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HB 1226

March 5, 2026

TO: Members of the House Judiciary Committee
FROM: Nina Themelis, Director of Mayor's Office of Government Relations
RE: House Bill 1226 -Maryland Illegal Online Gambling Enforcement Act

POSITION: SUPPORT WITH AMENDMENT

Chair Bartlett, Vice Chair Davis, and Members of the Committee, please be advised that the Baltimore City Administration (BCA) **supports with amendment**, House Bill (HB) 1226.

As the Baltimore Sun noted in an editorial last week, "Maryland has a gambling problem." (<https://www.baltimoresun.com/2026/02/26/maryland-gambling-problem/>). The piece notes that gambling addiction is on the rise, particularly among unmarried Black and Hispanic men. The increase in those reporting addiction has tracked with the rise of the availability of online gambling.

Baltimore City, through its Affirmative Litigation Division, has been investigating problematic conduct by online gambling platforms, and has brought actions against some actors alleging violations of its local unfair, deceptive, and abusive trade practices ordinance (which mirrors the Maryland Consumer Protection Act).

Of particular concern to Baltimore City are the "sweepstakes games" referenced in this bill, wherein a dual-currency system is used to essentially skirt gambling regulations by using one currency for betting that can be traded in for money. They effectively operate as a gambling site—a payment in exchange to play a chance game to win money—but misnomer themselves as a "sweepstakes" to evade not only government restrictions but consumer protections. Some of the protections that are absent are robust age verification systems to prevent minors from participating and participation in Maryland's Voluntary Exclusion Program (which allows problem gamblers to cut themselves off).

Baltimore City's position is that these sites are already engaging in unfair, deceptive, and abusive trade practices in their operations, but this bill will make it easier to prove those violations by making the mere unauthorized operation of such a site in Maryland a violation of the Consumer Protection Act.

There is no apparent downside to providing the Attorney General with the ability to pursue these violators more easily under the Consumer Protection Act. Not only do they take financial advantage of Maryland residents, but they contribute nothing in return. They pay no gaming taxes, nor do they contribute financially to gambling treatment or addiction services as licensed casinos do.

Baltimore City does suggest an amendment to the bill. Because social casinos are creating new games beyond traditional casino games on which to gamble, we recommend adding the following bolded and underlined language to this section of the bill:

9-1f-01(I)(2)(I)-(III). CASINO–STYLE GAMES, INCLUDING SLOT MACHINES, VIDEO 30 POKER, AND TABLE GAMES SUCH AS, **BUT NOT LIMITED TO**, BLACKJACK, ROULETTE, CRAPS, AND POKER; 4 HOUSE BILL 1226 1 (II) LOTTERY GAMES INCLUDING, **BUT NOT LIMITED TO**, DRAW GAMES, INSTANT WIN 2 GAMES, KENO, AND BINGO; AND 3 (III) SPORTS WAGERING.

As such, the BCA respectfully requests a **favorable report with the above amendments** on HB 1226.