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Behind the Whistle: The Alleged Yellow Card Trick
in Football Spot-Fixing

- Professor Jack Anderson

Betting on Change: How COVID-19 Supercharged
Sports Betting in South Africa

- Professor Steve Cornelius

Fighting the Odds: A Toolkit for Regulators to
Combat Illegal Betting

- Martin Purbrick

Behind the Whistle: The Alleged Yellow Card Trick in Football Spot-Fixing

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This article focuses on recent investigations (sporting and law enforcement) into alleged betting conspiracies in football (soccer) predicated on a player agreeing, or being bribed, to spot-fix by way of deliberately obtaining a yellow card. By doing so, the player may permit, either on their own behalf or in conjunction with others, the accompanying betting markets on that game to be exploited for illicit financial gain. Recent examples from the UK, Brazil, Spain and Australia are discussed. There are some concluding remarks on what all sports bodies can learn from these examples in order to mitigate the threat posed by this type of spot-fix. It will also be noted how the illegal betting markets can exacerbate football's vulnerability to this type of conspiracy which undermines the integrity and reputation of the game and defrauds those consumers who bet legally.

UK

There is a long history of match-fixing – a conspiracy among players to fix in advance the final score or an element of the game to make illicit gains on the gambling markets – in football. Infamously, in 1915, a game between Manchester United and Liverpool was fixed leading to a criminal investigation and life bans for some of those involved.¹ In the 1960s, a number of England internationals were convicted for their part in an illegal betting conspiracy in which they were bribed to fix games.² In 2013, the National Crime Agency (NCA) arrested several individuals – players, an agent, and a number of fixers of Singaporean nationality – on charges of conspiracy to defraud, emanating from a scheme which, by gaining inside information from players and a commitment by them to fix a match accordingly, the odds of an Asian handicap (a no-draw handicap bet based on the offer of a deficit or an advantage to the favourite or the underdog) could be manipulated.

In 2014 and 2015, those involved were convicted and jailed.³ One of the players involved, Moses Swaibu, then 25, was central to a 2024 BBC podcast ([Confessions of a Match Fixer](#)) in which he described the means and motives underpinning the conspiracy.⁴

A feature of the NCA investigation in 2013 was that the players involved would deliberately set out early in the game to obtain a yellow card (a caution, usually for foul play on an opponent or dissent towards a referee) as a means of indicating to their co-conspirators that the fix was on and that the players would be working towards securing a result to profit from the Asian handicap on the game.

In 2017, the football authorities in the UK (the FA) were faced with a slightly different, stand-alone situation of a player deliberately obtaining yellow cards in games having informed others in advance to bet heavily but specifically on that outcome.⁵ The player, Bradley Wood, received a six-year suspension from the FA in a decision that relied on phone records, and evidence of irregular betting patterns supplied by licensed operators.⁶

Brazil

The players involved in the 2013 conspiracy in the UK played at a semi-professional level in England, while Wood played in the lower leagues of the professional code with Lincoln City. In contrast, in May 2024, the FA announced that West Ham United midfielder Lucas Paqueta had been charged with misconduct offences after allegedly getting booked deliberately “for the improper purpose of affecting the betting market” in four separate English Premier League games.⁷ A first instance, sports tribunal hearing on the matter commenced in March 2025 (but has been adjourned and will not be completed until at least June 2025).

Paqueta is a Brazil international and gave testimony in late 2024 to an ongoing Senate Inquiry in that country on the manipulation of games and sports betting. The final report of the inquiry is being delayed until the FA deals with the Paqueta matter, though in February 2025 it recommended that criminal proceedings should be instigated against, among others, members of Paqueta’s family for, allegedly, bribing players to fix, or spot-fix in, games (by deliberately obtaining yellow cards), and all as part of a wider international illegal betting conspiracy.⁸ The Inquiry has also heard that illegal betting based on teams deliberately getting relegated has been a feature of the game in Brazil for some time as, allegedly, centred on a person known as William Rogatto. Rogatto is currently detained in Dubai, awaiting return to Brazil where he will have to testify to the Inquiry. He has claimed that he has earned BRL300 million (USD50 million) by manipulating results and further alleges to have “relegated” 42 football teams in Brazil.⁹

Spain

Another Brazilian player linked to yellow card spot-fixing by the Inquiry is Luiz Henrique, who played for Spanish club Real Betis for two seasons (2022-2024). The allegation is that Henrique, who is now back playing professionally in Brazil, received money transfers from Brazil (totalling BRL40,000 (USD7,000)) prior to him being booked on 28 January 2023, in a 1-0 win against Getafe and on 4 February, in a 4–3 defeat against Celta Vigo.¹⁰

Neither the law enforcement nor sporting authorities in Spain are investigating the above, though, in January 2025, it was announced that Sevilla defender, Kike Salas, was under criminal investigation for a gambling conspiracy premised on him deliberately obtaining yellow cards, so that acquaintances could make money on the accompanying betting markets. In mid-January 2025, Salas was arrested by Spanish police but later released without charge. He continues to be under judicial investigation.

The central allegation is that in the 2023/2024 season, he received 10 yellow cards; seven in the club's final nine games. Salas played in eight of those late season games, when Seville were no longer in danger of relegation and were, in football parlance, "safe" in the lower-mid ranges of the table, with little otherwise at stake in their games. The investigation also includes two friends of the Sevilla defender, who it is claimed, made around EUR10,000 over the period in question betting on Salas obtaining yellow cards.

Australia

In May 2024, three players playing for Macarthur FC in the A-League in Australia were arrested (and subsequently released on bail) by the NSW Police Organised Crime Squad Gaming Unit as part of the investigation of alleged manipulation of yellow cards during football games for gambling purposes. Central to the allegations is that one of the players, the captain, at the direction of an organised crime syndicate in South America, recruited two other players and paid them AUD10,000 to deliberately obtain yellow cards during A-League games and thus allowing illegal gamblers to profit on the betting markets. In February 2025, one of the players was, under the NSW Crimes Act which has specific anti-match-fixing provisions, charged with an additional three counts of facilitating conduct that corrupts betting outcome of event, engaging in conduct that corrupts betting outcome of event, and knowingly directing a criminal group in assisting crime.¹¹

Back in 2013, as the NCA in the UK investigated match-fixing in non- or lower league football, the authorities in Victoria, Australia were also investigating a similar conspiracy in football which involved UK players recruited by match fixers (based in Singapore and Malaysia) with promises of payments of AUD500 a week, to throw games for a club, Southern Stars, in order to exploit the Asian Handicap on games. Four players and a coach pleaded guilty to charges under the Crimes Act (Victoria), which, as in NSW, has specific anti-match-fixing provisions. The “at/on the ground” contact person for the match-fixers, a Singaporean called Segaran Subramaniam was also charged. The players and coach were banned from the game and fined as part of their criminal convictions. Noting Mr Subramaniam’s central role in the fix, and the wider international illegal betting conspiracy at play, Subramaniam was sentenced to three years’ imprisonment of which two were suspended.¹²

One of the players appealed and had his conviction overturned and, in comments that continue to have relevance a decade later, the County Court judge in Victoria explained her leniency in the following terms: “he found himself in a predicament not unlike ‘modern slavery’, where he wanted to escape the fixing but felt trapped by the syndicate as they controlled his accommodation and he was in a foreign country. He was also not being paid the promised AUD500 a week.”¹³

Staying in the state of Victoria in Australia, and exactly a decade after the above remarks; in December 2024 officers from Victoria police’s dedicated sports intelligence unit and anti-corruption detectives began an investigation (which included allegations relating to narcotics and the involvement of an organised crime group) into possible match-fixing and sports corruption offences at a semi-professional club (Dandenong Thunder) which plays in the National Premier League of Victoria, the state’s most senior competition (and, at the time, the second tier of Australian soccer). No charges have been laid as of yet.¹⁴

Concern that Victoria’s and Australia’s semi-professional football leagues may be vulnerable to infiltration by domestic as well as international organised crime groupings has existed for some time among state and federal law enforcement agencies: take, for example, the conviction of an alleged associate of Melbourne underworld figures for using inside information to facilitate an AUD4,000 multi-bet on a match between Dandenong Thunder and Melbourne City’s under-20 team in the National Premier League second division in August 2017.¹⁵ The multi-bet had two parts: the first on a horse race, which was successful; the second on Melbourne City to win, which was not. The allegation was that a Mr John Khoury, at half time in the football game, rang the coach of Dandenong Thunder to put in place tactical changes that might ensure a City victory (Dandenong had already won the league in question). The match ended in a draw. The bet would have realised over AUD40,000 if successful but despite that, and on a guilty plea, Khoury was fined a mere AUD750 for using inside knowledge for corrupt betting purposes.¹⁶ The coach in question, who did not in fact carry out the tactical adjustments, also pleaded guilty and avoided conviction.¹⁷

Conclusion

A yellow card against a player in football is a punishment for foul play against another or dissent against a referee but it also acts as a warning to the player that another infraction and they will be sent off. The potential for betting markets on yellow cards to be exploited by players supplying inside information (i.e., agreeing to and then obtaining a yellow card) to others in advance, who then place bets accordingly, must also serve as a warning to those who police football.

The exact prevalence of yellow card spot fixes in world football is unknown, though it is of note that in first half of 2024, on foot of a report by Chilean media outlet 24 Horas, the National Sports Commission in Chile announced an investigation into the fact that 764 yellow cards were issued across 119 matches during the first half of the National First Division season, marking the highest number in the past five years. There is a state monopoly on land and online betting in Chile, confirmed by a Supreme Court decision in 2023, and there is an ongoing debate in Chile as to whether such a monopolistic approach should be liberalised to one based on regulation and licensing. It may be the case that an overly restrictive gambling regulation regime may be driving gamblers towards the illegal markets and thus increasing the temptation to become involved in yellow-card conspiracies.¹⁸

Prevalence aside, players, at all levels of the game, but especially those at the lower levels or in countries where pay is irregular, must be educated on the dangers of agreeing to either share privileged information with others (even friends and family) or to carry out spot fixes (even for small amounts). As prop betting markets (allowing punters to wager beyond the standard full-game odds and bet on different aspects of a game) broaden in both the types of bets offered and their attraction to punters (both casual and professional) sport's vulnerability to spot-fixing increases.

Nevertheless, what marks out most of the successful investigations noted above is the following: (i) sporting organisations working, ideally through formal arrangements, with legal wagering operators to discuss or otherwise control the range of betting products that may be offered on a sport (from full game odds, to in-play betting to prop bets etc); (ii) sporting organisations working, ideally through formal arrangements, with legal wagering operators to monitor irregular betting patterns on aspects or outcomes of football games; (iii) sporting organisations having specific regulations and resources in place to pursue an investigation of (and if necessary punish) those involved once such betting-intelligence alerts are received; (iv) sporting organisations, again ideally through formal arrangements with single points of contact, having the capacity to quickly escalate such matters to law enforcement, if criminality is suspected; and (v) national law enforcement agencies having specialised capacity or units to pursue sporting crimes, as supported by both bespoke national criminal laws on sports corruption and as plugged into international law enforcement networks (such as Interpol) if the matter (as match-fixing in football can) raises transnational economic criminality involving organised crime groups.

And three final points.

The first is specific to sports bodies: where a player faces criminal charges, as here where a deliberately ploy by a player to receive yellow cards may conflate to a conspiracy to defraud, does that sports body have a specific policy as to whether the player should be suspended or otherwise “stood down” pending criminal trial or does the legal presumption of innocence trump all other regulatory or sporting concerns, or are matters dealt with by the sport on a case-by-case basis?

In the 2025 example from Spain above (Salas), the presumption of innocence has been applied such that the player continues to play for his club (Seville).¹⁹ In the 2024 example from Australia (Macarthur FC), the players have been issued by Football Australia with no-fault suspensions which will remain in place until the accompanying criminal matters have been concluded.²⁰

The Macarthur player suspensions are based on Clause 7 of Football Australia’s National Code of Conduct and Ethics ([2021](#)) which reads as follows:

“7. NO-FAULT INTERIM SUSPENSION

FA may immediately suspend a Constituent for a period on an interim basis and without any finding of fault pending investigation or determination of a matter in the following circumstances:

(a) in order to protect the safety and wellbeing of any Child or Adult at Risk where the matter involves consideration of a potential breach of clause 2.3 of this Code and where the balance of convenience, in FA’s reasonable opinion, warrants such interim suspension;

(b) where the Constituent has been charged with a serious criminal offence and the Constituent’s continued participation in Football may, in FA’s reasonable opinion, cause damage to the reputation of FA or Football generally; and/or

(c) any other circumstance where, in the reasonable opinion of FA, the reputation of FA or Football generally would be damaged if the Constituent was not suspended on an interim basis.”

Second, where a matter such as this is deemed sufficiently criminal as to merit prosecution, it remains difficult to prove such matters to the criminal standard. A recent example of this is from Scotland in 2023. A Scottish professional player, Kane Hester, was charged with various criminal offences arising out of a game between his team, Elgin City and Hibernian in 2019. It was alleged that Hester had agreed with friends to deliberately obtain a yellow card and the evidence at court showed that Hester was booked after 29 minutes of the match and bookmaker Bet365 paid out GBP13,583. The prosecution also provided evidence of group messages between Hester and his co-conspirators.

Hester told the police that he felt some pressure but not duress from his friends to engage in the illicit activity, which in a criminal sense equated to charges relating to unlawful receipt and cheating at gambling offences. Hester also explained to police that he was, as a semi-professional, in a precarious contractual position: he earned about

GBP1,000 per month as a footballer, but also made GBP1,300 as an electrician and GBP300 per month as a retained firefighter.

Hester was acquitted (his co-conspirators were charged separately), when according to reports the jury accepted that although Hester did appear before the game to go along with the conspiracy; nevertheless, the “jury accepted Mr Hester's claim during the trial, that he got caught up in the moment during the match and forgot about any agreement to deliberately get booked.”²¹ Hester was later given an eight-match ban by Scottish football authorities for breach of player betting regulations.²²

The final point is of more general concern: irrespective of whether a criminal or sporting sanction is ultimately imposed, the chief characteristic of a successful investigation into the allegation of a yellow card-related spot fix is epitomised by sport working with law enforcement and legal wagering operators. This has to be starkly contrasted with how such yellow card conspiracies might be aggravated if they involved illegal betting operators and the associated black and grey illegal wagering markets.

Such operators exist in the transnational shadows. They evade regulation and taxation. Punters who engage with them do so outside the norms of consumer protection and are vulnerable to identity theft, fraud and money laundering. Such illegal operators have no obligation or inclination to supply information on irregular, or indeed any, betting patterns on games nor do they have any working relationship with sporting organisations or law enforcement. It is quite the opposite. And that is why the illegal betting markets pose such a threat to football and to sport.

Any engagement with illegal betting operators should, in football parlance, be given a straight red.

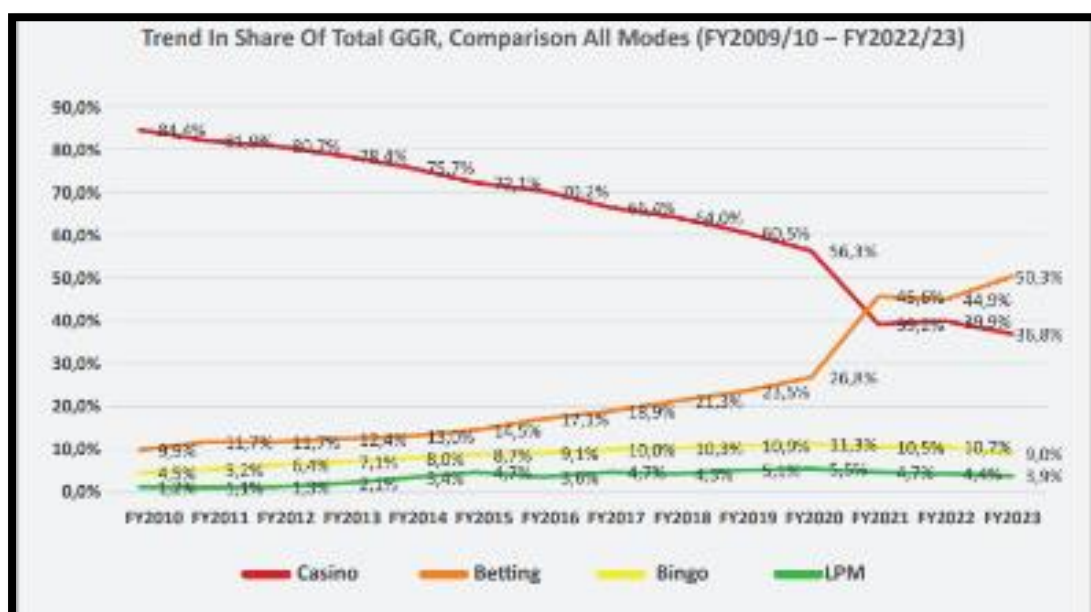
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Betting on Change: How COVID-19 Supercharged Sports Betting in South Africa

By Professor Steve Cornelius, Department of Private Law, University of Pretoria and Member, IFHA Council on Anti-illegal Betting and Related Crime

As far as sport in South Africa is concerned, arguably the most profound consequence of the COVID-19 pandemic is the significant increase in online gambling. According to the MarketLine *Global Casino Profile*,¹ online gambling and betting increased by a staggering USD76 billion in 2021. It is also significant that sports betting has steadily grown in relation to other forms of gambling and now accounts for almost one-third of all gambling and betting. In fact, the growth in the global gambling and betting markets since 2017 is almost exclusively attributable to the growth in sports betting, as all other gambling and related activities have either contracted or remained relatively unchanged.

This trend has been even more profound in South Africa. The graph in the figure below, taken from the 2022/2023 *Annual Report* of the National Gambling Board of South Africa,² shows that the impact of the COVID-19 pandemic on gambling and betting is patently obvious. While traditional casino gambling, as well as the related Bingo and limited payout machine gambling has shown a steady decline since 2010, sports betting has bucked this trend and shown a consistent growth. The impact of the national lockdown and restrictions on movement in 2020 can clearly be seen on the graph as there was an immediate and clear shift from traditional gambling to sports betting, with the latter now making up more than half of all gambling and betting activities while continuing to grow. The annual market turnover on lawful sports betting in South Africa is now approximately ZAR430 billion (approximately USD24 billion) with the gross gambling revenue (GGR) generated from sports betting now totalling around ZAR24 billion (approximately USD1.5 billion).



Of concern for the racing industry, is that horse racing has not shared in the profound growth. It is rather the result of an unprecedented growth in betting on other sports, particularly rugby union, as South Africa successfully defended the World Cup in 2023, cricket, football and mixed martial arts. Betting on horse racing remained stagnant with a GGR of approximately ZAR2.6 billion (approximately USD160 million) annually between 2018 and 2023. On the other hand, other sports betting has grown five-fold from ZAR4 billion in 2018 to almost ZAR21 billion (approximately USD1.2 billion) in 2023.

In another indication that COVID-19 has had a profound impact, values of bets placed with bookmakers showed a significant increase, both for horse racing and other sports, while the number of totalisator bets decreased significantly for horse racing and remained stagnant for other sports. The obvious reason is that bookmakers were more successful in making the switch to the online environment, while totalisators remained mostly based at physical premises.

A major concern is that there are no current statistics on the unlawful betting market in South Africa, particularly since online betting with operators or betting exchanges that are not licensed in South Africa, even if lawful and licensed elsewhere, is also considered to be unlawful betting in South Africa.

In South Africa, section 3 of the National Gambling Act 7 of 2004 provides:

“An activity is a gambling activity if it involves-

- a) placing or accepting a bet or wager ...;
- b) placing or accepting a totalisator bet, ...; or
- c) making available for play, or playing-
 - i. bingo or another gambling game ...; or
 - ii. an amusement game, to the extent that applicable provincial laws require such games to be licensed.”

This definition clearly includes sports betting and wagering. In addition, each of the nine provinces have their own provincial legislation which also deals with gambling and betting in this sense.

A major concern is that online gambling and betting is not specifically regulated in South Africa, but apparently has to conform to statutory measures that are more suited to traditional casino gambling and physical totalisator or bookmaker betting.

In the online environment, there is now a growing presence of other operators who appear or claim to be “licensed to operate” and seek to exploit this apparent lack of regulation. In *Casino Enterprises (Pty) Ltd (Swaziland) v Gauteng Gambling Board* 2011 (6) SA 614 (SCA), the court found that Casino Enterprises, based in eSwatini (Swaziland), sought to exploit the apparent “lack of regulatory framework and regulation of online gambling in South Africa”, as they attempted to evade the provisions pertaining to the licensing and advertisement requirements and advertised both online casino and online sports betting services in South Africa. Casino Enterprises argued that any gambling or betting transaction takes place where the server is situated – in their case, eSwatini, where they are licensed to operate. However, the court held that it was the location of the party placing the bet, rather than the location of the gambling or sports betting operator, which determined the location of the gambling or betting activity.

In essence therefore, since online gambling is not specifically regulated in South Africa, online sports betting is only legal in South Africa if the exchange is offered by a licensed operator in terms of the National Gambling Act 7 of 2004 and the relevant provincial gambling legislation. Websites such as *Betway*, *Sportingbet* and *Hollywoodbets* are licensed operators in South Africa and exchanges offered by such licensed operators equates to legal online gambling.

Criminal investigations into domestic cricket match fixing over the past ten years, have suggested that the illegal betting market is not insignificant and certainly poses a material risk to legal betting and sports integrity in South Africa. Despite frequent statements by authorities that there will be a crackdown on illegal online gambling and betting in South Africa, the *Casino Enterprises* case remains a lone instance of action being taken by regulators. This is arguably the result of expedience – Casino Enterprises ran advertising campaigns in South Africa and were easy to locate with its base lawfully in a neighbouring country. Other operators, particularly ones that are not licensed in any jurisdiction, are more difficult to locate and investigate. Given that there has been such an increase in betting on racing and other sports, as well as other forms of gambling, it is important that the authorities form a better understanding of the extent of the illegal market in South Africa and formulate appropriate policies to counter this problem.

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Fighting the Odds: A Toolkit for Regulators to Combat Illegal Betting

By Martin Purbrick, Chairperson, IFHA Council on Anti-illegal Betting and Related Crime

As illegal betting has expanded around the world and increased market share at the expense of legal licensed betting on racing and other sports, it is increasingly important for national gambling regulators to have a clear strategy to combat illegal betting and also the tools to do so.

As the IFHA Council wrote in 2024, “As sports betting continues to globalise, it becomes harder for consumers to differentiate between online legal and illegal betting and also more difficult for gambling regulators to understand the silent encroachment of illegal betting operators in their local market.” This “silent encroachment” is a particular challenge as gambling regulators tend to be focussed on the legal operators who are their licensees subject to regulations.

For instance, the Gambling Commission in the UK states that under its regulatory remit “We are responsible for issuing personal gambling licences for individuals and gambling operating licences for businesses.”¹ The Gambling Commission sets requirements for all licensees, carries out assessments to make sure that licensees are following their requirements, and takes enforcement action if they find individuals or businesses failing to follow rules and regulations.

For gambling regulators, regulation is de facto of what they see, which are legal licensed betting and other gambling operators. What they do not immediately see, and in the past have devoted less or no resources to detecting, is illegal betting by operators that silently encroach into legal markets.

There is a clear need for gambling regulators to differentiate between legal and illegal betting (and other gambling). It is self-evident that illegal betting causes greater harm to society than legal betting. Whilst there is debate regarding the role of legal betting as a pathway to illegal betting, it should be accepted that there is a greater risk of gambling harm from illegal betting as well as the wide range of negative impacts on society. This difference is eloquently explained by the Hong Kong Government Home and Youth Affairs Bureau, the gambling regulator, summarising their policy approach as follows:

“First, while we recognise that there is always a demand for gambling, the conduct of gambling activities should be authorised and regulated. This is because unregulated gambling activities can lead to a number of social problems - frauds, underage gambling, loan sharking, etc. - and become a potential source of income for triad and criminal activities. Second, since it is impossible to reconcile the different views in the community on the extent to which authorised gambling outlets should be allowed to exist, a compromise approach is to allow only a limited number of authorised gambling outlets, the purpose of which is to satisfy substantial and persistent public demand for gambling which would otherwise turn to illegal operators.”²

Combatting Illegal Betting

The problem now confronting gambling regulators is that online betting (and other gambling) provided largely by offshore operators has created global choices for local consumers. Whilst betting and gambling before the early 1990s was entirely local and analogue, from 1994 sports betting changed due to three factors. Firstly, a new free trade zone in Antigua and Barbuda effectively allowed U.S. bookmakers (based in Antigua) to accept bets by phone on horse racing and sports, theoretically immune from U.S. gambling prohibition laws. Secondly, in 1994 Isle of Man based company Microgaming developed gambling software for online gaming. Thirdly, in 1995 the Dublin based company CryptoLogic developed encrypted communication protocols that allowed secure online monetary transactions.³

Whilst these developments allowed the evolution of legal licensed betting from retail cash based to Internet based transactions within regulatory limits, they also created an explosion of offshore based online illegal betting that continues to grow at an almost exponential pace. Gambling regulators could cope with the growth of legal licensed betting as regulators set the conditions and hence set the pace of development.

However, the torpid development of competitive betting products as well as prices (i.e. attractive betting odds) in legal betting markets has two impacts: Firstly, as betting operators are unable to compete with illegal operators they also move offshore and into illegal markets to enable them to utilise new technology and sell cutting edge betting products to consumers. Secondly, consumers also move away from legal licensed betting providers and progressively accept betting with offshore unlicensed illegal operators as legitimate.

An outcome of this has been the growth of purported legitimate offshore gambling licensing hubs, such as Curacao, Malta, and the Philippines. The IFHA Council has called this “pseudo-regulation” as these hubs clearly have no authority to regulate the impact of remote betting and gambling on consumers in markets around the world. Illegal betting operators increasingly purchase licences in these “pseudo-regulation” hubs that do not confer legality beyond that jurisdiction, creating a grey area for consumers who see them only as an online betting operator.

This is the situation confronting gambling regulators around the world – consumers have a global betting product range in front of them provided by the Internet and cannot distinguish between what is licensed, regulated and legal betting and what is illegal betting. This worsening situation is leading to the objectives of gambling regulation not being met.

Protection of consumers from gambling harm is ineffective because of the greater risk from offshore illegal betting. Betting is not free from crime as organised criminal groups dominate the operation of illegal betting and create illicit markets which go on to facilitate the corruption of sports. Children and vulnerable people are not protected because illegal betting operators do not care about or implement any safeguards. Gambling regulators must combat illegal betting in order to meet their objectives and duties.

It is possible to combat illegal betting, despite the operators being located remotely and outside of the legal jurisdiction and reach of national gambling regulators and law enforcement agencies. There are good examples from around the world of smart government policy making leading to effective regulation of legal betting as well as robust combatting of illegal betting, without the former constricting the latter.

In Australia from November 2019 to March 2025, the Australian Communications and Media Authority (ACMA) blocked 1,178 illegal gambling and affiliated websites and another 220 illegal services have pulled out of the Australian market since the ACMA started enforcing new illegal online gambling rules in 2017.⁴ In February 2025, the gambling regulator in Colombia blocked 10,000 websites and social media profiles that were offering illegal betting.⁵ These actions show that regulators can send a public signal that illegal betting websites will be blocked.

In India in March 2025, the Directorate General of Goods and Services Tax Intelligence (DGGI) in collaboration with the Ministry of Electronics and Information Technology (MeitY) blocked 357 websites and 2,400 bank accounts linked to these entities. This coordination between the government policy ministries responsible for taxation and telecommunications means that website blocking and payment transactions facilities can simultaneously be disrupted.⁶

In Brazil in March 2025, the Ministry of Finance's Secretariat of Prizes and Betting (SPA) issued a directive requiring banks, payment processors, and financial platforms to monitor suspicious transaction activity, report the details to the authorities, and block any transactions linked to illegal betting platforms. This disrupts the ability of illegal betting operators to process transactions from local consumers.⁷

In Turkey in February 2025, the Istanbul Chief Public Prosecutor's Office took action against three Turkish celebrities accused of appearing in videos to illegally promote gambling while visiting Malta. This disrupted the advertising of online illegal betting based outside Turkey.⁸

In January 2025, the Treasury and Finance Ministry's National Lottery Administration reported that in 2024 they had shut down 233,000 illegal betting and gambling websites.⁹

The Gambling Regulator's Toolkit

- Gambling regulators should proactively include combatting illegal betting in their roles and responsibilities, and reflect this to the relevant government policy department (for approval if necessary).
- Gambling regulators should proactively research and then brief the relevant government policy departments (i.e. responsible for national policy regarding gambling, telecoms / internet, banking and finance, and criminal law enforcement) so that government is always aware of the extent and nature of the illegal market as well as the legal market.
- Gambling regulators should proactively seek collaboration with other key stakeholders, such as the national telecoms / Internet regulator(s) (to plan and enforce Internet website and domain blocking), the banking and financial sector regulator(s) (to enforce payment restrictions), and the police and other law enforcement agencies (to enforce criminal laws against illegal betting), all of whom have a role in a holistic strategy to combat illegal betting.
- Gambling regulators should engage with the appropriate police or other law enforcement agencies to ensure that not only are relevant gambling laws enforced but also that there is widespread public communication (to betting operators as well as consumers) that breaches of the gambling laws relating to the operation of illegal betting will be subject to investigation and prosecution.
- Gambling regulators should provide regular details to the telecoms / Internet regulator of online betting websites that are to be blocked (i.e. blacklisted) in their jurisdiction under an appropriate legal mechanism, as well as online licensed betting websites that are legal and not to be blocked (i.e. whitelisting). A clear message to appear when consumers search for blocked websites that the domain is blocked because it is not licensed in the jurisdiction where the consumer is based (although this can be circumvented by VPNs, it is important that when innocent consumers search for illegal betting websites without a VPN they are confronted with a clear message regarding the illegality in that jurisdiction).
- Gambling regulators should provide details to banking and financial regulators of payment system providers that are processing payments to illegal betting operators both inside and outside of their jurisdiction, for those regulators to take appropriate action under an appropriate legal mechanism.

- Gambling regulators should proactively seek collaboration with gambling regulators in other national jurisdictions to exchange intelligence on operators that are not licensed.
- Gambling regulators should construct an engagement mechanism with legal licensed betting operators in their jurisdiction to assess if they are able to effectively compete with illegal operators whose products are available to consumers in the jurisdiction. This engagement mechanism should include measurements of price, products, and process to determine if illegal betting operators are undermining the legal market and if legal operators are able to compete effectively.
- Gambling regulators should construct highly visible education for consumers to ensure that they are aware that there are laws relating to illegal betting (i.e. operating illegal betting and if applicable betting with an illegal betting operator), and which online betting websites are illegal.

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Combatting illegal betting (and other illegal gambling) is possible, and indeed necessary. Without a strategy for the gambling regulator in every jurisdiction to combat illegal betting, the activity will inevitably grow as consumers migrate to cheaper prices (i.e. betting odds) and faster changing attractive product (i.e. bet types) offered by illegal operators. It is critical that every gambling regulator has a clear strategy to combat illegal betting in addition to regulating legal betting, and also avoids over-regulating legal markets to the extent that they cannot compete with illegal markets. The Gambling Regulator's Toolkit is the starting point for building an effective strategy.

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