



**LEGAL OPINION ON WHETHER 'RUMMY' IS A GAME OF SKILL OR
CHANCE?**

Our Ref: 32444/G-1

Date: June 16, 2025

Disclaimer: The opinions herein contained are based on the limited facts provided by the Client and as per the applicable laws at the time of drafting the opinion. This document and its contents are strictly confidential and may not be disclosed to any third party without due authorisation and prior permission, or presented before any court or tribunal within or without the territory of India.

ANAND AND ANAND
Advocates
Date: Jun 16, 2025
Signature: [Handwritten Signature]

A. ABOUT ELEVIO SOLUTIONS PRIVATE LIMITED

1. ELEVIO SOLUTIONS PRIVATE LIMITED is a company incorporated under the Companies Act, 2013 having address at 5-2-64/7/E/A/1, JALAL BAGH SANGAREDDY, Sangareddy, Sangareddy, Medak- 502001, Telangana.
2. ELEVIO SOLUTIONS PRIVATE LIMITED has launched an online gaming platform through its website www.winrummygames.com and an app named TF RUMMY.

CLIENT QUERY: Whether 'Rummy' is a game of skill or chance?

B. FOCUS AREA OF THE PRESENT OPINION

1. The present opinion clarifies the settled legal position on whether a game of 'Rummy' is considered to be a game of skill or chance by way of landmark legal precedents.
2. Considering that ELEVIO SOLUTIONS PRIVATE LIMITED is providing an online gaming platform for 'Rummy', the present opinion also clarifies how the settled principles of law on whether a game of 'Rummy' is a game of skill or chance apply to an online game of 'Rummy'.

C. GENERAL RULES OF A GAME OF 'RUMMY'

The general game play rules for a physical game of rummy as available on Wikipedia at <https://en.wikipedia.org/wiki/Rummy> are as follows:

- i. Each player is randomly distributed a total of 13 cards from a shuffled deck
- ii. The players are supposed to arrange the 13 cards in a valid set and two sequences which could be pure sequence or impure sequence
- iii. The players form these sets and sequences by drawing or discarding a card as the need be
- iv. The first one to form these sets and sequences can declare and win the game

We have been informed that ELEVIO SOLUTIONS PRIVATE LIMITED is operating an online gaming platform for playing an online game of 'rummy' using the actual rules of RUMMY.

I. ABOUT THE PUBLIC GAMBLING ACT, 1867

- The Public Gambling Act, 1867 contains provisions on *inter alia* public gambling specially with respect to imposing penalties on gambling and related activities. However, Section 12 of the said Act states “*Nothing in the foregoing provisions of this Act contained shall be held to apply to any game of mere skill wherever played.*”
- In other words, if gaming or related activities are found to be a ‘game of skill’, such activities are protected from the penalty and other stringent provisions of the said Act.

II. JUDICIAL PRONOUNCEMENTS ON ‘WHETHER RUMMY IS A GAME OF SKILL OR CHANCE?’

1. Over the years, the Indian Courts have dealt with the question ‘*whether rummy is a game of skill or chance?*’ by way of various judicial pronouncements. The said question was thoroughly dealt with by the Hon’ble Supreme Court of India way back in 1967 through its judgment in *State of Andhra Pradesh v. K. Satyanarayana & Ors.*¹. The salient findings of the said judgement are as follows:
 - i. The game of rummy is not a game of entirely chance like the “three-card” game like “flush”, “brag”, etc. which are games of pure chance;
 - ii. Rummy requires certain amount of skill because the fall of the cards has to be memorized and further skill is required in holding and discarding the cards;
 - iii. Rummy is mainly and preponderantly a game of skill
 - iv. There is an element of chance as far as the distribution of cards is concerned. However, this alone is not sufficient to hold that it is a game of chance.

Hence, on the basis of the decision rendered by the Hon’ble Supreme Court, a conclusion can be drawn that ‘rummy’ is to be treated as a different game in comparison with other ‘three card’ game for the simple reason that the final outcome of a game of ‘rummy’ solely depends on the skill and expertise of the player.

2. The said legal position has remained unshaken since 1967 and have been quoted with approval by subsequent pronouncements of the Hon’ble Supreme Court. Reference may also be placed on another judgment of the Hon’ble Supreme Court of India in *Dr. K.R. Lakshmanan v. State of Tamil Nadu & Anr.*,²
3. The Hon’ble Supreme Court relied upon the findings of the *K. Satyanarayana case* and distinguished the ‘game of chance’ and ‘game of skill’ in the following manner:

¹ 1968 AIR 825

² (1996) 2 SCC 266

GAME OF CHANCE	GAME OF SKILL
<ul style="list-style-type: none"> • Determined entirely or in part by lot or mere luck. Eg., throw of dice, turning of the wheel, shuffling of cards • No human mind knows or can know the result 	<ul style="list-style-type: none"> • Elements of chance cannot be entirely eliminated • Success depends principally upon the superior knowledge, training, attention, experience, and adroitness of the player

On the basis of the said distinction made by the Hon'ble Court, the Hon'ble Supreme Court also observed that golf, chess, and rummy are considered to be a game of skill.

4. By placing reliance on the judicial pronouncement as mentioned above, it is evident that even though there is an element of chance involved in a game of 'rummy' when the dealer distributes the cards to the players. However, to establish whether a game is a game of skill or chance, one has to consider if the final success is dependent on the skill of the players or on pure chance. Since, in a game of 'rummy', the players use their skills and expertise to win, 'rummy' clearly falls under the category of a 'game of skill'
5. The findings returned by the Hon'ble Supreme Court have been relied upon by various High Courts across several jurisdictions to reinstate that Rummy is a game of skill. Details of some of the Judgements pronounced by various High Courts of India has been provided hereinbelow.
6. In *Fulsingh Naik Krida Mandir v. State of Maharashtra*,³ an F.I.R was registered for offences under the Maharashtra Prevention of Gambling Act, 1887 against Fulsingh Naik Krida Mandir, as its members were involved in playing 'Rummy'. The said F.I.R was quashed as the Hon'ble Court of Bombay agreed with the submissions made on behalf of Fulsingh Naik Krida Mandir that *"the individual members of the Petitioner were playing the game of 'Rummy' and since the game of 'Rummy' is not a game purely of a chance and is a game of skill, the offence could not have been registered against the petitioners"*.
7. Also, in another case before the Hon'ble High Court of Andhra Pradesh in *G.V.R. Family Club v. State of Andhra Pradesh*,⁴ a batch of writ petitions were filed by various Clubs seeking directions for the State Government to permit these clubs to organize and conduct the game of 'Rummy'. The Hon'ble High Court of Andhra Pradesh relied upon the *K. Satyanarayana case* and the *Dr. K.R. Lakshmanan case* which held that 'Rummy' is a game of skill. By placing reliance on the two judgements of the Hon'ble Supreme Court, the Hon'ble High Court directed the State Government to not interfere with any card game of 'Rummy'.

³ 2017 SCC OnLine Bom, 10354

⁴ 2011 SCC OnLine AP 1281

8. In another case before the Hon'ble High Court of Andhra Pradesh in *D. Krishna Kumar & Anr. V. State of Andhra Pradesh*,⁵ an F.I.R. was filed against the management of a Club on the ground that it was making huge profits by allowing people to play a game of 'Rummy' in contravention of the Andhra Pradesh Gaming Act, 1974. The Hon'ble High Court of Andhra Pradesh relied upon the *K. Satyanarayana case* and the *Dr. K.R. Lakshmanan case* which held that 'Rummy' is a game of skill. By placing reliance on the two judgements of the Hon'ble Supreme Court, the Hon'ble High Court held that "it is clear that conducting card room where members and guests play the game of rummy (13 card game) with stakes/syndicate would not attract the provisions of the Act."
9. Further, recently the said question was also dealt with in detail by the Hon'ble High Court of Madras in *Junglee Games India Pvt. Ltd. V. State of Tamil Nadu*,⁶ The Hon'ble High Court of Madras made the following important observations:
 - i. Every game depends on an element of chance.
 - ii. There is no doubt that both rummy and poker are games of skills as they involve considerable memory, working out of percentages, the ability to follow the cards on the table and constantly adjust to the changing possibilities of the unseen card.

The Hon'ble High Court of Madras quoted with approval the judgements of the Hon'ble Supreme Court in the *K. Satyanarayana case* and the *Dr. K.R. Lakshmanan case* as mentioned above and confirmed that 'rummy' is a game of skill.

D. APPLICABILITY OF THE SETTLED LAW ON ONLINE 'RUMMY' GAME

Since ELEVIO SOLUTIONS PRIVATE LIMITED has launched an online 'rummy' gaming platform, it is imperative to assess the application of the legal principles on whether 'rummy' is a game of skill or chance on an online version of 'rummy' as have been returned by various Indian Courts some of which have been mentioned above.

The said question was recently dealt with in detail by the Hon'ble High Court of Madras in *All India Gaming Federation v. State of Tamil Nadu*, 2023 SCC OnLine Mad 6973. The Hon'ble High Court made the following important observations:

- i. The games of rummy and poker, which are considered as games of skill are also now sought to be played online. In online games of rummy and poker also, the same brain activity would be involved as required for offline games of rummy and poker.

⁵ 2002 (3) A.P.L.J. 211 (HC)

⁶ 2021 SCC OnLine Mad 2762

- ii. The Respondents raised a question that bots may be used or the dealer i.e the software in this case would know the cards. The argument was rejected by the Hon'ble Court for being insufficient.

However, it is pertinent to note that one of the important contentions which were raised by the State that in a game of online 'rummy', the opponent players may be replaced by bots. In such case, the chances of the human player winning would significantly get impacted. The said findings were returned by the Hon'ble Supreme Court on the basis that all the players in an online game of 'rummy' are real human beings. Since, the State would not support their argument on use of bots by way of any cogent reasoning, the same was not taken into account but the question of left open. Hence, the said findings may change in a case where bots are used.

E. OUR ANALYSIS

In conclusion, while the game of rummy does involve an element of chance due to the shuffling and distribution of cards, this chance factor is negligible in determining the outcome of the game. The primary determinant of success in rummy is the player's skill. Indian courts have consistently recognized rummy as a game of skill, a view that has remained steadfast over time. This legal perspective extends to online versions of the game, affirming that online rummy is also considered a game of skill. Therefore, both traditional and online rummy should be regarded as games of skill under Indian law.

Your sincerely,

Date:

★ Signature:

Omesh Puri

Advocate

Enrolment No.: D-2535/2006

First Channel Building Plot No. 17 A Sector 16 A

Film City | Noida 201301 (UP) | India

Phone +91.120.4059300

Omesh@anandandanand.com

www.anandandanand.com

Registered Office:

B - 41, Nizamuddin East | New Delhi 110 013 | India