquet prize-giving survived the fall of the Roman Empire and flourished as late as the 19<sup>th</sup> century among the royalty of Europe, who regularly showered their courtiers with tickets that could be redeemed for toys or trinkets.<sup>1</sup>

These prize drawings, though, lacked the most important feature of modern lotteries: the payment of a price or stake for a chance. Such a gambling scheme requires a densely populated

urban area from which to draw sufficient ticket-buyers and, more importantly, an economy with readily circulating money. At the time, Flanders was the most heavily industrialized area of northern Europe, possessed a flourishing economy, extensive trade, and a vibrant culture.

The earliest recorded evidence of lotteries comes from the city of L'Ecluse, which in 1444 organized a lottery for the sake of raising funds for the repair of the city's walls and fortifications. With a grand prize of 300 florins, the lottery was advertised widely throughout the region—its promoters sent over 450 letters publicizing the draw to most of the major towns from Holland to Hainault. An earlier form of the lottery existed in Bruges, where it was a long-standing practice to fill vacancies in the office of the *scrooder*, who was in charge of wine-tasting and transport, by means of a random draw (in the ancient Roman tradition). To earn a chance at the *scrooder's* job, though, one had to pay a fee. To assuage the disappointment of *scrooder* also-rans, the organizers of the drawings began awarding cash prizes to runners-up. Throughout the early 16<sup>th</sup> century, lottery draws with prizes of money, gold, and jewelry became common throughout what is today Belgium, Holland, and northern France.

This kind of lottery is known today as a draw game, and its identifying characteristics are the drawing of a numbered (or personally signed, in early days) ticket from a container, variously called a wheel (though it did not spin) or box. In many countries, this has remained the dominant lottery game into the 21<sup>st</sup> century. In Renaissance Flanders, these lotteries benefited churches and guilds, and, until their suppression by municipal authorities who then entered the lottery market (Bruges, for example, prohibited all “private” lotteries in 1561), flourished in private hands throughout the region.<sup>2</sup>

Italian merchants had been resident in the region since the end of the 13<sup>th</sup> century, and members of Italian colonies in Bruges were active as bankers, merchants, moneylenders, and

pawnbrokers.<sup>3</sup> The lottery made a quick transition to Italy: medieval northern Italian shopkeepers regularly supplemented their humdrum selling of goods with a random element. For a sum, a customer could draw from a lucky jar a ticket that entitled him to the article written on it. Before long, these shopkeepers were profiting more from their drawings than from their commerce. City authorities or the local nobles soon demanded a measure of consumer protection, attention to public welfare, and a piece of the action: they insisted that all drawings be rigorously inspected to ensure their honesty, and that a portion of the profits go to either the needy poor or to the authorities themselves.<sup>4</sup> With this transformation, the modern lottery was born, as here can be found the key elements of today's government sanctioned lotteries—a public drawing, a supervisory commission and the redistribution of revenues for charitable purposes.

With the development of capitalist economies and an increased need by governments and charitable institutions for cash, lotteries truly began to flower in the 16<sup>th</sup> and 17<sup>th</sup> centuries, particularly in the developed urban centers of northern Italy. In 1522, a Venetian diarist wrote that a second-hand clothes dealer named Geronimo Bambarara created “a new method of commerce” by offering a chance at carpets and money prizes for any who ventured an entry fee—at first only 20 *soldi*, then an entire *ducat*. Bambarara had created a monster. Before long, the entire Rialto district was filled with nothing but lottery hawkers and players, and the cash prizes had increased from 200 to 1,500 *ducats*.<sup>5</sup>

City authorities soon moved to suppress these raucous draws and corner the lottery business themselves. The Venetian Republic began running its own lotteries with prizes of cash, merchandise, real estate, and even government offices, including the right to collect taxes and tolls. The proceeds went to the benefit of poor young women, assistance for the generally

indigent, the redemption of hostage captives in foreign lands, and other noble endeavors. The sponsors of the new lottery also wished to offer a relatively benign form of gambling that had clear social utility, believing that if people were allowed a chance on this game, they would not play other, more pernicious games. But the lottery apparently only inflamed the gambling spirit, as non-lottery gambling merrily continued and, by the division of expensive tickets into shares, lottery betting spread to the less affluent. Governments became dependent on lotteries and, wishing to maximize their revenues, forbade citizens from buying tickets for foreign lotteries, paid some salaries in part with lottery tickets, and even made ticket purchases compulsory for guilds and other associations.<sup>6</sup>

The Venetian lottery, though it offered bettors a chance to score huge prizes, was hardly an exercise in instant gratification. Lottery drawings were drawn out, mind-numbingly anti-climactic, and far from efficient. Tickets were not numbered; each bettor instead wrote his or her name or personal motto on a slip of paper, which went into one urn. Into the other urn went slips of paper bearing the word *patientia*, patience, meaning “better luck tomorrow,” or *precio*, prize, and a description of the prize won. Blindfolded charity boys selected winners by simultaneously drawing slips from each urn. The draw, which did not end until all tickets had been pulled and matched, could take as long as eleven days.<sup>7</sup>

The Venetian version of the lottery quickly spread throughout Italy. The Genoese, not content to merely copy the Venetians, made substantial reforms in the lottery, spurred improbably by a change in election law. Each year, five new members of the ruling colleges were chosen by lot from a pool of candidates. In 1576, the Doge of Genoa, Andrea Doria, designed a new system more in spirit with the age. Doria proposed assigning each of the 120 candidates a number then simply drawing five numbers from an urn called the *seminario*. This

new system of selecting candidates proved an efficient electoral reform and, as a public, random drawing, offered an excellent opportunity for a lottery.<sup>8</sup> This electoral lottery became the basis for lotto-type games, which soon competed with draw lotteries.

Although betting on these election drawings was initially conducted on the sly, Genoa authorities ultimately took a piece of the action for the public coffers. Nor did the Genoese see any point in keeping all of the fun of the election lottery for themselves: they sent lottery agents to towns throughout Europe, particularly Germany, to sell tickets and award prizes.<sup>9</sup> Other Italian principalities, such as Venice, Milan, and Naples, copied the Genoese lotto model in 1665, and for a while it flourished both in Italy and Germany, without much modification, though the number of possible numbers was reduced from 120 to 90 through the years. Surviving initial papal denunciations, the lottery won a new measure of legitimacy when, in 1732, the papacy permitted the establishment of a Roman lottery in 1732.<sup>10</sup>

The original Genoese lottery lasted until the end of the 18<sup>th</sup> century in Germany, when most of the German states banned it, though lotto is alive and well in Italy, where a national lottery came in 1863, fast on the heels of Italian unification, and continued into the 21<sup>st</sup> century. The lottery became one of the most durable gambling forms in the world, flourishing on every continent (with the exception of Antarctica) and helping hundreds of national, state, and local governments finance a variety of programs.

#### The Ridotto paves the way...

While some were content to play the lottery, others sought more immediate gambling thrills. Dice games have been popular since around since at least the 7<sup>th</sup> century B.C., and cards became popular in Europe in the late 14<sup>th</sup> century. With the upswing in commerce of the 16<sup>th</sup>

and 17<sup>th</sup> centuries, it was only a matter of time people a crafty group of innovators hit upon a formula for turning these games into businesses.

The Venetian Republic was the setting for the transformation of cards and dice games into mercantile games that would be as profitable as the lottery. Europe's most economically, socially, and culturally advanced region, Northern Italy was a cradle of mercantile gambling. Venetians were long familiar with gambling. One historian has paralleled the risky nature of maritime commerce, the city's stock in trade, with the establishment of a gambling spirit, even conjecturing that when the sea-going trade started to diminish, Venetian nobles took up gambling with cards and dice out of habit.<sup>11</sup> Gambling was certainly engrained into the culture of Venice; in 1229, for example, when an election to the office of doge (duke) ended in a tie, the two candidates decided the contest by a test of chance, possibly a toss of the dice. Venice was one of the first centers of card-playing as well.

During Carnival season, which sometimes lasted from October to March, gambling was openly tolerated, and despite laws contrary to it, it flourished through the rest of the year as well. Less affluent Venetians enjoyed card and dice games in public places, such as street corners, bridges, grand squares, and wine shops. Though these games were occasionally disrupted by the police and convicted gamblers could face fines and imprisonment, they usually ran more or less openly. Members of the nobility offered a more refined setting for their gambling: at private parties, they presented their guests with games of chance and, as most were politically well connected, these games were rarely stopped by police.<sup>12</sup>

Municipal edicts banning gambling did nothing to stop its dramatic transformation in the 16<sup>th</sup> century. By 1567, legislation specified a new danger: the *ridotti* of nobles, places where gambling took place. The word *ridotto* is likely derived from *ridurre*, to reduce or close, or to



make private. Generally, a *ridotto* could be anything enclosed place—a top-secret meeting of government officials, or a private suite of rooms in a larger domicile. But the word soon came to suggest a semi-private place for gambling, dancing, eating, and gossip. These notorious houses remained the haunts of the aristocracy. For the rest, inns and other public places continued to serve as convenient gathering places.<sup>13</sup>

By the turn of the 17<sup>th</sup> century, anti-gambling laws reflected a change in the status of *ridotti*. They were no longer merely places where nobles permitted gambling and drinking: they had become places where nobles, by taking a portion of the money staked, profited directly from gambling. The nobles apparently had specialized dealers, for the Executors against Blasphemy (*Escutori contro la bestemmia*) prosecuted both nobles who owned *ridotti* and their employees who actually ran the games.<sup>14</sup>

Chief among the games of the *ridotti* was *bassetto* or basset, a Venetian game that was invented in the late 16<sup>th</sup> century. The game of basset, notably, was a game without even the pretense of equality between the dealer/banker and the bettor—a quintessential mercantile game. In addition to its main bet, where the player tried to guess whether a card would be dealt to the player or dealer pile, basset also featured a series of long-shots that, though they paid off handsomely, were extremely unlikely. If a player bet his money on the king, for example, and had the first king in the deck placed in the player's pile, he could either collect three-to-one on his money or let his bet ride and hope to get the king when it was dealt again, in which case he would win seven times his original bet. If he won a second time, this bet, and the third, could also be kept alive: if he triumphed each time, he could collect up to thirty times his initial bet. This was known as the *paroli* (the origin of the English word “parlay”). Though the laws of

probability declared such an eventuality highly unlikely, the willingness of bettors to press on in hopes of a larger payout made basset an extremely profitable game—for the banker.<sup>15</sup>

The Ridotto differed from earlier gambling houses in that it featured mercantile games pitting players against the “house,” or the dealers’ financial backers. Earlier gambling houses, which were common as early as the late Republic in Rome and Vedic India, were places where players or game operators leased seats and equipment from the management. They usually featured social games. The facility in question usually made only a small portion of its income from gambling, and often gave customers gambling equipment as an inducement to eat and drink more—precisely the opposite of current casino comping policies.

*Ridotti* flourished, and, frustrated at the inability of the Venetian Inquisition to eliminate the gambling dens, the Great Council embarked on a novel plan—the legalization of gambling, at least during Carnival, within a single specified free zone. In 1638, the Great Council opened the *Ridotto* in the San Moise Palace, a four-story building owned by Marco Dandolo. This was the first legal, state-sanctioned public gambling house in European history—from this notable edifice that today’s casino industry can rightfully claim descent. The opening of the *Ridotto* represented a historic union between mercantile gamblers, who ran games for profit, and government, who sought to legitimize the gamblers for purposes of public order and revenue enhancement.

Upon entering the *Ridotto*, one could visit two small rooms, one selling stimulating refreshments (coffee, tea, and chocolates), and another which dispensed cheese, wine, fruit, and sausage. Past this initial vestibule one entered the Long Hall, a two-story room whose ceiling was painted with Gerolamo Colonna’s *The Triumph of Virtue*, perhaps a warning against cheaters. Along the sides of the Long Hall, one found basset tables at which members of

impoverished clan of noblemen known as the *barnabotti* or Barnabots dealt cards and took wagers. The Barnabots, despite having limited financial means, were as noble prohibited from regular employment, living at the public expense in the parish of St. Barnabas. Granting them the *Ridotto* monopoly was a step towards minimizing the public cost of maintaining them—an early example of public interest gambling.<sup>16</sup> According to Venetian law, the Barnabots who dealt games had to wear black robes and shoulder-length wigs. As these poor nobles at first lacked the money to bank games themselves, wealthier nobles or merchants sometimes put the Barnabots on salary, bankrolling their games in exchange for the lion's share of the profits.<sup>17</sup>

Off the Long Hall, about six smaller rooms offered even more tables for basset, *biribisso* (the leather-sack version of roulette that the French called *biribi*), and a now-obscure Italian card game known as *panfil*. The windowless Long Hall was lit by six-armed chandeliers that hung from the ceiling and a municipally-specified two candles on each table. All gamblers, except for members of the nobility, had to wear masks while gambling, something that clearly ties the legality of the *Ridotto* to the permissive spirit that reigned at Carnival. The *Ridotto* began admitting customers between eight or ten in the morning, depending on the season, and stayed open until well past midnight; its votaries often emerged only in the morning, blinking in the sudden sunlight as the rest of Venice began its work day.<sup>18</sup>

Though anyone wearing proper attire (a three-cornered hat, cape, and mask for men) could enter the *Ridotto*, the high minimum stakes served to restrict its play to the wealthy. Men and women (especially noblemen) were expected to gamble with a phlegmatic detachment that forbade both bettors and bankers from expressing even the slightest dismay at an astounding loss or the tiniest excitement over a victory. The *Ridotto* was nevertheless an exciting mishmash of Venetian society, with nobles, prostitutes, pimps, usurers, police informants, and degenerate

gamblers mixing with curious visitors. The anonymity of the masked Carnival atmosphere no doubt lowered inhibitions. Those seeking adventure outside the bonds of marriage were seldom disappointed at the *Ridotto*. Its “Chamber of Sighs” was a famously darkened room upon whose couches unlucky gamblers could moan with despair, and lovers with passion.<sup>19</sup>

The profit generated by the *Ridotto* for the Barnabots and the Venetian government only grew over the years. At the insistence of the city authorities, the *Ridotto* was enlarged in 1768 using money confiscated from convents, outraging the “social conservatives” of the era. A second legal *ridotto* opened at the San Cassian Theater, though the *Ridotto* at San Moise remained the focal point of the city’s gambling. The *Ridotto* changed its games to keep up with the times. About midway through the 18<sup>th</sup> century, basset began to lose popularity at the expense of faro, a game that would remain popular in Europe and the United States for the next century and a half.

The combination of the Venetian mania for gambling with the house advantage of the *Ridotto*, led to a sad phenomenon: nobles playing themselves into bankruptcy. Fortunes accumulated over generations were lost at the *Ridotto* and furniture, artwork, and even palaces were pledged to money-lenders in order to secure funds for more gambling.<sup>20</sup>

Perhaps alarmed by the growing impoverishment of its aristocratic families, the Great Council of Venice eventually took action. A reform-minded Barnabot named Giorgio Pisani urged his colleagues that, “to preserve the piety, sound discipline, and moderate behavior” of Venetian society, they had to close the *Ridotto* and end the experiment in legal public gambling. On November 27, 1774, by a vote of 720 to 21, the Council passed the measure, though, according to Casanova, its members had not intended that to be the case: each felt that since there would naturally be a majority of votes opposed to the bill, he could support it and thus

claim the moral high ground. When the vote was announced, according to Casanova, the Solons blankly looked at each other, stupefied at the calamity they had just authored.<sup>21</sup>

After 136 years, the *Ridotto* was silent. The wife of a French gambler penned an epitaph for the *Ridotto* when she declared that, with its closure, Venice had been gripped by a morbid depression: “usurers look as sour as lemons, shop-keepers can’t sell a thing, mask-makers are starving, and the Barnabot noblemen, accustomed to dealing cards ten hours a day, find their hands are withering away. Clearly, no state can keep going without the aid of vice.”<sup>22</sup>

Yet the closure of the *Ridotto* did not mean the end of Venetian gambling, but only a new beginning. From its former center at San Moise, gambling spread to over a hundred illicit *ridotti* and *casini*. Originally, a *casino* was a small house used as a gathering place by a group of people: a club-house. The first references to *casini* appear in the early 17<sup>th</sup> century, and *casini* soon became centers for gambling and gossip. The closure of the public *Ridotto* increased the number of these little houses: by the end of the century, there were 136 operating in Venice.<sup>23</sup>

From Venice, the idea of a government-sanctioned gambling house which allowed players to test their mettle against the house at mercantile games migrated to France, where semi-legitimate gambling houses became common in Paris. *Academies de Jeux*, or gaming academies, had first appeared during Henry IV’s reign (1574-1589), but these were likely gathering places for social gamblers.<sup>24</sup> Gambling expanded, and by the early 18<sup>th</sup> century, it was said that three-quarters of the nation thought of nothing but cards and dice.<sup>25</sup>

During the Regency of Louis XV, licensed gambling houses known as *maisons de jeux* became fixtures of the Paris cityscape. They commonly glided by official prohibitions by maintaining a pretense of offering only card games requiring skill, collectively known as *jeux de commerce*. Games of pure chance, or *jeux de hazard*, also flourished in the *maisons de jeux*.

Popular games included basset/faro, *biribi*, and *lansquenet*—all of them bank games, indicating that mercantile gamblers ran the houses. Gamblers also plied their trade without even superficial fear of the police at two seasonal fairs and within foreign embassies. In addition, hundreds of ostensibly illegal gambling rooms were widely known, proclaiming their existence by telltale lights at their entrance.<sup>26</sup> The Revolution did not close these houses, and they were only shuttered by the comprehensive 1837 ban on French gambling.

But by that time, gambling houses had migrated again, this time to isolated health resorts. At these spas, which included the eponymous Spa in today's Belgium, Bath in England, and numerous resorts in today's Germany along the Rhine, gambling at mercantile games was a chief diversion. In these resorts, many of the currently accepted aspects of casinos, including complimentary food and beverage and all-star entertainment, became the norm.

While the casinos of today don't feature masked players or wigged dealers, they owe a tremendous debt to Venice's *Ridotto*. In the Most Serene Public, the first marriage between card players and government revenue agents took place. Later operators would refine the *ridotto* model for legal public gambling, and by the 20<sup>th</sup> century, several governments would conclude that gamblers made excellent partners. The 136-year experiment of Venice has, indeed, been vindicated.

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<sup>1</sup> William Hone. *The Every-Day Book, or Everlasting Calendar of Popular Amusements, Sports, Pastimes, Ceremonies, Manners, Customs, and Events, Incident to Each of the Three Hundred and Sixty-Five Days, in Past and Present Times*. London: William Hone, 1827. 1529

<sup>2</sup> C. L'Estrange Ewen. *Lotteries and Sweepstakes: An Historical, Legal, and Ethical Survey of Their Introduction, Suppression, and Re-Establishment in the British Isles*. New York: Benjamin Bloom, 1972. 24-28.

<sup>3</sup> See Raymond de Roover. *Money, Banking, and Credit in Medieval Bruges: Italian Merchant-Bankers Lombards and Money-Changers, A Study in the Origins of Banking*. Cambridge, Massachusetts: The Medieval Academy of America, 1948.

<sup>4</sup> Hone, 1531.

<sup>5</sup> Adrian Seville. "The Italian Roots of the Lottery." *History Today*. March 1999. 17-18.

<sup>6</sup> Hone, 1531.

<sup>7</sup> Seville, 18.

<sup>8</sup> Seville, 18.

<sup>9</sup> Hone, 1534-1535.

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<sup>10</sup> Seville, 19.

<sup>11</sup> Maurice Andrieux. *Daily Life in Venice in the Time of Casanova*. London, 1972. 130.

<sup>12</sup> Russell T. Barnhart. "Gambling with Giacomo Casanova and Lorenzo Da Ponte in Eighteenth Century Venice—The Ridotto: 1638-1774." In Russell T. Barnhart Papers, University of Nevada Reno Special Collections. Box 14. 2. Cited as Barnhart (Casanova).

<sup>13</sup> Jonathan Walker. "Gambling and Venetian Noblemen." *Past and Present*. No. 162. February 1999. 32-33; Barnhart (Casanova), 2.

<sup>14</sup> Walker, 34.

<sup>15</sup> Parlett, 77.

<sup>16</sup> Barnhart (Casanova), 13.

<sup>17</sup> Barnhart (Casanova), 4-5.

<sup>18</sup> Barnhart (Casanova), 4-5; Maurice Rowdon. *The Fall of Venice*. London: 1970. 45.

<sup>19</sup> Barnhart (Casanova) 16.

<sup>20</sup> Andrieux, 131.

<sup>21</sup> Andrieux, 131; Barnhart (Casanova), 20.

<sup>22</sup> Barnhart (Casanova), 20.

<sup>23</sup> Barnhart (Casanova), 4.

<sup>24</sup> Andrew Steinmetz. *The Gaming Table: Its Votaries and Victims, in All Times and Countries, Especially in England and in France*. Originally published 1870. Reprint published in Montclair, New Jersey: Patterson Smith, 1969. 85.

<sup>25</sup> Steinmetz, 99.

<sup>26</sup> Kavanagh, 30-31.