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# Monthly Despatch

Shutting the Digital Door:  
International Strategies to  
Block Illegal Betting Platforms

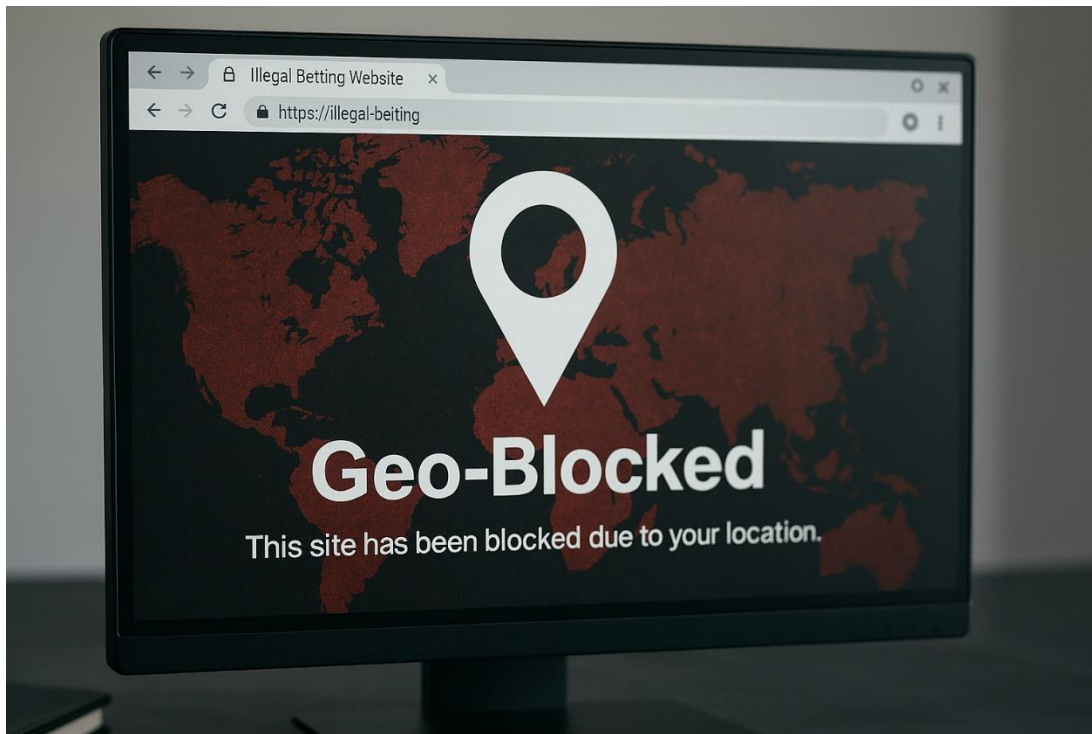
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Related Crime

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# Shutting the Digital Door: International Strategies to Block Illegal Betting Platforms



## Executive summary

Blocking local consumer access to illegal betting platforms within a jurisdiction has proven to be a popular method to disrupt online illegal betting, with geo-blocking implemented in just under 20% of jurisdictions globally.<sup>1</sup> The effectiveness of geo-blocking has been the subject of intense debate historically, although recent disruption and enforcement data from the United Kingdom indicates that geo-blocks can have meaningful impact in combating online illegal betting operations, but only when implemented alongside a range of other disruption measures.

## Introduction

There are many ways by which disruption can take place against illegal betting operations, chief among these being blocking access to such online platforms to a jurisdiction's residents so that they become inaccessible to those located within that jurisdiction. However, the availability and use of virtual private networks (VPNs) is now ubiquitous and allows consumers to bypass geo-blocking by disguising their location. In addition, online betting operators can assist consumers to bypass geo-blocking. This should be considered by government policy makers and gambling regulators when considering the effectiveness of geo-blocking, and indicates why it should be conducted as part of a suite of enforcement measures but not in isolation.

This Despatch outlines how such blocks work, how many jurisdictions globally utilise them, as well as providing context around the effectiveness of geo-blocking, among several other disruption measures which can be undertaken against online illegal betting operators.

## **How geo-blocking works**

In simple terms, geo-blocking takes place when a government agency requests Internet Service Providers (ISPs), website registrars or other online agencies to block or refuse access to an illegal betting website which is active within their jurisdiction.

These agencies have a number of ways by which they can block or refuse access to illegal online betting platforms, including removing the platform's address from Search Engines' Domain Name Systems within that jurisdiction (DNS blocking), blocking the platform's actual IP address, Geo-location-based blocking, which allows customers to access betting websites dependent on their IP address location, or two alternative methods (DPI blocking, considered to be highly invasive, or re-webpage directs).

## **The difficulties with geo-blocking**

While there are several ways by which a government authority can block online illegal betting platforms, there are also a multitude of ways by which operators, as well as customers, can circumnavigate such blocks.

### **Operators**

Operators employ two main methods to allow customers to bypass geo-blocks, either creating multiple mirror websites, allowing them to continue to offer betting services to their customers if authorities block their online access portals, or via the creation of mobile applications, which bypass internet search engines (such as Google) altogether and thus are immune from internet-based blocks.

#### ***Mirror websites<sup>2</sup>***

The widespread use of mirror websites, the vast majority of which are automatically created by illegal betting operators, creates a logistical nightmare for regulators if they are required to go through lengthy bureaucratic processes to block single websites. One illegal betting platform allegedly has over 170,000 mirror websites alone, exemplifying the lengths such operators will go to ensure their platforms are not completely shut down by enforcement action.<sup>3</sup>

The scale by which mirror websites can amplify internet traffic to illegal betting platforms can also be seen from a recent analysis<sup>4</sup> of Indian online traffic to the 15 largest online illegal betting websites, as well as their mirror websites, over a year-long period from 2024-2025. Total traffic to the 40 sites totaled 5.4 billion visits over the period, with two such operators being the 8<sup>th</sup> and 12<sup>th</sup> most popular websites in India, surpassing internet traffic to the Indian websites of Amazon and Wikipedia. The bulk of this traffic also stems from mirror websites, not the main illegal betting websites themselves, demonstrating the complexities of having meaningful impact via geo-blocking.

Even if authorities were able to block illegal betting mirror websites as fast as they appeared, operators would still be able to push mirror links directly to customers via other methods, for example, via encrypted instant messaging systems such as Telegram or WhatsApp, bypassing the need for the site itself to be indexed on internet search engines or via normal ISP routes<sup>5</sup> and thus negating the closure of those mirror websites accessible through online public domain searches.

As a result, mirror websites allow customers to circumnavigate geo-blocks, with Brazilian blocking efforts against 11,500 illegal betting websites having less than 20% effectiveness over an 18-month period.<sup>6</sup>

### ***Mobile applications***

Another method by which operators can get around regulatory blocks is by hosting their online illegal betting platforms via mobile applications, which are not subject to such blocks, instead, being policed by the application stores which offer them to the public.

A 2021 study<sup>7</sup> revealed that over half of illegal betting mobile applications are associated with illegal betting websites, with linked websites including detailed instructions on how to access the applications,<sup>8</sup> as well as routing potential customers through at least 8 different servers to obfuscate the operators' true origins, hide behind their registrar privacy settings, utilise a relatively high number of third party applications within their own app infrastructure, and create what the study described as 'fourth-party payment services' to layer payments made by customers through the app, with legitimate funds.

Accessing such apps via the Apple App store<sup>9</sup> is a simple two-step process which circumnavigates restrictions on betting related apps in the Apple App store,<sup>10</sup> either through downloading a beta version of the application through Apple's Testflight application, or through changing mobile device configuration profiles to allow the apps to be downloaded directly from the internet.

## Customers

Customers can similarly evade blocks of unregulated betting websites, primarily through using VPNs to obfuscate their online location (and thus, evade IP and DNS blocks), or by utilising proxy servers. The former is by far the most popular method to evade such blocks, because the process of using a VPN is very simple to initiate and is a very low-cost (in some cases, free) workaround. Utilising proxy servers or changing DNS servers is a slightly more involved process, although easily completable by the layman, especially using AI-generated instructions.

The ease with which customers are able to utilise VPNs is borne out anecdotally by the fact that when X (formerly Twitter) was banned in Brazil in August 2024, VPN usage increased 1600% within 24 hours, and that up to one-third of Brazilians use VPNs,<sup>11</sup> tallying with a conservative global estimation that approximately one-third of the globe's internet users utilise a VPN for at least one of their internet activities.

## Global employment of blocks to counter online illegal betting platforms

Of the 249 countries, states and territories globally,<sup>12</sup> 45 (18%) employ geo-blocking to disrupt illegal betting platforms being accessed by people within these jurisdictions (see Annex A).

Of these 45 jurisdictions, all also require the blocking of payments to illegal betting operators (typically enshrined in existing AML/CTF regulations) when these are identified through Merchant Category Codes (MCCs)<sup>13</sup> or via other methods, such as transactional pattern analysis, customer behaviour monitoring, or outright e-payment bans. 44 of these jurisdictions also have unlicensed betting operator advertising bans in place, whether this be in the traditional sensor through social media.

Of the 45 jurisdictions who continue to geo-block illegal betting operators, 32 of them introduced geo-blocking between 2010 and 2019, with the number of jurisdictions introducing geo-blocking legislation in the 2020-2024 period dropping to just five. However, it should be noted that in 2025 alone, blocks have been introduced in four countries (Chile, Japan, Norway and Spain) suggestive of a potential renaissance in geo-blocking.

Period	Geo-blocking introduction by jurisdiction
2005-2009	4
2010-2014	13
2015-2019	19
2020-2024	5
2025-2029	4 <sup>14</sup>

Table 1: Geo-blocking introductions by date

## **Effectiveness of geo-blocking**

### **The historical record**

The historical effectiveness of geo-blocking has been difficult to assess, chiefly because agencies are coy on just how effective geo-blocking is, potentially for fear of failure or, on the flipside, for tipping off illegal operators to geo-blocking's efficacy and having to tackle a response from illegal operators.

There has also been an inherent difficulty in measuring the actual effectiveness of such blocks given that they are passive in nature, leading to one academic (in 2023) to decry the 'paucity of of empirical research on the effectiveness of blocking measures.'<sup>15</sup>

Assessing the effectiveness of geo-blocking using proxies, such as illegal/legal market channelisation rate is also fraught with problems because channelisation rates themselves are ambiguous and are constructed and applied in different ways across the world. Channelisation rates can also be skewed by betting restrictions within that country, for example, in Australia, where the channelisation rate was below 80% in 2024,<sup>16</sup> chiefly attributable to bans on in-play betting.

Anecdotal evidence on the effectiveness of geo-blocking is also mixed, with detractors pointing to the ease by which such blocks can be circumnavigated by VPNs, that the largely automated process of illegal betting mirror website creation makes geo-blocking akin to playing a never-ending game of 'whack a mole', that technological developments, especially the rapidly-growing use of blockchain technology to host websites and customers' applications are making blocking irrelevant,<sup>17</sup> or that blocking access to certain websites is an infringement of personal data privacy rights<sup>18</sup> or has other unintended consequences (for example, blocking licensed betting websites, or other non-betting related websites which happen to share the same IP address as an illegal online betting platform).

These concerns all have their place in the ongoing debate about the effectiveness of geo-blocking, with a growing belief that the level of effectiveness depends on its implementation, and how integrated such geo-blocks are imposed alongside other methods of illegal betting disruption (payment and ad blocks being two such examples as mentioned previously).

Other measures alongside geo-blocking which agencies can undertake to halt illegal betting platforms include the following: <sup>19</sup>

- The publication of operator blacklists (of illegal betting operators) or whitelists (of licensed operators) to enhance customer education;
- The imposition of payment blocks of consumer transactions to unregulated betting operators although taking into account the following:
  - That such payment blocks should not impede legitimate operator payments;
  - Many (if not all) illegal operators will not classify their payments via MCCs as being related to gambling;
- In collaboration with other parties, limiting black market access to the gambling supply-chain chiefly through regulation of:
  - Online slots content (estimated to be around 700 suppliers globally);
  - Live dealer casinos content (estimated to be around 20 suppliers globally);
  - Sports results data (estimated to be around 20 sports data aggregators globally);
- Effective criminal and administrative enforcement through:
  - Issuance of cease and desist orders against illegal operators;
  - Law enforcement action against identified companies and individuals;
- Comprehensive bans of illegal operators advertising and marketing via traditional online channels as well as through relevant social media channels;

### **Recent assessments**

In Q4 2025, the UK Gambling Commission (UKGC) published new statistics which provide a comprehensive assessment of the effectiveness of some of these disruptive measures.<sup>20</sup> Between July 2024 and June 2025, the UKGC issued 470 cease and desist orders to illegal operators, a further 358 orders to illegal operator advertisers or affiliates, 445 illegal betting website referrals to internet registrars or hosts, as well as 798 illegal betting website referrals to search engines themselves. Over the same period, the UKGC referred just shy of 450,000 illegal betting website URLs to Internet search engines.

The outcomes of these actions include the closure of 288,000 of these URLs (64% of the total number reported), 963 illegal betting websites being blocked by the operator, removed/suspended by internet registrars or removed by search engines (77% of the total number reported), as well as 175 illegal betting-related advertisements being taken down.

The UKGC also measured the disruptive impact of various actions undertaken against online illegal betting platforms, shown below, demonstrating that the most impactful method of online disruption is website blocking and/or suspension by internet registrars albeit measured from a relatively small base.

<b>Disruption undertaken</b>	<b>Average disruption effect (decrease in percentage traffic to illegal betting websites)</b>	<b>Number of websites</b>
Blocked by registrar	91%	8
Website suspended	91%	8
Geo-IP block	60%	53
Website removal by search engine	30-52%	108
Removed by Facebook	8%	57

*Table 2: Mean disruption impact measured by % decrease in website traffic to illegal betting websites*

In their reporting, the UKGC outlines a multi-pronged approach to combatting illegal betting operations, including the purchase of specialist software to identify and such websites, closer collaboration with social media platforms (specifically, Meta, TikTok, X and YouTube), tech companies (Microsoft and Google), international betting regulatory bodies (such as the International Association of Gaming Regulators [IAGR] as well as the International Association of Gaming Advisors [IAGA]), as well as online betting industry players, all to better understand illegal betting markets, as well as expand their suite of disruption tools.<sup>21</sup>

In conclusion, the UKGC measured illegal betting website traffic to a sample of 160 illegal betting websites before<sup>22</sup> and after<sup>23</sup> disruption activities had been undertaken against them. This analysis revealed a 32% drop in traffic figures following the initiation of disruptive measures against this sample of 160 websites.<sup>24</sup>

## **Conclusion**

In summary, geo-blocking of illegal betting websites is undertaken by a relatively large number of jurisdictions globally and remains a popular and direct method by which to disrupt online illegal betting platforms, although there continue to exist several workarounds to geo-blocks which seemingly would render such disruption ineffective.

While the historical record of the effectiveness of geo-blocking is patchy, recent UKGC enforcement and disruption data does indicate that geo-blocking, in conjunction with other measures to disrupt online illegal betting operators, can result in meaningful reductions in internet traffic to such websites.



It is important to note that the UKGC analysis measures disruptive impact in their entirety, and that effects are complementary – in other words, it is difficult to measure “cause and effect in isolation, especially on such deliberately opaque operations. Consequently, while the causes of black markets can be effectively enumerated, a quantitative impact assessment on countermeasures is impossible.”<sup>25</sup> However, what the UKGC analysis does show is that meaningful disruption against illegal betting operators can be achieved through a raft of measures (which includes geo-blocking) which are carefully and repeatedly implemented on a consistent basis. At the same time, disruptors should be keenly aware of operational developments in the black-market as illegal operators look to respond to such disruption.

Geo-blocking alone is not an effective tool to prevent consumers gaining access to illegal betting websites. However, geo-blocking is an important tool in a suite of enforcement measures that should be used by gambling regulators. Most importantly, geo-blocking sends a clear signal to consumers that specific betting websites are not licensed in the jurisdiction where the consumer is located, which forces consumers to make a conscious choice to circumvent the restrictions on access. This is an important starting point to show clearly which betting and other gambling operators are licensed in a jurisdiction.

## **Annex A: Countries which employ geo-blocks as a method of illegal betting disruption**

<b>Country</b>	<b>Region</b>	<b>Year of Introduction<sup>26</sup></b>
Australia	Oceania	2019
Bahrain	Middle East	2018*
Belgium	Europe	2011
Brazil	South America	2024
Bulgaria	Europe	2019
Cambodia	Asia	2018*
Chile	South America	2025
China	Asia	2010
Cuba	Central America	2015*
Cyprus	Europe	2010*
Czech Republic	Europe	2017
Denmark	Europe	2008*
Estonia	Europe	2015
France	Europe	2010
Greece	Europe	2010*
Hungary	Europe	2014
India	Asia	2022
Indonesia	Asia	2015
Israel	Middle East	2017
Italy	Europe	2010
Japan	Asia	2025
Latvia	Europe	2014
Lebanon	Middle East	2015*
Lithuania	Europe	2016
Malaysia	Asia	2015
Norway	Europe	2025
Philippines	Asia	2018*
Poland	Europe	2017
Portugal	Europe	2015*
Romania	Europe	2012*
Russia	Europe	2006
Saudi Arabia	Middle East	2010*
Singapore	Asia	2015
Slovakia	Europe	2012*
South Korea	Asia	2010*
Spain	Europe	2025
Sudan	Africa	2015*
Switzerland	Europe	2007
Thailand	Asia	2020

Turkey	Europe	2007
UAE	Middle East	2010
Ukraine	Europe	2022
United Kingdom	Europe	2024
Uzbekistan	Asia	2015*
Vietnam	Asia	2017

<sup>1</sup> Note: Open source research IFHA Council on Anti-Illegal Betting & Related Crime

<sup>2</sup> Mirror websites are defined as ‘exact copies of a betting website hosted on a different URL. They are used by grey-market and illegal operators alike, providing redundancy and business continuity in case of detection and website closure by authorities. In the event that one URL is shut down or blocked by authorities, customers can be migrated to an alternate URL in minutes’ International Federation of Horseracing Authorities (IFHA) 2024, What is the IFHA Council doing about Illegal Betting?, IFHA, viewed 29 December 2025, <https://www.ifhaonline.org/default.asp?section=About+IFHA&area=130>

<sup>3</sup> Infoblox 2024, Vigorish Viper: A Venomous Bet, Infoblox, viewed 29 December 2025, <https://insights.infoblox.com/resources-report/infoblox-report-vigorish-viper-a-venomous-bet/>

<sup>4</sup> Shastry, SK 2025, Fixing the Odds: A Policy Blueprint for Curbing Illegal Online Gambling in India, CUTS International, Jaipur, viewed 29 December 2025, [https://www.medianama.com/wp-content/uploads/2025/06/Report\\_Fixing-the-Odds\\_CUTS1.pdf](https://www.medianama.com/wp-content/uploads/2025/06/Report_Fixing-the-Odds_CUTS1.pdf)

<sup>5</sup> Altenar 2025, ‘How Tech is Disrupting Illegal Offshore Gambling’, Altenar (blog), viewed 29 December 2025, <https://altenar.com/blog/how-tech-is-silencing-illegal-offshore-gambling/>

<sup>6</sup> Silva, G 2025, ‘Brazil’s challenge against the illegal online betting market: blocks, redirects, and the role of VPNs’, *SiGMA News*, 7 March, viewed 29 December 2025, <https://sigma.world/news/the-challenge-against-the-illegal-betting-market/>

<sup>7</sup> Luo, X., *Gambling and the Internet: A Growing Concern*. [pdf] Hong Kong: Department of Computing, The Hong Kong Polytechnic University. Available at: <https://www4.comp.polyu.edu.hk/~csxluo/Gambling.pdf> [Accessed 25 Aug. 2025].

<sup>8</sup> Android operating system applications only.

<sup>9</sup> Google play operates under a open system with far fewer restrictions of what can be downloaded Motta, M., 2025. *Google Play vs App Store: Key ASO Differences Explained*. [online] AppTweak. Available at: <https://www.apptweak.com/en/aso-blog/aso-apple-app-store-vs-google-play-store-differences> [Accessed 25 Aug. 2025]

<sup>10</sup> Apple Inc., 2025. *App Store Review Guidelines*. [online] Available at: <https://developer.apple.com/app-store/review/guidelines/> [Accessed 25 Aug. 2025]

<sup>11</sup> Silva, G 2025, ‘Brazil’s challenge against the illegal online betting market: blocks, redirects, and the role of VPNs’, *SiGMA News*, 7 March, viewed 29 December 2025, <https://sigma.world/news/the-challenge-against-the-illegal-betting-market/>

<sup>12</sup> United Nations Statistics Division 2024, *Standard Country or Area Codes for Statistical Use (M49)*, UN Statistics Division, viewed 29 December 2025, <https://unstats.un.org/unsd/methodology/m49/>

<sup>13</sup> Inpay 2024, ‘Understanding 7995 payments in iGaming: navigating restrictions and enhancing compliance’, *Inpay News and Insights*, viewed 29 December 2025, <https://www.inpay.com/news-and-insights/understanding-7995-payments-in-igaming/>

<sup>14</sup> Current to 18 December 2025

<sup>15</sup> McMullan, J, Reilly, J & Cassidy, R 2023, ‘Blocking measures against offshore online gambling: effectiveness, limitations and unintended consequences’, *International Gambling Studies*, vol. 23, no. 4, viewed 29 December 2025, doi:10.1080/14459795.2023.2190372

<sup>16</sup> H2 Gambling Capital 2024, *Of Sports Betting Products: An Economic and Integrity Analysis*, report prepared for the International Betting Integrity Association, IBIA, viewed 29 December 2025, <https://h2gc.com/site/assets/News%20Stories/IBIA-Report-2024-FINAL-TEXT-SINGLE-AW.pdf>

<sup>17</sup> Altenar 2025, ‘How Tech is Disrupting Illegal Offshore Gambling’, Altenar (blog), viewed 29 December 2025, <https://altenar.com/blog/how-tech-is-silencing-illegal-offshore-gambling/>

<sup>18</sup> InternetNZ 2024, *Blocking: A Technical and Policy Brief on Filtering Overseas Gambling Sites – Balancing an Open Internet with the Challenges of Overseas Online Gambling*, InternetNZ, Wellington, viewed 29 December 2025, <https://internetnz.nz/assets/Archives/The-Limits-of-Internet-Blocking-A-technical-and-policy-brief-on-filtering-overseas-gambling-sites-September-2024.pdf>

<sup>19</sup> Regulus Partners 2024, *Reducing Online Gambling Black Markets: An Analysis of International Practices Used to Combat Online Gambling Black Markets*, report commissioned by Entain Group, September, viewed 29 December 2025, <https://www.entaingroup.com/media/zh2n0i0s/regulus-report-2024-black-market-gambling.pdf>

<sup>20</sup> Gambling Commission 2025, *Illegal Online Gambling: Disruption of Illegal Online Gambling – Summary of Disruption Activity*, Gambling Commission, London, last updated 21 October 2025, viewed 29 December 2025, <https://www.gamblingcommission.gov.uk/report/illegal-online-gambling-disruption-of-illegal-online-gambling/summary-of-disruption-activity-disruption-of-illegal-online-gambling>

<sup>21</sup> Gambling Commission 2025, *Illegal Online Gambling: Disruption of Illegal Online Gambling – Summary of Disruption Activity*, Gambling Commission, London, last updated 21 October 2025, viewed 29 December 2025, <https://www.gamblingcommission.gov.uk/report/illegal-online-gambling-disruption-of-illegal-online-gambling/summary-of-disruption-activity-disruption-of-illegal-online-gambling>

<sup>22</sup> One month mean traffic figures prior to disruption activity taking place;

<sup>23</sup> Three month mean traffic figures following disruption activity taking place;

<sup>24</sup> Gambling Commission 2025, *Illegal Online Gambling: Disruption of Illegal Online Gambling – Summary of Disruption Activity*, Gambling Commission, London, last updated 21 October 2025, viewed 29 December

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2025, <https://www.gamblingcommission.gov.uk/report/illegal-online-gambling-disruption-of-illegal-online-gambling/summary-of-disruption-activity-disruption-of-illegal-online-gambling>

<sup>25</sup> Regulus Partners 2024, *Reducing Online Gambling Black Markets: An Analysis of International Practices Used to Combat Online Gambling Black Markets*, report commissioned by Entain Group, September, viewed 29 December 2025, <https://www.entaingroup.com/media/zh2n0i0s/regulus-report-2024-black-market-gambling.pdf>

<sup>26</sup> Starred years are estimated years of introduction