

Gambling Division

Compliance Circular: Poker and Poker Networks

- B2C and B2B Licence Holders which operate poker networks are reminded that peer-to-peer gaming is a potential means through which terrorist funding and player fraud can be facilitated.
- Whilst there are fraud checks conducted on online poker play to detect collusion and use of bots, those monitoring for fraud and abuse of this vertical are reminded that they need to be vigilant especially where liquidity is pooled on a cross-jurisdictional basis.
- Whilst the customer is registered with the B2C Licence Holder, poker network operators must work effectively with their B2C counterparts to detect possible fraud, money laundering and terrorist/proliferation financing. B2C operators participating in poker networks are under an obligation to seek all relevant information from the poker network operator to be able to make informed risk assessments of player activity.
- The Gambling Commissioner is particularly concerned with money transfer systems which support the poker community by allowing transfer of funds between players. This activity needs to be closely monitored, and all players involved in the money transfer system need further due diligence undertaken on a risk-based approach (taking into account amount, frequency, jurisdiction, etc.).
- No money transfers should be permitted to or from unregistered players and, if using a threshold approach, lower financial thresholds should be used for users of money transfer systems than those employed in other verticals. As part of fraud monitoring processes, the risk of terrorist financing should be considered in the round and suspect activity reported to the Gibraltar Financial Intelligence Unit (GFIU).
- It is the view and experience of the Gambling Commissioner that some regular poker players may engage in risky behaviour and that poker players may also be engaged in use of less regulated crypto poker rooms for exchanging funds. Social media around poker and poker chatrooms should also be monitored so that B2Cs and poker network operators are fully informed as to risk levels.