1. Purpose

This policy statement establishes clear operational directives regarding fundraising events, raffles, and games of chance conducted by parishes, schools, and affiliated entities. The objective is to ensure full legal compliance with Maryland charitable gaming laws and maintain alignment with guidance from the State Attorney General.

2. Background & Legal Guidance

Questions recently arose regarding whether parishes and schools may determine winners for local games of chance or raffles using winning numbers drawn from external sources (such as the State of Maryland lottery or out-of-state lotteries).
Following formal consultation with legal counsel (Gallagher LLP) and review of Maryland Attorney General guidance:

- **Distinction Between Charitable Gaming and Unlawful Gambling:** Maryland law classifies qualified nonprofit raffles and prize drawings as permissible "charitable gaming." However, the Maryland Attorney General has advised that determining a winner based on an external event or lottery crosses the legal threshold into **unlawful gambling**.
- **Ticket Pool Requirement:** To qualify as lawful charitable gaming, winning numbers/tickets **must be drawn at random from the pool of tickets or entries actually sold by the sponsoring charitable organization.**
- **County Regulation:** While individual counties administer local gaming permits and rules, county permits do not override or shield organizations from state-level Attorney General determinations regarding external lottery numbers.

3. Policy Directives

1. **Strict Prohibition on External Lottery Numbers:**
   Parishes, schools, and affiliated organizations are **strictly prohibited** from sponsoring, hosting, or participating in any raffle, game of chance, or fundraiser that relies on external lottery results (state, multi-state, or out-of-state) to select winners.
2. **Requirement for Internal Drawing:**
   All permissible charitable gaming activities must derive their winners strictly from the specific tickets sold or from internal, self-contained random number generator software operated by the parish, school, or affiliated organization that draws the winner from the pool of sold entries.
3. **Approved Alternatives for Number Generation:**
   Locations seeking to run legal games of chance or raffles may utilize:
   - Traditional live ticket/stub drawings.
   - Internal, self-contained random number generator (RNG) software or applications managed directly by the hosting location for its own ticket pool that draws the winner from the pool of sold entries.
4. **County Permitting Compliance:**
   All organizations must continue to secure and adhere to all local county gaming permits and rules prior to conducting any charitable gaming activity.

4. Implementation and Assistance

All locations currently operating or planning fundraising activities that utilize external lottery numbers must transition as soon as reasonably possible to compliant drawing methods.
For questions regarding county gaming permits or compliant drawing methods, please contact the Office of Risk Management at riskmanagement@archbalt.org