

# **\$HOW ME THE MONEY!**

## **NOT SO FAST.....**

**Many organizations at Edwards Air Force Base plan **RAFFLES** to raise money for their organizations or to raise money for outside charities. Raffles, however, are highly regulated by Department of Defense regulations and Air Force Instructions. In fact, raffles are only allowed in the very narrow circumstances outlined below. EDUCATE YOURSELVES! Help your organization and EAFB stay within the ethical confines of the law.**

**Unofficial private activities/organizations** may not conduct games of chance, lotteries, raffles, or other gambling-type activities under any circumstances. AFI 34-223, para 10.15.

**Official activities/organizations** (those sponsored or sanctioned by an official part of the Air Force) may not conduct raffles, or any other type of fundraiser.

**Private Organizations** (POs) may not conduct games of chance, lotteries, raffles, or other gambling-type activities except as provided in paragraph AFI34-223, para 10.16.

According to AFI 34-223, para 10.16, those POs which are composed primarily of DoD personnel or their family members may conduct fund-raising raffles on an Air Force installation on an occasional, infrequent basis when authorized in advance by the installation commander if they meet all the requirements outlined in the AFI (see below). PO raffles must be reviewed by 95 FSS and the EAFB Legal Office.

Raffles may not violate the law of the city, county, state, or country in which the installation is located and must comply with any applicable requirements of such laws. In California, only “eligible organizations” may have raffles. CA Attorney General’s, <http://oag.ca.gov/charities/raffles>. An “eligible organization” is defined in CA Penal Code section 320.5, subdivision (c) as a “private, nonprofit organization that has been qualified to conduct business in California for at least one year prior to conducting a raffle and is exempt from taxation pursuant to Sections 23701a, 23701b, 23701d, 23701e, 23701f, 23701g, 23701k, 23701l, 23701t, or 23701w of the Revenue and Taxation Code.” Unless specifically exempted, a nonprofit organization must register with the Attorney General's Registry of Charitable Trusts prior to conducting the raffle and file financial disclosure reports on each raffle event. Forms for registering and reporting activities are provided on this web page. There may be additional registration and reporting requirements if an organization is deemed “eligible.”

Additionally, raffles must be for the benefit of DoD personnel or their family members. Raffles may not be authorized to raise money for local or national groups such as a regional or national Heart or Cancer Association whose funds would not benefit primarily DoD personnel or their family members. To be approved, raffles must serve a charitable, civic, or other community welfare purpose within the DoD community and which directly benefit DoD personnel or their family members.

Raffles will NOT be approved if they are to raise funds for purely social, recreational, or entertainment purposes which benefit only individual PO members and/or their family members, such as to underwrite the cost of a weekend ski trip, a sight-seeing tour, or a shopping excursion will not be approved.

It is important to note that a request for approval to conduct a raffle must identify the purpose for which funds are being raised and the intended beneficiaries of the proceeds. It must also identify how the PO will ensure the proceeds are used only for that purpose and those beneficiaries. Raffles at EAFB may NOT be held in the workplace and may not be officially endorsed or supported except as permitted by sections 3-210 and 3-211 of the JER. They may, however, be conducted at public entrances and in community support facilities such as the lobby of the Base Exchange as long as the Installation commander approves.

Military members and civilian employees may not conduct raffles during their duty time, nor may military members be in uniform during a raffle. Air Force personnel may participate in PO fundraising raffles only in a purely personal, unofficial, volunteer capacity at authorized locations and in ways that do not imply official endorsement.

Properly conducted, raffles provide a means of extending needed services or other assistance to members of the DOD family, but failure to strictly follow state and local laws and the provisions in paragraph 10.16 could result in the raffles violating the general gambling prohibition in DoD 5500.7-R, Joint Ethics Regulation.

For more information or if you have questions, please call the EAFB Legal Office at DSN 527-4310 or send your question to [afftc.ja.generallaw@edwards.af.mil](mailto:afftc.ja.generallaw@edwards.af.mil).