



ARF Council on Anti-Illegal Betting & Related Financial Crime

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Transnational Crime, Money Laundering and Illegal Online Betting in Southeast Asia

John Langdale, Honorary Research Fellow, Macquarie University, Australia

This article examines illegal online betting and gambling in Southeast Asia in the context of transnational crime and money laundering in the region. Transnational crime and illegal online betting have expanded rapidly in the Mekong region of Myanmar, Laos and Cambodia, countries with high levels of corruption. The emergence of transnational criminal activities is not only destabilising these Mekong countries, but “overspill” from criminal activities is posing a major threat of growing organised crime activities to surrounding countries, particularly Thailand and Vietnam, but also to the broader Asia-Pacific region.

The United Nations Office of Drugs and Crime (UNODC) and other international agencies have been involved in anti-corruption and anti-money laundering campaigns in the Mekong countries for many years. However, it is clear that a major international effort is needed to halt the spiral of transnational crime and illegal online betting in the Mekong region. Unless this happens, it is likely that these countries will descend into narco-states¹.

A major factor underpinning the rise of the illegal online betting market in Southeast Asia has been the massive growth of transnational crime in the Mekong region. The UNODC has documented the displacement of transnational crime from China to Mekong region countries². The displacement effect has reshaped the illegal drug and wildlife trafficking industries in the region, with methamphetamines production skyrocketing in Shan State in Myanmar and more illegal wildlife trafficking taking place in Southeast Asia. The displacement effect has had major flow-on effects on the demand for money laundering in the region, since a significant percentage of the proceeds of these crimes are recycled through the region’s rapidly-expanding network of physical and online casinos³.

Rise of illegal online betting centres in the Mekong region

The rise of illegal online betting centres in the Mekong region is related to the massive Chinese demand for gambling and a rapid growth in transnational crime in the region, which has created a large demand for money laundering. The Covid-19 pandemic has limited gambling-related travel. Furthermore, many countries in the region have a “pot of gold” attitude to gambling and see physical and online casinos as a means of generating employment and taxation revenue. Finally, weak anti-money laundering (AML) regulation exists in Mekong region countries.

Chinese and other criminal groups have moved rapidly into illegal online betting activities in response to these developments. They recognised the profit opportunities of the market, not just with respect to the huge Chinese market, but also targeted opportunities in global gaming marketplace⁴. In addition, they have expanded online scamming operations, often alongside illegal online betting centres.

Diverse types of illegal online betting centres in the Mekong region countries

A range of illegal online betting operations is present in Mekong region countries. At the risk of simplifying this diversity, two broad types may be identified.

Firstly, some Special Economic Zones (SEZs) in Southeast Asia have become “one-stop shops” for transnational crime. Examples of such SEZs include the Golden Triangle SEZ, with the Kings Romans casino as the centrepiece in Bokeo Province, Laos. In addition, Yatai New City (Shwe Kokko) in Kayin State, Myanmar and Sihanoukville in Cambodia.

Different views exist about the relative benefits of SEZs in Southeast Asia. Proponents argue that they provide a springboard for regional economic development, because there are fewer government restrictions on development. Others argue that they function as incubators for crime, particularly those associated with illegal betting activities⁵. It is difficult for governments to act in these zones because of special exemptions from regulation, and frequently illicit entrepreneurs will move operations by the time the governments are able to act.

The “one-stop shop” SEZ model also has the advantage of controlling security, since weak Mekong region governments cede security arrangements, either because of corruption, or because the SEZ is controlled by alleged “warlords” such as in Myanmar for Yatai New City (Shwe Kokko). The internalisation of security in SEZs reduces access for law enforcement agencies and outside scrutiny of repressive labour practices is minimal. Few outsiders have information on illicit activities taking place in SEZs.

The most notorious SEZ is the Golden Triangle SEZ in Laos, controlled by the Zhao Wei criminal group⁶. Ostensibly, the SEZ provides the Golden Triangle region with economic growth, but it is a “one-stop shop” for transnational crime. The SEZ has a diverse range of criminal activities, ranging from illegal drugs, wildlife and human trafficking and child prostitution. Illegal online betting and online scamming activities are also prominent.

The “one-stop shop” model provides transnational criminals with significant advantages. A key advantage is that they are able to develop what economists call economies of scale and scope.

The economies of scale advantages allow criminals to build up large operations and derive lower costs from large-scale casino operations (physical or online). For example, the Zhao Wei criminal organisation operating the Golden Triangle SEZ has built its own airport to expand the number of Chinese gamblers coming to the casino.

Economies of scope refer to the advantages of operating a diverse range of complementary criminal activities which enhance the attractiveness of the centre. For example, a gambler may travel to a casino to gamble, but may also be involved with illegal wildlife, child prostitution and other illicit activities at the SEZ while visiting the site. The Zhao Wei criminal group has been able to derive economies of scope by expanding both the physical casino, but also diversifying into online betting and scamming centres. Such diversification has been valuable during the prolonged lockdown of international tourist travel during Covid-19.

Sihanoukville has a SEZ, which is part of China's Belt and Road Initiative⁷. It attracted numerous physical and online casinos reportedly owned primarily by ethnic Chinese, but the banning of online casinos in 2019 by the Cambodian government and the impact of Covid-19 decimated Chinese gambling tourism and led to the exodus of thousands of Chinese workers. The ban led to the growth of online scamming centres in Sihanoukville, with online betting continuing in an underground manner⁸.

The Sihanoukville experience illustrates the sequence of developments from legal physical casino developments to online betting operators, generally illegally targeting the Chinese market. China pressured Cambodia to outlaw these operators, but unfortunately this has led to some of them shifting underground, often facilitated by corrupt Cambodian local government and law enforcement officials⁹. In addition, these illegal operations have diversified to online scamming centres, a development that has attracted widespread negative publicity over slave-labour conditions for workers from many Asian countries.

“Footloose” online illegal betting operations have the advantage of being able to move on quickly when law enforcement agencies act to close them. Two broad types may be identified. One is represented by online betting operations which are shifted from country to country in response to tightening government regulations on online illegal betting¹⁰. A sub-variant of this type are facilities which move within countries to more remote rural locations.

Secondly, technology allows illegal online betting enterprises to shift to offshore centres which have few, if any, regulations against their operations¹¹. Clearly, widespread adoption of this model would have major implications for illegal online betting.

Implications for governments

These developments in transnational crime and online betting and gambling are raising major policy concerns for governments in the region. The danger is that transnational crime will spiral out of control in the Mekong region countries and the “overspill” of crime will spread throughout the region.

China has been increasingly worried about these developments and has criticised countries promoting online casinos targeting Chinese gamblers. It pressured Cambodia in 2019 to ban online betting, an action which led to many of these operations either leaving Sihanoukville or moving underground. China has threatened to retaliate against Southeast Asian countries that do not halt illegal online betting by banning Chinese tourism, although it has not publicly announced which countries are on the hit list¹². China is particularly concerned that online betting is promoting capital flight. The wider the adoption of online betting, the greater the difficulty for China in controlling capital flight¹³.

The U.S. has been concerned about the development in transnational crime, money laundering and human trafficking in the Mekong region. The U.S. has categorised Cambodia in the worst category for human trafficking offences. The U.S. Treasury designated the Zhao Wei criminal group of illegal drug trafficking, human trafficking, child prostitution, money laundering, bribery and wildlife trafficking, much of which has been facilitated by the Kings Romans casino¹⁴.

The negative implications of the “overspill” of transnational crime and illegal online betting is having the greatest impact in Southeast Asia, with Thailand in particular being impacted. Illegal casinos operated by Chinese criminal groups are being used to launder money from illegal drug trafficking and other illicit activities¹⁵. The Thai government has been conducting numerous law enforcement operations against illegal online betting.

However, a recent major scandal in Thailand has exposed the extent of the involvement of Chinese criminal groups, who have trafficked illegal drugs from Myanmar, as well as being involved in illegal migration of Chinese to Thailand, property development and money laundering. The Thai case study illustrates both the “overspill” of crime from adjacent Mekong countries and the displacement effect of China’s crackdown on transnational crime, which has pushed crime into corrupt Southeast Asian countries¹⁶.

This scandal meshes with the concerns in Southeast Asia and elsewhere about the human trafficking of duped people lured to online betting and scamming centres in Mekong countries. Southeast Asian governments have not been vocal in their criticisms of these centres, although international pressure is forcing Cambodia to close at least some of them¹⁷.

While countries have been pressuring the Mekong countries to outlaw illegal online betting centres, profits from transnational crime, as well as physical casinos, online betting and scamming centres are massive. Criminal groups are able to bribe government officials and hinder law enforcement. Endemic corruption in Cambodia and in the rest of the Mekong region makes it difficult for any outside governments to exert sustained pressure on Mekong region governments to ban these illegal betting activities

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INTERPOL – Combatting Illegal Betting and Money Laundering during the Qatar World Cup

Claudio Marinelli, Operations Coordinator pro tempore, INTERPOL Financial Crimes and Anti-Corruption Centre

The increased involvement of transnational organised crime in illegal betting and match-fixing has made corruption in sport a global threat affecting the security of people worldwide. Organised criminal groups, which are often highly organised and operate across multiple jurisdictions, actively use illegal betting as a means of generating massive profits and benefit from limited risks of detection. Online betting platforms present additional challenges for police, as they have intensified the international dimension of sports betting, making betting on matches anywhere in the world extremely easy and accessible.

In the light of ever-increasing globalisation and digitalisation, coupled with a huge influx of money in professional sport, illegal betting requires a coordinated global response. As the world's largest international police organisation with 195 members, INTERPOL is uniquely placed to enable worldwide law enforcement agencies to work together beyond borders to tackle corruption in sport and has developed a number of initiatives to do that. The organisation's activities targeting illegal betting include operational response, analytical support and capacity building.

In terms of operational work, in 2007 INTERPOL launched Operation SOGA (short for SOccer GAMbling), which targets illegal betting and related money laundering. It is a regular campaign timed to coincide with major international soccer events, when the international criminal networks behind illegal betting are particularly active due to high betting turnover. Suspected illegal bookmakers, illegal bettors, and money launderers are identified following intensive research and intelligence exchange between participating countries, and are arrested in a simultaneous crackdown, hitting criminal syndicates hard.

The ninth wave of Operation SOGA was carried out from November 2022 to January 2023 under the auspices of INTERPOL's Joint Task Force for the World Cup Qatar 2022. SOGA IX saw thousands of specialised officers across 19 countries target organised crime groups looking to profit from illegal betting and related money laundering.

Due to the commitment of law enforcement authorities on the ground, the operation led to 1,400 raids and 1,200 arrests. Authorities of participating countries also seized USD 2 million in cash and bank account funds, USD 76 million in digital betting records, as well as computers, mobile phones, credit cards, luxury cars, jewellery and handbags.

As an example of coordinated efforts carried out by participating officers within the framework of SOGA IX, the Hong Kong Police Force neutralised several illegal-bookmaking syndicates, detaining hundreds of suspects. Additionally, Italian law enforcement authorities conducted numerous targeted checks of betting points, which resulted in administrative sanctions for illegal betting activities amounting to EUR 3 million.

Investigators identified several trends during the operation, such as a confirmed preference for online betting, with criminals taking full advantage of financial technology, including the use of international betting websites and online bank accounts; lower amounts being wagered to avoid detection; and that men under 40 were considered the typical profile to watch.

Year after year, INTERPOL's Operation SOGA has highlighted the importance of collective mobilisation across various countries for tackling organised crime groups operating on a global scale. To date, nine SOGA operations have resulted in 20,300 arrests, seizures of USD 64 million in cash and the closure of some 4,000 illegal betting dens, which handled more than USD 7.3 billion worth of bets.

Operation SOGA IX is the first wave of the initiative to be coordinated under the aegis of INTERPOL's Financial Crime and Anti-Corruption Centre (IFCACC), launched in 2022 with a view to centralising the international response to transnational financial crime and corruption. SOGA IX has also benefited from the global outreach support of the Asia-Pacific Expert Group on Organised Crime (APEG) and the INTERPOL Match Fixing Task Force (IMFTF).

The IMFTF forms the focus of INTERPOL's operational response in the area of match-fixing and corruption in sport, bringing together law enforcement agencies around the world to tackle these crimes. The Task Force has around 100 member units, with more than 150 National Points of Contact worldwide. It focuses on sharing experiences and best practices and now represents the largest global network of investigators dealing with sport corruption and illegal betting.

Other specific tools in the area of illegal betting developed by INTERPOL are available to law enforcement worldwide. INTERPOL allows its member countries to share intelligence and information securely, and crosscheck data via Project ETICA dedicated to data collection on sport corruption. INTERPOL's Financial Crime Analysis File (FinCAF) serves to identify suspicious patterns of activity and track down individuals and groups involved in illegal betting, helping law enforcement to gather additional intelligence to enlarge domestic investigations.

INTERPOL has also coordinated operations codenamed "HAECHI" under a project to tackle cyber-enabled financial crime. Along with other types of cyber-enabled fraud such as romance scams, HAECHI targeted money laundering associated with illegal online betting. The results of the three waves of the operation (2020-2022) confirm that transnational organised crime groups, including illegal betting syndicates, exploit the borderless nature of the Internet to extract millions from their victims before funnelling the illicit cash to bank accounts across the globe, or concealing it in virtual assets.

In addition to the operational and analytical frameworks, INTERPOL carries out a joint capacity building and training project with the International Olympic Committee to combat competition manipulation. The project offers tailored training courses, workshops and webinars for law enforcement, government agencies, sports, betting operators and regulators, to address competition manipulation and create a global network of practitioners.

Thus, INTERPOL has been playing an important role in combatting illegal betting and promoting integrity in sport through information sharing, development of best practices, and implementation of targeted operational actions. In the coming decades, law enforcement will face an increasingly sophisticated criminal landscape, as technological advances will further push the boundaries between the physical and the digital. In order to counter the constantly emerging threats, INTERPOL will continue to support its member countries' efforts in detecting and disrupting criminal activities, including illegal betting operations, and provide police with a coordinated tactical response.

How the World Lottery Association Approaches Illegal Betting and Works to Protect the Integrity of Sport

Luca Esposito, Executive Director, World Lottery Association

The World Lottery Association (WLA) is a global organization that represents state-authorized lotteries and suppliers to the industry -- many of which also operate sports betting or have partnerships with the Licensed and Regulated sports betting industry. With more than 150 members from over 80 countries and territories, it is the largest organisation of such state-authorized operators in the world.

The WLA also runs a sports betting integrity unit, and is partnered with United Lotteries for Integrity in Sports (ULIS), a bet monitoring service which provides alerts on suspicious betting activity to members (formerly known as GLMS). As General Secretary of ULIS, I am pleased to join the ARF Council on Anti-Illegal Betting and Related Financial Crime (ARF Council) so that we may collaborate in protecting the integrity of sports from illegal betting, and to explain to readers how seriously the WLA / ULIS see illegal betting, and what we are doing about it.

Illegal betting is a key threat to the integrity of the lotteries and sports betting sector, as well as the broader sports world. In recent years, a combination of innovative technologies and the global pandemic have facilitated the rapid growth and evolution of online betting, and unfortunately also of illegal online betting.

It is complex, vast, and transnational in nature. The global effort to combat illegal betting and maintain sports integrity is vital to ensure that the lotteries and sports betting operators continue to provide legal betting services and products that are safe and secure, while entertaining for all.

Stakeholders from across the entire sports and sports betting ecosystem work together, including regulators, national and international law enforcement agencies and judiciaries, the lotteries, sports federations and organisations (the IOC, FIFA, UEFA), sports betting monitoring organisations, such as the ULIS and others, including the Council of Europe, and INTERPOL, in a network that continues to grow.

The work of WLA member lotteries in supporting good causes has never been more pertinent, especially in light of greater global themes, including economic challenges in the aftermath of the global COVID-19 pandemic, and the impact of climate change and ongoing issues around global energy. To this point, the 2022 edition of the WLA Global Lottery Data Compendium states that 144 WLA lottery and sports betting operators raised the significant amount of USD 79.5 billion for good causes in 2021.

Leading the lotteries in the fight against illegal betting

WLA member lotteries face a constant threat from operators that are not authorized by local regulators to offer gaming products or services in their respective jurisdictions. It is therefore in the collective interest of state-licensed lotteries to protect their territorial integrity.

One of the aims of the WLA is to advance such interests by addressing lottery-related issues that have a global dimension. The large-scale problem of illegal betting requires international cooperation. With its broad worldwide membership, the WLA is well suited to take a leading role in this fight.

There is a high responsibility to offering lottery and betting services. Gaming products are subject to oversight of state authorities and are regulated to mitigate their impact on society. The WLA has always advocated a regulated lottery and betting market and works to support its members within the regulatory framework of their respective jurisdictions.

On the contrary, illegal operators disregard regulations, avoid taxation and consequently, contributing to society and good causes. They do not follow best practices, nor do they implement responsible gaming measures, such as checking the player's age, or running Know Your Customer processes, to stop criminals from laundering money from illicit activities.

Many such operators accept cryptocurrency payments, which save processing fees and time, while providing players with almost complete anonymity and instant payments. This means that illegal operators can offer more exciting products and better payout rates.

A clear stand – WLA position on illegal betting

In the WLA Code of Conduct, the association makes its position clear on licensing and jurisdictions. Article 2 states, "no member shall offer gaming services via electronic commerce services unless it has received the necessary permission to do so by the government or authorities competent to grant such authorization for the territory where the gaming services are made available." It further states that, "members shall only offer a gaming service to or accept bets from residents of the jurisdiction(s) whose government or competent authority has granted an authorization to offer the gaming services concerned".

The WLA believes that a gaming operator must possess a license in the jurisdiction where the player is located. Anything else is to be considered an illegal betting operation.

This is in line with the Convention on the Manipulation of Sports Competitions – also known as the Macolin Convention – a legally binding, international treaty established by the Council of Europe in 2014, for which the WLA was among the parties that created the initial draft.

The WLA Illegal Lotteries and Betting Committee

The WLA's efforts to protect the gaming sector from corruption and criminal activity and maintain the probity of state-authorized lotteries and sports betting operators are undertaken primarily through the work of its Illegal Lotteries and Betting Committee (ILBC).

The ILBC carries out the important task of reviewing and developing tools and resources that help member lotteries maintain territorial integrity with stakeholders, in every region.

It produces informative materials, such as 'The Macolin Convention: A brief guide on the Council of Europe Convention on the Manipulation of Sports Competitions and why it is important for the lottery and sports betting sector'.

Another example is the brochure on 'Combatting illegal betting to protect the integrity of sports', developed with one of the working groups of the WLA Betting Integrity on Sports and Horse Racing Committee (BISHRC). The brochure considers trends and technologies that have contributed to the global expansion of illegal betting operators, and the impact that such operators have on the legal lottery and sports betting sector.

As a means of helping members combat the activities of unauthorized operators, extensive work was undertaken, regarding resellers operating in jurisdictions without authorization. A template of a cease-and-desist letter for these resellers was sent to all members for use in their respective jurisdiction, as well as a template addressed to the concerned multijurisdictional games advising them of the non-authorized sales of their tickets. The template allows for adjustments to the law of each jurisdiction.

The ILBC also maintains a key database called the Overview of Illegal Lottery and Betting Operations, which provides country fact sheets on the legislative, judicial, and commercial situation regarding bet-on lotteries and courier services in each country. It is available to WLA lottery and sports betting members and to our contributors.

The Committee organizes and participates in different online and physical events, to share its knowledge and expertise with WLA members and the broader lottery and sports betting community.

In the global fight against illegal betting, it is paramount to continue to develop new partnerships and expand our network. The ILBC also examines the role the WLA plays in the global effort to protect sports integrity through collaboration with organizations, such as the ARF Council, the ULIS and other stakeholders mentioned above.

The Macolin Convention – a framework for addressing sports competition manipulation

The Macolin Convention provides jurisdictions with the legislative means and practical tools to deal with specific aspects in the fight against the manipulation of sports competitions and illegal betting, which offers further support to national lotteries to operate with fewer risks, improve player safety, and tackle unfair competition.

If a country has not signed the Macolin Convention, national lotteries can still play a key role in approaching their governments to do so.

In our digital world, the extent and international nature of the manipulation of sports competitions calls for global action. By setting out a clear definition of illegal betting, the Macolin Convention creates a powerful international framework for the cooperation of all relevant stakeholders in the fight against sports competition manipulation.

Signatories agree to establish a National Platform, and to take different types of action to fight against the manipulation of sports competitions and illegal sports betting, such as: gathering and exchanging data and intelligence in a timely manner; promoting and coordinating awareness raising through educational and training programs; conducting research, identifying trends, and compiling data and intelligence.

The Convention also calls for authorities to do their part, within the applicable law of their respective jurisdictions. Some examples of this include closing down illegal betting operations or blocking website access; blocking the financial flow between illegal sports betting operators and consumers; prohibiting illegal betting operations from advertising and requiring all betting organizations to operate lawfully.

If individuals or entities commit criminal offences relating to the manipulation of sports competitions, launder proceeds from such activities or aid and abet such activities, the Convention calls for sanctions to be taken. Punitive measures could include monetary sanctions, deprivation of liberty, confiscation and seizure, and must be in line with domestic law.

The role of the national lotteries

National lotteries that follow the Convention's provisions and advocate for all members of the global lottery community to do so, not only raise awareness of the different issues, they can also share vital data and intelligence with authorities and other stakeholders and become part of a multijurisdictional network of National Platforms to facilitate the transnational flow of information vital in the global fight against sports competition manipulation.

It is especially important for the lotteries that already work with ULIS to be proactive.

The WLA and the United Lotteries for Integrity in Sports

Following on from the creation in 2009 of the European Lotteries Monitoring System (ELMS), the WLA was mandated to establish a proposal for the creation of a Global Lottery Monitoring System (GLMS) for sports betting during its General Meeting in Montreal in 2012. After close collaboration with EL, this came to fruition in June 2015, when GLMS was officially launched.

Over the past five years, GLMS membership and scope evolved greatly. In October 2022, during the GLMS General Meeting in Vancouver, members approved to change its name to the United Lotteries for Integrity in Sports (ULIS) to reflect the new strategic positioning of the association, which is now the main global state lottery actor to safeguard sports core values of integrity and fair-play. WLA and a growing number of its member lotteries collaborate and support ULIS activities, sharing their knowledge and expertise of sports betting, from their markets.

ULIS offers a complete ecosystem of preventive services, including education, training, and networking. It partners in educational projects, such as IntegriSport, which is co-founded by the European Union and coordinated by the Foundation for Sport Integrity (CSCF); Integriball, supported by UEFA and the Council of Europe, and Keep Crime Out of Sport Plus (KCOOS+), in collaboration with the Council of Europe.

Additionally, ULIS, together with the IOC and INTERPOL, is one of three observers to the Macolin Convention. As such, it is able to participate in meetings of the Follow Up Committee and contribute to subjects under discussion, for instance, the conditions to be met by sports betting operators in the exchange of information within National Platforms, the development of the list of sports organizations, and aspects of the Convention that are relevant to sports betting operators.

I look forward with the ARF Council to further developing our capacity and understanding of these vital issues, so that together we can continue to protect the integrity of racing and other sports from illegal betting.

The Asian Racing Federation Council on Anti-illegal Betting and Related Financial Crime

The Asian Racing Federation Council on Anti-illegal Betting and Related Financial Crime was established in 2017 as a think tank aimed at combatting illegal betting and related financial crime. The ARF Council now comprises 24 members from organisations engaged in horse racing and sports integrity, law enforcement, the United Nations, and academia.

The ARF Council's purpose is to research and share the scale and negative impacts of illegal betting, particularly as it relates to horse racing and sports integrity, and to foster international collaboration among stakeholders, such as horse racing operators and authorities, gambling regulators, law enforcement agencies, and government policy makers to raise awareness of the threat and to combat the negative impact of illegal betting and other financial crimes to horse racing, other sports, and to society.

Members of the Asian Racing Federation Council on Anti-illegal Betting & Related Financial Crime

Martin Purbrick	(Chairperson), former Director of Security & Integrity, The Hong Kong Jockey Club
Douglas Robinson	(Deputy Chairperson), The Hong Kong Jockey Club
James Porteous	(Research Head), The Hong Kong Jockey Club
Jack Anderson	Racing Victoria
Graham Ashton	Former Chief Commissioner, Victoria Police
Tom Chignell	The Hong Kong Jockey Club
Steve Cornelius	University of Pretoria
Brant Dunshea	British Horseracing Authority
Luca Esposito	World Lotteries Association/ United Lotteries for Integrity in Sport
Brent Fisher	Racing Victoria
Sally Gainsbury	The University of Sydney
Neil Grimstone	New Zealand Racing Integrity Unit
Clíodhna Guy	The Irish Horseracing Regulatory Board
Kim Kelly	Former Chief Stipendiary Steward, The Hong Kong Jockey Club
John Langdale	Macquarie University
Claudio Marinelli	INTERPOL Financial Crimes and Anti-Corruption Centre
Aahna Mehrotra	TMT Law Practice, AM Sports Law & Management Co.
James Ogilvy	Asian Racing Federation
Ronan O'Laoire	United Nations Office on Drugs and Crime
Catherine Ordway	University of Canberra
Michael Phelan	Former CEO, Australia Criminal Intelligence Commission
Tim Robinson	The Hong Kong Jockey Club
Tak Sung Hyun	Korean Racing Authority
Pim Verschuuren	University of Rennes, France