

REMOTE GAMBLING REGULATORY INTENSIVE
SMALLER JURISDICTIONS – OFFSHORE AND NICHE
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INTRODUCTION

When Lindsey Greig telephoned me to ask me to speak at this event, we discussed the fact that so often we attend conferences or exhibitions at which small jurisdictions from around the world are represented. They are there to compete for the business of online gambling operators which they do by highlighting the many attributes of their jurisdiction and, sometimes, by highlighting the deficiencies of other jurisdictions.

I know some regulators feel deeply uncomfortable about this state of affairs, arguing that regulators should not be competing, rather they should be meeting and agreeing international standards of regulation and, of course, the UK (presently with no interactive gaming licensees and no tax rate proposals) is seeking to lead the way. Such international standards are, however, a long way away. The licensing of online gambling is likely to remain a potentially lucrative source of income for island jurisdictions for the foreseeable future and a strong element of competition is therefore also likely to continue.

Lindsey's thinking was that this event would be an opportunity to introduce an element of objectivity in the analysis of the key aspects of regulation in small and niche jurisdictions and the relative advantages and disadvantages of the leading jurisdictions. Lindsey believes, rightly or wrongly, that a lawyer would be well qualified to perform this role.

I found myself agreeing wholeheartedly with Lindsey and, having agreed to speak, we moved on to discuss other things. It was only after I put the telephone down that I thought, hang on a second, that puts me right in the cross fire. How can I possibly give this presentation without offending one jurisdiction or another? Well, before I go about making myself unwelcome in some of the most beautiful and interesting islands in the world, and Gibraltar — oh dear one offence already — in true legal fashion I would offer some caveats:-

- I do not propose to conclude this presentation by announcing that any one jurisdiction is the best online gambling jurisdiction in the world. The considerations to be taken into account when selecting a jurisdiction, and the application of those considerations, will vary from operator to operator and business model to business model, although of course certain considerations, such as tax rates, will weigh heavily with all operators.
- All of the jurisdictions which I will be considering today, namely Alderney, Gibraltar, Isle of Man, Kahnawake and Malta, are successful in their own right. They are leading online gambling jurisdictions with a proven ability to attract licensees.
- I do not propose to undertake a definitive analysis of each of these jurisdictions. Firstly, there is not time and, secondly, it would be too easy to get lost in the detail. The truth is that everyone in this room could probably summarise their views on each of the jurisdictions in a word or phrase and, if reduced to writing, this would certainly make interesting reading.

All our views on the jurisdictions are based upon practical experience of operating in those jurisdictions, word of mouth and information available on the internet and in gambling publications. In this presentation, I will seek to further inform your opinion on the various jurisdictions, whether you are intending to apply for an interactive gambling licence, operating quite happily where you are already licensed, thinking about moving or even contemplating making disaster recovery plans.

THE GAMBLING OPERATORS' JURISDICTION WISH LIST

Before reviewing the regulatory regimes in the five jurisdictions, it is worth considering the requirements of online gambling operators. In a perfect world, what would be the profile of an online gambling jurisdiction?

- *Technologically advanced.* This is arguably the single most important consideration. An online gambling site is entirely dependent upon the telecommunications system and a network failure, even for a few minutes, can have serious implications. The

difficulty for prospective operators is that each of the jurisdictions makes bold claims in terms of technological capability and there is simply no substitute for taking expert advice on their relative capabilities, compatibility with your proposed system and speaking to existing operators in the relevant jurisdictions and discussing their experiences. As a general comment, I would also advise that you visit the jurisdiction before making a decision, even if you never intend to step foot in the place again. Speak to regulators, speak to other operators and, if you must, speak to lawyers.

- *Excellent payment processing and banking facilities.*
- *Zero tax rate and no licence fees.* This is of course a wish list and no such jurisdiction exists or is likely to exist. No one likes paying taxes and the amount of tax which will be payable will be a critical factor in selecting a jurisdiction. It is not, however, as simple as comparing rates of tax. The operator will have to assess the overall tax burden in terms of corporate tax, gaming taxes, VAT and, indirect taxes such as licence fees.
- *No regulation.* No operator wants to be regulated save to the extent that it enhances the reputation of the jurisdiction with potential customers and with the business community, and ensures that other operators in the jurisdiction do not do anything to damage that reputation. Many operators will feel that they are perfectly capable of regulating themselves and, indeed, would argue that it is in their commercial interests to do so. Their brand tells their customer all they need to know about their standard of operation. In reality, however, most operators will settle for a commercial, flexible and efficient system of regulation.
- *The ability to accept bets from all jurisdictions.* The consensus amongst the regulators in the various jurisdictions now appears to be that the best approach is for operators to determine whether they should accept bets from jurisdictions worldwide, including the United States. This no longer appears to be a distinguishing factor between jurisdictions.
- *Highly regarded by the investment community.* This is self explanatory given the

number of recent high profile flotations.

- *Convenience of location/international travel connections.*
- *A skilled workforce.*
- *A great place to live. Will everyone from your call centre operators to your CEO be delighted to live there if required? Is it warm and sunny?*

Back to the real world, to what extent do the leading online gambling jurisdictions fulfill these criteria? I turn now to consider the individual jurisdictions and stress that I do so in alphabetical order rather than order of preference.

ALDERNEY

- *Alderney is the third largest of the British Channel Islands. 8 miles from France and 60 miles from mainland Britain.*
- *The British Channel Islands are one of the world's leading offshore finance centres.*
- *Not part of the UK or the EU. They are self-governing dependencies of the Crown.*
- *Modern hosting facilities and an advanced telecommunications network. Since 2004, e-gambling operators have been permitted to locate their servers in Guernsey in addition to Alderney.*
- *Alderney Gambling Control Commission – very experienced. It was established in May 2000 — the Commissioners are independent, non political and recognized experts in gambling regulation and licensing.*
- *“World-class standards and world-class operations”.* The stated objective of the Commission is to provide a regulatory environment that meets world-class standards

to protect the reputation of Alderney and attract world-class operations. On this basis, it must be considered a great success given that its licensees include Paddy Power, Ritz Interactive, Blue Square, Harrah s and WagerWorks.

- *Gambling (Interactive Gaming) (Alderney) Ordinance 2001.* The Commission has positioned itself to offer a regulatory environment that is likely to attract operators who seek a comprehensive and tightly controlled regime. For the most part, these are major gambling operators who have brands that they wish to protect.

- *Fees.*
 - Licence fee £70,000, payable upon grant and annually
 - Company investigation costs £15,000
 - Individual s investigation costs £1,000 per person
 - Standard rate of corporation tax 20% but most companies will be exempt, annual fee of £600 payable
 - No gaming taxes and no VAT

A licence fee of £70,000 is perceived by many to be extremely expensive, but when you consider that no taxes are payable, the jurisdiction compares extremely favorably to other jurisdictions with lower licence fees. For a start-up, a tax on profits may be preferable — but start-ups are not really Alderney s target market.

- *Rigorous probity investigations.* Owners, managers, system providers and sources of finance all subjected to probity investigations, although they are tailored to the risk profile of the applicant.

- *Internal Control System to be approved.* Prior to commencement of interactive gaming operations, licensees will be required to produce, and have approved by the Commission, a control system. This is a system of internal controls and administrative and accounting procedures for the conduct of interactive games. It is a chore and time consuming, but that is good regulation for you. It covers everything from corporate structure and staff, accounting systems and players accounts to details of the premises. The Commission provides detailed written guidelines in

relation to this system. Once it has been approved and certified, it can only be altered with the approval of the Commission, but, in our experience, the Commission deals with any changes quickly and pragmatically.

- *Software testing requirements – accredited testing authorities.* The gaming system must be certified as complying with the Commission's requirements. This will involve testing of the system by one of the accredited testing authorities and this is expensive, it is unlikely to be less than £50,000.
- *Timeframe for applications* - two to three months.
- *White Listing?* In view of the close links between the Gambling Commission in the UK and the Alderney Gambling Control Commission, and the standards of regulation which are in force in the jurisdiction, we have every reason to believe that Alderney will be on the White List. Indeed, if it is not, it is difficult to see which jurisdictions will be. Operators based in Alderney should therefore be able to advertise in the UK upon the implementation of the Gambling Act 2005.
- *US bets?* The Alderney Gambling Control Commission supports a free market approach towards e-gambling, which is consistent with the approach taken by the Gambling Commission in the UK, which means that it will not prevent its licensees from offering gambling to players in other countries. The onus is on the licensee to ensure that he conducts his business in a lawful manner and keeps abreast of the laws of the jurisdiction within which he conducts his business. The Commission is of the view that the e-gambling transaction takes place where the e-gaming or e-betting transaction server and database are based, namely Alderney.
- *The Alderney Licensees forum.* This forum meets on a quarterly basis and gives licensees an opportunity to exchange views on issues of mutual interest.

My firm has had considerable experience in dealing with Alderney and can recommend it as a well regulated jurisdiction, although I appreciate that not all operators will be looking for a high degree of regulation. In our experience, the regulators in Alderney are commercially-

minded and, where possible, try to administer a light touch approach to regulation. They and the law officers have a flexible approach, and legislative changes, where necessary, have been made quickly and efficiently. Also, the absence of any corporation tax, VAT or gaming duty is very attractive.

GIBRALTAR

- *Self-Governing British Overseas territory.*
- *Located at the southern tip of Spain.* A short flight from most EU centres.
- *Highly successful jurisdiction.* It has proved to be an attractive site to remote gambling operators and is home to, amongst others, Ladbrokes, Coral Eurobet and Party Gaming. It is my understanding that Gibraltar is basically full and it is certainly not going out of its way to attract new licensees. One of the explanations which I have heard is that the granting of further licences may lead to a dangerous over-reliance on the industry for employment opportunities on the island.
- *Well-developed telecommunications.* However, Party Gaming has expressed reservations as to whether there will be sufficient bandwidth to meet the very significant requirements of their online poker business.
- *Gambling ordinance 2005.* This was enacted in December 2005 and is due to come into effect later this year, although I am not aware that any date has been set. It updates the gaming legislation and provides a modern framework for the licensing and regulation of online gambling. The existing legislation dates back to the 1950s and, as with the UK legislation, is hopelessly out of date.
- *“The world’s foremost reputable jurisdiction for virtual and online casino gambling”.* According to a Gibraltar spokesman, the legislation is designed to ensure that Gibraltar remains the world’s foremost reputable jurisdiction for online gambling. The legislation probably also reflects a recognition on the part of the Gibraltar authorities

that a good system of regulation is likely to play a significant role in the ongoing success of the jurisdiction. In the present climate, it is no longer sufficient to rely entirely on self regulation by operators, regardless of their status or repute.

- *New licensing authority.* The new legislation creates a ministerial controlled licensing authority and the Gibraltar regulatory authority will become the gambling commissioner. Social responsibility is a strong feature of the new legislation and licensees will be required to have direct links to organizations dedicated to assisting problem gamblers and must designate a named person to be responsible for formulating responsible gambling policy. The licensing authority will also have new investigation powers. Overall, the new legislation will give structure to the thriving industry in Gibraltar.

- *Tax.*
 - Sports betting - 1% of turnover
 - Gaming - 1% of gaming yield
 - minimum tax contribution £85,000
 - maximum tax contribution £425,000
 - corporate taxes - zero % for exempt companies
otherwise 35%
 - no VAT

- *Highly educated multi-lingual labour force.*

- *White List?* Gibraltar does not need to be on any White List. There is a specific clause in the Gambling Act 2005 relating to Gibraltar and, for the purposes of gambling, it will be treated as if it were an EEA state. Licensees will therefore be able to market to UK residents.

ISLE OF MAN

- *An international finance centre in the Irish Sea.*
- *The island is a Dependency of the British Crown.* It has a high degree of autonomy and exercises domestic, political and legislative independence through the island's Parliament called Tynwald. It is a completely separate legal jurisdiction to the United Kingdom.
- *Online gambling is a legal licensable activity.* Online Gambling Regulation Act 2001. The Act currently licenses gambling which is within the category of gaming such as poker and online casinos. The legislation is due to change and online bookmaking will also fall within this Act.
- *Pioneer within Europe.* It is worth considering briefly the history of online gaming in the Isle of Man, not least because it explains some of the recent legislative developments. The Isle of Man was one of the pioneers of online gaming within Europe and, as so often happens to pioneers, they were hit by a lot of arrows.

The Isle of Man set out to attract operators of international repute who were seeking to locate their operations in a highly regulated jurisdiction and they were very successful in this, attracting the likes of MGM Mirage and Kerzner International.

Unfortunately, from the perspective of the Isle of Man, all of their prestigious licensees subsequently left the island complaining that the system of regulation was unworkable from a commercial perspective. They perceived some fundamental flaws such as a lack of understanding on the part of the Commissioners of the industry which it was regulating and a lack of flexibility in the legislation. The Money Laundering Code was particularly contentious in that it was designed for land based businesses and was, in many respects, impractical in relation to an internet business. If my memory serves, players were required to send their original identification documents, such as their passport, to the Isle of Man to verify their identity.

In return, the Isle of Man may say that they were scapegoats for the inability of some very large gambling companies to operate successfully in the online environment. In any event, the Isle of Man has demonstrated a continuing commitment to attract operators to the island and has sought to address the concerns expressed by previous licensees. It may be thought that the events of 2001 are ancient history but they are helpful in understanding the present regulatory environment in the Isle of Man.

- *Excellent telecommunications system.* I understand that the Isle of Man has an excellent telecommunications system and enormous bandwidth capacity. It also has an abundance of hosting facilities. I could tell you about their existing fibre ring with its 1.2 tera bits per second capacity and the island's 2 self-healing rings, but I am not entirely sure what they are and I do not really want to hazard a guess.
- *Zero Corporation Tax from 6 April 2006.* No requirement to pay corporation tax on gambling profits.
- *Online gambling duty.*
 - rate of duty for gross gaming yield not exceeding £10m per annum — 2.5%.
 - rate of duty for gross gaming yield exceeding £10m but not exceeding £40m per annum — 0.5%

So, a gross gaming yield of, for example, £10m will generate an online gambling duty of £250,000.

- *Fees.*

-	Application fee	-	£1,000
-	Annual licence fee	-	£35,000
- *Highly regulated jurisdiction.* The Department of Home Affairs has a responsibility to the public to ensure that licences are not granted to companies that could damage the island's reputation as a premier international finance centre.

- *Legislation*
 - Online Gambling Regulation Act 2001
 - Online Gambling (Registration and Accounts) Regulations 2001
 - Online Gambling (Advertising) Regulations 2001
 - Online Gambling (Advertising) (Overseas) Regulations 2006
 - Online Gambling (System Verification Amendment) (No 2) Regulations 2006
 - Online Gambling (Technical Support and Disaster Recovery) (Amendment) Regulations 2006
 - The Anti-Money Laundering (Online Gambling) Code 2002

As I have already said, I cannot possibly attempt to review the legislative requirements of each jurisdiction. Also, it can get a bit repetitive. I will try and give you a flavour of the regulations.

There is a rigorous application procedure and the licence will only be granted by the Department when it is satisfied that the applicant will comply strictly with the provisions and underlying regulations of the Act. Personal declaration forms will be required from directors of the applicant and ultimate parent company and from shareholders with more than a 5% shareholding. The regulators seek to adopt a strict but practical approach, for example where the applicant is a subsidiary of a large publicly quoted company.

In considering the application the Department may have regard to all the usual considerations and, interestingly, the value of the applicant's international brand names. This reflects the fact that regulators take considerable comfort from the fact that the prospective operator has something to lose if it breaches the regulations.

As you would expect, operators must have satisfactory procedures to prevent underage gambling and to identify and deal with problem gambling. The regulations are designed to provide players with some protection from their own actions. For example, a player's account may not go overdrawn, a player cannot be encouraged to hold more than one account and the player must have the option to set his

maximum stakes over a period.

Money deposited by debit or credit card cannot be available for gambling until the funds are received from the provider or the provider issues an authorization to the operator indicating that the funds are guaranteed.

The player shall not be permitted to make withdrawals from his account except to the card account or other financial facility from which the initial deposit was made, or if the operator of the card accounts or financial facility will not accept it, by cheque sent to the player's place of residence as stated in his registration.

Online gambling advertising companies can now set up on the island and take advantage of the zero corporate tax rate, although there are detailed regulations governing their advertising. For example, advertisements may not be directed at any jurisdictions in which online gambling, or any kind of online gambling is prohibited.

The requirement for a £2Million security deposit, which limited potential licensees to the MGMs and Kerzners of this world, has as I understand it been abolished. A ring fenced insurance policy or some other form of security approved by the Commissioners will suffice.

Licensees are entitled to accept bets from anywhere in the World.

Systems verification requirement – results and output based. The applicant is required to produce a certificate to the Department of Home Affairs that the online gambling system complies with the standards specified in the regulations. This certificate will, in practice be issued by a testing house which has been approved by the Government. As most of you will know, testing is not inexpensive. To reduce the cost and complexity of compliance, it is moving to a results and output based approach. Further, software providers will not have to disclose their source codes.

Further testing is no longer required if the operator is using a white label product of an existing Isle of Man licensee with the same online gaming system and the online

gaming system may now be amended or new games launched without the need for prior approval of the Commissioners, as long as the online gaming system still complies with the regulations.

The Anti-Money Laundering Code has, after consultation, been adapted to reflect the limitations of obtaining the physical evidence of identity in an internet environment.

- *Timeframe.* Two to three months.
- *Disaster Recovery.* The level of regulation is impressive, but may not be to every operator's taste. Even those operators, however, may wish to consider the disaster recovery facilities which are available. Pursuant to the disaster recovery regulations, overseas licensed operators may use accredited disaster recovery facilities on the island. If a disaster occurs in the overseas licensing jurisdiction that requires the overseas operator to switch operations then it may do so and all the bets will be deemed to have been taken in the overseas jurisdiction and the overseas operator will continue to be regulated by the overseas regulator. Only a lawyer would contemplate taking you through the definition of a disaster but I will resist the temptation.

Application forms need to be completed and a £10,000 application fee is payable.

This is not to say that the island may be used by operators from jurisdictions with dubious regulatory systems. The Commissioners will review the overseas jurisdiction to ensure that it has satisfactory regulations governing issues such as underage gambling, anti-money laundering and problem gambling.

If the disaster is likely to render the operation out of action for more than 45 days, an application will have to be made for an online gambling licence.

- *White listing?* As in the case of Alderney, I would be very surprised if the Isle of Man were not to be white listed enabling its licensees to market their products to UK residents upon the implementation of the Gambling Act 2005.

In summary, the Isle of Man has much to commend it in terms of zero corporate tax, an excellent telecommunications infrastructure and associated support services. It is highly regulated and, with attraction of Neteller and microgaming and the relocation of the global headquarters of pokerstars.com to the island, it may be that the island's persistence and commitment to the industry will attract further big names to the jurisdiction. I understand from their website that it is at a relatively advanced stage in negotiations with a number of very significant companies wishing to relocate part or all of their operation.

KAHNAWAKE

- *The Mowhawk territory of Kahnawake is located 10 km south of Montreal.*
- *State of the art technical infrastructure* — Kahnawake professes to have state of the art technical infrastructure coupled with direct access to the extensive transportation and telecommunication services of the Montreal region. The success of the jurisdiction, which is home to many leading poker, bingo and casino operators including Paradise Poker, Aspinalls and GlobalCom, which are generating a phenomenal amount of internet traffic, is the best endorsement of this claim. The proximity of Kahnawake to the United States speeds up internet connections by an infinitesimal amount which gives it an advantage over other jurisdictions, particularly in relation to poker. My feedback from clients is that Kahnawake has, quite possibly, the best hosting facilities available anywhere, albeit at a price.
- *Application fees*
 - first annual permit fee - US\$10,000
 - cost of probity checks and control system testing — US\$15,000
- *No gaming taxes are payable.*
- *“Regulations concerning interactive gaming”* These regulations were enacted in July 1999. The Commission was assisted by Frank Catania, a former director of the New Jersey division of gaming enforcement and by Legal Counsel. The regulations are

extremely well drafted and are designed to ensure that only suitable persons and entities are permitted to operate within Kahnawake, that the games are fair and that winners are paid.

- *Enforcement of regulations?* It is of course one thing to have a set of regulations in place and, quite another to rigorously enforce them. My understanding of the position in Kahnawake is that the Commission adopts a pragmatic, commercial and licensee friendly approach, and the reputation of the territory is a paramount consideration. This is certainly not intended as a criticism, unless perhaps you are looking at it from a regulatory perspective. As I said at the beginning, from an operator s perspective and in an ideal world, there would be no regulations.

The only regulatory activity referred to on the Commission s website, and this does not of course mean there has been no other activity, relates to an incident at the Olympic Games in Athens when a person streaked at the event displaying the name of one of Kahnawake s licensees. The Commission issued a statement to the effect that it did not condone this type of marketing and required the licensee to make a substantial donation to Kahnawake organizations.

- *White List?*

In summary, Kahnawake is a thriving and successful jurisdiction with state of the art technological facilities and well placed to cater to the US market. For those of you, however, who wish to market extensively in the UK, or to float in the UK, it may not be the place for you. The application and licence fees are extremely reasonable and there is no gaming duty, but the hosting fees are expensive.

MALTA

- *EU member state since May 2004.*
- *Gaming regulated by the Lotteries and Gaming Authority (LGA).*

- *Bandwidth is relatively inexpensive – fibre links to European mainland.*
- *Remote Gaming Regulations 2004.* Malta was the first EU member state to regulate remote gaming.
- *Applicant must be a Maltese registered company/the “key official” must be resident in Malta.* The key official must be a director of the applicant company and his role is to personally supervise the operations of the licensee and to ensure that the licensee complies with the applicable laws, regulations, licence conditions and any directives.
- *Licences are valid for 5 years.*

Application Process

- *“The LGA applies a rigorous process prior to granting a remote gaming licence” – LGA fact sheet.* The application process to obtain a licence is divided into three stages:
 - fitness and propriety
 - business and technical ability assessment
 - compliance audit

Fit and proper — the LGA must be satisfied that all persons involved in the applicant company are fit and proper. The LGA states that this stage is usually completed within 2 weeks, which is impressive, as it takes much longer in Isle of Man and Alderney despite, I believe, more staff.

Business and technical ability assessment — this includes checking incorporation documents, reviewing operation manuals, security and control procedures, payment methods and systems and reviewing agreements with business partners. The LGA states that this stage is usually completed in 3 weeks. Again, impressive.

Compliance audit — this includes certification of the gaming systems, review of

agreements with third parties and approval of the applicants Control System (consisting of a system of internal controls, reporting and accounting procedures), testing of the web site through a test account and a review of the backup and disaster recovery procedures. I do not believe that the LGA conducts tests on the gaming software. Instead the whole gaming system is subject to a form of audit based on a questionnaire completed by the applicants.

- *Timeframe.* Six weeks.

- *Letter of intent.* At the end of the second stage, the applicant is given a letter of intent to operate remote gaming with the intent of obtaining a certification of compliance within 6 months. The applicant may then establish the business in Malta, conclude all agreements and carry out testing. A formal licence is issued when the authority obtains approval from the compliance certification entity. A normal compliance certification procedure takes 2 weeks to be carried out.

- *Fees.*
 - Application fee LM1,000 (_2,300)
 - Annual licence fee LM3,000 (_6,900)

- *Effective rate of corporate tax is 4.17%.* The corporate tax rate is 35% but credits and reliefs for non-resident shareholders mean an effective rate of tax of 4.17% on profits.

- *Gaming taxes.*
 - Casino operators — LM2,000 (_4,600) per month for the first 6 months, subsequently LM3,000 (_6,900) per month.
 - Fixed odds betting operators 0.5% on the gross amount of bets accepted.
 - Betting exchanges and poker networks pay a percentage of net takings.
 - The maximum gaming tax payable annually by one licensee in respect of any one licence is LM200,000 (_460,000).
 - Different rates apply in relation to software vendors who take commission on wagers.

- *Skilled IT workforce and multilingual society*
- *Freedom of movement between EU member states.*
- *No restrictions on accepting bets from the United States.*
- *Gambling Act 2005 – ability to advertise.*

Malta is a relatively new jurisdiction with high aspirations to be a leading online gambling jurisdiction. Indeed, I understand that it has already attracted over 100 licences, the biggest name being Betfair. It may be that Malta does grow into a well regulated jurisdiction and it does have the significant advantage of being in the EU and processes application speedily. It is probably fair to say, however, that it does not yet have as rigorous an approach to regulation as, say Alderney or the Isle of Man and is the subject of mixed reviews.

CONCLUSION

- *Alderney, Gibraltar, Isle of Man, Kahnawake and Malta all have significant advantages and disadvantages.*
- *No "one size fits all" online gambling jurisdiction.*
- *Do not take promotional literature at face value.*
- *Better the devil you know?*

As I said at the outset, all of the jurisdictions which we are considering today have their advantages and disadvantages, there is no "one size fits all" on jurisdiction. The choice of jurisdiction will vary from operator to operator and business model to business model. For the foreseeable future, jurisdictions will be competing for your business and you cannot necessarily take promotional literature at face value. Consult with existing licensees and visit the

jurisdiction, and remember, if you are having a bad day and experiencing technological difficulties or problems with the regulator, it could be worse, you could be licensed and regulated in the UK!

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