

# **UNCHECKED AND UNBALANCED: ILLEGAL BETTING AND THE CONSEQUENCES OF FAILING MARKET REGULATION**



**International Federation of Horseracing Authorities  
Council on Anti-Illegal Betting and Related Crime**



# Foreword

---



It is my great pleasure as Chair of the International Federation of Horseracing Authorities (IFHA) to provide attendees of the 59<sup>th</sup> International Conference of Horseracing Authorities with this new collection of articles produced by the IFHA Council on Anti-Illegal Betting & Related Crime (IFHA Council).

The IFHA Council moved from the Asian Racing Federation to the IFHA in October 2024, and since then its Quarterly Bulletin of articles covering illegal betting, the impact on racing and other sports integrity, as well as wider social issues, have been published under the banner of the IFHA. We are pleased to report that the IFHA is projecting its role as a thought leader in the world of sports integrity by producing these articles as well as engaging with stakeholders around the world.

The articles in this compendium were published in the IFHA Council Quarterly Bulletin or as more lengthy standalone reports from August 2024 to May 2025 and continue to illustrate how the IFHA Council is a global thought leader on a wide range of issues.

The standalone report from Tom Chignell published in November 2024 covers 'Modern Day Integrity Bet Monitoring and Betting Analysis Conducted by Horseracing and Sports Regulators' and is a clear guide to how this should be structured and conducted to safeguard integrity in racing and other sports. The articles cover the regulation of betting and the growing global criminal profits from illegal betting, as well as how some of our partners such as INTERPOL (also a member of the IFHA Council) are leading the global response to illegal betting and related crime.

My thanks to all of the IFHA Council members for giving their time and expertise and for making such a strong contribution to maintaining integrity in racing and other sports by combatting illegal betting.

Winfried Engelbrecht-Bresges

Chair, International Federation of Horseracing Authorities

---

# Table of Contents

1	Foreword
3	<b>Section One - Report</b>
4	Modern Day Integrity Bet Monitoring and Betting Analysis Conducted by Horseracing and Sports Regulators
27	<b>Section Two – Bulletin Articles</b>
28	Offshore Betting and Gambling Licensing - The Pseudo Regulation of Betting
34	The Invisible Empire: How Singapore Court Cases Unmasked A Multi-Billion-Dollar Illegal Betting Syndicate
45	Betting Blindspot: Sports' Urgent Need to Understand Global Gambling Complexities
50	Globalising The Council on Anti-Illegal Betting & Related Financial Crime – Transition to The IFHA
53	The Ban On Philippines Pogos and The Consequent Global Expansion of Illegal Betting Hubs
61	Game Changers: How Interpol is Leading The Global Response to Illegal Betting and Related Crime
66	Illegal Betting on Everything Everywhere All at Once in 2025
74	Unintended Consequences? Traffic Analysis Shows Significant Rise in UK Visits to Unlicensed Betting Websites Offering Racing
79	Game on: Inside Sport Integrity Australia's Efforts to Protect Sports From Competition Manipulation
86	Behind The Whistle: The Alleged Yellow Card Trick in Football Spot-Fixing
95	Betting on Change: How Covid-19 Supercharged Sports Betting in South Africa
98	Fighting The Odds: A Toolkit for Regulators to Combat Illegal Betting
104	About The IFHA Council on Anti-Illegal Betting and Related Crime
105	IFHA Council Members Biographies

# **SECTION ONE - REPORTS**

# **Modern Day Integrity Bet Monitoring and Betting Analysis Conducted by Horseracing and Sports Regulators**

*Thomas Chignell, November 2024*

---



## Executive Summary

- By establishing an in-house betting analysis capability, sports regulators (governing bodies, racing clubs and racing authorities) gain the capacity to generate intelligence, establish networks and connections and investigate incidents of betting-related corruption. They also have the right expertise on hand to prosecute betting breaches of the sport's rules.
- Major sports regulators that entirely rely on outsourcing bet monitoring deprive themselves of crucial intelligence and a comprehensive understanding of key threats, risking damage to the sport's reputation and confidence in the regulator's capabilities.
- Technological progress presents sports regulators with a real opportunity to greatly enhance their capabilities in monitoring and identifying suspicious betting activities across both legal and illegal betting markets.
- Cloud computing and user-friendly programming languages, have significantly reduced administrative and IT costs, making the development of in-house bet monitoring models more accessible for sports regulators.
- By leveraging technology, integrity teams can efficiently analyse vast amounts of betting data, increase market coverage and free up betting analysts.
- Recent technological advances such as conversational artificial intelligence (AI) can support these processes.
- Conducting a risk assessment of the betting operators and bet types enables sports regulators to gain insights and prioritise core betting integrity threats.
- Failing to understand core betting integrity threats puts the reputation of the sport at risk and neglects the essential task of safeguarding the sport's events, participants and stakeholders.
- Sports regulators are in a unique position to build valuable betting intelligence.
- Intelligence gathered by the sport is critical. Bet monitoring needs to go beyond low-hanging fruit and identify more than just the extreme suspicious betting cases which tend to be the majority of cases flagged through automated monitoring systems.

- The intelligence gathered from in-house betting analysis allows sports regulators to take proactive action in real time, establishing a strong deterrent against betting corruption.
- By acting upon betting intelligence, regulators create an environment where individuals tempted by such corruption are deterred by the fear of being caught, contributing to fair and clean sporting events.
- Sports regulators can control their data by introducing strict contractual conditions requiring the data companies to sell data only to betting operators who agree to enter into a data-sharing agreement to support sports integrity-related inquiries and investigations.
- Government policy makers and gambling regulators should seek a commercially reasonable and stable betting duty rate that provides a balance between channelling gambling demand to the legal betting sector and allowing licensed betting operators to compete effectively with the illegal market.

## Introduction

A jockey gives a horse a poor ride and it finishes unplaced. A footballer gets sent off for verbally abusing the referee. Are these two incidents a genuine part of a race or match or are the actions by the jockey or footballer predetermined to ensure bets placed on the event become profitable? Racing and sports face a serious threat from betting corruption. This threat is particularly severe in the illegal market where customer-level information is not shared with racing and sports regulators.

The purpose of this report is to explain why having betting analysis capabilities is a fundamental and crucial function of any racing or sports regulator (governing body, racing club or racing authority). The report provides concrete and pragmatic examples of the key principles of developing and implementing an efficient betting analysis function. These examples demonstrate how such a function can effectively address and mitigate betting integrity threats to racing or other sports, while enhancing the regulator's overall analytical capabilities and delivering real overall value to the regulator.

Racing and sports regulators are entrusted with the responsibility of establishing and implementing a robust framework to proactively prevent and detect malpractice within their sports. The approach detailed in this report is specifically designed to tackle issues such as betting corruption, and the misuse of inside information for betting purposes, through effective betting integrity processes.

There are significant advantages to the approach adopted by prominent racing regulators which conduct their own in-house betting analysis, rather than fully outsourcing this function to a data company or third party. In-house analysis offers substantial benefits to regulators, including the ability to develop comprehensive intelligence within the sport, gain a deep understanding of the threats, and also crucially maintain that corporate knowledge. This enables effective risk management and resource allocation. Conversely, major sports that entirely rely on outsourcing and alerts may deprive themselves of crucial intelligence and a comprehensive understanding of key threats, risking damage to the sport's reputation and confidence in the regulator's capabilities.

Sports integrity teams have often prioritised allocating a significant portion of their resources to investigative personnel, sometimes neglecting the essential skill set needed to understand and analyse the extensive volume of betting intelligence associated with their sporting events. By establishing an in-house betting analysis capability, sports regulators gain the capacity to generate intelligence, establish networks and connections, investigate incidents of betting-related corruption, and prosecute breaches of the sport's rules. If all betting integrity analysis is outsourced, sports lose these benefits, as well as their integrity knowledge as it sits with another party.



While the need for regulators to invest in betting integrity is emphasised, the report acknowledges the challenges faced by smaller regulators with limited funding and resources. Nonetheless, it is important to highlight that technological advancements, such as cloud computing and user-friendly programming languages, have significantly reduced administrative and IT costs, making it more accessible for regulators to develop in-house bet monitoring models. The speed at which these models can be developed and deployed can be remarkably quick. This ongoing technological progress presents regulators with a real opportunity to greatly enhance their capabilities in monitoring and identifying suspicious betting activities across both legal and illegal betting markets.

### **Bet Monitoring and Betting Analysis: Why It Matters to Racing and Sports**

Legal and illegal betting markets have grown and are growing at a rapid rate. Analysis by the Asian Racing Federation (ARF) identified that in 2020/21 there were 39.75 billion total visits to betting websites, an increase of 37% compared with the previous year.<sup>1</sup> In 2021, the UN Office on Drugs and Crime estimated that up to USD1.7 trillion is wagered on illegal betting markets each year.<sup>2</sup> The expansion of betting markets carries with it a heightened risk to the integrity of racing and sports, making financial incentives for race or match fixing potentially even more lucrative.

Instances such as stopping a horse from winning, or intentionally receiving a red card in football with the aim of profiting from betting, serve as genuine integrity threats. These examples demonstrate how the manipulation of events can be directly connected to betting activities.

The landscape of betting on racing and sports continues to evolve, with the nature of betting integrity threats evolving alongside it. Over the past two decades, there has been a significant growth in internet gambling. Illegal betting through online platforms has also experienced rapid growth, presenting new challenges to be addressed.

---

<sup>1</sup> Asian Racing Federation Council on Anti-illegal Betting and Related Financial Crime, The State of Illegal Betting Report, May 2022. <https://www.asianracing.org/publications/the-state-of-illegal-betting>. Accessed 3 May 2024.

<sup>2</sup> United Nations, Illegal bets add up to 1.7 trillion dollars each year: new UN report. 9 December 2021, <https://news.un.org/>. Accessed 3

Lay betting is a type of bet placed on a betting exchange on an outcome not to happen, e.g. a horse, team or player not to win. Lay betting and the ease of profiting off negative information, such as horses not winning or being placed, pose a significant and persistent integrity threat. This threat is particularly pronounced when carried out through illegal or under-regulated operators, where the betting audit trail is usually non-existent, or at best, far less transparent compared with well-regulated markets. For example, if a jockey were to establish a corrupt relationship with a gambler and conspire to prevent a horse from winning, lay bets (bets placed on the horse not to win) could be placed with an illegal market operator, knowing that these bets would not be reported to the regulator by that operator.

Image 1 illustrates a striking example of substantial bets offered with an illegal operator. The image shows bet requests displayed on a large illegal betting exchange. Specifically, it displays significant lay offers, made by customers who wish to bet on a horse to lose and are offering highly favourable odds compared with the legal market. Additionally, the size of the lay offers is capped at 999,999, which in this instance falls just short of a quarter of a million USD equivalent. This lay offer has a potential liability larger than USD 600,000.

Hs	Win	Plc	%	Limit
3	460473	460473	78	300/100
3	999999	0	78	300/0

Image 1, Example of a 999,999 lay bet offer made on a horse in a Hong Kong race. The large size is not uncommon.

Betting corruption is a tangible threat across sports, as evidenced by the International Tennis Integrity Agency website which details regular sanctions and suspensions imposed on those involved in tennis corruption, underscoring the real and ongoing battle to safeguard the sport's integrity.

A purposely-dropped service game in a tennis match or pre-determined poor bowling over in a cricket match can make bets placed upon inside information highly profitable through placing bets at specific times, without the need for the entire event to be fixed.

Inside information holds immense value in sports as it enables individuals who have it to profit from betting using the information. Inside information can be described as any information not available in the public domain that could be used for betting purposes. For instance, a Premier League team physiotherapist may have knowledge that a star player will not be fit for an upcoming match, which is likely to lead to a substantial shift in the odds. Similarly, an assistant racehorse trainer may be aware of a horse's interrupted preparation in the lead-up to a race, providing advantageous information for betting purposes.

Racing and other sports regulators bear the responsibility of developing robust infrastructures designed to proactively prevent and detect malpractice, including betting corruption and the misuse of inside information within their sports.

The identification and analysis of irregular or suspicious betting activity is fundamental to the detection and combating of manipulated racing or sports events, as well as addressing corruption and the misuse of inside information for betting purposes. Knowledge of irregular betting patterns can help uncover incidents within a race or match that might have otherwise gone unnoticed. It provides the red flag, signalling the presence of unusual activity that warrants further scrutiny and investigation.

The intelligence gathered from in-house bet monitoring and from building information sharing-relationships with key stakeholders helps regulators take action to create a strong deterrent to those who are considering manipulating an event.

### **What is meant by Bet Monitoring and Betting Analysis?**

Betting analysis encompasses several key components:

- **Bet monitoring:** This involves monitoring both legal and illegal betting markets for any irregular or suspicious betting activity that may have an impact on the integrity of a race or a match. This can include significant changes in odds or irregularly high betting volumes. This analysis can be performed through manual monitoring or automated systems, through the analysis of betting records obtained from betting operators.
- **Transactional analysis in bet monitoring:** This entails examining individual betting transactions for any unusual or suspicious patterns.
- **Integration of intelligence:** A crucial aspect of betting analysis is connecting different pieces of betting-related intelligence to form a comprehensive assessment of what has transpired. This includes linking the gathered information with other intelligence held by the sport.

- Adaptation to new threats: It is essential for regulators to innovate, update and adapt betting analytical processes to incorporate new threats emerging in betting markets. New technology can make it a relatively simple process for skilled analysts to incorporate new markets and data sets into existing analysis.

## Risk Assessment

Conducting an in-depth risk assessment is a very useful practice for any regulator, regardless of available resources. Failing to understand the betting integrity threat puts the reputation of the sport at risk and neglects the essential task of safeguarding the sport's events, participants and stakeholders.

Risk assessments of the betting operators and bet types enables regulators to gain insight and prioritise core betting integrity threats. It is worth noting that the significance of individual betting operators within the market can vary considerably across different sports and racing jurisdictions. Additionally, the nature of threats may differ, making it necessary to tailor the approach to each specific sport. While betting markets are increasingly global, the mass public betting markets for racing can remain unique and localised to their own jurisdictions.

When conducting a risk assessment, integrity teams can take into account the following factors:

- Betting operators involved: The market should be researched to identify the key operators who offer betting on their specific racing or sport. This includes determining the operators with the highest turnover, market share and willingness to stand large liabilities.
- Legal and illegal operators: Differentiation should be made between legal and illegal operators within the betting market. A clear understanding of both types is essential for assessing potential integrity risks, and how relevant integrity information can be obtained. Building relationships with legal operators is explored in subsequent sections.
- Focus on high-risk operators: Particular attention should be paid to operators that pose the greatest integrity threat. This may involve considering factors such as the markets they offer, their market influence and the location of their licence (if they have one).

In the risk assessment process, it is important to identify the specific markets being offered, as they can indicate different levels of integrity risk. Some considerations for horse racing include:

- "Lay to lose" betting on betting exchanges: This type of betting carries a higher integrity risk compared with "back to win" betting. Monitoring and analysing lay betting activity is crucial if there are high levels of turnover bet on a betting exchange.

- Match betting: This market involves prices on just two specific horses in a race and excludes the finishing position of other horses. It poses a high integrity risk and should be closely monitored.
- Fixed odds betting on an event not to happen: This market, such as betting on a horse not to win, carries a high integrity risk. Knowledge of such markets and which operators offer them is important.
- Spread betting markets: These markets, where a sell trade on underperformance can generate profits from horses not winning or being placed, present a high integrity risk from deliberate underperformance and require close scrutiny.
- Regular betting products: Traditional betting products like Win, Place, Forecast and Quinella, should also be considered. While they may carry a lower inherent risk, monitoring them is still important due to large amounts of betting turnover they attract.
- Other factors: Intelligence should be sought about the size of any localised illegal market, betting commission agents and potentially small-scale 'white label' operations betting without a licence.

By identifying and assessing various market types, integrity teams can prioritise their monitoring efforts most effectively. Such focused and targeted measures will help identify suspicious betting by directing attention on monitoring higher-risk markets.



## A Modern Approach To Bet Monitoring

Racing stewards and sports integrity teams should be vigilant about suspicious betting on race or match days. This awareness will enable them to take proactive measures before, or even during, an event to ensure that it remains free from manipulation and betting corruption.

The purpose of the bet monitoring process is to detect, flag, and appropriately address suspicious betting activities. This involves capturing relevant betting data, processing and assessing it, and taking necessary actions. In the context of horseracing, real-time assessment of betting information allows for prompt communication to the racing stewards, alerting them to any suspicious betting patterns. This enables the racing stewards to take proactive measures on race day. These actions may involve disruption tactics, such as speaking to jockeys or trainers, or conducting further investigations to ensure the integrity of the race.

The advancement of new technology presents significant opportunities for enhancing betting analysis processes. By leveraging these technological advancements, regulators can gain a better understanding of the betting market and effectively flag suspicious betting activity. One key advantage brought by cloud computing is the ability to process and analyse larger volumes of data, linking it to relevant sports information such as jockey or player data, as well as results information. This integration of data sets allows for a more comprehensive assessment of betting patterns and potential integrity concerns.

Integrity teams that have modernised their bet monitoring processes aim to strike an effective balance between automated monitoring of bets and manual assessment by betting analysts. Finding this balance brings several benefits. Increased automation allows for monitoring a larger number of markets, processing more data, and achieving greater market coverage.

Moreover, this automated approach is often less resource-intensive in terms of human involvement. By leveraging technology and automation, integrity teams can efficiently analyse vast amounts of betting data, freeing up betting analysts. However, it is important to note that while automation offers numerous advantages, the expertise of betting analysts remains crucial. Manual assessment by these analysts adds a valuable layer of human insight and contextual understanding to individual betting incidents and emerging trends.

By striking the right balance between automated monitoring and manual assessment, integrity teams can harness the benefits of increased automation while leveraging the expertise of betting analysts, ultimately enhancing their ability to detect and address suspicious betting activity effectively.

To effectively handle and act upon suspicious betting, the following fundamental steps in bet monitoring can be employed:

1. **Access:** Obtain large quantities of available betting data, such as through application programming interfaces (APIs), to ensure comprehensive coverage. An API allows for computer programs to communicate with each other.
2. **Processing:** Automate the processing of the data to extract meaningful information and patterns that are relevant to the monitoring model.
3. **Alerts:** Set up automated alert systems that can promptly flag individual incidents or emerging trends in real time, drawing attention to potential integrity concerns.
4. **Manual Assessment:** Make good use of betting analysts, who play a crucial role in providing valuable insights by manually assessing the alerts and visuals, and updating the processes.
5. **Action:** Take appropriate actions once the information has been assessed, such as implementing disruption measures, launching investigations, or further developing the gathered intelligence.

The first step involves accessing large quantities of betting data, which form the foundation for building a monitoring model. Betting analysts require access to information sourced from all different types of operators - legal, grey, and illegal. There are multiple ways to obtain betting data, including connecting directly to a betting operator's API or utilising a third-party API from a data-sourcing company. Well-regulated betting operators are unlikely to charge a sports regulator for connecting to an API, while purchasing a data feed from a specialised company involves a fee. Once the integrity team has conducted a risk assessment of the betting market, it can determine the specific data required.

Capturing substantial volumes of relevant betting data enables the integrity analyst to automate the data processing stage. The data is fed into an in-house developed model, which identifies potential irregularities or suspicious patterns. This flagged information is subsequently reviewed manually by betting analysts. Their role is to assess whether the betting activity can be explained without any concern, or if it exhibits irregular or suspicious characteristics, or if it necessitates further investigation.

Developing alerts in the model can begin by focusing on outliers and then working backwards. Betting analysts require alerts to notify them when unusual events occur, such as a significant lay offer made at an atypical time relative to the bet size or a substantial odds change that occurs only 1% of the time.

While the idea of model development and data processing may seem daunting, cloud computing has made it feasible to handle and store vast amounts of data at a relatively low cost. Additionally, user-friendly programming languages enable analysts to build and deploy models without extensive technical expertise. These advancements in technology facilitate the efficient processing of millions of data points, empowering analysts to monitor and identify suspicious betting activity most effectively.

Recent technological advances such as conversational artificial intelligence (AI) can also support these processes when asking questions of the data. For example a chat box could be applied to a monitoring model which can provide information to such questions as “identify all runners ridden by jockey A which drifted in the market and were slow to leave the starting stalls in the past six months”. Machine Learning (ML) also provides opportunities for identifying irregular patterns as part of betting integrity monitoring, especially when large data sets are available.

The use of transactional monitoring which is available in some jurisdictions to examine customer-level transactions of licensed and regulated betting operators, is highly effective. Transaction-level monitoring provides regulators with access to detailed transactional data (including time-stamped individual betting transactions) prior to a race, enabling enhanced analytical capabilities across the regulated betting market. The incorporation of such informative data sets, coupled with advanced technology like a user-friendly AI chat box for queries, provides opportunities to greatly enhance the effectiveness and efficiency of betting monitoring, particularly when monitoring live in-play events.

## Betting Intelligence, Partnerships and Investigations

Sports regulators are in a unique position to build valuable betting intelligence. As the regulators of the sport they can obtain betting integrity information directly from licensed and regulated betting operators, as well as gambling regulators. This information is exceptionally valuable in building the betting intelligence picture as it includes customer information and transactional level bet details. To obtain this information and data from other sources, regulators can consider collaborating with the following key organisations and individuals:

- **Licensed and regulated betting operators:** Establishing communication channels and co-operative agreements with licensed and regulated betting operators is highly beneficial. Arranging meetings, particularly with the head trader, can facilitate increased information sharing and cooperation. An example of an effective relationship would mean the operator contacting the regulator, as well as the regulator making frequent enquiries to the operator.
- **Gambling regulators:** Collaborating with gambling regulators provides access to industry-wide oversight and regulatory knowledge. They can offer valuable support and data regarding betting transactions.
- **Regulator's point of contact:** Identifying the appropriate point of contact within the integrity team is important for receiving the reporting of suspicious activities, even during weekends. Betting analysts within the authority are ideal candidates as they can process and assess information in real-time and alert relevant persons.
- **Industry professionals, licensed persons, and stakeholders:** Utilising their expertise and knowledge can contribute to identifying and understanding potential integrity risks.
- **Industry integrity organisations and betting data companies:** Collaborating with betting integrity organisations and betting data companies can build betting intelligence. These entities can assist in building an overall betting picture of an incident.
- **Professional bettors:** Building relationships with bettors who adopt computer pricing models can be a valuable source of information. Their opinions can be particularly valuable when assessing odds movements, and they may also have other integrity concerns they are willing to share. Their expertise and financial interest in corruption-free events make them often willing to share information on integrity matters.

## **The Placement of Betting Analysis in Regulatory Bodies and Its Roles in Supporting Investigations**

Positioning the betting analysis function close to the intelligence team within a regulator encourages close collaboration between the teams which is very beneficial. The integration of betting information with non-betting intelligence, such as identifying high-risk participants or events, leveraging anti-doping information, and addressing concerns raised by participants or industry professionals, brings significant advantages.

Betting information can corroborate other intelligence held within the integrity team and vice versa. Also, non-betting intelligence can allow intelligence-led bet monitoring where a specific jockey, player or team that is subject of the intelligence is given additional scrutiny to identify whether the intelligence can be corroborated.

Automated bet monitoring without intelligence sources is not enough to capture those placing bets who are cheating by using anti-detection strategies. For example, those seeking to corrupt sports are likely to be aware that bets are monitored, and therefore will use strategies to avoid creating large ripples in the market that would trigger alerts. These anti-detection strategies include betting to smaller stakes, using large numbers of betting accounts, and betting with a wide range of betting operators at specific times. Betting account holders losing large amounts of money can also be recruited by persons to place corrupt bets through their accounts, as they are more likely to have higher bet limits (allowed to stake more money per bet) and will be less likely to raise suspicion.

Bet monitoring thus needs to go beyond low-hanging fruit and identify more than just the extremely suspicious betting cases which tend to be the majority of cases flagged through automated monitoring systems.

Betting analysts working alongside intelligence teams create the whole picture including bettor associations and networks, linked entities and other potential sources of information.

This is particularly important when identifying threats posed by the illegal market where individual betting transactions cannot be monitored and analysts do not receive suspicious betting reports from illegal operators.

When a sport has well-defined rules and regulations for betting and inside information, the presence of an investigative capability within a robust disciplinary framework enables the effective prosecution of betting-related cases.

- Social media: Monitoring social media platforms and specialised betting forums can provide valuable information on betting trends, rumours, or potential integrity breaches.
- Law enforcement: Identifying points of contact at relevant law enforcement organisations is valuable for collaboration and information sharing.

It is important to emphasise that establishing communication channels and points of contacts at key betting operators and regulators is an exceptionally cost-effective way for regulators with limited resources to receive intelligence on betting integrity threats to their sports.

The diagram below<sup>3</sup> illustrates how betting analysis can feed into an investigation process leading to a disciplinary hearing:

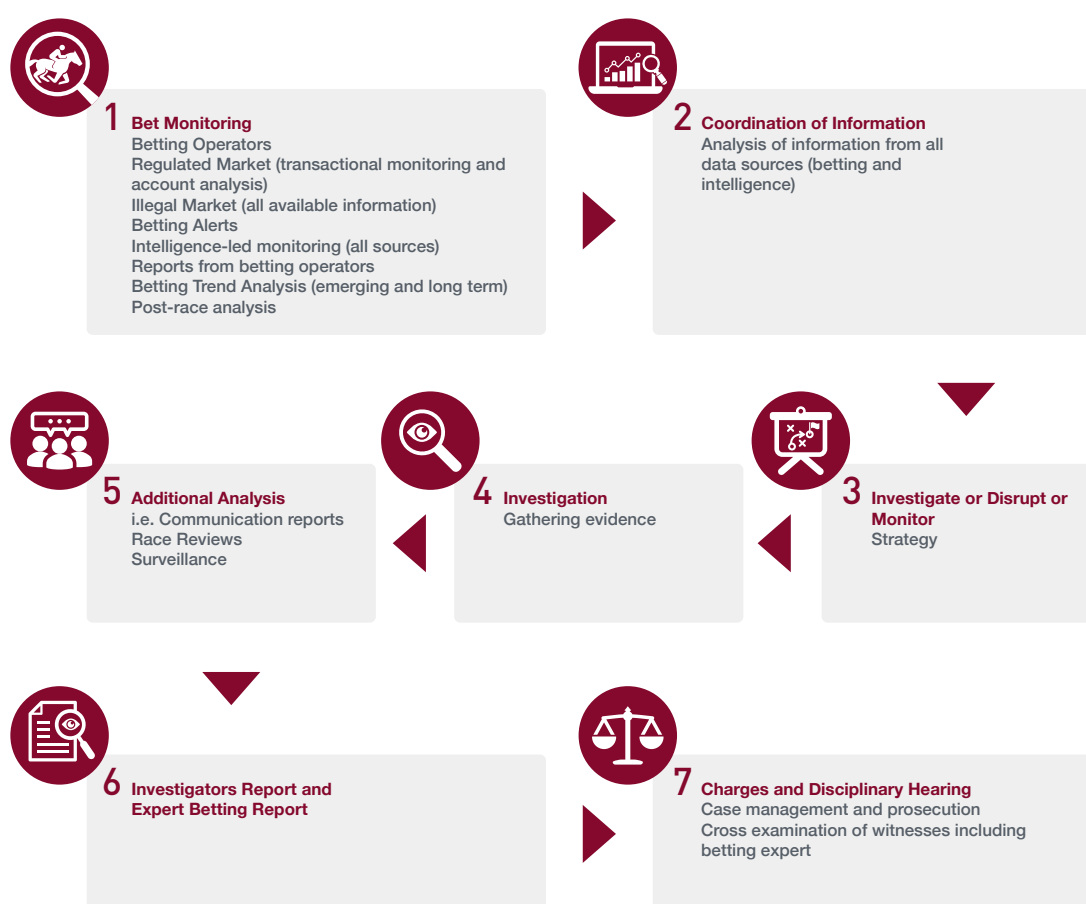


Figure 2. Role of Betting Analysis in Investigation Process

<sup>3</sup> ARF Council on Anti-Illegal Betting and Related Financial Crime, "Good Practices in Addressing Illegal Betting: A Handbook for Racing and Sports Organisations to Uphold Integrity", October 2020, <https://www.asianracing.org/aib/resources>.



## Technical Expertise and Value for Money

Previously, there was a prevailing belief that bet monitoring demanded significant resources. With advancements in technology, the idea that significant resources are required for efficient bet monitoring is no longer applicable. Instead, the focus should be on hiring individuals who possess the necessary expertise and can significantly enhance the capabilities of the monitoring process, bringing real overall value to the sports regulator.

The following skill sets are essential for the successful implementation and continuous improvement of an effective bet monitoring operation:

- i. A comprehensive understanding of betting markets and betting integrity threats.
- ii. Proficiency in programming languages such as Python or R as well as statistics, such as a data scientist.

These skill sets enable the development and deployment of monitoring and analytical models.

Employing individuals possessing these skill sets offers several benefits: Betting Integrity:

- Designing and implementing monitoring models and alerts that are tailored to specific sports or racing jurisdictions.
- Providing informed assessments and reports on betting activities.
- Enhancing communication and understanding of betting concerns and threats within the sport.
- Assisting in the investigation process by conducting interviews and preparing interview materials.
- Delivering expert reports during inquiries and disciplinary hearings.
- Collaborating with betting operators and regulators to gather and analyse relevant data.
- Integrating additional integrity-related data sets with betting analysis to identify trends, such as incorporating drug testing data with betting data.

When regulators acquire the skill set of data modelling, it opens up opportunities to utilise those skills for the development and modelling of other integrity-related data sets, such as identification of stand-out trends from participant performance metrics. In horse racing, this can involve automating statistics with alerts on factors like horses and jockeys slow to leave the starting stalls, as well as conducting non-related statistical analysis, such as horse population modelling. The presence of this expertise within a regulatory body can greatly enhance the quality of the analysis undertaken and bring expert analysis to a sport, as well as adding the benefits of using new technology such as artificial intelligence and machine learning.

It is important to reiterate that some prominent sports regulators allocate an excessive amount of staff resources to employing investigators while severely neglecting investment in betting expertise. This sometimes-unbalanced approach is likely to overlook and neglect a substantial amount of valuable betting and performance intelligence that could otherwise be identified and acted upon through investing in expert betting analysts.

## Sports Data Companies

This section considers commercial sports betting monitoring organisations, often known as data companies, which are heavily relied upon by sports regulators who do not conduct in-house bet monitoring or analysis.

With its longstanding and deep-rooted association with bookmakers and betting, horse racing stands out as a sport well-equipped to address the challenges surrounding data in relation to betting. In fact, it can serve as a role model for other sports in terms of understanding and tackling integrity concerns that arise from sports data.

Regulators of horse racing and other sports should exercise control over their data and be mindful of their collaboration with data companies, taking into account their business nature and potential conflicts of interest. This includes being cautious of services provided by data companies that could facilitate betting through unlicensed operators. When entering into commercial agreements, it is crucial to establish clear guidelines for data management, as certain illegal and under-regulated betting operators depend on data suppliers to function. It should be noted that certain data companies have pursued a commercial approach focused on maximising profits by selling sports data to as many operators as possible.

The existence of conflicts between the commercial departments and integrity teams of sports regulators regarding the sale of data is widely recognised.

Horse racing and sports can control their data by introducing strict contractual conditions on data companies that require all third-party users of the data (from racing and other sports) to be licensed and well regulated.

Another term to be agreed with data companies is requiring these companies to sell data only to betting operators who agree to enter into a data-sharing agreement that supports the sports integrity-related inquiries and investigations.

As this report highlights, racing and sports regulators must develop the capability and capacity to understand both legal and illegal betting markets and not rely entirely upon the services of data companies to interpret how betting impacts integrity.

Data companies can have a significant role in providing bet monitoring services to sports regulators, particularly in sports with a wide array of betting markets, such as in-play micro markets, and to a lesser extent in racing. However, it is crucial for sports regulators to have the capability to interpret external commercial reporting. To achieve this, racing and other sports regulators need to have employees with a comprehensive understanding of betting markets and the ability to navigate the betting industry. This will enable the authority to collaborate effectively with the data companies. Ultimately, as described in this report, the goal for racing and other sports regulators should be to develop the capacity to conduct in-house bet monitoring and analysis, reducing their total dependence on contact from external data companies.

Data companies frequently conduct reviews and deliver information several days after an event has occurred, resulting in missed opportunities for timely actions on the day of the event. Moreover, they may adopt an overly cautious approach in sharing information with sports regulators, often reporting only highly suspicious situations. Consequently, it is vital for sports that rely on external monitoring services to work assertively with data companies and challenge them to provide prompt feedback and support, especially at an information-gathering stage when seeking to corroborate intelligence held by the sport.

## Summary

Betting corruption has posed a longstanding threat to the integrity of the racing industry. To combat this threat, racing regulators have established modern and well-structured integrity teams, equipped with the necessary capabilities to investigate and prosecute cases related to betting integrity. However, corrupt actors are constantly seeking new ways to get one step ahead of detection. It is therefore crucial for racing and sports integrity teams to continue innovating and enhancing their intelligence to gain a comprehensive understanding of the evolving betting integrity threats to their sporting events.

Developing in-house betting expertise and employing advanced models for analysing betting data will substantially bolster the regulators' capabilities in addressing betting corruption and the improper use of inside information for betting purposes.

A summary of the benefits include:

### Building Betting Intelligence

- **Increasing Betting Intelligence:** Betting data modelling by analysts to identify suspicious trends can develop comprehensive betting intelligence within the sport and gain a deep understanding of the threats.
- **Streamlined Communication:** In-house betting expertise allows for direct information-sharing with betting operators and gambling regulators. This shortens the lines of communication, facilitating the reporting of suspicious betting and making inquiries to operators.
- **Efficient Resource Deployment:** With a clear understanding of the threats, investigative resources can be deployed where the integrity risk is highest.
- **Integration of Information:** Betting information can corroborate other intelligence held within the integrity team and vice versa. The integration of betting information with non-betting intelligence strengthens the regulator's capability to manage threats.
- **Intelligence-Led Monitoring:** The ability to focus on specific races, matches or participants subject to existing integrity concerns allows for intelligence-led monitoring.
- **Enhanced Understanding of Betting Markets:** The utilisation of in-house betting expertise and comprehensive data analysis enhances the regulator's overall understanding of betting markets.

**Allowing for direct action taken on race / match day:**

- Real-time bet monitoring facilitates the timely intervention and potential disruption of planned event manipulation. The combination of real-time data processing and in-house expert assessment enables prompt reporting of suspicious activity to racing stewards and match officials, ensuring swift action can be taken on the day of the race or match. This proactive approach helps to safeguard the integrity of the event and mitigate the impact of potential manipulations.

**Facilitating Investigation & Disciplinary Hearings:**

The bet monitoring and betting analysis processes provide:

- New Investigations: The monitoring and analysis of bets are likely to uncover suspicious activities, which can initiate new investigations into potential integrity breaches within the sport or event.
- Investigation Support: The findings from bet monitoring and analysis can provide valuable support to the investigation process. This includes preparing for interviews with relevant individuals involved in the suspicious betting activities.
- Presentation of Betting Evidence: The betting evidence gathered can be presented and utilised during disciplinary hearings.

**Adding value through technology and expertise:**

Advancements in technology have made it cost-effective to deploy and run analytical models, enabling regulators to coordinate bet monitoring and large-scale data processing in-house. This integration of in-house betting analysis significantly enhances the regulator's overall analytical capabilities, leading to improved integrity management.

By investing in expert analysts and leveraging in-house betting expertise, regulators can unlock valuable insights related to betting and performance intelligence. Neglecting such expertise would mean missing opportunities to identify and address integrity risks effectively. While a thorough understanding and experience of betting and betting integrity threats is a necessity, a data scientist well-versed in new technology can play a pivotal role in enhancing betting integrity processes and leveraging sports analytics, including the application of machine learning and artificial intelligence.



Regulators that solely rely on outsourcing and alerts will likely deprive themselves of crucial intelligence and a comprehensive understanding of key threats. Ultimately, this approach risks damaging the sport's reputation and eroding confidence in the regulator's capabilities. In contrast, the intelligence gathered from in-house betting analysis allows regulators to take proactive steps, establishing a strong deterrent against betting corruption. By acting upon betting intelligence, regulators create an environment where individuals tempted by such corruption are deterred by the fear of being caught, contributing to fair and clean sporting events.

## **SECTION TWO – BULLETIN ARTICLES**

# Offshore Betting and Gambling Licensing - The Pseudo Regulation of Betting

*Martin Purbrick, August 2024*

---

The growth and globalisation of internet-based ('online') illegal betting in the past several decades has been accompanied by the expansion of offshore jurisdictions that purport to license online gambling and betting on markets in other jurisdictions. This is highly problematic for the effective regulation of betting and other forms of gambling, which traditionally has been a local national responsibility.

The increasing impact of illegal betting on racing and other sports' integrity, on financial and organised crime, and other negative issues such as loss of potential tax revenue, and social impacts such as problem gambling, necessitate that the activities of offshore gambling regulators be scrutinised by national governments and appropriate international organisations to assess how they are affecting national social policies.

Objectives in the regulation of online gambling inevitably reflect local national social, cultural, economic and political circumstances, and consequently require a local regulatory approach. The issues to be addressed by gambling regulators include "containing gambling addiction (as a public health matter), protection of minors, consumer protection (in particular minimising misleading advertising and unfair commercial practices), upholding the integrity of sports (preventing sports manipulation such as match-fixing), preventing money laundering and fighting crime more generally (fraud, organised crime)."<sup>4</sup>

There are clearly social, economic, and criminal aspects to the negative social impact of illegal betting, as shown in ARF Council reports. What must increasingly be assessed is what role do the offshore gambling licensing "pseudo regulators" play in the expansion of online illegal betting by providing camouflage to their actual illegality at the point of sale of bets to consumers?

---

<sup>4</sup> European Commission, Evaluation of Regulatory Tools for Enforcing Online Gambling Rules and Channelling Demand towards Controlled Offers, November 2018 (<https://op.europa.eu/en/publication-detail/-/publication/6bac835f-2442-11e9-8d04-01aa75ed71a1/language-en>)

## Illegal Betting, The Macolin Convention and Betting Regulation

Online betting has made many jurisdictions' gambling legislation – often written pre-internet – obsolete, as it allows betting operators to target consumers across the globe regardless of whether or not they are licensed to operate under the laws of jurisdictions in which their consumers are located.

The relevant gambling laws in every jurisdiction differ, but either the operator or the consumer, or both, may breach the law by betting or gambling when no licence exists in the local jurisdiction.

*'Illegal betting' is best defined by the Council of Europe Macolin Convention on the Manipulation of Sports Competitions as follows:*<sup>5</sup>

“Illegal sports betting” means any sports betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located.

If an online operator accepts bets from a consumer in a jurisdiction where the operator is not licensed then this is – by the Council of Europe definition – “illegal” betting. But many betting operators who operate in jurisdictions where they are unlicensed are able to argue that they are not engaged in illegal activity because there is no express law preventing online operators from accepting bets from persons located outside the jurisdiction in which the operator holds the licence; others simply ignore local laws because they know there is almost no likelihood of a successful prosecution being brought.

As illegal betting is clearly defined, it follows that legal betting can also be inferred from this definition. As sports betting activity should only be legally allowed under the applicable law of the jurisdiction where the consumer is located, it follows that the regulatory status of the betting operators should also be recognised under such local laws. Offshore pseudo gambling regulators are not part of a national regulatory structure and hence have no relation to national laws of any jurisdiction except that in which they sit.

---

<sup>5</sup> Council of Europe, Convention on the Manipulation of Sports Competitions, Article 3, 5a., 18 September 2014 (<https://rm.coe.int/16801cdd7e>)

The European Union, as a single market of 27 countries, has grappled with the national regulatory requirements relating to betting and other gambling and largely concluded that there are a diverse range of regulatory frameworks. The approach taken by the EU is essentially that although a single market for the provision and use of cross-border gambling services constitutes an economic activity that falls within the scope of the fundamental freedoms of the Treaty on the Functioning of the European Union, there is no obligation of mutual recognition of authorisations or licences to provide gambling services granted by an authority in an EU country.<sup>6</sup>

The Court of Justice of the European Union (CJEU) “has also repeatedly recognised EU countries’ rights to restrict the cross-border supply of certain gambling services where necessary to protect public interest objectives such as the protection of minors, the fight against gambling addiction, and the prevention of crime and fraud.”<sup>7</sup>

To be considered legal sports betting, it must be allowed in law where the consumer is located. Regulation of the gambling activity of a consumer is based on those national laws. As noted above, it has been legally recognised that it is the right of countries in the EU to restrict gambling (including sports betting) based on public interest. This principle that countries should have the right to restrict gambling based on public interest applies even more so for each sovereign country across the world regulating gambling within its own borders to its own consumers.

## **Betting and Gambling Taxation**

The desire to restrict gambling for social reasons has led to the use by governments of taxation as a tool to limit gambling by raising the price of betting through high levels of taxation. The growth of online betting challenges the efficiency of this approach, and it is further undermined by offshore jurisdictions that purport to license online gambling and betting.

---

6 European Commission, Gambling Case Law ([https://single-market-economy.ec.europa.eu/sectors/online-gambling/gambling-case-law\\_en](https://single-market-economy.ec.europa.eu/sectors/online-gambling/gambling-case-law_en))

7 European Commission, Gambling Case Law ([https://single-market-economy.ec.europa.eu/sectors/online-gambling/gambling-case-law\\_en](https://single-market-economy.ec.europa.eu/sectors/online-gambling/gambling-case-law_en))

Consumers are attracted to betting and gambling with online operators not licensed in their local country because such operators often offer a vastly superior product choice (i.e. sports and bet types to bet on, modes of betting such as in-play which may not be available in the local market) and much better prices (i.e. betting odds), since these operators are not limited by any condition of licence. Because of this, the impact of increased taxation in limiting gambling is diminished. Firstly, taxation is less efficient to ensure a suitable price point for betting that is a deterrent to people to gamble too much. Secondly, online betting provided by betting operators based remotely outside of the jurisdiction where the consumer is based, many claiming to be licensed in an offshore jurisdiction, undermines gambling taxation revenue. Betting and gambling operators licensed in offshore jurisdictions contribute zero taxation to the country where the consumer is based.

While offshore pseudo regulators may claim to offer a range of regulatory conditions for licence holders, taxation revenue is not one of these and clearly this is a major part of the attraction of such “licences”.

### **Offshore Gambling Licensing**

Offshore international gambling and betting licensing hubs are jurisdictions that have established regulatory frameworks to attract online gambling and betting operators by offering licences. These hubs often provide favourable conditions such as lower taxes (i.e. no tax paid in the jurisdiction where the point of sale takes place), streamlined regulations (i.e. under-regulated), and legal stability (i.e. no legal scrutiny). The number of these hubs is growing, and consequently so is the problem of illegal betting being camouflaged by pseudo-licenses.

As the table below shows almost all of the offshore betting and gambling licensing hubs are small island territories with small populations (the exceptions being Panama and the Philippines).



<b>Jurisdiction</b>	<b>Licensing Authority</b>	<b>Area (sq miles)</b>	<b>Population</b>	<b>Location</b>
Alderney	Alderney Gambling Control Commission (AGCC)	3	2,100	English Channel
Anjouan	Betting and Gaming Board	164	360,000	Indian Ocean
Antigua and Barbuda	Directorate of Offshore Gaming	170	100,000	Caribbean Sea
Curacao	Curacao Gaming Authority	171	148,000	Caribbean Sea
Gibraltar	Gambling Commissioner	2.6	32,000	Southern tip of Spain
Isle of Man	Gambling Supervision Commission (GSC)	220	84,000	British Isles
Kahnawake	Kahnawake Gaming Commission (KGC)	<20	<8,000	Canada
Malta	Malta Gaming Authority (MGA)	120	<520,000	Mediterranean Sea
Panama	Gaming Control Board	29,000	4.3 million	Latin America
Philippines	Philippine Amusement and Gaming Corporation (PAGCOR)	120,000	114 million	Southeast Asia
Vanuatu	Vanuatu Gaming Authority	4,700	<335,000	South Pacific

\* \* \*

The growth of illegal betting involves a failure in many countries to provide an appropriate legal licensed and regulated betting structure for consumers. This has led to the growth of offshore online betting (and also gambling), and in parallel a system of offshore gambling licensing hubs that offer regulation for remote betting and gambling. The inherent contradiction of this situation is apparent: countries where the regulation of betting and gambling has been insufficient do not need an offshore entity purporting to fulfil their regulatory role. The regulation of betting and gambling is a responsibility for the government of the country where the consumers accessing the services are located.

In contrast, many jurisdictions have shown that a clear definition of illegal betting in law, and flexibility for the legal market to compete within reason on price and product, can provide effective channelling of illegal betting demand to the local, well-regulated market, protecting consumers from gambling harm and providing tax benefits for local society, rather than leaking money to offshore entities. It is time for national gambling regulators and government policy makers to look more closely at this growing offshore pseudo licensing system and state clearly that it is detrimental to effective national social policies.

# The Invisible Empire: How Singapore court cases unmasked a multi-billion-Dollar Illegal Betting Syndicate

*James Porteous, Research assistance by Jeremy Leung, The Hong Kong Jockey Club, August 2024*

---

Illegal betting, money laundering, organised crime and corruption go hand-in-hand, underlined by recent convictions in Singapore's biggest-ever money laundering case directly linked to illegal betting syndicates spanning China, the Philippines, Cambodia, Dubai and Europe.

Despite the staggering sums mentioned in the USD 2-billion-dollar case<sup>8</sup>, the illegal betting operations described are in fact completely typical – in many ways, the only notable thing is that in this case, there were successful prosecutions.

## Background

On 15 August 2023, Singaporean authorities arrested 10 individuals since jailed for 13 to 16 months on money laundering and other charges (see table below).<sup>9</sup>

Illegal betting is the “predicate crime” which generated the money laundered; authorities focused on this crime rather than transnational online illegal betting, because it was easier to prove it had taken place in Singapore as the individuals simply had no way of legitimately explaining their vast wealth.<sup>10 11</sup>

---

8 Mercedes Ruehl, 'Singapore secures last conviction in \$2bn money laundering case', Financial Times, 7 June 2024 <<https://www.ft.com/content/28e9115d-6ab4-4a9a-b57d-defd4968f736> accessed on 27 June 2024>

9 Andrew Wong & Nadine Chua, '\$3b money laundering case: 10 convicted, 17 on the run; police are after the rest', The Straits Times, 9 June 2024 <<https://www.straitstimes.com/singapore/3b-money-laundering-case-10-convicted-17-on-the-run-police-are-after-the-rest> accessed on 16 June 2024>.

10 David Sun, 'Suspects in billion-dollar money laundering case in S'pore allegedly linked to China gambling groups', The Straits Times, 22 August 2023 <<https://www.straitstimes.com/singapore/suspects-in-1-billion-money-laundering-case-in-s-pore-allegedly-linked-to-china-gambling-groups> accessed on 25 June 2024>.

11 United Nations Office on Drugs and Crime, 'Casinos, Money Laundering, Underground Banking, and Transnational Organized Crime in East and Southeast Asia: A Hidden and Accelerating Threat', January 2024 <[https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf) accessed on 25 June 2024>

Nor did they keep a low profile: assets seized included 152 properties, millions in cryptocurrency, gold bars and 62 luxury vehicles such as Ferraris and Rolls-Royces. A treasure trove of high-end watches, 250 luxury handbags, 726 bottles of premium alcohol, jewellery, art collectibles and more was taken from luxury villas in Singapore's most exclusive residential neighbourhoods,<sup>12</sup> while some of the convicts flaunted their wealth at expensive golf and yacht clubs.<sup>13 14</sup>

All 10 are from Fujian province in China, but have passports from multiple countries such as Cambodia, Vanuatu, St Kitts & Nevis, Cyprus and Dominica.<sup>15 16</sup> This highlights the risks associated with so-called citizenship-by-investment schemes which, in essence, grant anyone a passport in exchange for a suitably large cheque, and have been highlighted by global anti-money laundering organisations as key enablers of criminality.<sup>17 18</sup>

Seventeen other people are wanted by Singapore Police but fled the city, while authorities are also investigating individuals suspected of enabling the laundering by forming shell companies and setting up bank accounts.<sup>19</sup>

12 Kelly Ng, 'The \$2bn dirty-money case that rocked Singapore', BBC, 12 April 2024 <<https://www.bbc.com/news/world-asia-66840450> accessed on 16 June 2024>

13 Low De Wei & Bernadette Toh, 'The Banks That Hold Most Money in Singapore Laundering Scandal', Bloomberg, 8 June 2024 <<https://www.bloomberg.com/news/articles/2024-06-08/singapore-money-laundering-scandal-what-s-next-for-2-billion-of-seized-assets> accessed on 26 June 2024>

14 David Sun & Osmond Chia, 'Golf club managers to meet over money laundering concerns amid \$1 billion probe', The Straits Times, 29 August 2023 <<https://www.straitstimes.com/singapore/golf-club-managers-to-meet-over-money-laundering-concerns-amid-1-billion-probe> accessed on 26 June 2024>

15 Aidan Jones, 'Citizenship for sale: Singapore's US\$1.3 billion money laundering probe exposes Chinese criminals' paid-for passports', South China Morning Post, 16 September 2023 <<https://www.scmp.com/week-asia/economics/article/3234760/citizenship-sale-singapore-u13-billion-money-laundering-probe-exposes-chinese-criminals-paid> accessed on 26 June 2024>

16 Christine Tan & David Sun, 'Extradition worries grow for convicted money launderer after deportation to Cambodia', The Straits Times, 14 May 2024 <<https://www.straitstimes.com/singapore/courts-crime/extradition-worries-grow-for-convicted-money-launderer-after-deportation-to-cambodia> accessed on 25 June 2024>

17 'FATF Report: Misuse of Citizenship and Residency by Investment Programmes', Financial Action Task Force, November 2023 <<https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Misuse-CBI-RBI-Programmes.pdf.coredownload.pdf> accessed on 25 June 2024>

18 'FATF REPORT: Money Laundering Through the Physical Transportation of Cash', Financial Action Task Force, October 2015 <<https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/money-laundering-through-transportation-cash.pdf> accessed on 16 June 2024>.

19 Kelly Ng, 'The \$2bn dirty-money case that rocked Singapore', BBC, 12 April 2024 <<https://www.bbc.com/news/world-asia-66840450> accessed on 16 June 2024>

Table 1 - The 10 individuals convicted

Name	Age	Nationality	Other Passports Held	Guilty Plea Date	Charges	Sentence	Assets Forfeited	Deportation Date
Su Wen-qiang <sup>20</sup>	32	Cambodian	China, Vanuatu	April 2	2 Money Laundering Charges	13 months' jail	SGD 6 million (USD 4.4 million)	May 6
Su Haijin <sup>21</sup>	41	Cypriot	China, Saint Lucia	April 4	1 Resistance to Lawful Apprehension, 2 Money Laundering	14 months' jail	SGD 165 million (USD 121 million)	May 28
Wang Bao-sen <sup>22</sup>	32	Chinese	Vanuatu	April 16	2 Money Laundering Charges	13 months' jail	SGD 8 million (USD 5.8 million)	May 6
Su Baolin <sup>23</sup>	42	Cambodian	Vanuatu	April 29	2 Money Laundering, 1 False Representation	14 months' jail	SGD 65 million (USD 48 million)	May 25
Zhang Ruijin <sup>24</sup>	45	Chinese	Saint Kitts and Nevis	April 30	1 Money Laundering, 2 Forgery-Related	15 months' jail	SGD 118 million (USD 87 million)	
Vang Shui-ming <sup>25</sup>	43	Turkish	China, Vanuatu	May 14	2 Money Laundering, 1 Forgery-Related	13 months and six weeks' jail	SGD 179 million (USD 131.8 million)	Deported to Japan June 1, despite his multiple passports from other countries, for reasons unknown.
Chen Qing-yuan <sup>26</sup>	34	Cambodian	China, Dominica	May 23	2 Money Laundering, 1 Forgery-Related	15 months' jail	SGD 21.3 million (USD 15.6 million)	

20 Singapore Police Force, 'First Man Sentenced for Money Laundering Offences in Anti-Money Laundering Probe', 2 April 2024 < [https://www.police.gov.sg/Media-Room/News/20240402\\_first\\_man\\_sentenced\\_for\\_money\\_laundering\\_offences\\_in\\_anti\\_money\\_laundering\\_probe](https://www.police.gov.sg/Media-Room/News/20240402_first_man_sentenced_for_money_laundering_offences_in_anti_money_laundering_probe) accessed on 2 July 2024>

21 Singapore Police Force, 'Man Sentenced for Resisting Arrest and Money Laundering Offences in Anti-Money Laundering Probe', 4 April 2024 < [https://www.police.gov.sg/Media-Room/News/20240404\\_man\\_sentenced\\_for\\_resisting\\_arrest](https://www.police.gov.sg/Media-Room/News/20240404_man_sentenced_for_resisting_arrest) accessed on 2 July 2024>

22 Singapore Police Force, 'Third Man Sentenced for Money Laundering Offences In Anti-Money Laundering Probe', 16 April 2024 < [https://www.police.gov.sg/media-room/news/20240416\\_third\\_man\\_sentenced\\_for\\_money\\_laundering\\_offences\\_in\\_anti-money\\_laundering\\_probe](https://www.police.gov.sg/media-room/news/20240416_third_man_sentenced_for_money_laundering_offences_in_anti-money_laundering_probe) accessed on 2 July 2024>

23 Singapore Police Force, 'Fourth Man Sentenced for Making False Representations and Money Laundering Offences in Anti-Money Laundering Probe', 29 April 2024 < [https://www.police.gov.sg/media-room/news/20240429\\_fourth\\_man\\_sentenced\\_for\\_making\\_false\\_representations](https://www.police.gov.sg/media-room/news/20240429_fourth_man_sentenced_for_making_false_representations) accessed on 2 July 2024>

24 Singapore Police Force, 'Fifth Man Sentenced for Forgery and Money Laundering Offences in Anti-Money Laundering Probe', 30 April 2024 < [https://www.police.gov.sg/media-room/news/20240430\\_fifth\\_man\\_sentenced\\_for\\_forgery\\_and\\_money\\_laundering\\_offences](https://www.police.gov.sg/media-room/news/20240430_fifth_man_sentenced_for_forgery_and_money_laundering_offences) accessed on 2 July 2024>

25 Singapore Police Force, 'Sixth Man Sentenced for Forgery and Money Laundering Offences in Anti-Money Laundering Probe', 14 May 2024 < [https://www.police.gov.sg/media-room/news/20240514\\_sixth\\_man\\_sentenced\\_for\\_forgery\\_and\\_money\\_laundering](https://www.police.gov.sg/media-room/news/20240514_sixth_man_sentenced_for_forgery_and_money_laundering) accessed on 2 July 2024>

26 Singapore Police Force, 'Seventh Man Sentenced for Forgery and Money Laundering Offences in Anti-Money Laundering Probe', 23 May 2024 < [https://www.police.gov.sg/media-room/news/20240523\\_seventh\\_man\\_sentenced\\_for\\_forgery\\_and\\_money\\_laundering\\_offences\\_in\\_antimoney](https://www.police.gov.sg/media-room/news/20240523_seventh_man_sentenced_for_forgery_and_money_laundering_offences_in_antimoney) accessed on 2 July 2024>

Name	Age	Nationality	Other Passports Held	Guilty Plea Date	Charges	Sentence	Assets Forfeited	Deportation Date
Lin Bao-ying <sup>27</sup>	44	Chinese	Cambodia, Dominica, Turkey	May 30	2 Forgery-Related, 1 Money Laundering	15 months' jail	SGD 154 million (USD 113.4 million)	
Wang Dehai <sup>28</sup>	35	Cypriot	China, Cambodia, Vanuatu	June 7	2 Money Laundering	16 months' jail	SGD 49.2 million (USD 36.4 million)	
Su Jian-feng <sup>29</sup>	36	Vanuatu	China, Saint Kitts and Nevis	June 6	1 Money Laundering, 1 Forgery	17 months' jail	SGD 179 million (USD 132 million)	
<b>Total</b>							SGD 944.5 million (USD 695.4 million)	

27 Singapore Police Force, 'Woman Sentenced for Forgery and Money Laundering Offences in Anti-Money Laundering Probe', 30 May 2024 < [https://www-police-gov-sg.cwp.sg/media-room/news/20240530\\_woman\\_sentenced\\_for\\_forgery\\_and\\_money\\_laundering\\_offences\\_in\\_antimoney\\_laundering\\_probe](https://www-police-gov-sg.cwp.sg/media-room/news/20240530_woman_sentenced_for_forgery_and_money_laundering_offences_in_antimoney_laundering_probe) accessed on 2 July 2024>

28 Singapore Police Force, 'Ninth Person Sentenced for Money Laundering Offences in Anti-Money Laundering Operation', 7 June 2024 <[https://www-police-gov-sg.cwp.sg/media-room/news/20240607\\_ninth\\_person\\_sentenced\\_for\\_money\\_laundering\\_offences\\_in\\_anti\\_money\\_laundering\\_operation%20](https://www-police-gov-sg.cwp.sg/media-room/news/20240607_ninth_person_sentenced_for_money_laundering_offences_in_anti_money_laundering_operation%20) accessed on 2 July 2024>

29 Singapore Police Force, 'Tenth Person Sentenced for Forgery and Money Laundering Offences In Anti-Money Laundering Operation', 10 June 2024 <[https://www.police.gov.sg/Media-Room/News/20240610\\_tenth\\_person\\_sentenced\\_for\\_forgery\\_and\\_money\\_laundering\\_offences](https://www.police.gov.sg/Media-Room/News/20240610_tenth_person_sentenced_for_forgery_and_money_laundering_offences) accessed on 2 July 2024>

30 Loke Kok Kuen Chinese Cultural Legacy Research Trust, 'Migration of the Hokkien People to Southeast Asia', 1 April 2023 <<https://ccs.city/en/anthology-of-chinese-diasporas/migration-of-the-hokkien> accessed on 27 June 2024>

31 Management Today, 'The world's successful diasporas', 3 April 2007 < <https://www.managementtoday.co.uk/worlds-successful-diasporas/article/648273> accessed on 27 June 2024>

## The Illegal Betting Link

Fujian, on China's south coast, has for hundreds of years seen its people emigrate across Asia and beyond seeking a better life,<sup>30 31</sup> and several of Asia's richest people have Fujian origins.<sup>32</sup>

But this entrepreneurial spirit has also inspired highly successful transnational organised crime groups.<sup>33 34 35</sup> several of the 10 convicts are from a Fujian county, Anxi, labelled by China media as "The Hometown of Fraudsters",<sup>36 37 38 39</sup> because many of its citizens are deeply involved in transnational telecom and cyber-scams and illegal betting operations.<sup>40</sup> All of the convicts have long-standing close business and personal relationships, and several are family members. Five have been on various China wanted lists since at least 2015 in relation to illegal betting, telecoms fraud and money laundering<sup>41</sup>.

The illegal betting links go back to at least 2012<sup>42</sup>, and the foundation of a betting platform "Hongli International Casino," ( 鸿利国际赌博 ) by a then 23-year-old, Wang Binggang.<sup>43</sup> He was a key target of the Singapore case but evaded authorities, although his cousin was among the 10 convicted.

Wang had been sentenced to three years in jail in 2015 by a Chinese court for his illegal betting operation, but this seems to have had minimal impact on Hongli (or its successor platforms), which were/are based in the Philippines and Cambodia but mainly targeted bettors in Greater China.<sup>44 45</sup> On his release around 2017/18 (exact date unclear) he moved to Singapore.

---

32 Iris Gonzales, 'Fujian, the land of billionaires', Philstar Global, 6 June 2019 < <https://www.philstar.com/business/2019/06/06/1923894/fujian-land-billionaires> accessed on 27 June 2024>

33 Poh Lay Hoon, 'Property, nightclubs, collector items: How 'Fujian gang' lifestyles aided money-laundering activities', Think China, 31 August 2023 <<https://www.thinkchina.sg/society/property-nightclubs-collector-items-how-fujian-gang-lifestyles-aided-money-laundering-activities> accessed on 27 June 2024>

34 James O. Finckenaue, 'Chinese Transnational Organized Crime: The Fuk Ching', U.S. Department of Justice, 2001 <<https://www.ojp.gov/ncjrs/virtual-library/abstracts/chinese-transnational-organized-crime-fuk-ching> accessed on 27 June 2024>

35 Sebastian Rotella, 'Outlaw Alliance: How China and Chinese Mafias Overseas Protect Each Other's Interests', ProPublica, 12 July 2023 <<https://www.propublica.org/article/how-beijing-chinese-mafia-europe-protect-interests> accessed on 27 June 2024>

36 Mina Chiang, 'How is Singapore's largest money laundering case associated with organised cyberfraud?', LinkedIn Pulse, 18 May 2024 < <https://www.linkedin.com/pulse/how-singapores-largest-money-laundering-case-organised-mina-chiang-x3vqc> accessed on 25 June 2024>

37 徐天, '盛產鐵觀音的安溪,為何成了最早搞電詐的“福建口音”?', 中國新聞週刊 1 August 2021 <[https://www.ineweek.cn/society/2021-08-21/13497.shtml?trk=article-ssr-frontend-pulse\\_little-text-block](https://www.ineweek.cn/society/2021-08-21/13497.shtml?trk=article-ssr-frontend-pulse_little-text-block) accessed on 25 June 2024>

38 Sohu.com " 十個安溪九個騙 還有一個在鍛煉 " 對話安溪電信詐騙犯 Hongqing Times, 30 August 2016 <[https://www.sohu.com/a/112683244\\_268508?trk=article-ssr-frontend-pulse\\_little-text-block](https://www.sohu.com/a/112683244_268508?trk=article-ssr-frontend-pulse_little-text-block) accessed on 25 June 2024>

39 中國新聞週刊, '盛產鐵觀音的安溪,為何成了最早搞電詐的“福建口音”?', 21 August 2021 <<https://www.ineweek.cn/society/2021-08-21/13497.shtml> accessed on 28 June 2024>

40 Elizabeth Law, 'S'pore's billion-dollar money laundering case: The criminal link to Fujian's tea county in China', Straits Times, 23 August 2024 <<https://www.straitstimes.com/asia/east-asia/billion-dollar-money-laundering-case-china-s-tea-county-hides-criminal-side> accessed on 16 June 2024>

41 Ibid.

42 8 World, '十被告關係錯綜複雜 洗錢案核心為菲律賓賭博集團' 24 October 2023 <<https://www.8world.com/singapore/billion-dollar-money-laundering-gambling-operation-based-in-the-philippines-2275276> accessed on 28 June 2024>

43 Case No.: (2015) Yuxingchu No. 00176

44 Christine Tan 'Founder of Chinese gambling website linked to S'pore's \$2b money laundering case', The Straits Times, 25 September 2023 <<https://www.straitstimes.com/singapore/courts-crime/founder-of-chinese-gambling-website-linked-to-singapore-s-2b-money-laundering-case>>

45 David Sun, Andrew Wong & Nadine Chua, 'Wider network of suspects linked to 10 nabbed in billion-dollar money laundering bust', The Straits Times, 10 September 2023 < <https://www.straitstimes.com/singapore/wider-network-of-suspects-linked-to-10-nabbed-in-billion-dollar-money-laundering-bust> accessed on 26 June 2024>

### Case study – a typical Asian illegal betting platform

Hongli employed a pyramid-scheme style agent-customer recruitment network,<sup>46</sup> used Taiwan-programmed “off the shelf” betting technology,<sup>47</sup> and Macau-themed branding all features common to scores of other illegal betting platforms targeting customers in Asia. (Macau imagery is often used to lend a sheen of legitimacy to such websites by implying they are associated with the city’s famous casinos).

Hongli had business operations initially in a Special Economic Zone in the Philippines, before moving to Bavet, Cambodia. Again, Philippines and Cambodia are typical hubs for such operations. (Border town, Bavet, has become notorious as a hub for online illegal betting and related criminality such as cyber-fraud and human trafficking<sup>48 49 50, 51 52</sup> and there is circumstantial evidence suggesting Citibet, the world’s largest illegal betting network specialising in horse racing, may have operations there).<sup>53 54 55 56</sup>

Hongli generated massive profits from illegal betting on sport and casino games – at minimum in the hundreds of millions of dollars a year, according to court records<sup>57</sup> – which were then laundered through multiple offshore accounts and investments in real estate.<sup>58</sup>

46 萬事通教育發佈, ‘新加坡萬事通 Vaster News, 2 November 2023 <<http://vasternews.com/index/view/5996.html> accessed on 16 June 2024>.

47 吳睿明, ‘24 億洗錢案 王斌剛王水明或曾注資台公司 Lianhe Zaobao, 29 September 2023 <<https://www.zaobao.com/realtime/singapore/story20230929-1438036> accessed on 16 June 2024>.

48 Khuon Narim, ‘Dozens of Vietnamese questioned by police after allegedly seeking escape from Bavet casino’, Cambodia News, 21 July 2023 <<https://cambojanews.com/dozens-of-vietnamese-questioned-by-police-after-allegedly-seeking-escape-from-bavet-casino/> accessed on 16 June 2024>.

49 Tith Kognov, ‘90% of foreign workers in Bavet casinos illegal’, Khmer Times, 24 January 2023 <<https://www.khmertimeskh.com/501224586/90-of-foreign-workers-in-bavet-casinos-illegal/> accessed on 16 June 2024>.

50 Nathan Paul Southern & Lindsey Kennedy, ‘Laos’ criminal casino empire: Chinese gangsters’ new playground’, South China Morning Post, 15 October 2022 <<https://www.scmp.com/magazines/post-magazine/long-reads/article/3195932/laos-criminal-casino-empire-chinese-gangsters> accessed on 16 June 2024>.

51 Danielle Keeton-Olsen, ‘Inside Southeast Asia’s Casinoland: the ‘underground bank’ at the centre of transnational crime’, South China Morning Post, 20 January 2024 <<https://www.scmp.com/week-asia/economics/article/3249121/inside-southeast-asias-casinoland-underground-bank-centre-transnational-crime> accessed on 27 June 2024>.

52 Inside Asian Gaming, ‘Cambodia to crack down on casinos, illegal gambling as more human trafficking, kidnapping cases emerge’, 19 September 2022 <<https://www.asgam.com/index.php/2022/09/19/cambodia-to-crack-down-on-casinos-illegal-gambling-as-more-human-trafficking-kidnapping-cases-emerge/> accessed on 27 June 2024>.

53 ‘How Organised Crime Operates Illegal Betting, Cyber Scams & Modern Slavery in Southeast Asia’, Asian Racing Federation, 10 October 2023 <<https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/651e89> accessed on 16 June 2024>.

54 ‘Casino Bavet-Moc Bai did not respond to allegations of online scam operations’, Business & Human Rights Resource Centre, 3 January 2020 <<https://www.business-humanrights.org/en/latest-news/casino-bavet-moc-bai-did-not-respond-to-allegations-of-online-scam-operations/> accessed on 16 June 2024>.

55 James Porteous, ‘Franchise Wars - How Citibet and Asia’s other biggest bookmakers have McDonaldised illegal betting’, Asian Racing Federation, 6 May 2024 <<https://www.asianracing.org/email/202405qb-franchise-wars---how-citibet-and-asias-other-biggest-bookmakers-have-mcdonaldised-illegal-betting> accessed on 16 June 2024>.

56 Andrew Haffner, ‘Taiwan money laundering trials spotlight Asian cyberscam sector’, Nikkei Asia, 3 February 2024 <<https://asia.nikkei.com/Spotlight/Society/Crime/Taiwan-money-laundering-trials-spotlight-Asian-cyberscam-sector> accessed on 16 June 2024>.

57 Case No.: (2015) Yuxingchu No. 00176

58 Christine Tan ‘Founder of Chinese gambling website linked to S’pore’s \$2b money laundering case’, The Straits Times, 25 September 2023 <<https://www.straitstimes.com/singapore/courts-crime/founder-of-chinese-gambling-website-linked-to-singapore-s-2b-money-laundering-case>>





Figure 1 - Hongli's platform in a screenshot from 2016 shows it to be typical of such unlicensed operators targeting customers in Greater China, offering sports and casino betting and implying an association with Macau's famous casinos. Source: People's Procuratorate of Tongshan District, Xuzhou City.

All of these characteristics are typical of illegal betting operations in Asia.

It is not known what happened to Hongli's operations after the imprisonment of Wang in 2015, but indicators are that they simply carried on, probably under a rebrand.

For example, China media has reported that one of the 10 Singapore convicts, Vang Shuiming, has been wanted by China in connection with another online illegal betting platform, "Hengbo Baowang Group" (恒博包网集). According to one report<sup>59</sup>, Vang's operation had 10,000 employees in the Philippines and Cambodia and was generating the equivalent of USD 687 million a month in turnover.

The numbers seem incredible until one understands the demand in Greater China. For example, one of the largest such operations – that run by Macau junket operator Suncity until the January 2023 imprisonment of its chief Alvin Chau on charges relating to illegal betting, money laundering and organised crime in Macau<sup>60 61 62 63 64</sup> – had illegal betting turnover reportedly worth ~USD 145 billion a year from Mainland China customers alone. That makes Hongli / Hengbo's turnover of around ~USD 7-8 billion a year start to seem paltry by comparison.

59 陀螺財經, '新加坡百億洗錢案背後: 網詐、賭博, "福建幫" 的奢靡與罪惡', 26 September 2023 <<https://www.tuoluo.cn/article/detail-10109660.html> accessed on 28 June 2024>

60 Farah Master and Eduardo Baptista, 'Suncity closes its Macau VIP gaming rooms after CEO's arrest -sources', Reuters, 2 December 2021 <<https://www.reuters.com/markets/europe/shares-macau-gambling-group-suncity-halted-second-time-3-days-2021-12-01/> accessed on 26 June 2024>

61 Emily Hung, 'Macau 'junket king' Alvin Chau jailed for 18 years on 162 charges of fraud, illegal gambling and criminal association', South China Morning Post, 18 January 2023 <<https://www.scmp.com/news/hong-kong/law-and-crime/article/3207267/macau-junket-king-alvin-chau-jailed-18-years-charges-fraud-illegal-gambling-and-criminal-association> accessed on 16 June 2024>

62 James Porteous, 'Back to the Future - Macau Junkets and Illegal Betting', Asian Racing Federation, 18 August 2023 <<https://www.asianracing.org/email/202308qb-back-to-the-future-macau-junkets-and-illegal-betting> accessed on 16 June 2024>

63 Vivian Chan 'Suncity's online gambling operation wagers exceeded \$42.2 billion: CCTV', Asia Gaming Brief, 8 January 2024 <<https://agbrief.com/intel/deep-dive/08/01/2024/suncitys-online-gambling-wagering-exceeded-42-2-billion/> accessed on 25 June 2024>

64 Radosav Milutinovic 'Macau's Syndicate Operated Illegal Cross-Border Gambling to Generate \$2.4 Million Profit', World Casino Directory, 8 January 2024 <<https://news.worldcasinodirectory.com/macaus-syndicate-operated-illegal-cross-border-gambling-to-generate-2-4-million-profit-111726> accessed on 25 June 2024>

### ***Case study – a lucrative profession***

Details in the conviction of Wang Dehai, who received the longest jail term of the 10 convicted (16 months), underline why Asia's illegal betting industry will always prove attractive to some.

Wang is the cousin of the founder of the Hongli illegal betting platform and was involved since its inception in 2012, starting as a seemingly lowly tech support officer. He became a customer recruitment agent in 2014 and soon was receiving a 3% share in the platform's profits. The court heard he earned CNY 80 million (~USD 11 million) in 2016 alone – if that was his 3% cut, by implication Hongli had profits in the region of USD 366 million that year (11 million / 0.03), equating to annual turnover in the billions.

This commission-based profit-sharing model is typical of Asian illegal betting operations. Since the hundreds of online platforms are in most respects indistinguishable from each other, employing similar “plug-in” betting software from the same core suppliers, the key to success is direct recruitment of as many customers to your platform as possible. Customers are in turn incentivised to recruit others in a pyramid-scheme like model.

As shown in Wang's case, the rewards for successful agents can be extremely lucrative. He forfeited SGD 49 million (USD 36 million) in assets on his conviction, among them a suitcase containing the equivalent of more than USD 1.6 million in cash – authorities were not convinced by his explanation that these were mah-jong winnings.

## Transnational and Geo-Political Implications

The Singapore case has ties to jurisdictions across the globe, including Dubai, Cambodia, Malaysia, Philippines, the United Kingdom, Cyprus and Jersey – underlining that, while much of the customer base for illegal betting may be based in Asia, its impacts are felt worldwide.<sup>65 66</sup>

According to data leaks from Dubai reported by various media outlets, one of the convicts was involved in brokering at least 126 Dubai property sales for money laundering between 2020-2022 worth over AED 537 million (USD 146 million). He himself had bought 30 properties in Dubai.<sup>67 68</sup>

As noted, the illegal betting platforms involved had operations in both the Philippines and Cambodia, and five of the 10 convicted had Cambodia passports. There do not appear to have been repercussions in Cambodia in relation to the case, perhaps due to vested interests, but in the Philippines, an ongoing corruption scandal has direct links to the Singapore case.

This involves a woman named Alice Guo, mayor of a small town called Bamban, approximately 60 miles away from Metro Manila, within the Clark Freeport and Special Economic Zone – the same SEZ in which the Hongli illegal betting platform had operations.

She has been labelled the “POGO mayor” because of apparent close ties to online betting, and public displays of wealth out of keeping with her modest position<sup>69 70</sup> (POGO, Philippines Offshore Gaming Operators, is the local term for the online betting industry).

---

65 Martin Young & Yan Yan, ‘Members of Alleged Singapore Money Laundering Syndicate Bought London Properties Worth \$56M’, Organized Crime and Corruption Reporting Project, 13 September 2023 < <https://www.occrp.org/en/investigations/members-of-alleged-singapore-money-laundering-syndicate-bought-london-properties-worth-dollar56m> accessed on 27 June 2024>

66 Samuel Devaraj, ‘Money laundering case: Accused Su Haijin linked to London buildings bought for \$73m’, The Straits Times, 14 September 2024 < <https://www.straitstimes.com/singapore/courts-crime/money-laundering-case-accused-su-haijin-linked-to-73m-london-buildings-on-famous-shopping-street> accessed on 27 June 2024>

67 Andrew Wong, ‘3b money laundering case: Su Jianfeng sentenced to 17 months, last of 10 to be sent to jail’, The Straits Times, 13 June 2024 < <https://www.straitstimes.com/singapore/courts-crime/3b-money-laundering-case-su-jianfeng-sentenced-to-17-months-last-of-10-to-be-sent-to-jail> accessed on 16 June 2024>

68 David Sun, ‘S’pore’s alleged money launderers named alongside terrorist financiers, drug lords in Dubai probe’, The Straits Times, 19 May 2024 < <https://www.straitstimes.com/singapore/s-pore-s-alleged-money-launderers-named-alongside-terrorist-financiers-drug-lords-in-dubai-probe> accessed on 16 June 2024>

69 Cecille Suerte Felipe, ‘Guo declares ₱367 million assets, ₱189 million liabilities’, Philstar Global, 6 June 2024 < <https://www.philstar.com/headlines/2024/06/06/2360703/guo-declares-p367-million-assets-p189-million-liabilities> accessed on 16 June 2024>

70 ‘Statement Of Sen. Win Gatchalian On The Suspension Of Bamban Mayor Alice Guo’, Senate of the Philippines, 3 June 2024 < [http://legacy.senate.gov.ph/press\\_release/2024/0603\\_gatchalian2.asp](http://legacy.senate.gov.ph/press_release/2024/0603_gatchalian2.asp) accessed on 14 June 2024>

Guo was co-director with two of the Singapore convicts,<sup>71</sup> in a company which built a POGO compound in her town accused of running cyber-scams and forced labour.<sup>72 73 71 75</sup>

<sup>76</sup> She has been suspended pending investigations,<sup>77</sup> with the country's organised crime commission announcing that "serious and non-bailable" criminal charges will be filed against her and two other officials.<sup>78</sup> At the time of writing in July 2024, she was reportedly "in hiding" from police.

The Singapore case also has geo-political implications, because illegal betting and related organised criminality on China's borders are a core concern for the country. The arrests came just four days after the visit of Wang Yi, China's Minister of Foreign Affairs, to Singapore on 10-11 August 2023, although Singapore officials denied there was any link.<sup>79 80</sup>

Wang Yi subsequently hosted senior ministers from Myanmar, Thailand, Cambodia, Laos and Vietnam in Beijing, promising that China and its Asian neighbours would "resolutely combat cross-border crime in the region, especially cyber fraud and gambling."<sup>81</sup>

71 Christine Tan, 'Senate probes Mayor linked to couple in Singapore's \$3b money laundering case', The Straits Times, 27 May 2024 <<https://www.straitstimes.com/singapore/courts-crime/philippine-senate-probes-mayor-linked-to-couple-in-singapore-s-3b-money-laundering-case> accessed on 16 June 2024>.

72 Lian Buan & Joann Manabat, 'Bamban Tarlac raided: POGO fortress Alice Guo', Rappler, 30 May 2024 <<https://rappler.com/newsbreak/in-depth/bamban-tarlac-raided-pogo-fortress-alice-guo/> accessed on 16 June 2024>.

73 Dempsey Reyes & Frances Mangosing, 'POGO probe: Guo, 2 other Bamban execs suspended', Inquirer.Net, 4 June 2024 <<https://newsinfo.inquirer.net/1947791/pogo-probe-guo-2-other-bamban-execs-suspended> accessed on 16 June 2024>.

74 Alan Robles, 'Chinese asset in Philippines raises alarm over mystery mayor suspected links to POGOs', South China Morning Post, 16 May 2024 <<https://www.scmp.com/week-asia/politics/article/3262875/chinese-asset-philippines-raises-alarm-over-mystery-mayor-suspected-links-pogos> accessed on 16 June 2024>.

75 Neil Jayson Servallos, 'Ombudsman suspends Mayor Guo, 2 others', Philstar Global, 4 June 2024 <<https://www.philstar.com/headlines/2024/06/04/2360188/ombudsman-suspends-mayor-guo-2-others> accessed on 16 June 2024>.

76 Ibid.

77 Andrew Wong & Nadine Chua, '\$3b money laundering case: 10 convicted, 17 on the run; police are after the rest', Straits Times, 9 June 2024 <<https://www.straitstimes.com/singapore/3b-money-laundering-case-10-convicted-17-on-the-run-police-are-after-the-rest> accessed on 16 June 2024>.

78 Frank Schuengel, 'Criminal charges to be filed against Philippines POGO Mayor Alice Guo', Asian Gaming Brief, 17 June 2024 <<https://agbrief.com/news/philippines/17/06/2024/criminal-charges-to-be-filed-against-philippines-pogo-mayor-alice-guo/> accessed on 16 June 2024>.

79 Grace Leong, 'Money laundering probe sparked by suspicious transaction reports, not external pressure: Shanmugam', The Straits Times, 11 September 2023 <<https://www.straitstimes.com/business/money-laundering-probe-sparked-by-suspicious-transaction-reports-not-external-pressure-shanmugam> accessed on 26 June 2024>.

80 Kimberly Lin, 'Singapore money-laundering probe not done 'at the behest of China': minister', South China Morning Post, 3 Octo.ber 2023 <<https://www.scmp.com/week-asia/politics/article/3236672/singapore-money-laundering-probe-not-done-behest-china-minister> accessed on 26 June 2024>.

81 Zhao Ziwen, 'China vows closer security ties with Mekong states as cyber scams, Myanmar unrest have cross-border impact', South China Morning Post, 8 December 2023 <<https://www.scmp.com/news/china/diplomacy/article/3244388/china-vows-closer-security-ties-mekong-states-cyber-scams-myanmar-unrest-have-cross-border-impact> accessed on 28 June 2024>.

82 Embassy of the People's Republic of China in the Republic of the Philippines, 'Statement of the Spokesperson of the Chinese Embassy in the Philippines', Embassy of the People's Republic of China in the Republic of the Philippines, (14 June 2024), [http://ph.china-embassy.gov.cn/eng/sgdt/202406/t20240614\\_11436131.htm](http://ph.china-embassy.gov.cn/eng/sgdt/202406/t20240614_11436131.htm), accessed 3 July 2024.

In the Philippines, China's embassy publicly called for a complete shutdown of the POGO online betting industry in June 2024,<sup>82</sup> labelling it a "social ill" detrimental to China-Philippines relations, and in July 2024, the president of the Philippines announced a complete ban on POGOs to be enacted before the end of the year. However, it is highly probable that this will simply drive operators underground (there are many more unlicensed "POGOs" than licensed in the Philippines) and/or see operators move to Cambodia / Laos / Myanmar.

## **Conclusion**

The Singapore convictions underline again the enormous scale and transnational impact of illegal betting – as well as the difficulty of prosecuting it. Notably these convictions were on laundering of the profits from illegal betting, rather than the crime which generated them.

From the outside, the punishments seem relatively slight – most of the 10 served less than a year in jail and have already been deported after time served. It seems probable they might return to "business as usual" elsewhere in Asia – again, this underlines a key message of the ARF Council, that there is little to deter individuals in the face of vast profits to be made from the illegal betting industry.

The case also underlines the reputational impact to jurisdictions such as Singapore which pride themselves as strongly regulated financial hubs of high integrity – although it should be noted that in some other jurisdictions in Asia, this case would never even have come to trial because of corruption.

Ultimately, the Singapore case serves as a stark reminder that illegal betting is far from a victimless crime. Its tentacles reach deep into the fabric of society, fuelling corruption, enabling organised crime, and undermining economic stability. The vast sums involved don't merely represent lost tax revenue; they represent funds diverted from legitimate businesses, communities, and individuals. They fuel human trafficking, exploitation, and addiction. Every dollar laundered through these networks carries with it a human cost.

# Betting Blindspot: Sports' Urgent Need to Understand Global Gambling Complexities

*Pim Verschuuren, August 2024*

A prominent Italian football player<sup>83</sup>, an NBA-basketball player<sup>84</sup>, a group of college American football players<sup>85</sup>, other players in Japan<sup>86</sup>, Australia<sup>87</sup> or France<sup>88</sup> ... A recent string of scandals linked to betting behaviour from professional sportspeople are a reminder of the potential impact on sport's reputation and integrity from close ties with betting operators who may not have.

Betting by athletes may expose them not only to potential excessive / addictive behaviour but may also lead to competition manipulation either through financial difficulties, thrill-seeking or ignorance.

The recent "Paqueta case", involving an English Premier League football player who allegedly received yellow cards on purpose on four occasions so his friends and family could benefit from bets placed on this market<sup>89</sup>, underlines the risk. Lucas Paqueta has put his entire career at risk for what, according to public reports, was likely very small financial benefit to his friends. He denies the charges.

83 Louise Taylor, 'Sandro Tonali's 10-month ban over betting complicated by Italy rehab trips', The Guardian, (26 October 2023), <https://www.theguardian.com/football/2023/oct/26/sandro-tonali-newcastle-banned-10-month-over-betting>, accessed 3 July 2024.

84 David K. Li, 'Jontay Porter banned from NBA for gambling on games, giving info to bettors and limiting play for betting purposes', NBC News, (17 April 2024), <https://www.nbcnews.com/news/us-news/jontay-porter-banned-nba-gambling-games-giving-info-bettors-limiting-p-rca148227>, accessed 3 July 2024.

85 Albert Samaha, 'A betting scandal rocked Iowa sports. Then the case went sideways.', The Washington Post, (16 April 2024), <https://www.washingtonpost.com/sports/2024/04/16/iowa-college-sports-betting/>, accessed 3 July 2024.

86 NewsMobile Desk, 'Yomiuri Giants pitchers suspended in Japan betting scandal', News Mobile, (11 November 2015), <https://www.newsmobile.in/sports/yomiuri-giants-pitchers-suspended-in-japan-betting-scandal/>, accessed 3 July 2024.

87 Lia Harris, 'Three Macarthur FC players stood down after being charged over alleged betting scandal', ABC News, (18 May 2024), <https://www.abc.net.au/news/2024-05-18/nsw-a-league-players-stood-down-over-betting-charges/103865078>, accessed 3 July 2024.

88 Robert Fletcher, 'France's LFP sanctions footballers for breaching betting ban', iGB, (23 June 2023), <https://igamingbusiness.com/sustainable-gambling/sports-integrity/frances-lfp-sanctions-footballers-for-breaching-betting-ban/>, accessed 3 July 2024.

89 Chris Waugh, 'What we learned from Sandro Tonali's betting commission hearing', The Athletic, (3 May 2024), <https://www.nytimes.com/athletic/5467366/2024/05/03/sandro-tonali-newcastle-betting-commission/>, accessed 3 July 2024

Notably in that case, the betting reportedly took place among the player's contacts in Brazil. Since Brazil does not (yet) have a regulated online betting market – i.e. the bets were by definition with operators not licensed in Brazil, or illegal betting by the Macolin Convention's definition. Further complicating the issue, is that it seems those bets were actually reported to authorities by the betting operators involved according to public reports - perhaps because the operator, ironically, is the shirt sponsor of Paqueta's team and may have wanted to protect its reputation in jurisdictions in which it is licensed (such as the UK).<sup>90</sup>

The above underline the complexities of the globalised betting industry, which sports and certainly its athletes seem ill-equipped to understand; with the potential financial benefits on offer to often hard-pressed sports organisations from association with the betting industry, it is essential that stakeholders better understand these issues, and not least how and why they are far more exacerbated by association with poorly regulated / unlicensed betting operators.

### **Level of betting and addiction among athletes: research findings**

Numerous research programmes have demonstrated a higher propensity of athletes to bet and likelihood to fall into addiction situations. Research samples cover British football players<sup>91</sup>, Gaelic games players in Ireland<sup>92</sup>, Swedish sport<sup>93</sup>, Portuguese football<sup>94</sup>, Cyprus football<sup>95</sup> and a panel of disciplines in Europe<sup>96</sup>, among others. Interviews and focus groups recently conducted by the author throughout the Erasmus+ EU MotivAction programme<sup>97</sup> highlight the prevalence of betting in European elite sport population, in particular when coaches and club officials explain how they witnessed the rapid advent of betting behaviour in the teams and academies. Another specificity of sport is the difficulty for many stakeholders to escape addiction situations, leaving them in a trap of silence and isolation within their local sport environment<sup>98</sup>.

---

90 Patrick Allen, 'Revealed: West Ham's own sponsor Betway reported suspicious betting patterns that led to Lucas Paqueta's £70m Man City move collapsing', Goal.com, (no date provided), <https://www.goal.com/en/news/west-ham-betway-lucas-paqueta-manchester-city-move-collapse/blt0cf451e66c8a6c98>, accessed 3 July 2024.

91 Lim, M. S., Bowden-Jones, H., Salinas, M., Price, J., Goodwin, G. M., Geddes, J., & Rogers, R. D. (2017). The experience of gambling problems in British professional footballers: a preliminary qualitative study. *Addiction Research & Theory*, 25(2), 129-138.

92 Turk, M. A., Murphy, C., McCaffrey, J., & Murray, K. (2023). Predictors of adverse gambling behaviours amongst elite athletes. *Scientific Reports*, 13(1), 823.

93 Vinberg, M., Durbeej, N., & Rosendahl, I. (2020). Gambling and gambling problem among elite athletes and their professional coaches: Findings from a Swedish total population survey of participants in four sports. *International Gambling Studies*, 20(2), 262-281.

94 Moriconi, M., & De Cima, C. (2020). Betting practices among players in Portuguese championships: From cultural to illegal behaviours. *Journal of gambling studies*, 36(1), 161-181.

95 Krambia Kapardis, M., & Levi, M. (2023). Fraud and corruption in football: lessons from a survey of match-fixing in Cyprus. *Journal of Financial Crime*, 30(4), 891-907.

96 Grall-Bronnec, M., Caillon, J., Humeau, E., Perrot, B., Remaud, M., Guilleux, A., ... & Bouju, G. (2016). Gambling among European professional athletes. Prevalence and associated factors. *Journal of Addictive Diseases*, 35(4), 278-290.

97 <https://www.motivationsport.com/>

98 Brownrigg, A., Burr, V., Bridger, A., & Locke, A. (2018). 'You shut up and go along with it': an interpretative phenomenological study of former professional footballers' experiences of addiction. *Qualitative Research in Sport, Exercise and Health*, 10(2), 238-255.



### Three factors to explain betting behaviour among athletes

Several key factors underlined by past and current research help to put this development into context. The first is the growth of betting throughout modern societies. The ubiquity of legal (and also illegal) betting, available anytime on any phone device, supported by large advertisement campaigns, have increased betting behaviour across societies, reaching sport like any other sector. Sport is even more concerned as sponsorship deals have been signed between sport organisations and betting operators – some of whom are of dubious provenance. Betting operators do not only appear on shirts or on ad boards around the pitch, they also appear on official championship names (The French national basketball championship is now called the “Betclic Elite”).

The second reason is linked to the specificities of the professional sport conditions and context. Players and athletes may believe that they know their sport and its environment better than anyone else. They can be tempted to consider that they could make betting money out of their expertise. This could bring them a feeling of power and control. In addition, professional athletes may be more prone to risk-taking attitudes<sup>99</sup>, which includes betting or gambling. Team sport athletes could also be influenced by the closed and intimate network of the team, in which betting could become encouraged and routinised as one recreation activities among others<sup>100</sup>.

A third factor regards the economic incentives to bet. The MotivAction research programme identifies that many players, group of players or even clubs engage in betting activities, sometimes on manipulated games, to secure additional profits. Past research has also raised this issue<sup>101</sup>. The financial insecurity of professional sport, the lack of players contractual and financial stability undermines work conditions in many disciplines and countries and push individuals to consider alternative money-making activities.

99 Steinbrink, K. M., Berger, E. S., & Kuckertz, A. (2020). Top athletes' psychological characteristics and their potential for entrepreneurship. *International Entrepreneurship and Management Journal*, 16, 859-878.

100 The importance of social networks for the occurrence of problem gambling has been underlined in past research: Reith, G., & Dobbie, F. (2011). Beginning gambling: The role of social networks and environment. *Addiction Research & Theory*, 19(6), 483-493.

101 Moriconi, M., & De Cima, C. (2020). Betting practices among players in Portuguese championships: From cultural to illegal behaviours. *Journal of gambling studies*, 36(1), 161-181; Krambia Kapardis, M., & Levi, M. (2023). Fraud and corruption in football: lessons from a survey of match-fixing in Cyprus. *Journal of Financial Crime*, 30(4), 891-907.



## Protecting athletes while embracing betting: the impossible bet?

Given the multiple dangers represented by the spread of betting among its stakeholders (coaches, club and federation officials, referees or judges are also concerned), sport organisations have had to react. They started by introducing betting prohibition in their disciplinary regulation. Although the scope of the ban may vary, the standard is to prohibit any betting on its discipline and/or on its competition (when it is a multi-sport event, such as the Olympics<sup>102</sup>). Awareness-raising campaigns have also been articulated to inform stakeholders about this ban and the consequences should they be caught betting. Sport organisations may also rely on player associations to convey the messages. The Protect Integrity campaigns run by the European Elite Athlete Association is an example<sup>103</sup>.

Such campaigns have mostly targeted top professional athletes and teams, but it is likely that many championships, disciplines or even countries have not been covered yet. Also, constantly rotating team line-ups require the messages to be constantly repeated. Besides, where they have been implemented, it remains to be seen to what extent they are well understood: a recent report on anti-manipulation education and awareness-raising campaigns questions their effectiveness<sup>104</sup>: it is easy to set a campaign on foot, it is more difficult to implement an impactful one. Many sport stakeholders may not be aware they that are not allowed to bet on any competition of their discipline, as recent consultations such as the MotivAction Programme suggest.

To enforce the rules, sport organisations increasingly cooperate with public authorities to check if their affiliated stakeholders actually respect the betting ban. They hand the list of registered individuals to the authorities (often the national betting regulating authority), who then cross-checks it with the names appearing on the list of betting accounts provided by licensed betting operators. Athletes could easily circumvent this detection mechanisms by placing bets through intermediaries, or by registering with unlicensed betting operators who do not report such information. But the publication of this checking and the sanctions might serve as a reminder of the applicable rules and as a form deterrence. In France, for example, such checking is conducted on a regular basis in football and every year players are sanctioned for placing bets, despite having been covered by the awareness-raising programmes<sup>105</sup>.

---

102 IOC. (2018). Olympic Movement Code on the Prevention of the Manipulation of Competitions. <https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/What-We-Do/Protecting-Clean-Athletes/Competition-manipulation/Code-Prevention-Manipulation-Competitions.pdf>

103 <https://www.protect-integrity.com/>

104 EU Athletes, 'PROTECT Integrity Online Report on Mapping and Recommendations for Developing Education Tools Against the Manipulation of Sport Competitions', EU Athletes, (30 June 2023), <https://euathletes.org/wp-content/uploads/2023/07/PIO-Report.pdf>, accessed 3 July 2024

105 Robert Fletcher, 'France's LFP sanctions footballers for breaching betting ban', iGB, (23 June 2023), <https://igamingbusiness.com/sustainable-gambling/sports-integrity/frances-lfp-sanctions-footballers-for-breaching-betting-ban/>, accessed 3 July 2024.

106 Council of Europe, 'Council of Europe Convention on the Manipulation of Sports Competitions', Council of Europe Treaty Series - No. 215, (18 September 2014), <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016801cdd7e>, accessed 3 July 2024.

The effectiveness of the compliance framework put in place by public and private authorities might be questioned given the prevalence of betting behaviour by sport stakeholders. Of larger concern are the ambiguities (or conflicts of interest) of sport organisations, and public authorities, in the current situation. Attracted by perspectives of large tax windfalls, an increasing number of national and state authorities across the world are opening the gates of betting and legalised offline and online operators. Sport organisations and event promoters also seize the opportunity, lured by financial prospects linked to the sale of sport data to the betting industry, attractive sponsorship deals and the perspective that betting might actually increase sport viewership, therefore indirectly raising economic revenues and legitimacy.

By embracing sports betting for example through sponsorship agreements, sports organisations should consider potential reputational risk - not least when it comes to betting operators who target customers in jurisdictions where they are unlicensed. There is also potential to undermine their own credibility and the effectiveness of their awareness-raising campaigns: as implied above, how to convince stakeholders not to bet when you yourself sign partnerships deals with betting operators who may employ disreputable business practices?

To shield sport stakeholders and protect the integrity of sport competitions, proper regulation of the betting supply and of betting advertisement and sponsorship are required, as well as coherent and substantial integrity policies from sport organisations. As public and private organisations need to cooperate on this matter, the model of national platforms promoted by the Council of Europe Convention against the Manipulation of Sports Competitions (Article 13<sup>106</sup> 'Macolin Convention') should be highlighted as a good practice.

It should also be noted that all of these negative impacts are greatly amplified by the involvement of betting operators who would be defined as illegal betting under the Macolin Convention. While Licensed and Regulated operators will typically report suspicious betting behaviour – including that of athletes – those licensed in poorly regulated jurisdictions typically will not. Effective due diligence on potential betting and betting data partners is essential.

# Globalising The Council on Anti-Illegal Betting & Related Financial Crime – Transition to the IFHA

*James Ogilvy, Research assistance by Sara Yau, International Engagement, The Hong Kong Jockey Club, November 2024*

---

At the recent 58th International Conference of Horseracing Authorities held in Paris, it was announced that the Asian Racing Federation's ("ARF") Council on Anti-illegal Betting & Related Financial Crime ("ARF Council") will transition to become a global body under the International Federation of Horseracing Authorities ("IFHA") and be named the IFHA Council on Anti-illegal Betting and Related Crime ("IFHA Council"). This development is a logical and meaningful evolution of the intensive and extensive work undertaken by the ARF over many years to build knowledge and awareness of the threat of illegal betting.

## **The foundation of the IFHA Council – the ARF Council**

The ARF established a taskforce dedicated to the issue of anti-illegal betting in 2017, shortly after the 36th Asian Racing Conference. The taskforce was directed to foster and enhance international cooperation among horse racing operators, regulators, intergovernmental organisations, governments and international organisations in order to better combat the threat of illegal betting and related financial crime risks to horse racing integrity in particular, and sport in general.

In 2020, the ARF moved to permanently establish the Council to become a think tank, representing horse racing as a sport and the ARF as a leading sports federation. The primary objective of the Council has been to educate government policy makers, regulators, and other stakeholders about illegal betting as a major threat to racing and sports integrity and also to highlight its various negative impacts on society. In addition, the Council has sought to promote horse racing as a sport by illustrating to key stakeholders the importance of integrity in racing and also the good practices that are employed in racing to effectively maintain integrity.

Over time, the Council expanded its membership to include leaders from across racing regulation, academia, law enforcement, sports integrity and beyond. It produced an exceptional body of work, with its many publications and international engagement leading to it being recognised as the leading authority on how illegal betting and related financial crime impact racing and other sports. The Council's readership spread across the globe, reflecting the international relevance of, and interest in, the complex issues researched. The Council's stakeholder engagement also extended globally, focused on key stakeholders including the Council of Europe ("Macolin Convention"), INTERPOL, the United Nations Office on Drugs & Crime ("UNODC"), the World Lottery Association ("WLA"), and the World Tote Association ("WoTA").

With a global impact, a global set of stakeholders, and addressing global issues affecting racing and other sports relating to illegal betting and financial crime, the ARF and IFHA agreed that expanding the scope of the Council to become a global entity under the IFHA would bring clear benefits to horse racing and the broader sports integrity landscape. There are multiple advantages from this move of the Council to the IFHA.

### **Tackling the globalisation of illegal betting**

From a global perspective, one of the key challenges confronting the sport of racing relates to the escalation in illegal betting activities transcending borders, which has been propelled by advancements in technology. The evolution of what were traditionally regarded as national concerns into major international threats concerning the integrity of racing and other sports now demands an integrated, collaborative and international approach.

As highlighted in the Council's Quarterly Bulletin published in August 2024, the emergence of offshore international gambling and betting licensing hubs has created formidable obstacles to existing national policies, such as those governing betting and gambling taxation. The pervasive reach of online betting, facilitated by the borderless nature of the internet, empowers betting operators to attract and cultivate consumers worldwide, irrespective of whether they hold licences to operate within certain jurisdictions. Laws formulated prior to the advent of the internet era are inevitably no longer applicable to this landscape. The internationalisation of the issue requires a global and coordinated response by racing authorities and related organisations. The transition of the Council to the IFHA will enable all major and emerging racing bodies to work together in a more unified way on a global platform.

## **Enhancing collaboration and partnerships with stakeholders**

As a global entity, the IFHA Council will benefit from increased collaboration and information sharing among international racing jurisdictions, law enforcement agencies, regulatory bodies, and sports organisations. The sharing of resources, tools, and technologies among a broader range of member jurisdictions will enable more efficient and effective responses to emerging threats related to illegal betting and match-fixing. The nature of the expansion presents the IFHA Council with the opportunity to tap into a wider pool of data and expertise from other international and regional organisations, and support international investigative work. By working from a truly global perspective, the IFHA Council will more effectively support information sharing, joint investigations, and cooperation in combating illicit activities in the racing industry.

## **Strengthening membership of the Council**

Given the international recognition of the work of the Council, the IFHA Council is presented with the opportunity to further expand its membership to include more experts from other regions globally. In particular, there are opportunities to include more racing and sports integrity experts from regions including the Americas and Europe, which will further enhance the IFHA Council's research capability and legitimacy as a global think tank focused on sports integrity and anti-illegal betting.

## **Providing Global Authority**

By operating from a global platform, the IFHA Council will allow the sport of racing to speak with one authoritative voice on illegal betting and related criminal matters. This is both logical and important for the sport to more effectively engage with government, and major transnational bodies and professional sports to educate and bring about key reforms.

## **The future of the IFHA Council**

The transition of the Council into a global entity under the IFHA will significantly amplify its influence to support horse racing and other sports integrity operations, and strengthen the fight against illegal betting and corruption in the industry, promoting a culture of integrity and fair play across international racing and other sports.

# The Ban on Philippines POGOs and the Consequent Global Expansion of Illegal Betting Hubs

*James Porteous, November 2024*

---

## Introduction

For more than 20 years, the Philippines has been a hub for online betting operators targeting customers primarily in Greater China<sup>107</sup> and other parts of Asia where gambling is illegal or heavily restricted.<sup>108</sup> In July 2024, the Philippine government announced a ban on Philippine Offshore Gaming Operators (POGOs) following overwhelming evidence linking many to cyber scams, human trafficking, money laundering, and other organised criminal activities – in addition to their core “licensed” business of facilitating illegal betting. This article examines the developments following the ban and explores how this move may affect illegal betting across the globe.

## Background on POGOs

Offshore online betting in the Philippines dates back to the early 2000s, when the Cagayan Economic Zone Authority (CEZA), a special economic zone in the country’s northern tip, began issuing licences to companies seeking a veneer of legitimacy for their online betting operations. These licences allowed operators to present themselves as “licensed” betting companies, but their primary customer base was bettors in jurisdictions like China, where online gambling is illegal.

In 2016, President Rodrigo Duterte decreed that the Philippine Amusement and Gaming Corporation (PAGCOR) would become the sole offshore betting licensor, reporting directly to the Office of the President. This led to a boom in the industry, with hundreds of POGO licences issued, and sub-licences for technology support companies, call centres and similar entities.

While some individuals amassed significant wealth from this burgeoning sector, the broader benefits to the Philippine population were questionable. Widespread tax avoidance, fraud, and systemic corruption marred the industry. The immigration process was manipulated to bring in hundreds of thousands of Chinese-speaking workers to Manila, often under exploitative conditions.

---

<sup>107</sup> Defined for the purposes of this article as Mainland China, Hong Kong, Macau and Taiwan.

<sup>108</sup> <https://firstcagayan.com/>

Due to close ties between illegal betting and organised crime in Asia, POGOs quickly became associated with a spectrum of illicit activities, including human trafficking, labour exploitation, kidnappings, prostitution rings, money laundering, and violent crimes such as torture and murder.<sup>109</sup> The industry facilitated alleged corruption among government officials and was publicly linked to transnational criminal networks.

These negative impacts intensified from around 2019 as organised crime-run illegal betting operators expanded their business lines into factory-like online scamming, as detailed in reports from the Asian Racing Federation<sup>110</sup> and the United Nations Office on Drugs and Crime (UNODC).<sup>111</sup>

### **2023–2024 Raids and the Ban Announcement**

Some Filipino politicians had long campaigned to ban POGOs due to their extensive negative impacts, but no decisive action was taken until President Ferdinand Marcos Jr. succeeded Duterte in June 2022. Throughout 2023 and into 2024, authorities conducted a series of high-profile raids on POGOs, uncovering criminal activities far beyond their supposed purpose of online betting.<sup>112</sup>

Operations such as raids on Clark Sun Valley Hub Corporation,<sup>113</sup> Xinchuang Network Technology,<sup>114</sup> Rivendell Global Gaming,<sup>115</sup> Smart Web Technology,<sup>116</sup> and Zun Yuan Technology<sup>117</sup> revealed a complex web of illegal activities, including forced labour, human trafficking, prostitution, cyber fraud, and money laundering. Thousands of workers from multiple countries were found in exploitative conditions. In some instances, investigations implicated local officials in the criminal networks.

In his State of the Nation Address in July 2024,<sup>118</sup> Marcos announced a total ban on POGOs, declaring:

---

109 Annabelle Liang, 'Philippines bans online casinos linked to scam centres', BBC News, 23 July 2024 (<https://www.bbc.com/news/articles/crgm1k01kdyo> accessed 17 October, 2024)

110 'How Organised Crime Operates Illegal Betting, Cyber Scams & Modern Slavery in Southeast Asia', Asian Racing Federation, 10 October 2023 (<https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/651e89> accessed 17 October, 2024)

111 'Casinos, Money Laundering, Underground Banking, and Transnational Organized Crime in East and Southeast Asia: A Hidden and Accelerating Threat', United Nations Office on Drugs and Crime, January 2024 ([https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf) accessed 17 October 2024)

112 Paolo Romero, 'Over 300 victims in 102 POGO-related crimes', Phil Star, 1 February 2023 (<https://www.philstar.com/headlines/2023/02/01/2241671/over-300-victims-102-pogo-related-crimes> accessed 17 October 2024)

113 Joann Manabat, 'Over 1,000 human trafficking victims rescued in Clark, official confirms', Rappler, 5 May 2023 (<https://www.rappler.com/philippines/human-trafficking-victims-rescued-clark-may-4-2023/> accessed 17 October 2024)

114 'POGO investigations heat up, with PAGCOR targeting Xinchuang', Asia Gaming Brief, 3 July 2023 (<https://agbrief.com/news/philippines/03/07/2023/pogo-investigations-heat-up-with-pagcor-targeting-xinchuang/> accessed 17 October 2024)

115 Alexis Romero, 'Deport 200 foreigners in POGO raid – PAOCC', Phil Star, 25 August 2023 (<https://www.philstar.com/nation/2023/08/25/2291125/deport-200-foreigners-pogo-raid-paocc-> accessed 17 October 2024)

116 Joann Manabat, 'Internet gaming license hub raided in Pasay over alleged human trafficking', Rappler, 28 October 2023 (<https://www.rappler.com/philippines/internet-gaming-license-hub-raided-human-trafficking-october-27-2023/> accessed 17 October 2024)

117 Victoria Tulad, 'Senate investigation into text scams pushed', ABS-CBN News, 20 June 2024 (<https://news.abs-cbn.com/news/2024/6/20/senate-investigation-into-text-scams-pushed-1512> accessed 17 October 2024)

118 State of the Nation Address 2024 News Release, 22 July 2024 ([https://pco.gov.ph/news\\_releases/pbbm-bans-all-pogos/](https://pco.gov.ph/news_releases/pbbm-bans-all-pogos/) accessed 17 October 2024)



“Disguising as legitimate entities, their operations have ventured into illicit areas furthest from gaming, such as financial scamming, money laundering, prostitution, human trafficking, kidnapping, brutal torture—even murder. The grave abuse and disrespect to our system of laws must stop.”

## A Web of (alleged) Corruption and Organised Crime

The fall-out from these raids and the ban announcement has been to expose a massive web of alleged criminality and corruption which has been detailed on a daily basis through hearings of the “Quad Comm” – a four-part committee in the House of Representatives looking into public order and safety, dangerous drugs, human rights, and appropriations.

Following the POGO ban announcement, several high-profile arrests were made. One of the most prominent was that of former Bamban town mayor Alice Guo. Apprehended while on the run by Indonesian authorities in September 2024 and deported back to the Philippines,<sup>119</sup> Guo is accused of being a significant figure in POGO-linked corruption in her town, where she was elected mayor in 2022. Investigators allege that POGOs linked to her were fronts for illegal activities, including cryptocurrency scams and human trafficking.<sup>120 121</sup>

Reporting in the Philippines has highlighted connections between Guo, other POGOs in the Philippines accused of trafficking,<sup>122</sup> entities in Cambodia sanctioned for human rights violations, individuals convicted in Singapore’s largest-ever money laundering case connected to illegal betting, and a defunct Hong Kong cryptocurrency exchange whose owner is accused of defrauding users.<sup>123</sup>

Guo maintains her innocence and denies all allegations.<sup>124 125 126</sup>

119 Frank Schuengel, ‘Alice Guo back in Manila, faces decades in prison if convicted of money laundering’, Asia Gaming Brief, 6 September 2024 (<https://agbrief.com/news/philippines/06/09/2024/alice-guo-back-in-manila-faces-decades-in-prison-if-convicted-of-money-laundering/> accessed 17 October 2024)

120 Kathleen Magramo, ‘Who is the real Alice Guo? Fugitive mayor accused of spying for China faces legal reckoning after weeks on the run’, CNN News, 6 September 2024 (<https://edition.cnn.com/2024/09/04/asia/philippines-alice-guo-fugitive-arrested-intl-hnk/index.html> accessed 17 October 2024)

121 Rebecca Ratcliffe and Guill Ramos, ‘Cognac, tortois and a pink-striped helicopter: inside the mystery of Alice Guo, the missing Philippines mayor’, The Guardian, 4 August 2024 (<https://www.theguardian.com/world/article/2024/aug/04/inside-mystery-alice-guo-missing-philippines-mayor> accessed 17 October 2024)

122 Lian Buan, ‘Chinese crime gangs penetrate PH through Alice Guo, POGOs’, Rappler, 14 October 2024 (<https://www.rappler.com/newsbreak/investigative/chinese-crime-gangs-penetrate-philippines-alice-guo-pogos/> accessed 17 October 2024)

123 Martin Young, Yan Z.H., ‘Alleged Hong Kong Crypto Swindler Tied to Singapore Money Laundering Syndicate’, Organized Crime and Corruption Reporting Project, 14 October 2024 (<https://www.occrp.org/en/scoop/alleged-hong-kong-crypto-swindler-tied-to-singapore-money-laundering-syndicate> accessed 17 October 2024)

124 ‘Philippine President Duterte’s Former Economic Adviser was a “Drug Lord,” Says Affidavit in New ICC Case’, Organized Crime and Corruption Reporting Project, 10 November 2021 (<https://www.occrp.org/en/investigation/philippine-president-dutertes-former-economic-adviser-was-a-drug-lord-says-affidavit-in-new-icc-case> accessed 17 October 2024)

125 Shiela Crisostomo, ‘Michael Yang, associate linked to “web of criminal activities”’, The Philippine Star, 29 September 2024 (<https://qa.philstar.com/headlines/2024/09/29/2388760/michael-yang-associate-linked-web-criminal-activities> accessed 17 October 2024)

126 Jarius Bondoc, ‘Lawmakers trace Michael Yang to drugs, heinous POGO crimes’, The Philippine Star, 11 September 2024 (<https://www.philstar.com/the-freeman/opinion/2024/09/11/2384330/lawmakers-trace-michael-yang-drugs-heinous-pogo-crimes> accessed 17 October 2024)



## Organised Crime Leadership

In October 2024, Philippine authorities arrested an individual they labeled a “kingpin” connected to multiple POGOs, including one shut down in June for alleged involvement in torture, human trafficking, and cyber scams. The Presidential Anti-Organised Crime Commission (PAOCC) identified the individual as Lin Xunhuan and believes he is connected to Guo, who claims not to know him.<sup>127</sup> The PAOCC described Lin as a “figure of significant concern within the landscape of organised crime in the Philippines” who, since 2016, has “systematically built a network of scam farms, often employing legal businesses as fronts to obscure his illicit activities.”

Investigations are ongoing, and no convictions have been made regarding these allegations, nor substantiation as to whether Lin is truly the senior leader of these criminal enterprises.<sup>128 129 130 131</sup>

## Effects of the POGO Ban

The decision to ban POGOs will have economic implications, leading to job losses for Filipino workers<sup>132</sup> and impacting commercial real estate. PAGCOR's chairman estimated a potential annual loss in revenue of over PHP 20 billion (approximately USD 342 million).<sup>133</sup> However, considering the extensive alleged corruption, criminality, and social costs<sup>134</sup> the industry, it is certain that government revenue gains were far outweighed by negative impacts.<sup>135</sup>

---

127 Emmanuel Tupas, 'PAOCC witness claims Guo connected to POGO kingpin' Phil Star, 13 October 2024 (<https://www.philstar.com/headlines/2024/10/13/2392162/paocc-witness-claims-guo-connected-pogo-kingpin> accessed 13 October 2024)

128 Kelly Ng & Virma Simonette, 'Chinese spy mayor' wanted by Philippines arrested', BBC News, 4 September 2024 (<https://www.bbc.com/news/articles/c0mnyrm8739o> accessed 17 October 2024)

129 'She Zhijiang: Discarded Chinese spy or criminal mastermind?', Al Jazeera, 26 September 2024 (<https://www.aljazeera.com/program/101-east/2024/9/26/she-zhijiang-discarded-chinese-spy-or-criminal-mastermind> accessed 17 October 2024)

130 United Kingdom Office of Financial Sanctions Implementation HM Treasury Financial Sanctions Notice, 8 December 2023 [https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice\\_Global\\_Human\\_Rights\\_081223.pdf](https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice_Global_Human_Rights_081223.pdf)

131 'Philippines takes allegations of foreign spying in the country seriously', Reuters, 3 October 2024 (<https://www.reuters.com/world/asia-pacific/philippines-takes-allegations-foreign-spying-country-seriously-2024-10-03/> accessed 17 October 2024)

132 'PAGCOR Chair: Spare outsourcing companies from POGO ban', Gambling Insider, 31 July 2024 (<https://www.gamblinginsider.com/news/26233/pagcor-chair-spare-outsourcing-companies-from-pogo-ban> accessed 17 October 2024)

133 'PAGCOR chief Tengco says banning IGLs likely to drive legitimate operators underground', Inside Asian Gaming, 11 June 2024 (<https://www.asgam.com/index.php/2024/06/11/pagcor-chief-tengco-says-banning-igls-likely-to-drive-legitimate-operators-underground/> accessed 17 October 2024)

134 Felix Iglesias, 'The Problem With POGOs', The Dipomat, 8 July 2024 (<https://thediplomat.com/2024/07/the-problem-with-pogos/> accessed 17 October 2024)

135 'DOF chief welcomes Marcos' total Pogo ban order', Philippine News Agency, 23 July 2024 (<https://business.inquirer.net/470680/dof-chief-welcomes-marcos-total-pogo-ban-order> accessed 17 October 2024)

Despite the ban, it is doubtful whether illegal betting and related cyber scams will be much affected.<sup>136</sup> Some licensed POGOs will rebrand<sup>137</sup> as “business process outsourcing” (BPO) firms, a trend already being observed, or move to another “pseudo-regulator” – Timor-Leste on the tip of the Malay peninsula is seeking to introduce its own POGO-style legislation despite warnings from the Philippines about likely negative impacts, while others such as the Pacific islands of Vanuatu and Papua New Guinea have also been mentioned as eyeing this business.<sup>138</sup>

Additionally, CEZA continues to issue offshore gambling licences. CEZA claims its licensees are “interactive gaming support service providers” only and are not involved in illicit activities associated with POGOs.<sup>139</sup> However, the UNODC has shown that several criminal syndicates, including those linked to Macau’s junket operator Suncity, have or had associations with operations in Cagayan.<sup>140</sup>

Finally, since there are somewhere between 100-300 unlicensed POGOs already acting illegally, the ban will only drive them further underground.

## Displacement of Operators to Other Jurisdictions

Some operators will migrate to jurisdictions where they have existing infrastructure and/or connections – previous industry upheaval in the Philippines in 2016 led to the proliferation of POGO-style illegal betting and related cyber-scam compounds across Laos, Cambodia, and Myanmar and the resulting global epidemic of transnational organised crime which continues to operate from these regions.

ASEAN countries are showing greater coordination in combating these operations, partly due to pressure from China. In September 2024, the ASEAN-China Ministerial Meeting issued a joint statement<sup>141</sup> recognising the regional threat posed by telecommunications fraud and online gambling crimes, committing to enhanced cooperation.

136 Andrea Taguines, ‘PH authorities preparing for more underground POGO ops after ban’, ABS-CBN News, 11 September 2024 (<https://news.abs-cbn.com/news/2024/9/11/ph-authorities-preparing-for-more-underground-pogo-ops-after-ban-2254> accessed 17 October 2024)

137 Dianne Sampang, ‘Netizens wary about Pogo ban effectivity due to ‘supposed rebranding’’, Inquirer.Net, 23 July 2024 (<https://globalnation.inquirer.net/243472/netizens-wary-about-pogo-ban-effectivity-due-to-supposed-rebranding> accessed 17 October 2024)

138 Viviana Chan, ‘Relocating POGOs: Risks and considerations in a changing landscape’, Asia Gaming Brief, 24 October 2024 (<https://agbrief.com/intel/deep-dive/24/10/2024/relocating-pogos-risks-and-considerations-in-a-changing-landscape/> accessed 25 October 2024)

139 Lian Buan, ‘Before Duterte’s POGO, Cagayan had ‘i-Gaming.’ Where did it go wrong?’, Rappler, 1 August 2024 (<https://www.rappler.com/newsbreak/in-depth/before-rodrigo-duterte-pogo-cagayan-internet-gaming-where-did-go-wrong/> accessed 17 October 2024)

140 ‘Transnational Organized Crime and the Convergence of Cyber-Enabled Fraud, Underground Banking and Technological Innovation in Southeast Asia: A Shifting Threat Landscape’, United Nations Office on Drugs and Crime, October 2024 ([https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf) accessed 17 October 2024)

141 ASEAN-China Joint Statement on Combatting Telecommunication Network Fraud and Online Gambling, 10 October 2024 <https://asean.org/asean-china-joint-statement-on-combating-telecommunication-network-fraud-and-online-gambling/>

However, endemic corruption, political instability and weak legal frameworks in some of these jurisdictions will continue to pose challenges – the massive profits generated by illegal betting and related crime provide ample ammunition to encourage politicians and law enforcement to look the other way, whatever is said in public statements.

## **Global Exportation of the Illegal Betting Crime Model**

Nevertheless, as scrutiny and awareness of this issue increases in Asia, there is evidence<sup>142</sup> that crime syndicates are exporting their illegal betting and related crime model globally to regions less familiar with this modus operandi. Similar operations have been uncovered in Europe, the Middle East, South America, Africa, and the Pacific.

Recent examples include the rescue of over 40 Malaysians held captive by a Taiwanese Organised Crime syndicate in Peru in late 2023;<sup>143</sup> in April 2024, authorities in Zambia arrested 77 suspects, including 22 Chinese nationals, linked to similar syndicates; in October 2024, 120 Chinese nationals were arrested in Sri Lanka in connection with POGO-like operations.

Humanity Research Consultancy, an NGO, has identified seven illegal betting and online fraud operations in Dubai,<sup>144</sup> which has also emerged as a key destination for laundering the profits from illegal betting and related crime. Key individuals linked to Asian illegal betting have been shown to have “legitimate” businesses in European jurisdictions too, such as Georgia and Montenegro – coincidentally or not, there have also been illegal betting and trafficking operations in these countries that are very similar to the Philippines POGOs.<sup>145 146</sup>

---

142 INTERPOL announcement, 7 June 2023 <https://www.interpol.int/en/News-and-Events/News/2023/INTERPOL-issues-global-warning-on-human-trafficking-fueled-fraud>

143 'Dozens of Malaysians rescued in Peru after being trafficked to commit online fraud', The Guardian, 9 October 2023 (<https://www.theguardian.com/world/2023/oct/09/dozens-of-malaysians-rescued-in-peru-after-being-trafficked-to-commit-online> accessed 17 October 2024)

144 'HRC BRIEFING: Uncovering the Spread of Human Trafficking for Online Fraud into Laos and Dubai', Humanity Research Consultancy, 31 July 2024 (<https://www.humanity-consultancy.com/publications/hrc-briefing--uncovering-the-spread-of-human-trafficking-for-online-fraud-into-laos-and-dubai> accessed 17 October 2024)

145 Matthew Strong, 'Taiwan Criminal Investigation Bureau helps scammer return from Georgia', Taiwan News, 7 December 2023 (<https://www.taiwannews.com.tw/news/5054705> accessed 17 October 2024)

146 Taiwan Taichung District Prosecutors Office announcement, 3 June 2020 <https://www.tcc.moj.gov.tw/296098/296099/685148/685150/788328/post>

147 Frank Schuengel, 'More details emerge in King Gaming Isle of Man investigation', Asia Gaming Brief, 29 April 2024 (<https://agbrief.com/news/europe/29/04/2024/more-details-emerge-in-king-gaming-isle-of-man-investigation/> accessed 17 October 2024)

## Case Study: The Isle of Man

A recent case in the Isle of Man – like the Philippines, a pseudo-regulator specialising in issuing licences to betting companies targeting Asia – illustrates the global expansion of these operations and their negative impacts. In April 2024, the Isle of Man Constabulary conducted raids linked to an investigation into King Gaming Ltd, a licensed online betting company. The Gambling Supervision Commission suspended the licences of King Gaming Ltd and Dalmine Ltd, while the Financial Services Authority directed Soteria Solutions Limited, a related cryptocurrency business, to suspend operations.<sup>147</sup>

There is no official detail about the case, but news media have reported<sup>148</sup> that “pig-butcher” – a key cyber-scam line of such operators – had been taking place since 2022 alongside online betting. This is verified by Chinese court records, which show seven individuals were imprisoned in China in 2023 for participating in large-scale overseas fraud run by this company in the Philippines and Isle of Man between 2019 and 2022, which defrauded victims of approximately CNY 38.87 million (approximately USD 5.4 million).<sup>149</sup> One hundred employees had been transferred from a Philippines POGO to work in the Isle of Man. Meanwhile, the UNODC has outlined connections between the co-founder of King Gaming Ltd and illegal betting and related crime compounds in Cambodia, and between him and Zhao Wei and the Golden Triangle Special Economic Zone in Laos, which is notorious for illicit activities.<sup>150</sup>

King Gaming Ltd had signed a planning agreement late in 2023 for a huge headquarters on the site of a former naval training base described as the “largest single private investment in the Isle of Man”, underlining that due diligence often is abandoned when such entities begin to deploy their illicit profits.<sup>151</sup>

148 ‘China scam run from Isle of Man’, BBC News, 23 August 2024 (<https://www.bbc.com/news/articles/cz6x1ql1yelo> accessed 17 October 2024)

149 河南省武陟縣人民法院刑事判決書(2023)豫0823刑初379號, 31 January 2024 (<https://wenshu.court.gov.cn/website/wenshu/181107ANFZ0BXS4/index.html?docId=q5nmPTFTik8P/0sgYbJ/MEb2dLpOUB6VdAzqLuDA7p2ZfjHjezt%E2%80%A6>)

150 ‘Casinos, Money Laundering, Underground Banking, and Transnational Organized Crime in East and Southeast Asia: A Hidden and Accelerating Threat’, UNODC, January 2024 ([https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf) accessed 17 October 2024)

151 ‘China scam run from Isle of Man’, BBC News, 23 August 2024 (<https://www.bbc.com/news/articles/cz6x1ql1yelo> accessed 17 October 2024)

## **Conclusion**

The Philippines' ban on POGOs highlights yet again the profound negative impacts of illegal betting, which is intertwined with organised crime, human trafficking, cyber fraud, and corruption. These present significant challenges not only for the Philippines or Asia alone, but globally.

The very real worry is that organised crime syndicates are exporting their model to new territories, and suborning regulators and officialdom by presenting as “legitimate” enterprises. Illegal betting is not, as many people wrongly believe, a victimless crime, but a key pillar supporting a vast range of other transnational criminality – a key fact which global stakeholders need to understand.

## Game Changers: How INTERPOL is Leading the Global Response to Illegal Betting and Related Crime

*Claudio Marinelli, November 2024*

---

INTERPOL is the world's largest international police organisation, dedicated to supporting law enforcement agencies in its 196 member countries to combat all forms of transnational crime. With its truly global presence, INTERPOL provides unique support and collaboration opportunities worldwide. The INTERPOL Match-Fixing Task Force is the cornerstone of INTERPOL's operational efforts to address financial crime and sports-related corruption. Currently, the INTERPOL Match-Fixing Task Force includes 110 member countries - an increase of 10 countries since January 2024 - and over 200 national points of contact globally. The network is currently composed of member countries' law enforcement representatives from the following regions:

- Asia: 16 countries (2 joined in 2024)
- Caribbean & Central America: 4 countries (2 joined in 2024)
- East Africa: 13 countries (1 joined in 2024)
- Europe: 44 countries
- Middle East & North Africa: 8 countries (2 joined in 2024)
- North America: 2 countries
- Oceania: 2 countries
- South America: 9 countries (2 joined in 2024)
- West Africa: 12 countries (1 joined in 2024)<sup>152</sup>

Established in 2011, the INTERPOL Match-Fixing Task Force supports member countries by assisting with investigations and law enforcement operations concerning crimes related to sports. The Task Force also serves as a platform for case coordination and international efforts to protect the sports industry from criminal exploitation. Recognising that manipulation and corruption in sports are often linked to broader criminal activity, the Task Force addresses transnational cases involving fraud and money laundering. Asset recovery is an additional area of focus, as INTERPOL works to enhance the tracing of illicit money flows globally.

---

<sup>152</sup> INTERPOL member countries have been grouped accordingly to reflect the relevance of different regions.

## **Operational Initiatives in Southeast Asia**

The INTERPOL Financial Crime and Anti-Corruption Centre (IFCACC) coordinates transnational investigations into cyber-enabled financial crimes through Operation HAECHI. Operation HAECHI tackles some of the most prevalent ones, as voice phishing, romance scams, sextortion, investment fraud, money laundering tied to illegal online betting, business email compromise (BEC) fraud, and e-commerce fraud.

Since its inception, Operation HAECHI has specifically targeted money laundering linked to illegal online betting - a highly profitable and pervasive form of cyber-enabled crime fuelled by high returns and addictive behaviours. Once criminals establish an online betting platform, they can attract participants worldwide, causing harm that far exceeds traditional, offline betting. Given the immense illicit profits generated, money laundering often accompanies these operations to conceal and legitimise unlawful earnings. Notably, this aspect of money laundering is also addressed by Operation SOGA, highlighting its intersection with Operation HAECHI.

The modus operandi used for these crimes are increasingly sophisticated and malicious. Online scam centres, a major threat in this realm, have proliferated and are involved in a range of criminal activities, including human trafficking, voice phishing, illegal online betting promotion, and romance scams. Through coordinated efforts with member jurisdictions, INTERPOL has dismantled several of these operations. These scam centres often house the masterminds behind various crimes investigated under Operation HAECHI, underscoring their pervasive and dangerous nature.

For instance, one recent case coordinated by INTERPOL involved dismantling an online scam centre in the Philippines where illegal online betting was one of the primary crimes. This case underlines how INTERPOL operations complement each other, enhancing global cooperation to combat cyber-enabled crimes like illegal online betting and related financial offences. Similar scam call centres have been reported across Southeast Asia, where they have become regional hubs for transnational crimes and human trafficking, posing significant challenges to law enforcement. In response, INTERPOL and other organisations such as the Asian Racing Federation have issued intelligence reports to prevent the spread of these crimes. INTERPOL actively monitors the evolving tactics of these criminal enterprises and adapts its strategies accordingly.

Another recent case further illustrates INTERPOL's operations. For obvious reasons of confidentiality, as some lines of investigation are still opened, names of the countries involved are masked.

Authorities in Country A dismantled an organised criminal group involved in illegal online betting across Countries A, B, and C. The group recruited teenagers in Country A, luring them with the promise of illicit profits. As these teenagers became involved, they not only participated in the crimes but also targeted additional teenage victims. Leveraging the robust networks of Operations HAECHI and SOGA, authorities in Country A, with the cooperation of member jurisdictions in Countries B and C, successfully dismantled the group, which had illicitly earned over USD 33 million. Despite not involving kidnapping or forced labour in call centres, the crime followed a similar modus operandi, benefiting from online recruitment and promotion. Due to the swift response from the investigative team, over USD 5 million was captured and preserved. This case highlights the elements common in these crimes: online recruitment, operations that exploit vulnerable individuals, and rapid money laundering.

INTERPOL is also conducting another project named RESCUE, aimed at enhancing member countries' ability and readiness to combat the illicit financial flows behind cyber-enabled fraud through targeted training and case mentorship activities. The project works to provide law enforcement with the awareness and knowledge on addressing the links of cyber-enabled fraud with other forms of criminality.

Project RESCUE focus on the use of various rapid response mechanisms to facilitate transnational stop-payment requests stemming from cyber-enabled fraud cases, to improve their operational response with attention to scam call centres, and to identify and disrupt laundering of related illicit proceeds.

In addition to the intelligence reported by member countries, IFCACC produces the INTERPOL Biweekly Newsletter on Sports Integrity, a bulletin which offers practitioners a comprehensive overview of open-source reports on sports integrity related issues, investigations, sanctions, sentencing, best practices, criminal modus operandi and new developments. It also regularly includes updates on illegal betting investigations and features publications from the ARF Council on Anti-Illegal Betting and Related Financial Crime (now the IFHA Council on Anti-Illegal Betting and Related Crime).

On the back end, this open-source data set is accessible to law enforcement globally via an intelligence dashboard on the INTERPOL secured platform. The Bi-Weekly Bulletin enables INTERPOL member countries' law enforcement to track media reports of specific cases related to illegal betting throughout the operational period, serving as an open-source detection and reporting tool.



## **Operation SOGA X – modalities, global emerging trends and threats**

Illegal betting generates significant profits for organised crime networks and is often closely associated with other crime such as money laundering and corruption. The illegal betting market is worth some USD 1.7 trillion globally, according to research by the United Nations Office on Drugs and Crime, and is closely tied to other criminal enterprises.

### **Operation SOGA**

INTERPOL's Financial Crimes and Anti-Corruption units, with support from the Asia-Pacific Expert Group on Organized Crime (APEG) and the INTERPOL Match-Fixing Task Force, as well as the ARF Council on Anti-Illegal Betting and Related Financial Crime and UEFA Anti-Match-Fixing Unit, launched the 10th wave of joint global anti-illegal betting operation, codenamed SOGA<sup>153</sup> to coincide with the 2024 UEFA European Football Championship (EURO 2024).

EURO 2024 was predicted to generate a surge in betting turnover and lucrative profits for criminal organisations. A total of 28 INTERPOL jurisdictions participated in this year's SOGA operation, with authorities making over 5,100 arrests and recovering more than USD 59 million in illicit proceeds.

Authorities tackled various criminal activities linked to illegal betting, including money laundering, human trafficking, and cyber scams. As a result, over 650 human trafficking victims, including nearly 400 Filipinos, were rescued from exploitation in illegal betting and scams. The operation also dismantled criminal networks by shutting down illegal betting sites, breaking up complex financial crime schemes, and exposing international betting syndicates.

The majority of SOGA cases illustrate a comprehensive and evolving threat landscape in illegal betting, involving complex, technology-driven operations with significant financial, social, and human exploitation components. These have shown how illegal betting fuels human trafficking, money laundering and fraud, with hundreds of victims being trafficked and rescued. The operation also identified and disrupted financial fraud schemes and demonstrated how illegal online betting is linked to other crimes.

---

<sup>153</sup> SOGA stands for Soccer Gambling.

The connection between these case studies is that they all involve illegal sports betting operations, often with transnational connections, and highlight the need of strong efforts from law enforcement agencies from different jurisdictions to combat these criminal activities across borders. Additionally, they share common characteristics such as the use of technologies, namely the use of VPNs, fake websites, and mobile apps, to facilitate their illegal activities and evade detection. Law enforcement agencies have seized significant assets, including cash, properties, and luxury items, and made numerous arrests in connection with these illegal gambling operations.

One of the trends worth highlighting from this round of Operation SOGA X is the forced involvement of vulnerable individuals by criminal organisations to engage in betting activities. Especially in cases from the Philippines and Korea, recruitment for these syndicates often spans multiple countries, drawing in individuals with promises of legitimate employment, only to exploit them in illegal betting and fraud operations. Overall, the cases reported during Operation SOGA demonstrate the complexity and scope of illegal betting operations, as well as the efforts of law enforcement agencies to disrupt and dismantle these criminal networks.

# Illegal Betting on Everything Everywhere all at Once in 2025

*Martin Purbrick, February 2025*

---

Up to November 2024, the online cryptocurrency based prediction platform Polymarket received a total volume of US\$3,686,335,059 on the outcome of the US presidential election. Polymarket carries a wide range of markets, allowing clients to predict the outcome of events including the NBA champion, the UK Premier League winner, the La Liga winner, the Super Bowl champion, the future price of crypto Bitcoin, Ethereum, and Dogecoin, whether Vladimir Putin will continue as president of Russia, as well as sensationalist entertainment bets.<sup>154</sup> Consumers can essentially place bets on almost everything, everywhere, all at once.

Polymarket is an example of the rapid changes in technology that are enabling expanded consumer choices for betting and gambling. Key technology changes relate to data supply, peer-to-peer platforms, and crypto.

Access to huge amounts of data on sports, politics, entertainment, financial markets, etc, is allowing consumers to bet on everything.

Peer-to-peer platforms are facilitating consumers to bet against each other, not only against a fixed odds betting operator, allowing betting on an outcome against other people everywhere.

The increasing use of crypto is facilitating consumers to avoid the traditional banking and payments systems when betting, driving the immediacy of betting for transactions all at once.

The absence of regulation in these fast-changing areas is an effective absence of legality for many of the operators. The approach being taken by online betting operators is to avoid consumers (for example by voluntary geo-blocking) in jurisdictions where the authorities are more likely to pursue enforcement action (especially the US), but to open their platforms to consumers around the world on the basis that they will not be prosecuted in most jurisdictions. Gambling regulators are showing little sign of understanding how to manage this situation.

---

<sup>154</sup> Polymarket, Markets (<https://polymarket.com/markets>)

The outcome is illegal betting on everything, everywhere, all at once, and 2025 will be a year when illegal betting markets globalise even further. There are, however, effective actions for government policy makers, regulators, and other stakeholders to consider, and these are more essential to prevent online illegal betting (and “predictive markets”) becoming the new normal for consumers everywhere.

## Betting on Everything

Consumers have increasing access to huge amounts of data on sports, politics, entertainment, financial markets, etc, that allows them to bet on everything. This is reflected in the growth of online gambling, which reportedly doubled in size from 2020 to the end of 2023.<sup>155</sup>

The growth of online illegal betting should be considered in relation to the huge growth in interest in sports, also in the number of people viewing sports digitally, and consequently of people interested in betting on sports. For example, PwC estimates that in the USA the number of viewers who stream a sports event at least once a month is projected to rise to over 90 million by 2025, an increase of over 30 million from the number of viewers in 2021.<sup>156</sup>

The spectacular increase in consumer interest in viewing sports and then betting on them has been illustrated in recent years with the expansion of betting markets in South America, particularly Argentina and Brazil, and North America, and especially the US after legalisation of sports betting in most states from 2018.

The growth of consumer interest in sports and betting on them has been fed by the easier access to huge amounts of sports and betting data. This was described by the ARF Council (now the IFHA Council) in a report in 2022, which stated that “Dominated by a handful of providers, sports betting data is a multi-billion dollar (and growing) industry – but the vast increase in the quality, quantity and distribution of sports data has provided a new dimension to the growth of both legal and illegal betting markets, which in turn has led to increased threats to the integrity of horse racing and other sports.”<sup>157</sup> The Council report explained that as sports viewing, entertainment, and betting increasingly converge, sports entertainment includes marketing to betting customers, as well as sports content development to attract and retain fans.

<sup>155</sup> H2 Gambling Capital, Global Gambling Industry Generates \$536bn in 2023 with H2 Expecting 7% Growth Expected in 2024, 5 January 2024 (<https://h2gc.com/news/general/global-gambling-industry-generates-536bn-in-2023-with-7-growth-expected-in-2024> )

<sup>156</sup> PwC, Streaming the game: How the rise of digital platforms is changing sports consumption (<https://www.pwc.com/us/en/industries/tmt/library/sports-streaming-platforms.html#:~:text=The%20rise%20of%20streaming%20services,from%2057%20million%20in%202021> )

<sup>157</sup> ARF Council on Anti-Illegal Betting & Related Financial Crime, Data from Racing and Other Sports: Fuel for Illegal Betting, October 2022 (<https://www.ifhaonline.org/AibResources/Bulletins/October%202022%20Bulletin.pdf> )

The growth of interest in online betting has been accompanied by an expansion of interest in betting on other subjects. Bookmakers have shown in the past several decades that just by showing a live televised broadcast of any sports event and posting betting prices on the event, a market can be created on any sport. Now the new generation of predictive platforms are showing that by posting a prediction on the binary outcome of any other type of event (political, entertainment, social, economic, etc) they can create a market on everything.

Polymarket is not alone in this creation of new betting markets. Kalshi (<https://kalshi.com/events>), which is a regulated exchange for consumers to trade on real world events, has categories for economics, politics, culture, companies, crypto, financials, tech & science, climate, health, world, and transportation.

Investment platform Robinhood introduced event contracts on the outcome of the US election, and their CEO has said that prediction markets are here to stay. The CEO of Robinhood also said in December 2024 that the firm was looking into expanding into sports betting in some way. The CEO of sports betting operator Draftkings has also mentioned that prediction markets are generating high consumer interest, but that there are regulatory complexities.<sup>158</sup> More sports betting companies are likely to move towards prediction markets, or risk losing consumers to alternative platforms. Because of the regulatory complexity, growth is likely to be led by offshore online operators, and hence the illegal market is likely to thrive on this new business.

### **Betting everywhere against everyone**

Peer-to-peer platforms that facilitate consumers to bet against each other by predicting binary outcomes of events are not new in the betting world. Betfair was founded in 2000 as a betting exchange, one of the first platforms to provide markets for customers to essentially bet against each other by 'backing' (a winning outcome) or 'laying' (a losing outcome). The Betfair betting exchange created substantial markets on horse racing, but the ability for customers to 'lay' a horse to lose a race has caused continued integrity concerns as this presents greater opportunities for race fixing. Betting exchanges are also popular with many consumers whose bets are refused by bookmakers who limit their risk, and in 2004 the Matchbook betting exchange was created with a focus on professional and more sophisticated sports betting customers.

---

<sup>158</sup> Bettors Insider, DraftKings Eyes Election Prediction Markets After 2024 Polls Spark Betting Interest, 15 November 2024 (<https://www.bettorsinsider.com/news/2024/11/15/draftkings-eyes-election-prediction-markets-after-2024-polls-spark-betting-interest>)

The popularity of betting exchanges on racing and other sports led to the growth of illegal betting exchange Citibet in Asia. As the Head of Research of the Council wrote in May 2024, “Citibet is by far the largest and most liquid unregulated illegal betting exchange market for horse racing in the world, with this huge liquidity allowing illegal bookmakers to hedge their risk by laying off liabilities.”<sup>159</sup>

Illegal betting exchange Citibet has had a major impact on diverting consumers away from the legal market, with the Council estimating that Citibet turnover is comparable in some jurisdictions to the legal market, such as in Hong Kong where it has been estimated to turn over a comparable amount in betting volume to the Hong Kong Jockey Club. Betfair, Matchbook and Citibet have shown that there are large numbers of consumers who like the peer-to-peer betting system for sports, and this approach is widening with prediction markets.

These prediction markets are now turning to sports. Creating these markets is even easier than creating a traditional sports betting platform, which have become ubiquitous around the world with start-up costs for a betting engine and website design as little as around US\$25,000 and monthly costs for data feeds of a few thousand dollars per month and payment processing as little as around between one and five percent of transactions.<sup>160</sup>

Polymarket is a peer-to-peer marketplace where prices of predictive events are set by the market, so the platform is neutral on the outcome of events and does not stand to benefit from the outcome of any market or usage of any trader. The platform claims that “Unlike bookmakers or wagering operations, Polymarket does not charge deposit/withdrawal fees, or any type of trading fees.”<sup>161</sup>

Nevertheless, Polymarket looks a lot like a betting platform calling itself a prediction market. The legal basis to operate such a platform varies in different jurisdictions. In January 2022, the US Commodity Futures Trading Commission (CFTC) issued an order requiring Polymarket to pay a \$1.4 million civil monetary penalty, facilitate the resolution (i.e. wind down) of all markets displayed on Polymarket.com that do not comply with the Commodity Exchange Act (CEA) and applicable CFTC regulations, and cease and desist from violating the CEA and CFTC regulations.<sup>162</sup>

159 ARF Council, Franchise Wars – How Citibet and Asia’s Other Biggest Bookmakers have ‘McDonaldised’ Illegal Betting, May 2024 (<https://www.ifhaonline.org/AibResources/Bulletins/May%202024%20Bulletin.pdf>)

160 Orion Infosolutions, How Much Does It Cost to Build a Sports Betting Website?, 30 November 2024 (<https://www.orioninfosolutions.com/blog/how-much-does-it-cost-to-build-a-sports-betting-website#:~:text=Design%20and%20User%20Experience%20Costs&text=The%20cost%20of%20design%20and,range%20from%20%2410%2C000%20to%20%24100%2C000>)

161 Polymarket, FAQs (<https://learn.polymarket.com/docs/guides/FAQ/is-polymarket-the-house/>)

162 Commodity Futures Trading Commission, CFTC Orders Event-Based Binary Options Markets Operator to Pay \$1.4 Million Penalty, 3 January 2022 (<https://www.cftc.gov/PressRoom/PressReleases/8478-22>)

The CFTC considered the platform to be a derivatives market and that it had been operating an illegal facility for event-based binary options online trading contracts, known as “event markets.” Polymarket called this offering the public the opportunity to “bet on your beliefs” by buying and selling binary options contracts related to an event taking place in the future that are susceptible to a “yes” or “no” resolution.

There are reports that Polymarket has hosted “wash trading”, which is a form of market manipulation where the same financial instrument is repeatedly bought and sold by the same investor or group of investors in order to create misleading activity in the market, such as inflated trading volume. The purpose of “wash trading” is to mislead investors about the real demand for an asset, or a prediction or a bet, so that consumers gravitate to that position in the market.<sup>163</sup>

Polymarket seems very similar to a betting exchange, which the UK Gambling Commission defines as “a platform or service designed to facilitate the making or acceptance of bets between others.”<sup>164</sup> The French authorities seem to agree, and on November 2024, the Autorite Nationale Des Jeux (ANJ), the national gambling regulator in France, announced that the services offered on Polymarket “could be considered as unauthorised gambling and games of chance”, and that the publisher of the platform based in Panama had agreed to geo-blocking, thus preventing any gambling on Polymarket from France.<sup>165</sup>

In January, the Singapore Gambling Regulatory Authority reportedly issued an order ordering local internet service providers to block access to the platform.<sup>166</sup> This follows Taiwan, where in December 2024 the police arrested 17 people for betting on the outcome of the presidential election online. Polymarket users could buy either “yes” or “no” bets on the question: “Taiwan Presidential Election: Who will win?”<sup>167</sup>

## Betting all at once

The increasing use of crypto is facilitating consumers to engage in betting and avoid the traditional banking and payments systems, driving the immediacy of betting for transactions all at once. There are serious implications for financial crime and money laundering from this development.

---

163 Forbes, Polymarket's \$3.2 Billion Election Bet Shows Web3 Potential, 5 November 2024 (<https://www.forbes.com/sites/digital-assets/2024/11/05/polymarkets-32-billion-election-bet-shows-web3-potential/>)

164 Gambling Commission, Definition of terms (<https://www.gamblingcommission.gov.uk/about-us/guide/page/definitions-of-terms>)

165 Autorite Nationale Des Jeux, Suite à l'intervention de l'ANJ, le site POLYMARKET ne propose plus ses services sur le territoire français, 29 November 2024 (<https://anj.fr/suite-l-intervention-de-lanj-le-site-polymarket-ne-propose-plus-ses-services-sur-le-territoire>)

166 Yahoo News, Singapore Blocks Polymarket, Following Taiwan and France, 13 January 2025 ([https://www.yahoo.com/news/singapore-blocks-polymarket-following-taiwan-081646510.html?guce\\_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce\\_referrer\\_sig=AQAAAAe9ulF0mjc3OtiZHZGEBuygwQXwa5J9dbMtgNm5\\_ReQPKXHPgpCKUa2b4Ay9xr10keLi5-q59avNIELzUc-o9qnX5ag8CbtVbVh8Fi7RjLMCEh-rCY9ueJ7B-FEAQQN1rsmXXu1kxubdEjTwa3l6DP6FJl49Fj7xTfmcJQ7wdz](https://www.yahoo.com/news/singapore-blocks-polymarket-following-taiwan-081646510.html?guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAAe9ulF0mjc3OtiZHZGEBuygwQXwa5J9dbMtgNm5_ReQPKXHPgpCKUa2b4Ay9xr10keLi5-q59avNIELzUc-o9qnX5ag8CbtVbVh8Fi7RjLMCEh-rCY9ueJ7B-FEAQQN1rsmXXu1kxubdEjTwa3l6DP6FJl49Fj7xTfmcJQ7wdz))

167 Taiwan News, 17 arrested for Taiwan election betting on crypto prediction market, 17 December 2024 (<https://www.taiwannews.com.tw/news/5061332>)

In a report in May 2021, the Head of Research of the Council warned that the growth of cryptocurrency use “is a threat to legal betting because of the intrinsic features of many cryptocurrencies, such as: facilitating avoidance of anti-money laundering (AML) and know-your-customer (KYC) procedures by betting operators; circumvention by operators of international betting regulatory and licensing requirements; and instantaneous and anonymous cross-border transactions from bettors and operators.”<sup>168</sup>

Prediction markets are intrinsically linked to crypto use, and a key attraction of Polymarket is the use of crypto payments. Polymarket operates on Polygon, a proof-of-stake layer two blockchain built on Ethereum, and all transactions are denominated in USDC, a stablecoin that claims to be pegged at 1:1 to the US Dollar and backed by dollars and assets. In theory this means that betting in USDC allows stable trading without volatile movements in the price of the currency being invested in predictions (or bets). However, the USDC price does move within a range (from a low of \$0.89 in 2019 to a high of \$1.19 in 2021) and future volatility caused by speculators attacking the price cannot be ruled out.

The attraction of using crypto for trading on predictive platforms is reflected in the growth in online betting. In February 2024, the Council Head of Research reported that the number of illegal betting websites accepting cryptocurrencies had increased by 26% since 2020. The most popular crypto being used for betting websites were Bitcoin, Ethereum, and Tether (USDT). As the report from the Council pointed out, “For the illegal bookmaker, cryptocurrency makes life considerably simpler as they do not have to explain to traditional banks or other authorities where and for what purpose fiat currency deposits are being transferred to their accounts. Cryptocurrency exchanges and blockchains popular with illegal actors do not ask any such questions.”<sup>169</sup>

There has already been a real-world impact on sports from crypto betting. Online sports betting, casino operator and crypto exchange BC Game signed a two-year contract to sponsor English Premier League football club Leicester City from July 2024. However, in November 2024 BC Game was declared bankrupt in Curacao, where the operator is licensed.<sup>170</sup>

168 ARF Council on Anti-Illegal Betting & Related Financial Crime, A report of blockchain and cryptocurrencies in illegal betting, Quarterly Bulletin, May 2021 ([https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/60b750b954bd92482b4d5fca\\_Blockchain%20and%20Cryptocurrencies%20in%20illegal%20betting\\_May%2021\\_Final.pdf](https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/60b750b954bd92482b4d5fca_Blockchain%20and%20Cryptocurrencies%20in%20illegal%20betting_May%2021_Final.pdf))

169 ARF Council on Anti-Illegal Betting & Related Financial Crime, How Illegal Betting and Related Money Laundering Flourished Despite ‘Crypto Winter’, Quarterly Bulletin, February 2024 (<https://www.ifaonline.org/AibResources/Bulletins/February%202024%20bulletin.pdf>)

170 BBC News, Leicester ease fears after sponsor bankruptcy reports, 21 November 2024 (<https://www.bbc.co.uk/sport/football/articles/cpdv3e5yj25o>)



There is no shortage of offshore hubs willing to provide “licences” to online betting operators that take bets from anyone, anywhere in the world with no regard to local gambling licences. As the Council pointed out in August 2024, “Offshore international gambling and betting licensing hubs are jurisdictions that have established regulatory frameworks to attract online gambling and betting operators by offering licences. These hubs often provide favourable conditions such as lower taxes (i.e. no tax paid in the jurisdiction where the point of sale takes place), streamlined regulations (i.e. under-regulated), and legal stability (i.e. no legal scrutiny). The number of these hubs is growing, and consequently so is the problem of illegal betting being camouflaged by pseudo-licenses.”<sup>171</sup>

The growing number of offshore betting and gambling “pseudo licensing” hubs offer a semblance of legal legitimacy for betting and gambling operators that are targeting consumers in jurisdictions where they usually do not have a licence. Prediction markets are a natural business opportunity for the illegal betting operators based in these hubs.

## Conclusions

The illegal betting situation is worsened as many gambling regulators have not shown an understanding of the fast-changing nature of online betting and gambling markets, and have remained more focussed on over-regulation of legal licensed operators which has had the consequence in some jurisdictions of spurring the growth of illegal betting markets as consumers turn away from tighter regulatory conditions. Gambling regulators need to pay far more attention to illegal betting markets and balance their responsibilities to protect consumers from the far higher risk of gambling harm caused by illegal betting.

Enforcement actions against illegal betting operators must be sustained. Gambling regulators, telecoms regulators, banking regulators and law enforcement agencies must have a coordinated approach to taking action against illegal betting and gambling operators in their jurisdictions. If they do not then the growth of related financial crime is a certain outcome.

Blacklisting and blocking domains of betting and gambling websites (and prediction markets) not licensed locally should be a routine set of actions in every jurisdiction. This is essential so that consumers can see that certain websites are not legal, which causes most reasonable people to pause. Illegal operators can overcome blocking by using huge numbers of mirror websites or simply changing IP addresses quickly, but the technology exists for regulators to block more effectively.

---

<sup>171</sup> IFHA Council on Anti-Illegal Betting & Related Crime, Offshore Betting and Gambling Licensing - The Pseudo Regulation of Betting, August 2024 (<https://www.ifhaonline.org/AibResources/Bulletins/August%202024%20Bulletin.pdf>)

As we start the near year of 2025, a reflection of the state of illegal betting is necessary to consider the holistic global situation. Despite growing awareness of the wide negative impact of illegal betting, the problem continues to grow. Consumers can place bets on almost everything, everywhere, all at once. Effective enforcement action is more important than ever.

# Unintended consequences? Traffic Analysis Shows Significant Rise in UK Visits to Unlicensed Betting Websites Offering Racing

*James Porteous, February 2025*

---

## Summary

This article examines growth of visitor traffic from UK consumers to betting websites which are not licensed in the UK in light of the announcement of Affordability Checks proposed in the Gambling Act Review White Paper published in April 2023.

Based on website traffic analysis of 10 UK Gambling Commission Licensed & Regulated betting operators (“legal segment”) and 22 offshore non-UK licensed operators (“unlicensed segment”) chosen because they offer betting on British horse racing, it is found that:

- a) Total visitor traffic from UK to selected unlicensed betting websites since August 2021 has grown by 131 per cent. Unique visitor traffic (i.e. counted by unique consumers) has grown in the same period by 522 per cent.
- b) Total visitor traffic from the UK to legal betting websites since August 2021 has grown by only 49 per cent. Unique visitor traffic (i.e. counted by unique consumers) has grown in the same period by only 25 per cent.
- c) Visitor traffic from the UK to unlicensed betting websites is growing far faster than traffic to legal betting websites.

In summary, traffic to from UK to unlicensed websites offering British horse racing has grown significantly, from an admittedly small base, and faster than the legal market.

Although no causation with regulatory announcements is shown, the finding that more UK consumers are visiting unlicensed betting platforms supports those in other external reports (based on different methodologies such as surveys) that UK unlicensed betting has been growing in recent years.

It should also be noted that the 22 offshore operators in the unlicensed segment do not represent the entirety (nor even the majority) of the unlicensed market visited by UK bettors, but were selected as understood to be popular with UK horse racing bettors. Findings are thus only indicative of trend, and should not be read as representing the scale of the total UK unlicensed betting market, which will be larger.

## Background

In April 2023, the UK Gambling Commission proposed<sup>172</sup> the implementation of affordability checks as part of the Gambling Act Review, intending to prevent consumers from experiencing gambling-related harm by ensuring they do not spend beyond their means. Critics argued<sup>173</sup> that this would drive customers toward unlicensed operators. In February 2024, Parliamentary debate raised similar concerns<sup>174</sup> over invasion of privacy, data security and driving consumers to the unlicensed market. In May 2024, the Gambling Commission announced a six-month pilot scheme, which would not affect consumers but only examine sources of data,<sup>175</sup> viewed by some as a less intrusive approach.<sup>176</sup>

## Methodology and Limitations

Website traffic from UK IP addresses to two groups of websites offering UK horse racing – 10 leading UK-licensed betting websites and 22 non-UK licensed websites – was analysed. Monthly data was collected from August 2021 to September 2024 using SimilarWeb, for both Total Visits and Unique Visitors (broadly speaking, unique visits refer to individual IP addresses and total visits are the sum of all visits, so that 10 visits from the same Unique Visitor would equal 10 Total Visits).

The 22 unlicensed websites examined represent only an unknown fraction of the total unlicensed market targeting UK consumers, and many unlicensed operators use numerous mirror sites, meaning that traffic numbers in this article under-estimate the true scale of total traffic to the entire universe of unlicensed operators. Additionally, some UK bettors may use VPNs, masking their location and further skewing data. The study also does not include unlicensed betting via apps / brokers or other unlicensed betting methods, so findings illustrate indicative trends but do not represent the total market of unlicensed betting activity in the UK.

The analysis does not show any causation between public policy announcements about gambling regulation and increases in website traffic because of the many confounding factors other than policy announcements that could affect demand.

172 Gambling Commission Press release, 27 April 2023 (Source: <https://www.gamblingcommission.gov.uk/news/article/gambling-commission-publishes-gambling-act-review-advice>)

173 Zak Thomas-Akoo, 'Labour peer Lipsey slams affordability checks', iGB, 19th October 2023 (Source: <https://igamingbusiness.com/legal-compliance/labour-peer-lipsey-slams-affordability-checks/>)

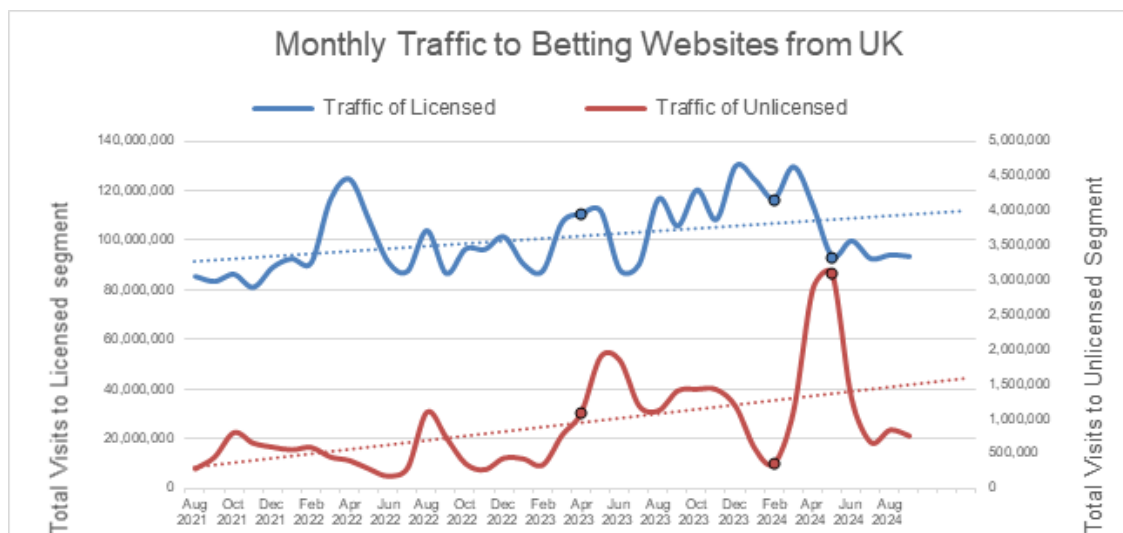
174 UK Parliament Financial Risk Checks for Gambling Volume 746: debated on Monday 26 February 2024 (Source: <https://hansard.parliament.uk/Commons/2024-02-26/debates/8860118F-57B3-428D-99CC-D719D3CDEEB4/FinancialRiskChecksForGambling>)

175 Helen Rhodes, UKGC, 28 August 2024 (Source: <https://www.gamblingcommission.gov.uk/blog/post/financial-risk-assessments-pilot-update>)

176 Elizabeth Dunn, Bird&Bird, 'UK: Enhanced Financial Risk Assessments - A Commentary on the Upcoming Changes' (Source: <https://www.twobirds.com/en/insights/2024/uk/enhanced-financial-risk-assessments-a-commentary-on-the-upcoming-changes>)

## Key Findings

The chart below shows monthly Total Visits<sup>177</sup> to the legal segment (top line), contrasted with monthly Total Visits to the unlicensed segment (bottom line) from August 2021 to September 2024. A key observation from this chart is that while both legal and unlicensed segments fluctuate, the unlicensed segment is trending upwards at a faster rate than the legal segment.



It is noted that there was a spike in the unlicensed segment and a corresponding decline in the legal segment coinciding with the three months following the announcement of affordability checks (May-July 2023), however it is not possible to attribute causation. Similarly, although traffic in both segments appears to have levelled off in the months following the announcement by the Gambling Commission in May that its pilot scheme would be less comprehensive than initially proposed, no inference can be made.

The very large spike in the unlicensed segment around April 2024 is almost entirely attributed to one operator. On investigating potential reasons for this spike, it was observed that this operator receives large referral traffic from affiliate marketing sites which promote betting operators who accept customers even if they have signed up to the UK's GAMSTOP gambling self-exclusion scheme. For example, during February to July 2024, when traffic spiked, 16.75% of visits to this particular operator came from such a referral site.

In other words, a large portion of this traffic spike will be from bettors searching for websites which are not blocked under GAMSTOP. This underlines the fact that unlicensed betting operators often actively target the most vulnerable bettors, i.e. those who have voluntarily requested to be denied access to UK licensed betting operators.

<sup>177</sup> Total visits to a website over a given period. Total Visits includes repeat visits from individuals (Unique Visits)

As the table below shows, the net impact of these fluctuations is that as of October 2024, the traffic portion of the 22 unlicensed operators as a percentage of both segments' total traffic has almost doubled from 0.65%<sup>178</sup> to 1.2%.<sup>179</sup> Also, while both segments have grown compared to 2021, the increase in traffic to the unlicensed segment is much larger in percentage terms (131% vs 25% in terms of total monthly visits).<sup>180</sup> There are now six times as many unique visitors on average to the unlicensed segment compared to 2021, which represents a 522% increase compared to 49% growth in the legal segment. In other words, the unlicensed segment has grown significantly on every metric, and has been growing faster than the legal market – albeit from a small base.

*Table 1 - Average monthly metrics for Legal and Illegal segment*

<b>Metric</b>	<b>Aug-Dec 2021 (Avg/Month)</b>	<b>Jan-Dec 2022 (Avg/Month)</b>	<b>Jan-Dec 2023 (Avg/Month)</b>	<b>Jan-Sep 2024 (Avg/Month)</b>	<b>Jan-Sep 2024 vs Aug-Dec 2021 (Avg/Month)</b>
Legal Unique Visitors	10,109,641	11,986,576	15,397,033	15,111,768	<b>+49%</b>
Unlicensed Unique Visitors	98,362	149,132	373,105	611,784	<b>+522%</b>
Legal Total Visits	84,762,199	99,469,848	105,414,963	106,294,001	<b>+25%</b>
Unlicensed Total Visits	555,917	469,639	1,175,028	1,286,779	<b>+131%</b>

<sup>178</sup> 0.65% = the total traffic to unlicensed website divided by the total licensed and unlicensed traffic from August 2021 to December 2021. Traffic data from earlier is not available due the inaccessibility of traffic data prior to that.

<sup>179</sup> 1.20% = the total traffic to unlicensed website divided by the total licensed and unlicensed traffic from January 2024 to September 2024

<sup>180</sup> 131% = the growth in average monthly traffic to unlicensed websites from August 2021 to December 2021 when compared to the period from January 2024 to September 2024; 25% = the growth in average monthly traffic to licensed websites for the same time frames; 522% = the growth in average monthly visitors to unlicensed websites for the same time frames; 49% = the growth in average monthly visitors to licensed websites for the same time frames

## Conclusion

The unlicensed segment examined – which is only an unknown portion of total unlicensed demand – has grown significantly and also grown faster than overall market growth, which supports findings from other studies and media reports<sup>181, 182, 183, 184, 185</sup> since 2021 that unlicensed betting in UK has been growing.

Although no direct causation can be made to recent regulatory developments and announcements in the UK, the apparent growth in demand for unlicensed betting options from UK bettors does echo findings elsewhere that over-regulating legal betting markets may drive consumers to unlicensed markets, which is the exact opposite effect intended by well-meaning regulators.

An effective balance must be struck between protecting consumers and allowing the legal market to channel betting demand away from unlicensed operators which do not benefit society through taxation, levies to sports, local employment, etc., nor have suitable responsible gambling safeguards in place.

---

181 Nicole Macedo, 'Spending caps, product friction points and lack of choice driving black market warns Regulus report', iGaming Business, (25 September 2024), <https://igamingbusiness.com/legal-compliance/legal/black-market-regulus/>, accessed 12 November 2024.

182 "Review of unlicensed online gambling in the UK", PwC study, 3 February 2021 (Source: [https://bettingandgamingcouncil.com/uploads/Downloads/PwC-Review-of-Unlicensed-Online-Gambling-in-the-UK\\_vFinal.pdf](https://bettingandgamingcouncil.com/uploads/Downloads/PwC-Review-of-Unlicensed-Online-Gambling-in-the-UK_vFinal.pdf))

183 "New Research Reveals Shocking Size of Black Market Gambling Across Europe", Betting & Gaming Council, 18 February 2022 (<https://bettingandgamingcouncil.com/news/new-research-reveals>)

184 "A warning for governments over illegal betting – and British racing must hope Rachel Reeves was listening", Racing Post, 14 October 2024 (Source: <https://www.racingpost.com/news/opinion/comment/a-warning-for-governments-over-illegal-betting-and-british-racing-must-hope-rachel-reeves-was-listening-aAFP3p4n5bt/>)

185 "Government assault on gambling freedom will drive punters to the black market", Daily Mail, 13 September 2023 (Source: <https://www.dailymail.co.uk/sport/racing/article-12512331/MARCUS-TOWNEND-Government-assault-gambling-freedom-drive-punters-black-market.html>)

186 Martin Purbrick, "Variable Betting Duty & the Impact on Turnover, Illegal Betting & Taxation Revenues", Asian Racing Federation report, 6 November 2023 (Source: <https://www.ifhaonline.org/default.asp?section=About%20IFHA&area=127>)

# Game on: Inside Sport Integrity Australia's Efforts to Protect Sports from Competition Manipulation

*Jason Whybrow, February 2025*

---

As a partner agency for many Council members and close collaborator on the integrity protection for sport, we appreciate the opportunity to outline some important Australian initiatives that may be useful in the work of anyone interested in protecting sport. This article introduces Sport Integrity Australia's establishment and background, and updates on a few key recent developments.

Sport Integrity Australia is a statutory Australian Government body established to coordinate a national response to the threats posed to the integrity of Australian sport through collaboration with sporting organisations, council members and industries. Sport Integrity Australia's mission is to keep Australian sport safe and fair, at all levels, for all participants.

## Background: The Need for a National Sport Integrity Body

At the international level, there has been a huge growth in sports wagering, particularly in Asia, in part due to the time zone, making wagering on Australian sports attractive. The compatibility of some Australian sports events with prime viewing time and the quality of the sporting products, including racing events, makes the associated markets favoured by customers in Asia, leaving sports vulnerable to corruption<sup>187</sup>. This growth is, of course, in both legal and illegal markets.

Combined with the increasing commercialisation of sport, the rapid growth in sports wagering, and revelations of ongoing manipulation of sports competitions and doping scandals, challenges prompted the Australian Government to develop a National Sport Plan to address the evolving threats to the integrity of sport.

## The Wood Review

The Wood Review of Australia's Sports Integrity Arrangements was requested as part of the work being done by the Australian Government to develop the National Sport Plan. The Report of the Review of Australia's Sports Integrity Arrangements (Wood Review) was presented to the Australian Government in March 2018.

---

187 Report of the Review of Australia's Sports Integrity Arrangements, 2018 (<https://www.sportintegrity.gov.au/sites/default/files/Report%20of%20the%20review%20of%20Australia%E2%80%99s%20Sports%20Integrity%20Arrangements.pdf>)



In line with its terms of reference, the Review examined key Australian and international threats to the integrity of sport. It made 52 recommendations across five key themes:

- A stronger response to match-fixing;
- Enhancing the regulation of sports wagering to improve the integrity outcomes;
- Enhancing Australia's anti-doping capability;
- The development of a National Sports Tribunal; and
- The development of a National Sports Integrity Commission.

## **Australian Government Response**

On 12 February 2019, the Australian Government released its response to the Review - Safeguarding the Integrity of Sport—the Government Response to the Wood Review. The Government supported the main recommendations of the Wood Review, including the establishment of Sport Integrity Australia. This commitment provided assurance to Australians that their sports will continue to be clean, fair, safe and inclusive.

## **Establishment of Sport Integrity Australia**

The Australian Government established Sport Integrity Australia in July 2020 as a direct outcome of the Wood Review, and the official Australian Government response.<sup>188</sup> For the first time, Australian sport has a single agency to deal with threats facing the sector. The agency brought together the country's existing sport integrity capabilities, knowledge and expertise to coordinate and develop new threat responses, including prevention, detection, investigation and enforcement programs.

As part of the agency establishment, Sport Integrity Australia leads the Australian Government's response to competition manipulation and sports wagering issues affecting Australian sport. To achieve this we work with sports, the sports wagering industry, state and territory regulators and international counterparts to provide a clearer, more transparent, and consistent sports wagering regulatory framework.

## **Current Issues and Developments**

As we approach five years on from the release of the Australian Government Response and four years since Sport Integrity Australia was established, we have made progress in our commitment to protecting the integrity of Australian sport for the benefit of the entire Australian community, notably in the sports wagering and competition manipulation sector. These include:

---

<sup>188</sup> Safeguarding the Integrity of Sport – the Government Response to the Wood Review, 11 February 2019 (<https://www.sportintegrity.gov.au/sites/default/files/Government%20Response%20to%20Wood%20Review.pdf>)

### ***Criminal Offences for Sport Corruption***

Efforts to manipulate sporting competitions tend to be cross-jurisdictional or multijurisdictional due to sporting competitions being national and international, and online wagering and telecommunications being borderless.

It is well understood that integrity threats to sport such as competition manipulation are able to prosper within illegal betting markets. It is vital to the health of our sporting ecosystems to establish rigorous and effective methods to circumvent these threats.

Sport Integrity Australia is leading the process to establish national match-fixing offences to encourage national consistency in relevant criminal provisions introduced by state and territory governments. The offences are being drafted to ensure:

- offence provisions have transnational application;
- match-fixing offences are linked to wagering outcomes, irrespective of whether said wager would have been otherwise lawful;
- provisions include offences for the use of inside information;
- offence provisions (including for sentencing) are calibrated to reflect the serious nature of the offending, such as to enliven the possibility of utilising telecommunication intercept powers; and
- be proportional to the level of criminality, considering the additional regulatory responses, such as the civil actions available to sport organisations.

The offences will be designed to capture:

- Corrupting a sporting event;
- Altering, destroying, or concealing corrupt conduct information;
- Use or communication of corrupt conduct information;
- Use or communication of inside information;
- Giving a bribe;
- Accepting a bribe; and
- Possession of corrupt conduct information

### ***Ratification of the Macolin Convention***

The Australian Government is in the process of ratifying the Council of Europe's Convention on the Manipulation of Sports Competitions (the Macolin Convention) to promote national and international cooperation between governments and organisations involved in sports and sports betting.

The Macolin Convention is a legal instrument and the only rule of international law to combat the manipulation of sports competitions. It aims to enhance cooperation between public authorities, sports organisations, betting operators and competition organisers to prevent, detect and sanction the manipulation of sports competitions. It proposes a common legal framework for an efficient international cooperation to respond to this global threat.

Ratification of the Macolin Convention will:

- Provide a constitutional head of power to Sport Integrity Australia to effectively regulate sport integrity elements of the gambling regulatory environment, through the development of the enhanced Australian sports wagering scheme; and
- Enhance domestic and international cooperation and coordination to better prevent, detect, and sanction national or transnational manipulation of national and international sports competitions.

To assist in meeting these aims SIA is progressing new criminal offences and developing a National Platform to meet the ratifications assessment.

### ***National Platform for Information Sharing***

Ratification of the Macolin Convention requires parties to fulfil certain functions and capability, one of which is the operation of a 'National Platform'.

The National Platform serves as a central point to collect, analyse, and disseminate information relevant to the fight against manipulation of sports competitions. It will also help coordinate activities between relevant bodies such as wagering service providers, sporting organisations, law enforcement and regulators nationally and internationally.

Since 2017, the National Integrity of Sport Unit, and now Sport Integrity Australia, partnered with the Australian Criminal Intelligence Commission to act as Australia's National Platform. This arrangement ended on 30 December 2024, so from 1 January 2025, Sport Integrity Australia assumed sole responsibility to act as Australia's National Platform, fulfilling a key recommendation of the Wood Review.

Sport Integrity Australia is responsible for the receipt, assessment and dissemination of data, information and intelligence relating to match-fixing, acting as a central hub for effective information sharing and collaboration between relevant stakeholders, so they can respond effectively. This includes information on irregular and suspicious bets placed on sports competitions, and, where appropriate, the issuing of alerts.

Through our role as the National Platform, Sport Integrity Australia aims to support sporting organisations, regulators, gambling operators, state and territory law enforcement agencies, in partnership with other key stakeholders to identify and respond to instances of competition manipulation and coordinate responses where we can.

### **Working with Australian partners**

As mentioned by Council Chair Martin Purbrick, in the IFHA (then ARF) Council's February 2024 Bulletin,<sup>189</sup> Australia requires stakeholders to perform relevant integrity functions which are legislated in a variety of ways in Australian jurisdictions. With the latest reforms, Sport Integrity Australia will continue to enhance the response by assisting the various stakeholders with knowledge, intelligence, resourcing and support.

The Australian Government is considering its response to a number of gambling reform proposals and Sport Integrity Australia is working with partner agencies to embed integrity and specific wagering integrity implications in the response.

Australian sports and athletes form a key stakeholder group for Sport Integrity Australia in addressing illegal betting. Working in consultation with sport sector partners Sport Integrity Australia has developed the National Integrity Framework to deliver a best practice and consistent approach to protecting sport against integrity threats.

<sup>189</sup> The model for Combatting Illegal Betting, Martin Purbrick, February 2024 (<https://www.ifhaonline.org/AibResources/Bulletins/February%202024%20bulletin.pdf>)

Sport Integrity Australia works closely with National Sporting Organisations (NSO) and National Sporting Organisations for People with Disability (NSOD), recognised by the Australian Sports Commission (ASC), to implement and embed the National Integrity Framework in their sports. This provides resources to sports at all levels to mitigate against corrupt wagering practices.

Education is also a vital tool to the safeguarding of sport integrity in Australia. Sport Integrity Australia proactively engages with all sports across the country to deliver relevant betting education to sports and athletes to provide further protections against illegal betting and competition manipulation.

Other stakeholders have responsibilities and powers in relation to online gambling that are evolving as well. The Australian Communications and Media Authority (ACMA) is responsible for the administration of the relevant legislation to enforce illegal gambling prohibitions – the Interactive Gambling Act 2001<sup>190</sup>. ACMA retains civil provisions for enforcing ISP blocking of illegal gambling provider websites, for example.

## **Connecting internationally**

Sport Integrity Australia maintains strong international relationships to increase our understanding of risks, vulnerabilities and threats to Australian sport, while exploring opportunities for new collaboration. We seek to learn from our international colleagues and help build capacity in regions where it is needed to strengthen the global integrity framework and help build better environments for our Australian athletes competing overseas.

The global anti-doping framework overseen by the World Anti-Doping Agency (WADA) is mature and well connected. Our expertise in anti-doping has been recognised globally and our staff hold positions on a range of WADA expert groups and committees. However, there are few all-encompassing sports integrity agencies internationally, like Sport Integrity Australia, charged with coordinating the national approach to safe and fair sport on all fronts.

We use our close relationships with international partners including INTERPOL, EuroPol, the International Partnership Against Corruption in Sport, the United Nations Office on Drugs and Crime, UNESCO and the Council of Europe to build our understanding of risks, vulnerabilities and threats to Australian sport, while exploring new collaborative opportunities aimed at continually strengthening the system.

---

190 About the Interactive Gambling Act | ACMA (<https://www.acma.gov.au/about-interactive-gambling-act#:~:text=Act%20sets%20the%20rules%20for%20companies%20that%20offer,offer%20some%20online%20services%20to%20people%20in%20Australia.>)

## Future Outlook

In 2023, industry research illustrated the potential cost and scope of the illegal offshore betting market in Australia. The research estimated that the illegal offshore betting market was valued at over \$1.1 billion dollars and that these activities were costing the Australian economy approximately \$1.3 billion in lost taxes and a further \$1.6 billion loss to racing and sports bodies.

These figures highlight the importance of continued and rigorous regulation within Australia and further demonstrate to members the need for the support of and engagement with their own respective National Platforms. These borderless and multi-jurisdictional crimes require a coordinated network to deter, disrupt and prevent these practices.

Sport Integrity Australia's commitment to safeguarding sport integrity is steadfast and evolving to adapt to the ever-changing threat landscape but this can only be done in collaboration and partnership. The agency has maintained a proactive approach to prevention, detection and deterrence of illicit activities through the signing of domestic and international Memorandums of Understanding, particularly with law enforcement, regulators and sport sector partners, building capabilities for information sharing.

## Conclusion

The expansion of these networks and their capabilities are a vital tool to disrupting illicit activities. Sport Integrity Australia welcomes IFHA members sharing our resources and learnings among your sport contacts and networks. Sport Integrity Australia's tagline 'protecting sport together' is a call to action for all those with an interest in maintaining integrity, fairness and safety in sport for everyone at all levels.

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

*Professor Jack Anderson, May 2025*

---

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.<sup>191</sup> 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.<sup>192</sup> 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.<sup>193</sup> 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.<sup>194</sup>

---

191 David Forrest, "The big Good Friday football fix of 1915: Man Utd 2 – Liverpool 0" (The Conversation, 3 April 2015) and available at <https://theconversation.com/the-big-good-friday-football-fix-of-1915-man-utd-2-liverpool-0-39552>

192 Matt Barlow, "Hard man Peter Swan stained by betting scandal that rocked Britain" (Daily Mail, 22 Jan 2021) and available at <https://www.dailymail.co.uk/sport/football/article-9173671/Hard-man-Peter-Swan-stained-betting-scandal-rocked-Britain.html>

193 "Three guilty in match fixing probe" (UK Gambling Commission, 18 June 2014) and available at <https://www.gamblingcommission.gov.uk/news/article/three-guilty-in-match-fixing-probe>

194 Mike Henson, "The cash came up to my torso" (BBC Sport Online, 10 Sept 2024) and available at <https://www.bbc.com/sport/football/articles/cd05385k722o>

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.<sup>195</sup> 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.<sup>196</sup>

## 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.<sup>197</sup> 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).

<sup>195</sup> “Bradley Wood: Ex-Lincoln City player banned for six years for match-fixing offences” (BBC Sport Online, 19 April 2018) and available at <https://www.bbc.com/sport/football/43829525>

<sup>196</sup> For a link to the full FA decision in this matter see, “Bradley Wood suspended for six years after breaching integrity and betting rules” (The FA, 19 April 2018) and available at <https://www.thefa.com/news/2018/apr/19/bradley-wood-lincoln-suspended-190418>

<sup>197</sup> “West Ham United’s Lucas Paqueta charged” (The FA, 24 May 2024) and available at <https://www.thefa.com/news/2024/may/23/lucas-paqueta-charged-230524>



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.<sup>198</sup> 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.<sup>199</sup>

## 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.<sup>200</sup>

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.

---

198 Jack Lang, "Criminal proceedings against Lucas Paqueta's uncle recommended after Brazilian football betting inquiry" (The Athletic, 14 Feb 2025) and available at <https://www.nytimes.com/athletic/6136364/2025/02/14/lucas-paquetas-uncle-betting-inquiry/>

199 Luiz Vinicius, "Senate extends Betting CPI until April and awaits trial of Lucas Paquetá" (igamingBrazil, 18 Feb 2025) and available at <https://igamingbrazil.com/en/legislation-en/2025/02/18/senate-extends-betting-cpi-until-april-and-awaits-trial-of-lucas-paqueta/>

200 Martyn Ziegler, "Lucas Paquetá's relatives sent money to another player accused of spot-fixing" (The Times, 25 Sept 2024) and available at <https://www.thetimes.com/sport/football/article/lucas-paquetas-family-sent-money-to-another-player-accused-of-spot-fixing-sft2bfmrd> and Jack Lang and Guillermo Rai, "Should Lucas Paqueta and Luiz Henrique be playing for Brazil?" (The Athletic, 8 Oct 2024) and available at <https://www.nytimes.com/athletic/5824685/2024/10/08/lucas-paqueta-luiz-henrique-brazil/>

## 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.<sup>201</sup>

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.<sup>202</sup>

201 Jesse Hyland, “NSW Police charge three A-League players including Sydney’s Macarthur FC captain Ulises Dávila over betting scandal” (ABC News Online, 17 May 2024) and available at <https://www.abc.net.au/news/2024-05-17/nsw-a-league-players-alleged-betting-scandal-yellow-cards/103860160> and see also Chris Barrett, “‘Extremely obvious’: How police allege A-League players were sprung in yellow card betting plot.” (Sydney Morning Herald, 17 May 2024) and available at <https://www.smh.com.au/national/nsw/three-a-league-soccer-players-arrested-for-alleged-betting-corruption-20240517-p5jef9.html>

202 On Subramaniam’s case, see Jean Edwards, “Match-fixing ringleader embarrassed players by yelling from sidelines, court hears” (ABC News Online, 11 April 2014) and available at <https://www.abc.net.au/news/2014-04-11/match-fixing-ringleader-back-in-court/5384192>. For an example of the case against the players, see AAP, “Don’t save it’, footballers told goalkeeper in Australia match-fixing bid” (The Guardian, 17 Jul 2014) and available at <https://www.theguardian.com/football/2014/jul/17/english-footballer-banned-after-admitting-match-fixing-in-australia> and Dan Oakes, “Southern Stars scandal: Soccer club’s ‘obvious’ match-fixing sparked questions from rivals” (ABC News Online, 22 Sept 2014) and available at <https://www.abc.net.au/news/2014-09-22/soccer-clubs-obvious-match-fixing-sparked-questions-from-rival/5761204>. For the case against the coach who was sentenced to a four-month jail term fully suspended for a year and fined AUD\$3,000, see AAP, “Football players who botched match-fixing result told it was ‘life and death’” (The Guardian, 4 August 2014) and available at <https://www.theguardian.com/sport/2014/aug/04/football-players-who-botched-match-fixing-result-told-it-was-life-and-death>

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.”<sup>203</sup>

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.<sup>204</sup>

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.<sup>205</sup> 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.<sup>206</sup> The coach in question, who did not in fact carry out the tactical adjustments, also pleaded guilty and avoided conviction.<sup>207</sup>

---

203 Nico Bucci, “Nicholas McKoy escapes conviction over Southern Stars match fixing” (The Age, 12 Dec 2014) and available at <https://www.theage.com.au/national/victoria/nicholas-mckoy-escapes-conviction-over-southern-stars-match-fixing-20141212-125us7.html>

204 Nick McKenzie, “Arrests, charges follow raids on Melbourne soccer club” (The Age, 12 Dec 2024) <https://www.theage.com.au/sport/soccer/police-raid-national-league-soccer-club-in-match-fixing-probe-20241211-p5kxh9.html>

205 Paul Sakkal, “Men charged with fixing outcome of Victorian soccer match” (The Age, 26 Feb 2019) <https://www.theage.com.au/national/victoria/men-charged-with-fixing-outcome-of-victorian-soccer-match-20190226-p5107p.html>

206 Cameron Houston and Chris Vedelago, “Gatto's business partner punted on soccer game with inside information” (The Age, 7 October 2019) and available at <https://www.theage.com.au/national/victoria/gatto-s-business-partner-punted-on-soccer-game-with-inside-information-20191007-p52ycd.html>

207 Adam Cooper, “Match fix call from Gatto's mate cost soccer coach his job, court told” (The Age, 13 Feb 2020) and available at <https://www.theage.com.au/national/victoria/match-fix-call-from-gatto-s-mate-cost-soccer-coach-his-job-court-told-20200212-p5406w.html>

## 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.<sup>208</sup>

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.

208 Paul Nicholson, "Chile bans betting sponsorship, killing new naming rights deal for top leagues" (Inside World Football, 23 Sept 2023) and available at <https://www.insideworldfootball.com/2023/09/28/chile-bans-betting-sponsorship-killing-new-naming-rights-deal-top-leagues/> and Garance Limouzy, "Yellow card epidemic in Chile triggers match-fixing investigation" (Sigma, July 2024) and available at <https://sigma.world/news/yellow-card-epidemic-in-chile-triggers-match-fixing-investigation>

209 Guillermo Rai, "Sevilla's Kike Salas placed under investigation for fraud" (The Athletic, 16 Jan 2025) and available at <https://www.nytimes.com/athletic/6061164/2025/01/15/kike-salas-sevilla-arrest-fraud/>

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).<sup>209</sup> 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.<sup>210</sup>

---

210 Lia Harris, “Three Macarthur FC players stood down after being charged over alleged betting scandal” (ABC News Online, 18 May 2024) and available at <https://www.abc.net.au/news/2024-05-18/nsw-a-league-players-stood-down-over-betting-charges/103865078>

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.”<sup>211</sup> Hester was later given an eight-match ban by Scottish football authorities for breach of player betting regulations.<sup>212</sup>

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.

---

211 “Elgin City footballer Kane Hester cleared of match fixing fraud” (BBC News Online, 10 March 2023) and available at <https://www.bbc.co.uk/news/uk-scotland-tayside-central-64892078>

212 “Kane Hester: Montrose striker receives suspended ban for gambling breaches” (BBC Sport Online, 15 June 2023) and available at <https://www.bbc.co.uk/sport/football/65918921>

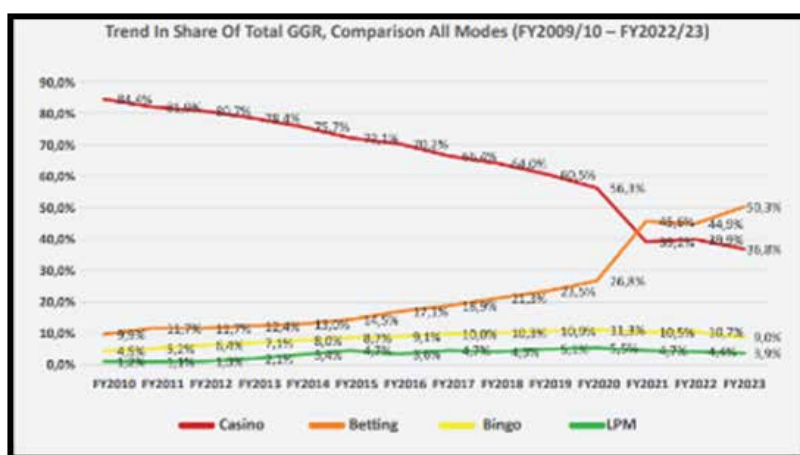


# Betting on Change: How COVID-19 Supercharged Sports Betting in South Africa

Professor Steve Cornelius, May 2025

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*,<sup>213</sup> 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,<sup>214</sup> 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).



<sup>213</sup> MarketLine Global Casino Profile (MarketLine, Datamonitor 2024).

<sup>214</sup> National Gambling Board of South Africa Annual Report 2023/24 (2024).



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-

- placing or accepting a bet or wager ...;
- placing or accepting a totalisator bet, ...; or
- making available for play, or playing-
  - o bingo or another gambling game ...; or
  - o 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 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.

## Bibliography

MarketLine *Global Casino Profile* (MarketLine, Datamonitor 2024).

National Gambling Board of South Africa *Annual Report 2023/24* (2024).

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

*Martin Purbrick, May 2025*

---

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.”<sup>215</sup> 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:

---

215 Gambling Commission, What we Regulate (<https://www.gamblingcommission.gov.uk/about-us/guide/what-we-regulate>)

“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.”<sup>216</sup>

## 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.<sup>217</sup>

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.

<sup>216</sup> Home and Youth Affairs Bureau, Hong Kong Government, Gambling Policy ([https://www.hyab.gov.hk/en/policy\\_responsibilities/District\\_Community\\_and\\_Public\\_Relations/gambling.htm](https://www.hyab.gov.hk/en/policy_responsibilities/District_Community_and_Public_Relations/gambling.htm))

<sup>217</sup> Robert T. Wood, Internet Gambling: Past, Present and Future, 2007 (<https://core.ac.uk/download/pdf/185287561.pdf>)

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.<sup>218</sup> In February 2025, the gambling regulator in Colombia blocked 10,000 websites and social media profiles that were offering illegal betting.<sup>219</sup> These actions show that regulators can send a public signal that illegal betting websites will be blocked.

---

218 Australian Communications and Media Authority, More illegal online gambling websites blocked, 18 March 2025 (<https://www.acma.gov.au/articles/2025-03/more-illegal-online-gambling-websites-blocked>)

219 CDC Gaming, Colombia regulator blocks 10,000 websites for illegal betting, 4 February 2025 ([https://cdcgaming.com/brief/colombia-regulator-blocks-10000-websites-for-illegal-betting/?utm\\_source=ARF+Anti-Illegal+Betting+Taskforce&utm\\_campaign=fdb4dc7d9b-EMAIL-CAMPAIGN\\_2025\\_02\\_18\\_02\\_08&utm\\_medium=email&utm\\_term=0\\_-fdb4dc7d9b-407059169](https://cdcgaming.com/brief/colombia-regulator-blocks-10000-websites-for-illegal-betting/?utm_source=ARF+Anti-Illegal+Betting+Taskforce&utm_campaign=fdb4dc7d9b-EMAIL-CAMPAIGN_2025_02_18_02_08&utm_medium=email&utm_term=0_-fdb4dc7d9b-407059169))

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.<sup>220</sup>

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.<sup>221</sup>

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.<sup>222</sup>

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.<sup>223</sup>

## 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.

220 Government of India, Ministry of Finance, DGGI cracks down on offshore Online Money Gaming firms to curb tax evasion, 22 March 2025 (<https://pib.gov.in/PressReleasePage.aspx?PRID=2113991> )

221 Government of Brazil, Ministry of Finance, Secretariat of Prizes and Bets, SPA/MF ORDINANCE No. 566, OF MARCH 20, 2025 (<https://www.in.gov.br/en/web/dou/-/portaria-spa/mf-n-566-de-20-de-marco-de-2025-619268422> )

222 Times of Malta, Turkish celebrities charged with advertising illegal gambling while in Malta, 23 February 2025 ([https://timesofmalta.com/article/turkish-celebrities-charged-advertising-illegal-gambling-malta.1105600?utm\\_source=ARF+Anti-Illegal+Betting+Taskforce&utm\\_campaign=53c99e183a-EMAIL\\_CAMPAIGN\\_2025\\_02\\_25\\_06\\_22&utm\\_medium=email&utm\\_term=0\\_-53c99e183a-407059169](https://timesofmalta.com/article/turkish-celebrities-charged-advertising-illegal-gambling-malta.1105600?utm_source=ARF+Anti-Illegal+Betting+Taskforce&utm_campaign=53c99e183a-EMAIL_CAMPAIGN_2025_02_25_06_22&utm_medium=email&utm_term=0_-53c99e183a-407059169) )

223 Hurriyet Daily News, Authorities close 233,000 illegal betting websites in 2024, 26 January 2025 ([https://www.hurriyetdailynews.com/authorities-close-233-000-illegal-betting-websites-in-2024-205103?utm\\_source=ARF+Anti-Illegal+Betting+Taskforce&utm\\_campaign=75290bc645-EMAIL\\_CAMPAIGN\\_2025\\_02\\_05\\_06\\_42&utm\\_medium=email&utm\\_term=0\\_-75290bc645-407059169](https://www.hurriyetdailynews.com/authorities-close-233-000-illegal-betting-websites-in-2024-205103?utm_source=ARF+Anti-Illegal+Betting+Taskforce&utm_campaign=75290bc645-EMAIL_CAMPAIGN_2025_02_05_06_42&utm_medium=email&utm_term=0_-75290bc645-407059169) )

- 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.

\* \* \*

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.



## About The IFHA Council on Anti-Illegal Betting and Related Crime

The IFHA Council on Anti-Illegal Betting and Related Crime is a think tank comprised of members from organisations engaged in horse racing and sports integrity, law enforcement, the United Nations Office on Drugs and Crime (UNODC), and academia. In October 2024 it succeeded the ARF Council on Anti-Illegal Betting and Related Financial Crime, which was established in 2017, thereby extending the focus worldwide through the global leader for the international sport of thoroughbred racing.

The purpose, objectives, and impact of the original ARF Council have become global, and as such have outgrown the original regional role. With a global impact and a global set of stakeholders, and by addressing global issues affecting racing and other sports relating to illegal betting and financial crime, the Council has moved under the auspices of the IFHA to become a global organisation.

The purpose of the IFHA Council is to foster and enhance international cooperation among horse racing operators, regulators, intergovernmental organisations, government agencies and NGOs in order to better combat the threat of illegal betting and other crime risks to the integrity of the sport of horse racing in particular, as well as sport in general.

**Subscribe to IFHA Council's bulletins and reports  
by scanning the QR code below**



## IFHA Council Members Biographies

### **Martin Purbrick**

Chairperson, IFHA Council on Anti-Illegal Betting and Related Financial Crime

Martin Purbrick has over 30 years' experience leading integrity and risk management, and is the former Director of Security and Integrity at The Hong Kong Jockey Club. He is also a former Royal Hong Kong Police officer whose service included Special Branch work engaged in counter-terrorism as well as the Criminal Intelligence Bureau in anti-triad intelligence.

### **Douglas Robinson**

Director, IFHA Council on Anti-Illegal Betting and Related Financial Crime; Executive Manager, International Illegal Betting Research and Liaison, The Hong Kong Jockey Club

Douglas Robinson is the Executive Manager of International Illegal Betting Research and Liaison at The Hong Kong Jockey Club. His main responsibility is to understand and mitigate global illegal betting and sports corruption-related integrity risks. Prior to joining the Club, He worked across a variety of industries in the UK as well as in Hong Kong.

### **Jack Anderson**

Professor of Law, University of Melbourne

Jack Anderson is Professor and Director of Sports Law Studies at the University of Melbourne with a primary research interest in the relationship between sport and the law and he has published widely in related areas. He joined Melbourne Law School in July 2017 as Professor and Director of Sports Law Studies. In 2021 he was appointed as Director of the Melbourne Law Masters program. Admitted to the Supreme Court of Victoria in 2022, Jack was Special Counsel (Integrity Regulation) at Racing Victoria from 2022 to 2024.

### **Graham Ashton**

Sports Integrity, Safety and Security Risk Consultant

Graham Ashton is the former Chief Commissioner of Victoria Police. As Chief Commissioner, he was the key driver in setting up the Sporting Integrity Unit of Victoria Police, which was the first law enforcement unit anywhere dedicated to combating match-fixing and is regarded as the leading police sports integrity unit in the world.

### **Stefano Caneppele**

Professor in Criminology and Deputy Director at the School of Criminal Justice of the University of Lausanne

Stefano Caneppele is a leader in international criminology and his main research interests are crime prevention, cybercrime, economic and organized crime. He has a specific interest on gambling related crime impacting sports, and as part of this work leads the delivery of the UEFA 'Fight the Fix' training program for professionals to combat sports competition manipulation.

### **Tom Chignell**

Racing Integrity & Betting Analysis Management for the The Hong Kong Jockey Club

Tom Chignell is the Executive Manager of Racing Integrity and Betting Analysis at The Hong Kong Jockey Club. He has over 15 years of experience implementing systems and processes to detect suspicious betting across regulated and illegal markets and producing analytical reports, which are used as evidence in sports betting and corruption cases and have also been used by UK Police and government agencies.

### **Steve Cornelius**

Professor in and Head of the Department of Private Law and Director of the Centre for Intellectual Property Law, University of Pretoria

Steve Cornelius is a member of the Independent Doping Hearing Panel of the South African Institute for Drug-free Sport, and an Independent director on the board of Cricket South Africa. Previously, he served on the Disciplinary Tribunal of the International Association of Athletics Federations.

### **Brant Dunshea**

Chief Executive Officer, British Horseracing Authority

Brant Dunshea is the Chief Regulatory Officer of the British Horseracing Authority. He joined the BHA in March 2015. He was promoted to the role of Director of Integrity and Regulatory Operations in September 2016 and then Chief Regulatory Officer in April 2018. Prior to joining the BHA, Brant held various senior roles within racing-related industries in Australia for 20 years.

**Luca Esposito**

Executive Director, World Lottery Association; General Secretary, United Lotteries for Integrity in Sport (formerly Global Lottery Monitoring System)

Mr. Luca Esposito is Executive Director, World Lottery Association and General Secretary, United Lotteries for Integrity in Sport (formerly Global Lottery Monitoring System) and has extensive knowledge and experience of technology in betting. Luca has significant insight into how IT is utilized by betting operators across wide geographies to focus on combating illegal betting through the WLA and ULIS.

**Brent Fisher**

General Manager Investigations & Intelligence, Racing Victoria

Brent Fisher is the General Manager Investigations & Intelligence for Racing Victoria since January 2022 and was previously the General Manager Integrity for Harness Racing Victoria from 2017 to 2021 and prior to that with Victoria Police. Brent will represent both Racing Australia as well as Racing Victoria.

**Dr Eliot Forbes**

CEO, Racing Integrity Board, New Zealand

Dr Eliot Forbes has over 25 years of racing administration and wagering experience across Australia, Asia, and the Middle East. He has served on the Boards of Racing Australia (RA) and Greyhounds Australasia; and Chaired RA's Retirement of Racehorses Committee.

**Dr Sally Gainsbury**

Director, Gambling Treatment & Research Clinic, University of Sydney

Sally Gainsbury is Associate Professor in the School of Psychology, Leader of the Technology Addiction Team within the Brain and Mind Centre at the University of Sydney and Director of Australia's only university-affiliated gambling treatment clinic. Her widely-published research focuses on how to minimise gambling harms including prevention and treatment of gambling problems and strategies to assist people to reduce risky gambling online and offline.

### **Marc Van Gestel**

Chief Stipendiary Steward, Hong Kong Jockey Club

Marc Van Gestel has over 30 years of involvement in upholding high standards of integrity, safety, and equine welfare in the thoroughbred racing industry. He commenced his career as a Stipendiary Steward in 1992, becoming Racing NSW's Deputy Chairman of Stewards in 2006, and Racing NSW's Chairman of Stewards in 2016.

### **Clíodhna Guy**

Head of Licensing, Legal & Compliance (Legal Counsel), Irish Horseracing Regulatory Board

Clíodhna has a career of over 15 years in sports administration and regulation. She has been in her racing role for over five years and had prior sports administration roles with the International Boxing Association, the Football Association of Ireland, and the Paralympic Council of Ireland as well as being a Doping Control Officer.

### **Kim Kelly**

Chairperson, International Harmonisation of Racing Rules Committee, International Federation of Horseracing Authorities

Kim Kelly was a Stipendiary Steward of the Hong Kong Jockey Club from 2002, and Chief Stipendiary Steward from 2009 until his retirement from that role in 2022. After leaving the HKJC he has continued to work with the Asian Racing Federation as well as the International Federation of Horseracing Authorities. Kim is one of the most respected Stipendiary Stewards in the world of horse racing with significant insight into the broad range of integrity management systems and structures in international horse racing.

### **Claudio Marinelli**

Operations Coordinator, Anti-Money Laundering and Asset Recovery IMFTF Lead, INTERPOL Financial Crime & Anti-Corruption Centre (IFCACC)

Claudio Marinelli is seconded to INTERPOL's Financial Crimes and Anti-Corruption Centre from Italian Economic and Financial Police (Guardia di Finanza). Mr. Marinelli has been instrumental in leading the work of the INTERPOL Match Fixing TaskForce since the creation of this initiative and coordinate law enforcement efforts within INTERPOL's programs on Integrity in Sport.

### **Aahna Mehrotra**

Founder, AM Sports Law & Management Co.

Aahna Mehrotra is the Founder & Principal Lawyer of AM Sports Law & Management Co. Aahna is an expert on Anti-Doping laws having been the youngest person to have served as the Vice Chairperson on the National Anti-Doping Disciplinary Panel. She is an advisor to Women in Sport India (WISI) and a member of the Governing Council of Ultimate Table Tennis. She regularly advises clients on matters relating to league formulation, transfer of players, sponsorship and merchandising agreements, gaming and betting laws, fantasy sports and contract law. She has been instrumental in setting up some of the major franchise-based leagues, both, in India and abroad and has also worked with several sports start-ups. She also serves as visiting faculty at several sports management schools of repute.

### **James Ogilvy**

Secretariat, Asian Racing Federation

James Ogilvy is the Executive Manager, International and Racing Regulation at The Hong Kong Jockey Club, and has deep experience in racing integrity and legal issues.

### **Ronan O'Laoire**

Crime Prevention and Criminal Justice Officer, Programme on Safeguarding Sport from Corruption and Crime, United Nations Office on Drugs and Crime

Ronan O'Laoire leads the United Nations Office on Drugs and Crime's Programme on Safeguarding Sport from Corruption and Crime, which supports governments, sports organisations and relevant stakeholders through delivering technical assistance, building capacity and networks, and conducting research and analysis.

### **Catherine Ordway**

Sport Integrity Consultant

Catherine Ordway is an international expert in the field of integrity in sports, and has specialised in anti-doping policy for almost thirty years. Catherine has published on sports integrity, governance and gender equality issues and is a sought-after media commentator and conference presenter.

### **Jacqui Partridge**

Head of Integrity, Cricket Australia

Jacqui Partridge leads the Integrity Unit that is focussed on a coordinated approach to protecting the integrity and spirit of cricket in Australia and for its participants. The Integrity Unit oversees all disciplinary protocols for domestic cricket and protects Australian cricket from threats of doping, match-fixing and other activities that may undermine the integrity of its competitions and the game of cricket and works with the International Cricket Council (ICC) to align with best practice codes and policies. From 2011 to 2016, Ms Partridge was the In-House Senior Counsel (Commercial & Integrity) for Racing Victoria, and hence she has a firm background in racing.

### **James Porteous**

Senior Manager, Research, The Hong Kong Jockey Club

James Porteous is Senior Manager, Research at The Hong Kong Jockey Club. His team conducts research into global illegal betting markets, their links to transnational organised crime and their negative impacts on society. Prior to joining the HKJC he was a journalist with The Herald in Scotland and the South China Morning Post in Hong Kong.

### **Tim Robinson**

Executive Manager, Racing Security and Integrity Assurance, The Hong Kong Jockey Club

Tim Robinson is the Executive Manager of Racing Security and Integrity Assurance at the HKJC. He has an extensive background in sports integrity and administration, law enforcement, security, risk and emergency management.

### **Tak Sung-hyun**

General Manager, Responsible Betting Department, Korea Racing Authority

Tak Sung-hyun is the General Manager of Responsible Betting, Korea Racing Authority (KRA). Since joining KRA in 1993, he has held various positions including racing and business strategy roles.

### **Pete Sweney, General Counsel, Racing New South Wales**

Pete Sweney has served as General Counsel for Racing New South Wales (Racing NSW) since 2008. Before joining Racing NSW, he worked in private practice as a solicitor for 11 years.

**Pim Verschuuren**

Associate Research Fellow, PhD candidate at the University of Lausanne

Pim Verschuuren is a co-author of two reports on sports betting, corruption and money laundering and has experience running a European Commission program of seminars in 23 EU countries to raise awareness among national sports administrators on the threat of match-fixing. He directed the '*Preventing Criminal Risks Linked to the Sports Betting Market*' project focused on the integrity of betting markets.

**Kristin Werner**

Senior Counsel, The Jockey Club (USA)

Kristin serves as Senior Counsel for The Jockey Club. In this role, she works with other members of The Jockey Club's legal team as well as each of The Jockey Club's for-profit subsidiary companies and not-for-profit organizations on a wide variety of contracts and legal issues. Kristin is also involved with The Jockey Club's industry initiatives related to the welfare and safety of the racehorse and aftercare, including the Equine Injury Database, the Thoroughbred Incentive Program and the Thoroughbred Aftercare Alliance.

**Jason Whybrow**

Former Director of Sports Wagering and Competition Manipulation, Sport Integrity Australia (Former IFHA Council Member)

Jason has extensive experience across a range of sport integrity areas. His earlier career was in horse racing as a Racing New South Wales stipendiary steward from 1998 to 2008, and he continues to be active as a part-time steward. In his current role at Sport Integrity Australia, Jason is engaged in policy development for sport integrity issues including sports wagering and competition manipulation and related evolving threats to sport







