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How Live Streaming is Boosting Illegal Betting

James Porteous, Research Head, ARF Council on Anti-Illegal Betting & Related Financial Crime

As young people and even children spend more and more time on technology platforms baffling to parents, they are being targeted there by unregulated betting operators – a practice evidently so lucrative that some betting operators have even set up rival tech platforms seemingly to avoid advertising bans. The Licensed & Regulated betting industry is always constrained by how it can market its product, and consequently how to compete effectively with illegal betting operators who have no constraints or scruples when it comes to promoting their product in any way they can.

This has been exacerbated by the rapid pace of new technologies which open up novel channels for accessing and engaging in illegal betting.

Platforms created for gaming, communication and entertainment – Discord, TikTok, and Twitch to name just three – are quickly and increasingly exploited by illegal betting operators to promote their product.

This raises concerns about consumer protection and harm, especially for the younger demographics active on these platforms. Meanwhile, the pace of technological development means the regulator will almost always be playing catch-up to unscrupulous betting operators incentivised by huge potential financial gain to exploit any new angle to promote their product.

This article focuses on one particular strand of this phenomenon, the exploitation of live-streaming platforms to promote cryptocurrency betting sites, and the novel way one such betting site evaded a ban on gambling adverts – by setting up its own rival live-streaming platform.

What is live-streaming?

Live-streaming allows people to broadcast video of themselves live over the internet, similar to a TV show but through websites and apps.

One of the most popular forms of live-streamed content is people broadcasting themselves playing video games, and by far the most popular platform for this is Twitch.tv, launched in 2011 and purchased in 2014 by Amazon.

Streamers host sessions of themselves playing video games; viewers can watch and interact in real-time and support streamers by subscribing to their channels or purchasing virtual goods. Top streamers have millions of followers and can make millions per year.

The appeal of this may baffle older demographics, but there are on average 2.5 million people watching Twitch streams at any given time, and 7 million people streaming each month.[1] More than 75% of users are aged 18-34 according to Twitch,[2] and around 20% aged 16-24.[3]

Live-streaming and gambling

Given this, Twitch and platforms like it are obviously potentially potent marketing tools, especially to sought-after younger demographics. This is amplified by the community aspects of the platforms – users feel a personal connection with streamers and want to actively support them by spending on products or services they recommend.[4] Among those quick to see the potential in this were crypto gambling sites, some of whose founders were young, digital native, live-streamers themselves.

Beginning around 2018-19 (exact dates unclear), some Under-regulated and Unregulated betting operators began using live-streaming to market to these massive audiences, including partnering with some of the most popular streamers, even though their websites were unlicensed in the jurisdictions where most of the audience was based (if licensed at all).

Twitch streamers promoted these sites either in text chats running alongside their video game streams, or by streaming themselves gambling live, often on digital slots or similar casino games but also on sports.

Prominent operators following this strategy were several cryptocurrency bookmakers, some of which were Licensed but Under-regulated in the offshore betting haven of Curacao, whose regulatory structure provides no actual oversight.

Streamers were paid at least tens of thousands of dollars an hour by these websites to stream gambling live. According to technology magazine *WIRED* in a July 2021 article, 64 of the top 1,000 most popular Twitch streamers had streamed crypto gambling or otherwise advertised deals from crypto gambling websites.[5]

One reportedly offered top gambling streamer Adin Ross between USD 1.4 million and USD 1.6 million a month to stream digital slots.[6] Another leading streamer, Trainwreckstv, claimed in October 2022 he had "been paid USD 360 million for 16 months of gambling" (equivalent to USD 22.5 million per month) although this seemingly incredible sum cannot be verified.[7]

Whatever the actual amounts, it is clear streamers were receiving large sums of money to promote gambling, implying the return on investment for the betting operators must have been significantly larger still.

None of the websites were licensed in the United States where most Twitch users are based, while the moral implications of promoting high-frequency addictive gambling products like digital slots on a platform where a large percentage of users are teenagers naturally attracted criticism of Twitch.

In October 2022, these factors, capped by a major controversy involving a streamer accused of scamming users and other content creators out of hundreds of thousands of dollars to fuel a gambling addiction, finally prompted Twitch to act.

Twitch did not outright ban the promotion of gambling, but banned several specific operators which it said "aren't licensed either in the US or in other jurisdictions that provide sufficient consumer protection" (the company did not list jurisdictions or define sufficient consumer protection).[8]

Phase two – if you can't beat them …

This ban might have seemed a major blow to these Unregulated and Under-regulated operators. Luckily, a rival live-streaming platform appeared just three months later (in January 2023), which offered essentially the same functionality as Twitch but with no restriction on promoting gambling.

Not coincidentally, the platform has close ties to a major cryptocurrency bookmaker licensed out of Curacao: the co-founder of both the betting site and the live-streaming site is a 27-year-old who was a keen streamer on Twitch himself.[9] He is reported to have become, in the last couple of years, one of the richest people in Australia, worth AUD 2 billion thanks to the betting site.[10][11]

The new streaming platform has made a major splash since launch, offering streamers much better revenue share deals than Twitch, and luring away major streamers with huge contracts (including the aforementioned Adin Ross and Trainwreckstv, who had been making millions streaming gambling on Twitch).[12]

In June 2023, it signed streamer xQc (known to his parents as Felix Lengyel) to a two-year USD 100 million deal – a similar sized contract to that of basketball superstar LeBron James.[13]

Drake, the Canadian rapper who is one of the most popular musicians in the world by any metric, also joined the platform[14] and regularly streams himself playing slots and roulette online, and promoting million-dollar-plus "giveaways" to fans.[15]

Clearly all of this is very expensive, and some doubt whether the new streaming platform is a viable alternative to Twitch from a purely business perspective, or exists solely as a means to promote one offshore Under-regulated crypto gambling website. The co-founder insists there is no relationship between his betting site and his live-streaming platform which promotes it.[16]

Implications for racing, other sports and licensed and regulated betting

The legality of promoting gambling on live-streaming platforms is unclear and untested, and none of the individuals or websites mentioned here are accused of breaking the law.

But the proliferation of Under-regulated and Unregulated gambling promotions across new tech platforms popular with youth raises moral, ethical and practical concerns. This article focuses on one specific mode of promotion, but other new technologies, apps and social media sites are also being widely used by unscrupulous operators as backdoors to market Unregulated betting unchecked to massive audiences, including vulnerable minors.

The ARF Council has previously reported on the ubiquity of illegal betting promotion and agent recruitment on social media platforms such as WhatsApp, Instagram and Facebook, which is incentivised by the high commissions paid by illegal betting operators, and continues to be widespread (and is also used by many crypto bookmakers).

Discord, a chat app popular with video gamers and crypto enthusiasts, hosts many channels which promote illegal betting websites, despite promotion of gambling being expressly against its "brand partnership guidelines".[17] Some Discord channels are devoted to guiding users on how to evade local restrictions to access bookmakers unlicensed in their jurisdiction.[18]

Telegram, the anonymous messaging app, is now one of the leading means of promoting illegal betting in Asia; for example, almost all of the Telegram groups in the category 'Sport' targeting the China market, are in fact actually recruitment agents for illegal sports betting platforms, according to one Telegram group ranking website.[19]

Of particular concern is the potential for young people, including those not of legal age to bet, being attracted to Under-regulated and Unregulated gambling platforms with no responsible gambling safeguards or age restrictions. Extensive research has shown that adolescents are more vulnerable to developing problematic gambling behaviours compared to adults because teenage brains are still developing decision-making capacities related to risk assessment and impulse control.

The impact of gambling marketing via the specific mode of live-streaming is an area for further academic study, but seems likely to be significant, given the high engagement of streaming fans noted above.

Licensed & Regulated betting operators should consider refraining from such practices. An example of why comes from Australia, where TikTok has allowed one licensed operator to advertise gambling as part of a controlled trial (contrary to TikTok's policies in other jurisdictions).

This has led to repeated and sustained criticism from anti-gambling campaigners, of not only the particular betting operator, but the entire Licensed & Regulated gambling sector, including accusations of promoting under-age gambling.

This draws the focus of key stakeholders away from Under-regulated and Unregulated operators who pose a far greater threat to society than Licensed & Regulated, responsible sports wagering. Regulated operators should hold themselves to higher standards in order to differentiate themselves – and also explain to stakeholders why maintaining this higher standard can put them at a competitive disadvantage versus the illegal market.

Racing and other sports should also consider the merits of associations with such platforms and operators. Some major sports teams in football, motor sport, mixed martial arts and elsewhere have signed lucrative sponsorship deals with operators in the crypto gambling and live-streaming spaces.[20] One major football team promotes both the specific live-streaming platform discussed above, *and* its associated crypto bookmaker, displaying both logos on its shirt to hundreds of millions each week.

Although such deals are no doubt valuable from a financial perspective, and important in a commercial environment where sponsorships are difficult to secure, they may leave partner sports and teams open to reputational impact and even question marks over integrity. Chelsea FC rejected a shirt sponsorship deal from a crypto bookmaker in July 2023 in response to fan criticism, for example.[21]

More generally, it is important that there is public discussion understanding and discussion of the reasons for the boom in cryptocurrency gambling, which some reports state has gone from strength to strength despite the overall crypto market deflating.

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Lessons from a Life Spent Protecting Racing from Illegal Betting – How Monitoring Betting Markets is the Key to Safeguard Racing Integrity

Kim Kelly - Chairman, International Harmonisation of Racing Rules Committee, International Federation of Horseracing Authorities

Since commencing my career in the racing industry as a Cadet Stipendiary Steward a good number of years ago I have always abided by the following guiding principles when performing my responsibilities in regulating the sport;-

- Always conduct yourself with unquestionable integrity.
- The Rules of Racing are the Stewards' bible. Know them back to front and never work outside them.
- The betting on a race is the window through which the race should be watched.

Of course there are other principles which are of vital importance to Stewards but those three in particular have held me in good stead to this very day. It is my firm belief that they remain the foundation to an effective racing Steward and failure to diligently and constantly adhere to any one of them will likely result in the ability to regulate the sport of horseracing to be fatally compromised.

Racing relies on confidence. A famous Australian gambler once said words to the effect "Money lost, nothing lost. Confidence lost, everything lost". And whilst that person was specifically referring to gambling on horses the same could very well be said of racing in general. If anyone who supports or takes part in racing loses confidence that the sport is being conducted fairly and with the utmost integrity then they will most likely be lost to racing at some point. And racing cannot afford to disenfranchise its customers and participants by having them lose that confidence.

There are many ways people can spend their money these days. Horse racing is just one such way. I often use the analogy of a person going to dinner along Hollywood Road in Hong Kong. There are 20 restaurants on one side of the road and another 20 on the opposite side of the road. If a person spends their hard earned money in one of those 40 restaurants and doesn't get value for money they would be highly unlikely to return to that restaurant. They will go to one of the remaining 39 next time. The same can be said for racing. If a person reasonably believes they didn't get a fair run for their money then they will likely find another way to spend their money in the future.

Racing regulators, primarily Racing/Stipendiary Stewards, have a responsibility to ensure that wherever possible people don't walk away from racing as a result of a loss of confidence in the integrity of the sport. We must always remain diligent to threats to racing, threats which can undermine confidence in the sport. And one of those significant threats which has emerged in recent years is the impact that unlicensed and unregulated betting can have on any racing industry which provides product which these operators target.

It used to be that Stewards would peruse bookmakers betting sheets and rely on information provided by totalizator betting providers when they required betting information relative to a particular race or series of races. At that time bookmakers operated on course and information was able to be readily obtained by perusing betting sheets. That changed somewhat with the advent of telephone betting and bookmakers no longer being required to field on course but remained a highly useful regulatory tool. Since that time the landscape of betting has changed appreciably with burgeoning internet betting and the like. And whilst it is still available for Stewards to obtain information from regulated bookmakers who are licensed or approved to operate the same cannot be said for the aforementioned unlicensed and unregulated betting operators whose dealings can be out of sight of racing's regulators. Putting aside the financial impact this has on racing as the Racing Authorities who put on the show do not receive any financial benefit from bets placed on that product, the significant integrity ramifications associated with these operators cannot be understated and must not be underestimated. It is an existential threat to the fabric of racing regulation and therefore it is incumbent on Racing Authorities to have systems in place to monitor the activities of rogue betting operators so that action can be taken when integrity is threatened.

Whilst it is highly likely that the actual identity of persons betting on these sites may not be known given the opaque nature of illegal and unregulated betting operators, it is essential for racing regulators to be aware of betting which is suspicious or clearly demonstrates that the integrity of a race has been compromised. The ever-increasing ability to be able to process large amounts of data within short amounts of time has proved to be essential in identifying and combatting integrity threats.

During my time as Chief Stipendiary Steward with the Hong Kong Jockey Club tremendous strides were made in establishing monitoring programs and techniques to identify suspect or unusual betting patterns. These monitoring capabilities extended from lay betting to spread betting and any further bet types which presented as integrity threats. Such betting patterns may result from 'inside information' being passed for gain or the Rules of Racing potentially being breached as far as every horse competing in the race to its optimal level is concerned. Both scenarios present as significant threats to the reputation of racing and are prejudicial to the integrity of the sport and accordingly must be identified and acted up, preferably before the race wherever possible.

Being notified before a race that betting patterns, whether on illegal betting sites or through regulated betting (totalizator/bookmakers), associated with that race are highly suspicious provides the Stewards with the opportunity to proactively address the situation before the barriers open. This can be done by interviewing persons associated with the horse(s) on which the suspicious betting is occurring and instigating measures aimed at ensuring that all horses compete on their respective merits. An example of the pre-race lines of enquiry which may be explored when suspicious betting occurs would be the tactics intended to be adopted during the race and whether the tactics are in accordance with the manner in which the horse has previously raced successfully. Early awareness of the suspicious betting also allows for the Stewards to view the race and the tactics employed during that race with the knowledge that betting associated with the race may not be as it should be. It is also critical to post-race analysis as it can be instrumental in establishing an adverse pattern which can be relied upon if needed. It is my experience that the early awareness capability of Stewards is enhanced by having 'in house' monitoring systems so that information is able to be instantaneously shared with decisions being made in a timely manner in respect of the most appropriate way to deal with the relevant circumstances. Outsourcing this key integrity function carries with it the potential for valuable time and information to be lost or delayed.

The emergence of the relevant departments within the Hong Kong Jockey Club to be able to identify suspicious betting patterns on illegal betting sites certainly complimented the already established ability to monitor regulated betting and, in my opinion, has created the gold standard for how Racing Authorities should approach this critical area of racing regulation. It has directly resulted in investigations and actions which otherwise may not be readily identified. This has, and will continue to be, a critical benefit to racing which relies on the confidence and support of its participants and the public to remain relevant. I have heard it said that a good culture in an organisation is hard to build but is easily destroyed. The same can readily be said for the confidence in the integrity of horseracing. Knowledge that the holistic betting picture as it relates to a race necessarily leads to increased public confidence. Confidence lost, everything lost.

Advertising of Betting Websites in India

Aahna Mehrotra - Founder, AM Sports Law & Management Co and ARF Council member

Cricket is the most popular sport in India and in the build-up to two major competitions - the Indian Premier League which commenced at the end of March, and the final of the World Test Championship which was held in June - promotions for online betting have surged in the country.

Various companies used celebrities to popularize their product to the general public through social media, while others used print and television commercials, both directly and by way of 'surrogate advertising' (explained below).

This is despite the fact that betting is illegal in most parts of the country and the advertising of gambling is regulated in a complex manner. This complexity has in turn allowed betting and gambling websites to function and dodge enforcement.

This article explores the complex set of regulations with loopholes that have allowed betting websites to function, evade enforcement and led to a surge in such advertising.

First, one must understand the relationship between sports, mobile and internet usage in India. India has a sports consumer base of approximately 722 million[1] people and a significant portion of which engages the sport beyond just watching the games. This has been fueled by the availability of inexpensive smartphones and affordable mobile data. There are more than 600 million smartphone users in India and 4G mobile internet data is available for as cheap as $1 per month.[2] Also, India's instant payment service, known as Unified Payments Interface (UPI), has seen significant growth and rise in mobile internet payments.[3]

These factors allow for a large consumer base willing to interact with sports and spend money while doing so. Several fantasy sports applications and other gaming applications that offer paid games of skill (which are legal in most parts of the country) have become popular. Despite the complex legal structure, betting operators are now attempting to attract this fanbase – and have been successful to a large extent.

According to data from a leading web analytics platform, India was the second largest global source of traffic to websites in the category 'Gambling > Sports Betting, and the fourth largest to the category 'Gambling' in the first five months of 2023, amounting to more than 2 billion visits in each category.[4]

This is despite the fact that betting and gambling is largely illegal in India, with a few statutory exceptions at the State-level. This is established by the Public Gambling Act, 1867 (PGA), enacted before the promulgation of the Constitution of India (Constitution).

The PGA criminalizes gambling in any public forum in India, and the running of a 'common gaming house' but upon the promulgation of the Constitution, per the Seventh Schedule respective state governments can make their own laws on betting and gambling. Therefore, in states where a specific gambling legislation exists, it prevails over the PGA, so a uniform country-wide formula as to the legality of betting and gambling cannot be scoped out.

And of course, since the PGA predates the internet, there are no references to online betting. Modern gambling laws have been enacted by certain states which specifically include online betting and gambling, such as Sikkim and Meghalaya, which permit online betting and gambling under certain conditions to operators licensed by the state. while states like Telangana and Arunachal Pradesh have expressly prohibited online and offline betting.

The industry can be broadly classified into six categories:

1. Sports betting (largely unregulated except in a couple of states);
2. Lotteries (regulated by the Lotteries (Regulation) Act, 1998);
3. Horse racing betting (an exception created in the PGA and principles laid out in Dr KR Lakshmanan v. State of Tamil Nadu[5]);
4. Prize competition (regulated by the Prize Competitions Act, 1955);
5. Games of Skill (fantasy gaming, card games such as rummy, poker, etc.);
6. Games of Chance (casinos, and card games such as flush, brag and local variants, etc.).

The first four categories are self-explanatory, for the last two, three landmark judgments[6] made a distinction between games of skill and games of chance. Whether a game is a game of skill or chance is determined as per what is majorly responsible (skill or chance) for the player's success. The PGA distinguishes between wagering on a "game of chance" and buying stakes into a "game of skill", ostensibly to enable fair wagering on games of skill that were popular and prevalent amongst the British such as horse-racing. Bolstering this, the Indian judiciary has, in many cases,[7] stipulated that games of skill are legitimate business activities and therefore protected under the Constitution.

But with the rise of online betting and gambling, the position has become complicated vis-à-vis the Centre and the State and all the more so because the constitutional framework gives the Central Government the power to regulate 'means of communications' – such as the internet.

This complexity has enabled Offshore under-regulated and unregulated betting operators without a physical presence in India to operate pan-India as they are not subject to the PGA or the respective State laws.

But offshore betting and gambling companies can be regulated under laws including: the Information Technology Act, 2000 (IT Act) which allows for blocking of websites; the Information Technology (Intermediaries Guidelines and Digital Media Ethics Code) Rules, 2021, which on its face prohibits advertising of online betting and gambling and places the responsibility on intermediaries, such as Facebook, Instagram etc., to ensure that users do not advertise gambling services; Section 69A of the IT Act further allows the Indian Computer Emergency Response Team (CERT-in) to block websites promoting: *"hate content, slander or defamation of others, promoting gambling"*.

There are other laws that regulate payment processors which can be used to facilitate gambling payments such as the Payment and Settlement Systems Act, 2007 which theoretically, protects users of betting websites if they are deemed "consumers" and Consumer Protection Act, 2019 which protects the interest of the end consumer.

Betting advertisements are further prohibited under the Guidelines for Prevention of Misleading Advertisements and Endorsements for Misleading Advertisements 2022 (Guidelines) under the Consumer Protection Act, 2019; the Advertising Standards Council of India (ASCI) Code; and the Cable Television Network Rules, 1994 (Rules) which together prohibit any advertisement of harmful products and situations like – alcohol, tobacco and betting & gambling.

How then, can betting operators advertise their service?

In order to get around these prohibitions, operators have relied on indirect advertising or as it is known popularly, "surrogate advertising". This involves using the brand and imagery associated with one product prohibited from advertising – an alcoholic drink for example – to advertise an ostensibly unrelated product like a music CD or a complementary product like soda.

Specific examples of surrogate advertisements in the context of offshore betting would be when an offshore under-regulated betting operator promotes a so-called sports news website with deceptively similar logos and names resembling their betting websites, for example ‘Dafanews’ and ‘1xBat’ associated with the betting websites Dafabet and 1xbet. Local celebrities have been signed as brand ambassadors for such ‘news portals’ as

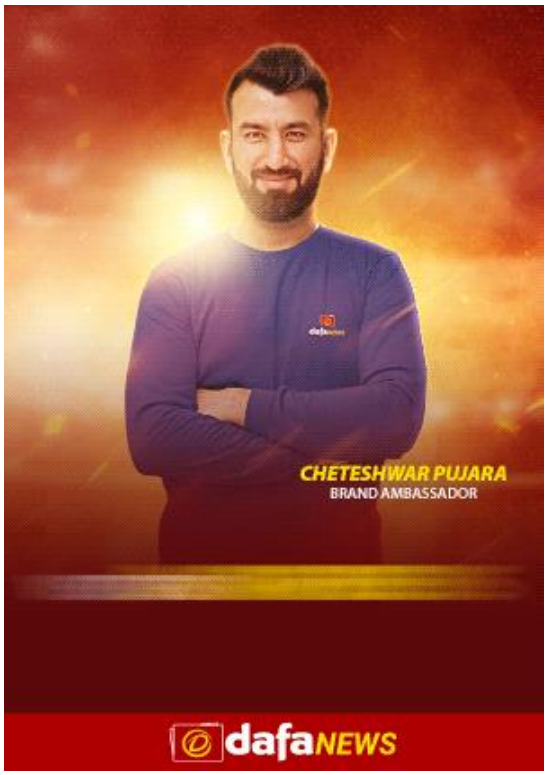


Figure 1 - Indian cricketer Cheteshwar Pujara is a 'brand ambassador' for dafanews. Source:



Figure 2 - Popular Indian actors Mimi Chakraborty and Ankush Hazra promote 1xBat. Source: https://1xbatsporting.com/611-we-are-happy-to-announce-that-fantastic-mimi-chakraborty-and-ankush-hazra-became-ambassadors-of-1xbat-sportinglines.html

While these so-called news portals tread a thin line legally, this line was crossed by many such companies who have blatantly advertised their betting portals. including DafaBet placing a banner on *Economic Times* (online) and Betway taking out a half page advertisement (in March, 2022) in the *Times of India*.

This led to the Central Consumer Protection Authority (CCPA) updating its Guidelines in June 2022 to prohibit surrogate advertisements to a large extent,[8] while the Advertising Council of India's Code for Self-Regulation made similar recommendations. While the CCPA Guidelines are slightly vague, both bodies' codes have several exceptions which in effect provide loopholes for such advertisements, as long as the prohibited products are not directly or indirectly mentioned.

The Ministry of Information & Broadcasting has on several occasions, in the last couple of years, issued advisories on the subject. In December 2020 it issued an advisory to TV Channels to adhere to the ASCI Code and in June 2022 it warned media (print, electronic and digital) to refrain from promoting online betting platforms. In October 2022 another advisory was issued to television channels and most recently, in April 2023 print mediums have been warned again for publishing advertisements pertaining to betting operators. It is pertinent to note that these advisories are directed to the media channels, TV channels and newspaper companies and don't impact the betting and gambling companies themselves directly.

These regulations seem to not deter the betting and gaming platforms but instead, these platforms see such regulations as a challenge to come up with ideas more creative than the next to simultaneously enable advertisements and defer taxes.

The current regulations and guidelines are not stringent or cohesive enough considering the fact that the online betting and gaming space is relatively new enabling such evasiveness. Indian laws need to take a stand, which the Government is now attempting to do, in some way, through the new tax regime. They must either completely prohibit online betting and gaming activities or regulate the same in a strict fashion to be able to profit from the tax generated through such transactions.



Figure 3 - an Unregulated betting operator published a half-page advertisement in The Times of India in March 2023 despite repeated warnings from the government. Source: https://g2g.news/online-gaming-laws/with-ipl-days-away-illegal-betting-sites-on-marketing-spr

Given the massive scale of the Indian betting market standing strong at approximately 1.4 billion people, many of whom are huge sports lovers – offshore under-regulated and unregulated betting operators continue to aggressively promote their product and are getting increasingly creative to evade prohibitions and find new loopholes.

For example, 'Parimatch Sports' purports to be "a sportswear brand, inspired by the world's top athletes" and has signed up leading Indian athletes as brand ambassadors to market its clothes. There is also a betting operator founded in Ukraine in the year 2000 with the exact same name and logo which, although not licensed in India, is quite candid about the fact it takes bets from India and actively targets the Indian market.[9] It is not known how much sporting apparel Parimatch sells – but its primary India betting URL had more than 500 million hits from India in the first five months of 2023 alone, amounting to an increase of >5,000% year over year. [10]

Although there are penalties, which has been introduced on account of online gaming being included under OIDAR transactions, for offshore betting operators advertising in India and notices are being issued to such entities for payment of taxes, it seems that the potential profits outweigh potential risk. The profits such operators will be making from Indian customers has almost zero benefit to India's economy in the form of tax or other duties, and some operators (not named in this article) will be directly funding other criminalities. There are also major implications for the integrity of cricket, racing and other sports in India from the huge betting turnover which will be flooding into these opaque platforms out of view of the sports themselves.

[1] PTI, 'TV Sports Market To Reach Rs 9,830 Crore By FY26 As Cricket Dominates Viewership: Report' (16 November 2022) <https://news.abplive.com/business/tv-sports-market-to-reach-rs-9-830-crore-by-fy26-as-cricket-dominates-viewership-report-1563762> accessed 31 May 2023.
[2] PTI, 'TV Sports Market To Reach Rs 9,830 Crore By FY26 As Cricket Dominates Viewership: Report' (16 November 2022) <https://news.abplive.com/business/tv-sports-market-to-reach-rs-9-830-crore-by-fy26-as-cricket-dominates-viewership-report-1563762> accessed 31 May 2023.
[3] 'UPI Transactions Expected to Account for 90% of Retail Digital Payments by 2026-27: Report - BusinessToday' <https://www.businesstoday.in/technology/news/story/upi-transactions-expected-to-account-for-90-of-retail-digital-payments-by-2026-27-report-383167-2023-05-28> accessed 31 May 2023.
[4] Source: SimilarWeb
[5] 1996 SCC (2) 226
[6] Dr. KR Lakshmanan v. State of Tamil Nadu; State of Andhra Pradesh v. K. Satyanarayana, AIR 1968 SC 825; and State of Bombay v. RMD Chamarbaugwala 1957 AIR 699
[7] For example Varun Gumber v. UT of Chandigarh & Ors CWP No. 7559 of 2017
[8] Detailed in Section 6 of the Guidelines
[9] 'Anton Rublievskyi, CEO Parimatch International speaks about the Indian Market and iGaming Industry', *The Week*, November 17 2022 (https://www.theweek.in/news/sci-tech/2022/11/17/anton-rublievskyi-ceo-parimatch-international-speaks-about-the-indian-market-and-igaming-industry.html accessed 21 June 2023)
[10] Source: SimilarWeb analysis of parimatch-in.com