



# **ARF Council on Anti-Illegal Betting & Related Financial Crime Quarterly Bulletin August 2024**

## Contents

Offshore Betting and Gambling Licensing - The Pseudo Regulation of Betting

- Martin Purbrick

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

- James Porteous

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

- Pim Verschuuren

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

*By Martin Purbrick, Chairperson, ARF Council on Anti-Illegal Betting & Related Financial Crime*

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>1</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?

### **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:

*"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.*<sup>2</sup>

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.

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>3</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>4</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.

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).

Jurisdiction	Licensing Authority	Area (sq miles)	Population	Location
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

Jurisdiction	Licensing Authority	Area (sq miles)	Population	Location
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.

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

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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>1</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>2</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>3 4</sup>

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>5</sup> while some of the convicts flaunted their wealth at expensive golf and yacht clubs.<sup>6 7</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>8 9</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>10 11</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>12</sup>

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>13</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>14</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>15</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>16</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>17</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>18</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>19</sup>	34	Cambodian	China, Dominica	May 23	2 Money Laundering, 1 Forgery-Related	15 months' jail	SGD 21.3 million (USD 15.6 million)	
Lin Bao-ying <sup>20</sup>	44	Chinese	Cambodia, Dominica, Turkey	May 30	2 Forgery-Related, 1 Money Laundering	15 months' jail	SGD 154 million (USD 113.4 million)	



Name	Age	Nationality	Other Passports Held	Guilty Plea Date	Charges	Sentence	Assets Forfeited	Deportation Date
Wang Dehai <sup>21</sup>	35	Cypriot	China, Cambodia, Vanuatu	June 7	1 Money Laundering	16 months' jail	SGD 49.2 million (USD 36.4 million)	
Su Jian-feng <sup>22</sup>	36	Vanuatu	China, Saint Kitts and Nevis	June 6	1 Money Laundering, 1 Forgery	17 months' jail	SGD 179 million (USD 132 million)	
Total							SGD 944.5 million (USD 695.4 million)	

### 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>23 24</sup> and several of Asia's richest people have Fujian origins.<sup>25</sup>

But this entrepreneurial spirit has also inspired highly successful transnational organised crime groups:<sup>26 27 28</sup> several of the 10 convicts are from a Fujian county, Anxi, labelled by China media as "The Hometown of Fraudsters",<sup>29 30 31 32</sup> because many of its citizens are deeply involved in transnational telecom and cyber-scams and illegal betting operations.<sup>33</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>34</sup>.

The illegal betting links go back to at least 2012<sup>35</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>36</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>37 38</sup> On his release around 2017/18 (exact date unclear) he moved to Singapore.

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

Hongli employed a pyramid-scheme style agent-customer recruitment network,<sup>39</sup> used Taiwan-programmed “off the shelf” betting technology,<sup>40</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>41 42 43 44 45</sup> and there is circumstantial evidence suggesting Citibet, the world’s largest illegal betting network specialising in horse racing, may have operations there).<sup>46 47 48 49</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>50</sup> – which were then laundered through multiple offshore accounts and investments in real estate.<sup>51</sup>



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" (恒博包网集团). According to one report<sup>52</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>53 54 55 56 57</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.

#### ***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>58 59</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>60 61</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>62 63</sup> (POGO, Philippines Offshore Gaming Operators, is the local term for the online betting industry). Guo was co-director with two of the Singapore convicts,<sup>64</sup> in a company which built a POGO compound in her town accused of running cyber-scams and forced labour.<sup>65 66 67 68</sup><sup>69</sup> She has been suspended pending investigations,<sup>70</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>71</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>72 73</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>74</sup>

In the Philippines, China's embassy publicly called for a complete shutdown of the POGO online betting industry in June 2024,<sup>75</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.

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

*By Pim Verschuuren, Senior Lecturer, University of Rennes; Member, ARF Council on Anti-Illegal Betting and Related Financial Crime*

A prominent Italian football player<sup>1</sup>, an NBA-basketball player<sup>2</sup>, a group of college American football players<sup>3</sup>, other players in Japan<sup>4</sup>, Australia<sup>5</sup> or France<sup>6</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>7</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.

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>8</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>9</sup>, Gaelic games players in Ireland<sup>10</sup>, Swedish sport<sup>11</sup>, Portuguese football<sup>12</sup>, Cyprus football<sup>13</sup> and a panel of disciplines in Europe<sup>14</sup>, among others. Interviews and focus groups recently conducted by the author throughout the Erasmus+ EU MotivAction programme<sup>15</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>16</sup>.

## **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 “Betclie 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>17</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>18</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>19</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.

### **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>20</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>21</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>22</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>23</sup>.

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>24</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.

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