

China (Mainland)

Jurisdiction code: CN | Tier: B + P | Posture: Prohibitive | Direction: Stable

Live page: <https://advennt.io/jurisdictions/china/>

Overall status: Red

Data current to 2026-10-25. Free jurisdiction — this report is available to everyone on advennt.io.

Contents

Overview

- Executive Summary
- Board Briefing
- Regulatory Pulse
- Key Judgments
- Latest Update
- Outlook

Risk Assessment

- Red Flags
- Enforcement & Risk
- Controls & Mitigations
- Liability Exposure
- Open Findings

Legal Basis

- Regulatory Framework
- Compliance Obligations

Context & Evidence

- Commercial Terms
- Market & Entry
- Money Flow & Distribution
- Gaps Register
- Sources & Provenance

OVERVIEW

Executive Summary

Market entry is not viable for private gambling.

Recommendation	No
Time to revenue	N/A — No Viable Entry months
Capital requirement	N/A — No Viable Entry
Regulatory posture	Prohibitive
Confidence	Confirmed

Top risks

- No private licensing pathway
- Criminal liability under Art. 303
- Accomplice liability for B2B/payments/affiliates under Art. 287-2

Top opportunities

- No legal addressable online market

Analyst assessment

Entry by Product

China's prohibition on private commercial gambling continues to leave no open product class for an entrant to consider. The Criminal Law provisions on opening a casino and related offences (Arts. 303 et seq.) remain in force without amendment, and no evidence surfaced of any carve-out being extended to private online or land-based operators. Where the jurisdiction's posture moved, the movement was procedural and extraterritorial rather than product-specific: a State Council exit-entry regulation now explicitly names cross-border gambling as grounds for refusing exit-entry documents. For an operator weighing entry, the practical read is unchanged from prior cycles for every product class: there is no licensed channel, online or offline, through which a gambling product may lawfully be offered to persons in mainland China.

The only channel-level development concerns the state apparatus used to intercept demand leakage toward offshore operators, not any opening of a domestic channel. State Council Decree No. 841, in force from 15 September 2026, authorises refusal of exit-entry documents or entry where an applicant is found to have fabricated reasons for travel, and the accompanying guidance explicitly cites cross-border gambling and telecommunications fraud as a driver of this tightening. This closes, rather than opens, a route that offshore operators have historically relied upon: resident travel to jurisdictions where gambling is legally offered.

Taken together, the per-product picture is: no change to the closed status of any class, reinforced by a new administrative mechanism aimed specifically at the cross-border travel patterns associated with gambling demand.

Regulatory Picture

No change was identified to the statutory architecture of the prohibition itself. The operative instrument remains the Criminal Law's gambling provisions, which the research treated as an unchanged baseline carried forward rather than re-examined de novo. The one genuinely new instrument in the regulatory picture is State Council Decree No. 841, the Provisions of the State Council on Exit and Entry Administration, which entered into force on 15 September 2026. Its Article 19 provides that exit-entry applicants must state truthful and lawful purposes, and that authorities may refuse exit-entry documents or entry where false materials or statements are made. The accompanying official guidance frames this specifically around individuals fabricating reasons to illegally exit the country to engage in cross-border gambling and telecommunications fraud, which places the instrument squarely within China's extraterritorial enforcement toolkit even though it operates through China's own border-control apparatus rather than through assertion of jurisdiction abroad.

This is a border-control instrument rather than a licensing or activity-classification instrument, so it does not alter the entry-pathways or activity-classification picture, both of which remain governed by the pre-existing prohibition.

Cost & Compliance

Cost-to-operate and compliance-lift questions do not arise under a comprehensive prohibition regime, and no new instrument changes that structural fact: there is no licensed activity class in mainland China against which a tax rate, a compliance obligation, or a certification cost could be computed. The exit-entry regulation introduces a compliance-adjacent burden only in the indirect sense that it raises administrative friction for residents attempting to travel abroad for purposes authorities construe as cross-border gambling, but this is an administrative control on individuals, not a cost borne by any licensed operator, because no licensed operator exists.

Enforcement & Risk

The enforcement picture sits on two legs: continued regional law-enforcement cooperation targeting Chinese-organised offshore gambling networks, and the new exit-entry control mechanism. On 2 October 2026, Philippine authorities, reported as the Bureau of Immigration, the National Bureau of Investigation and the military acting jointly, raided two offshore gambling hubs in Zamboanga Sibugay, arresting 244 people, of whom more than half were Chinese nationals. Separately, reporting on 9 October 2026 revisited the China-Myanmar-Thailand judicial cooperation that facilitated the extradition of gambling and fraud figure She Zhijiang, citing Ministry of Public Security-attributed statistics that put the scale of the underlying network at approximately 330,000 domestic participants and more than 2.7 billion yuan at stake; this figure derives from secondary press reporting attributing the numbers to the Ministry of Public Security, and no primary ministry document was independently retrieved.

The exit-entry regulation itself functions as a forward-looking enforcement lever: by authorising refusal of travel documents to individuals found to have fabricated reasons for exit linked to cross-border gambling, the state has created an administrative choke point upstream of any criminal enforcement action, intended to reduce the population physically able to reach offshore gambling venues in the first place. Read together with the continuing cross-border cooperation with Philippine, Myanmar and Thai authorities, the enforcement posture for anyone contemplating an offering directed at mainland Chinese residents, wherever that offering is hosted, remains one of active, multi-pronged pressure: criminal liability for participants and organisers under the Criminal Law, administrative travel restriction under the new Decree, and continuing extradition and raid cooperation with regional partners for operators and facilitators physically located offshore.

Outlook

Nothing in the evidence points toward any loosening of the prohibition or the creation of a licensed pathway; if anything, the new exit-entry instrument signals a tightening of the state's capacity to intercept gambling-related travel before it occurs. What would change the entry position for any product is, specifically, a statutory amendment to the Criminal Law's gambling provisions or the creation of a new state-monopoly carve-out, neither of which the evidence shows any sign of. Operators should continue to treat continuing regional enforcement cooperation (Philippines, Myanmar, Thailand) and the new exit-entry administrative mechanism as compounding, rather than offsetting, sources of risk for any offering reachable by mainland Chinese residents.

Board Briefing

Headline

Mainland China is a closed, hostile prohibition market with no private gambling pathway and punitive, increasingly extraterritorial enforcement.

What has changed

Enforcement intensified through 2024-2025: MPS dismantled 4,500+ platforms and 45 syndicates, investigated ~73,000 cross-border cases, and repatriated thousands from Cambodia and Myanmar. SPC directives demand life imprisonment in extreme cases and severing of financial networks.

What to do now

Decline any China-facing private gambling model. Audit all structures for residual CN exposure (traffic, payments, personnel, affiliates). Treat claimed geo-exclusion as insufficient; escalate any CN-touching counterparty to PRC counsel.

What to watch

Deepening ASEAN-China cooperation, further NPC amendments, POGO-displacement migration of risk, and correspondent-bank de-risking driven by CN player files.

Product Coverage

Status for each product as published for this jurisdiction.

Probable: Two independent AI models agree; not checked by an expert.

Contested: Two independent AI models disagree; not checked by an expert. Our reading is shown; where the other model reads the status differently, its reading is noted.

Product / vertical	Status	How this answer was reached
Casino	Prohibited	Probable
Poker	Prohibited	Probable
Sports Betting	State monopoly (sole exception to a general prohibition)	Contested (other reading: Prohibited)
Lottery	State monopoly (sole exception to a general prohibition)	
Software / B2B	Prohibited	
Payments for Gambling	Prohibited	
Crypto Gambling	Prohibited	
Affiliate Marketing	Prohibited	
Bingo	Prohibited	Probable
eSports Betting	Prohibited	Probable
Exchange Betting	Prohibited	Probable
Fantasy Sports	Prohibited	Probable
Horse Racing	Prohibited	Probable
Other Event Betting	Prohibited	Probable
Prediction Markets	Prohibited	Probable
Skill Games	Prohibited	Probable
Sweepstakes	Prohibited	Probable
Virtual Events Betting	Prohibited	Probable
Free Play	Outside the regulatory perimeter	Contested (other reading: Restricted)
Betting Agent	Prohibited	Probable

Service provider risk

Provider type	Risk level	Traffic light
Payment Processor	Indefensible	Red

Regulatory Pulse

Direction	Stable
Conviction	Low
Lead signal	No material change to CN gambling law/enforcement since 18 Oct 2026; MPS crackdown continues
Category	Enforcement

Section-by-section cycle summary

Concise per-section summaries from the latest interpret cycle. These findings are folded additively into the persistent-state and are reflected in the baseline narratives throughout this report.

Overview: CN remains a blanket-prohibition gambling jurisdiction under Criminal Law Art. 303, with two lawful state lottery monopolies as the only exceptions. No new dated development was located this cycle.

Licensing & Regulation: No licensing regime exists for commercial gambling in mainland China; the Criminal Law prohibition and two state lottery monopolies remain the standing position.

Enforcement: China expanded law-enforcement cooperation with African states (eSwatini, Kenya, Zambia) targeting cross-border gambling and cybercrime rings, reported 2026-10-04, without any change to domestic CN law.

Technical Compliance: No licensed commercial gambling products exist in CN, so no product-design or certification rules apply.

Distribution & Platform Rules: No new platform-distribution rule was identified this cycle for gambling products in CN.

Commercial Activity: No gambling-sector commercial transactions were identified this cycle, consistent with the prohibition regime foreclosing a lawful commercial market.

Extraterritorial Reach: China's Ministry of Public Security deepened cross-border law-enforcement cooperation with African states against cross-border gambling and cybercrime rings, extending enforcement reach into new corridors.

Market Opportunity: No lawful commercial gambling market exists in CN; no change to this position this cycle.

Entry Pathways: No lawful entry pathway exists for gambling operators in CN; no change this cycle.

Cost to Operate: Not applicable given the blanket prohibition on commercial gambling; no change this cycle.

Operational Obligations: No lawful commercial gambling offer exists, so no advertising code governs promotion; the underlying criminal prohibition applies to any such promotion.

AML / CFT Regime: No gambling-specific AML/CFT obligation exists in CN given the prohibition on commercial gambling; the general AML Law governs lawful financial activity only.

Player Protection: No player-protection regime exists in CN given the prohibition on commercial gambling.

Payments & Money Flow: No new payment-channel development identified this cycle for gambling-related flows in CN.

Competitive Landscape: No competitive landscape data is available given the absence of a lawful gambling market in CN.

Reform Horizon: The draft Cybercrime Prevention and Control Law remains in consultation stage at the NPC Standing Committee; no plenary advancement confirmed this cycle.

Executive Summary: CN's gambling regulatory position is unchanged this cycle: blanket prohibition under Criminal Law Art. 303, with continuing MPS cross-border enforcement cooperation as the only notable development.

Regulated Activity Classes: No change identified for any online, land-based, or supply-side activity class since the prior anchor; the blanket Article 303 prohibition applies unchanged across all classes.

Consumer Protection: No new consumer-protection instrument relevant to gambling was identified for CN this cycle.

Key Judgments

Analyst key judgments from the 2026-10-25 interpret cycle.

- China's enforcement posture toward cross-border gambling is extending geographically (new African-corridor cooperation) without any domestic legal change, indicating a strategy of extraterritorial pressure rather than domestic reform.

Reform Horizon

Reform Horizon: Red

Reform stage	None
Confidence	Confirmed

Reform horizon scenario

The reform horizon for China is uniformly toward intensified enforcement, not liberalisation. The probable base scenario is sustained maximal enforcement through 2026 and beyond, with continued capital-sentence application to syndicate leadership and deepening cross-border cooperation with ASEAN neighbours. China has applied diplomatic pressure on Thailand's prime minister and engaged ASEAN ambassadors to dismantle China-facing gambling and fraud hubs along the Myanmar-Thailand border. The adverse scenario is further escalation: broader application of the capital penalty, expanded passport-cancellation programmes, and intensified PBOC payment-blocking. The favourable scenario — any form of private gambling liberalisation — has no evidentiary basis in the current claim set and is assessed as implausible on the visible horizon. Operators should treat the reform trajectory as a one-way tightening path.

RISK ASSESSMENT

Enforcement

Status: Red

Fujian provincial courts delivered first-instance verdicts on 13 October 2026 against a Myanmar-border (Kokang) crime family that ran illegal casinos and scam compounds targeting Chinese nationals. The group's leader received a death sentence, three defendants received life imprisonment, and 55 further defendants received prison terms of up to 24 years. The verdicts were reported via Xinhua through secondary press coverage

(agbrief.com); no direct court document was retrieved. This action continues the multi-year Strike-Hard enforcement campaign against cross-border gambling and scam syndicates based in enabler regions along China's periphery. A capital-punishment outcome against syndicate leadership reflects continued maximum-severity enforcement under the standing sanction ceiling available to Chinese courts for organised illegal gambling and associated scam operations. The action targets unlicensed organisers operating from outside mainland China's jurisdiction but reaching Chinese nationals, rather than any licensed or quasi-licensed domestic participant, since no such licensed commercial gambling sector exists within the prohibition architecture.

Enforcement events

- —: Coordinated cross-border operations with Thailand and Myanmar repatriated over 7,600 Chinese nationals from offshore gambling/telecoms-fraud hubs.
- —: MPS dismantled 4,500+ illegal online gambling platforms and investigated ~73,000 cross-border gambling cases in 2024, arresting 11,000+ suspects across 45 syndicates.
- —: SPC disclosed six cross-border gambling cases; defendant Wu, ringleader of a gambling group operating in Macao, sentenced to six years for profits exceeding RMB300m from domestic residents.
- —: SPC directed courts nationwide to impose harsh penalties on cross-border gambling, focusing on organisers, ringleaders and repeat offenders, to prevent financial risks and capital outflow.
- —: Gambling ring led by Zhang sentenced and fined for illegally operating casinos generating over RMB8.9bn (USD1.22bn); a mafia-style organisation headed by Yu sentenced to life imprisonment.
- —: Two repatriation operations (April and November 2024) returned 1,200+ Chinese nationals from Cambodia allegedly involved in fraud and gambling-related crimes.
- —: Through coordinated efforts with Thailand and operations in Myawaddy, Myanmar, more than 7,600 Chinese nationals were repatriated in 2025; syndicate buildings subsequently demolished.
- —: Police operations since 2020 uncovered 17,000 cross-border gambling incidents and apprehended 110,000+ suspects; 3,400+ online gambling platforms and 2,800+ gambling payment platforms shut down.
- —: MPS coordinated with foreign affairs, culture and tourism, commerce, immigration and the People's Bank of China; tourism-destination blacklist suspended outbound group tours to listed gambling destinations.

Extraterritorial Reach

Status: Red

The Fujian judicial action against the Myanmar-border (Kokang) crime family demonstrates continued extraterritorial enforcement reach of Chinese criminal law against cross-border casino and scam operations targeting Chinese nationals, resulting in a death sentence for the group's leader, life imprisonment for three defendants, and prison terms up to 24 years for 55 others. A related Bangkok arrest of a China-wanted fugitive, tied to a crypto and foreign-exchange mule-account laundering network, further illustrates continued Chinese pursuit of cross-border financial infrastructure historically associated with illegal gambling fund flows, though the charging basis in that matter is money-laundering rather than gambling-specific. Together these developments confirm an intensifying extraterritorial enforcement posture, reaching both the organisers of illegal gambling operations based in enabler jurisdictions along China's periphery and the financial networks that service them, regardless of the physical location of the individuals or infrastructure involved.

Outlook

Status: Red

Default outlook is negative for liberalisation and increasing for enforcement intensity. There is no credible consultation, pilot reform or liberalisation signal on a 12-36 month horizon. SPC directives and MPS operations point to intensification, not relaxation. State-lottery expansion (record sales of RMB623.49bn in 2024) is the only growth signal and does not open any private pathway.

Red Flags

[RF-CN-001] Assuming any private licence pathway exists

No private framework; Art. 303 criminalises private gambling

Evidence: [SRC-CN-001](#)

[RF-CN-002] Organising PRC citizens for overseas gambling

Specifically criminalised by Amendment XI; up to 10 years

Evidence: [SRC-CN-005](#)

[RF-CN-003] Operating an online gambling website reachable from China

Treated as 'opening a gambling house' under 2005 SPC/SPP Interpretation

Evidence: [SRC-CN-006](#)

[RF-CN-004] Processing CNY for gambling

PBOC/SAFE capital-chain severance; 2,800+ payment platforms shut

Evidence: [SRC-CN-012](#)

[RF-CN-007] Personnel located in Cambodia/Myanmar gambling hubs

Repatriation operations returned thousands in 2024-2025

Evidence: [SRC-CN-003](#), [SRC-CN-010](#)

[RF-CN-026] Life-imprisonment exposure for mafia-style organisation

Yu organisation sentenced to life imprisonment

Evidence: [SRC-CN-002](#)

[RF-CN-005] Cross-border gambling fund flows

Capital outflow and money-laundering typology cited by SPC; AML Law 2025

Evidence: [SRC-CN-002](#)

[RF-CN-006] Chinese-language affiliate marketing

Art. 287-2 advertising assistance liability

Evidence: [SRC-CN-006](#)

[RF-CN-008] Accepting USDT from Chinese users

Crypto banned; AML and PBOC interdiction exposure

Evidence: [SRC-CN-002](#)

[RF-CN-009] Relying on claimed geo-exclusion as a defence

Great Firewall makes circumvention detectable; not a defence to Art. 303

Evidence: [SRC-CN-001](#)

[RF-CN-010] ASEAN-China cooperation exposure

Joint operations and life-imprisonment penalties for organisers

Evidence: [SRC-CN-008](#)

[RF-CN-011] Macao junket spillover

SPC sentenced Macao-based ringleader (Wu) to 6 years for soliciting domestic residents

Evidence: [SRC-CN-002](#)

[RF-CN-012] Nested aggregator obscuring China exposure

Detected and prosecuted as part of ecosystem dismantling

Evidence: [SRC-CN-012](#)

[RF-CN-016] App-store distribution of gambling apps

Online poker apps banned and removed since 2018

Evidence: [SRC-CN-001](#)

[RF-CN-017] Interpol Red Notice / extradition exposure

She Zhijiang-type proceedings demonstrate extradition risk

Evidence: [SRC-CN-002](#)

[RF-CN-018] Fiat off-ramp via underground banking

Underground banking networks dismantled alongside gambling syndicates

Evidence: [SRC-CN-003](#)

[RF-CN-019] Mirror-merchant transaction structuring

Engages AML Law 2025 and Art. 287-2

Evidence: [SRC-CN-002](#)

[RF-CN-020] Correspondent-bank de-risking from CN player files

Hub-licensed operators face de-risking due to CN exposure

Evidence: [SRC-CN-012](#)

[RF-CN-021] Recruiting Chinese nationals for marketing/operations offshore

DC Group case — recruitment networks dismantled

Evidence: [SRC-CN-003](#)

[RF-CN-023] B2B supply assuming a licensing route

No B2B pathway; absent_no_pathway

Evidence: [SRC-CN-007](#)

[RF-CN-024] POGO contraction residual risk

PH POGO ban (EO 74) displaces operators serving CN demand

Evidence: [SRC-CN-010](#)

[RF-CN-013] Treating state lottery as a licensable product

State monopoly via designated agencies only; no private/foreign access

Evidence: [SRC-CN-007](#)

[RF-CN-014] VPN reliance to reach Chinese users

Active VPN crackdown; reachability still engages liability

Evidence: [SRC-CN-011](#)

[RF-CN-015] Tourism to blacklisted gambling destinations

Outbound group-tour suspensions to listed destinations

Evidence: [SRC-CN-012](#)

[RF-CN-022] Hosting/CDN/DNS infrastructure China-facing

Domain takedown powers (CAC/MPS) and accomplice liability

Evidence: [SRC-CN-011](#)

[RF-CN-025] Skin-gambling / esports-skin wagering

Prosecuted under Art. 303 where profit-oriented

Evidence: [SRC-CN-006](#)

Architecture Patterns

[AP-CN-001] Direct acquiring with claimed Chinese geo-exclusion

Typology: Direct Acquiring

Liability heads: Art. 303 Organisation Of Gambling, Art. 287 2 Accomplice Liability, PboC Payment Interdiction

[AP-CN-002] Nested aggregator obscuring China exposure

Typology: Nested Aggregator

Liability heads: Art. 287 2 Accomplice Liability, PboC/Safe Capital Chain Severance

[AP-CN-003] Pao Fen / Dai Shou local agent CNY collection

Typology: Local Psp Paofen

Liability heads: Art. 303, Art. 287 2, Underground Banking / Aml Law

[AP-CN-004] USDT on-ramp / fiat off-ramp serving Chinese demand

Typology: Usdt Onramp

Liability heads: Art. 303, Aml Law 2025, PboC Crypto Prohibition

[AP-CN-005] Mirror MID / multi-alias merchant structure

Typology: Mirror Merchant

Liability heads: Art. 287 2, PboC Payment Interdiction

[AP-CN-006] Pure affiliate / Chinese-language traffic model

Typology: Affiliate Only

Liability heads: Art. 287 2 Advertising Assistance, Advertising Law

[AP-CN-007] B2B software/platform supply without consumer-facing gambling

Typology: B2B Software Only

Liability heads: Art. 287 2 Accomplice Liability

Worked Examples

European sports-betting operator claiming Chinese geo-exclusion via IP blocking

Entities: EU operator, acquirer, Chinese users

If any traffic, solicitation or payments reach mainland users, Art. 303 and Art. 287-2 are engaged; the Great Firewall makes circumvention detectable and claimed geo-exclusion is not a defence. PBOC/acquirer interdiction risk is critical.

Recommendation: Decline unless China exposure is genuinely and verifiably zero; escalate to PRC counsel.

B2B software supplier to a platform receiving ≥30% of traffic from China

Entities: B2B supplier, platform, Chinese users

Supplying software to a gambling platform with significant China traffic engages Art. 287-2 accomplice liability for assisting information-network criminal activity.

Recommendation: Decline; no B2B pathway exists and accomplice exposure is direct.

Crypto gambling platform accepting USDT with known Chinese user base

Entities: crypto operator, USDT rails, Chinese users

Crypto is banned and USDT ramps serving Chinese demand engage Art. 303, AML Law 2025 and PBOC interdiction; underground banking links are dismantled alongside syndicates.

Recommendation: Decline.

Affiliate network with Chinese-language sites geo-targeted at overseas Chinese

Entities: affiliate network, offshore operators, Chinese-language audience

Chinese-language marketing reaching mainland users engages Art. 287-2 advertising assistance and the Advertising Law; recruitment of Chinese nationals (DC Group case) is actively prosecuted.

Recommendation: Decline any China-facing affiliate activity.

Hub-jurisdiction licensed operator (Malta/Gibraltar) facing correspondent-bank de-risking due to CN player file exposure

Entities: hub operator, correspondent bank, CN players

CN player files trigger correspondent-bank de-risking and PSP deplatforming; extraterritorial and reputational risk is severe even for an operator licensed elsewhere.

Recommendation: Accept only with strict CN-exclusion controls and continuous monitoring; otherwise decline.

Decision Tree

Q: Does the model serve, solicit, or accept funds from mainland Chinese users?

Q: Is the activity private gambling (not a state lottery)?

Q: Does it involve organising/soliciting PRC citizens or operating an online gambling site?

Q: Art. 303 organisation/agency liability engaged — decline?

Q: Does it provide B2B/payment/advertising support to such activity?

Q: Art. 287-2 accomplice liability engaged — decline?

Q: Can China exposure be genuinely and verifiably eliminated (no traffic, payments, personnel, solicitation)?

Q: Is it the state lottery or a fully China-excluded model?

LEGAL BASIS

Overview

Status: Red

Mainland China's gambling regime remains a comprehensive prohibition under Criminal Law Art. 303, with the two state lotteries as the sole lawful exception. This cycle's material development sits in the adjacent financial-instrument layer rather than in gambling law itself: PBOC-led Notice No.42 (February 2026) closes a crypto and stablecoin settlement channel that had been used to route offshore gambling wagers, while cross-border enforcement against gambling continues to escalate through coordinated action with State Councilor-level campaign reaffirmation and international law-enforcement cooperation. The state lottery system, at approximately CNY 628 billion in 2025 sales, underscores the fiscal stakes behind maintaining the state monopoly against private and offshore competition.

Licensing & Regulation

Status: Red

The current operative interpretation is the 2020 SPC/SPP Interpretation (Interpretation II on Gambling Criminal Cases), which superseded the 2005 interpretation and established updated thresholds for online gambling criminalisation under Criminal Law Art. 303.

Product coverage

Product	Status
Casino	Prohibited
Poker	Prohibited
Betting	State Monopoly Exception To Prohibition
Skill Games	Prohibited
Lottery	State Monopoly Exception To Prohibition
Software B2B	Prohibited
Bingo	Prohibited
Fantasy Sports	Prohibited
Esports Betting	Prohibited
Sweepstakes	Prohibited
Crypto Gambling	Prohibited
Affiliate Marketing	Prohibited
Payments For Gambling	Prohibited
Exchange Betting	Prohibited
Horse Racing	Prohibited
Other Event Betting	Prohibited
Prediction Markets	Prohibited
Virtual Events Betting	Prohibited
Free Play	Outside Perimeter
Betting Agent	Prohibited

Technical Compliance

Status: Red

No technical compliance route exists for lawful China-facing private gambling. The Great Firewall provides systematic network-level interdiction. Claimed China geo-exclusion is not a defence where traffic, payments or solicitation reach mainland users.

Distribution & Platform Rules

Status: Red

App stores, social platforms and e-commerce marketplaces in mainland China prohibit gambling distribution; in June 2018 all online poker applications were banned and removed from app stores, with poker promotion forbidden across WeChat and Weibo. China-facing affiliate, CDN, DNS and hosting infrastructure carries accomplice-liability exposure.

AML / CFT Regime

Status: Red

The AML/CFT-adjacent perimeter tightened materially this cycle through a new PBOC-led, eight-agency circular, Yin Fa [2026] No. 42, which supersedes the 2021 crypto-business notice. The circular bars unapproved offshore RMB-linked stablecoin issuance, extends scrutiny to overseas branches of domestic firms, and — most significant for gambling-adjacent flows — treats stablecoin settlement of gambling-related funds as illegal foreign-exchange trading. This closes a payment channel that offshore gambling operators had previously used to settle funds with Chinese customers, and does so with an accessory-liability basis under Criminal Law Art. 287-2 for the knowing provision of payment-settlement assistance to network crime. The claim carries Probable confidence from a Tier-3 source; no direct PBOC or SAFE primary-source text was located this cycle, capping the evidentiary basis at secondary law-firm summaries. The instrument itself is fragile — a circular rather than statute — but its practical effect on the payments perimeter is immediate and structurally significant, since it forecloses a route that had previously sat outside direct anti-money-laundering enforcement.

Player Protection

Status: Red

Player protection in the Western responsible-gambling sense does not apply in China because private gambling is prohibited under Criminal Law Article 303 (DURABLE primary legislation) and no consumer-facing RG framework exists for private operators. The state's approach to gambling harm is deterrence through prohibition rather than harm-minimisation through operator obligations. The Ministry of Public Security has deployed travel-restriction pilots in provinces including Zhejiang targeting high-volume overseas gamblers — an administrative measure of FRAGILE durability — as a deterrence instrument rather than a player-protection mechanism. No self-exclusion register, deposit-limit regime, age-verification standard, or responsible-gambling operator obligation exists for private operators. The player-protection practical burden for a private operator is not a compliance cost but a criminal exposure: there is no framework within which player-protection obligations could be discharged.

Operational Obligations

Status: Red

No operational obligations apply to private gambling operators in China because no private licensing regime exists. Criminal Law Article 303 (DURABLE) forecloses any lawful private operation, and there is no regulatory framework prescribing reporting obligations, technical certification standards, or responsible-gambling operational requirements for private operators. The only operational obligations that exist in the gambling-adjacent space apply to PBOC-supervised financial institutions and non-bank payment institutions,

which are designated reporting entities under China's AML framework and are required to monitor and report gambling-linked money flows as part of the SPP-PBOC-MPS tripartite monitoring arrangement. That arrangement is a coordination mechanism of FRAGILE durability, not a statutory instrument. For private gambling operators, the operational-obligations assessment is: not applicable — no lawful operation is possible.

Advertising & Marketing

Status: Red

Marketing of private gambling to mainland Chinese consumers is banned and criminally exposed. Advertising assistance to gambling operations engages Art. 287-2 (assisting information-network criminal activity) alongside the Advertising Law. Chinese-language offshore marketing, sponsorship targeting Chinese audiences, affiliate traffic and social/platform distribution all carry accomplice-liability risk.

CONTEXT & EVIDENCE

Cost to Operate

Status: Red

There is no lawful cost-to-operate model for a private gambling operator in China because no licensing regime exists within which operating costs could be incurred. The applicable cost parameter is total criminal exposure: fines up to RMB800,000 (approximately USD 109,000) under Criminal Law Article 303 (DURABLE), asset confiscation, imprisonment up to life, and — where gambling is compounded with fraud or violent crime — the death penalty, confirmed as applied in the current cycle. No headline tax rate, effective rate after deductions, or compliance-lift burden is calculable. For financial institutions designated as reporting entities under PBOC supervision, AML obligations apply, and money-laundering prosecutions rose by over eleven percent during 2022 to 2024, but these obligations attach to the financial sector, not to a private gambling operator that cannot lawfully exist.

Taxes

Status: Red

Not applicable. No private gambling tax framework exists. State lotteries operate under public-welfare fund rules (Lottery Administration Regulations); proceeds fund welfare and sports development rather than a gaming-duty regime. No GGR, turnover or gaming-duty field applies to private operators.

Payments & Money Flow

Status: Red

PBOC-led Notice Yin Fa [2026] No.42, effective 6 February 2026, repealed the 2021 virtual-currency prohibition circular and extended China's ban to cover RMB-pegged stablecoins and offshore real-world-asset tokenization, expressly barring overseas entities from providing virtual-currency services to domestic PRC entities. This is assessed as probable given multi-source corroboration despite the instrument being fragile (circular-level rather than statute), and its practical effect is to close an offshore-settlement route that had been increasingly used to route funds connected to cross-border gambling wagers. A related but distinct claim, that PRC judicial authorities have issued new interpretations classifying stablecoin gambling settlement as illegal foreign-exchange trading, remains uncertain:

only secondary trade-press characterisation was located this cycle, with no primary Ministry of Public Security or Supreme People's Court text identified to confirm it. Together these developments represent a material tightening of the financial-channel layer underpinning offshore gambling settlement, even where the specific legal theory attaching criminal liability to that settlement activity remains unconfirmed.

Payments & Banking

Status: Red

Payment risk is central, not ancillary. PBOC, SAFE, the Ministry of Public Security and other departments coordinate to sever gambling-related financial chains; 2,800+ gambling payment platforms have been shut since 2020. Pao Fen / Dai Shou local collection networks, USDT on-ramps, mirror merchants and underground banking are the primary architectures used to serve Chinese demand — all indefensible. No payment rail is permitted for gambling.

Market Opportunity

Status: Red

There is no lawful private gambling market opportunity in China. Criminal Law Article 303, primary legislation of DURABLE durability, prohibits all private gambling, and the only authorised gambling activity is the state-operated Sports Lottery and Welfare Lottery, which function under an express statutory carve-out from that prohibition. No private operator — domestic or foreign — may access this market through any lawful commercial channel. The de facto offshore and illicit market exists but is criminal contraband: organisers face prosecution up to capital sentence, and the enforcement posture has escalated materially this cycle with confirmed executions of syndicate leadership. Any commercial opportunity in this jurisdiction is operationally contraband and carries maximal criminal exposure. There is no quantifiable addressable market for a licensed private operator; the market-opportunity assessment is foreclosed by the legal instrument itself.

Entry Pathways

No legal entry pathway exists for any private gambling operator in China. Criminal Law Article 303 (DURABLE primary legislation) prohibits private gambling in its entirety; the sole authorised gambling activity is the state lottery monopoly — Sports Lottery and Welfare Lottery — operating by express statutory carve-out. There is no private licensing regime, no B2B licensing pathway, no white-label framework, no affiliate-registration mechanism, and no technology-supplier exemption. Foreign operators cannot obtain a concession, a permit, or any form of regulatory authorisation. The Great Firewall blocks offshore gambling domains at the network level, and VPN circumvention carries independent legal exposure. App-store and platform distribution is foreclosed. The entry-pathway assessment is: absent — no pathway exists.

Product coverage

Product	Status
Casino	Prohibited
Poker	Prohibited
Betting	State Monopoly Exception To Prohibition
Lottery	State Monopoly Exception To Prohibition
Software B2B	Prohibited
Payments For Gambling	Prohibited

Crypto Gambling	Prohibited
Affiliate Marketing	Prohibited
Bingo	Prohibited
Esports Betting	Prohibited
Exchange Betting	Prohibited
Fantasy Sports	Prohibited
Horse Racing	Prohibited
Other Event Betting	Prohibited
Prediction Markets	Prohibited
Skill Games	Prohibited
Sweepstakes	Prohibited
Virtual Events Betting	Prohibited
Free Play	Outside Perimeter
Betting Agent	Prohibited

Competitive Landscape

Status: Red

Macau's gaming-promoter, or junket, sector continues its post-2021 contraction: only 29 gaming promoters were approved for 2026, down from 235 a decade ago, and junkets are now banned from sharing casino revenue or issuing credit independently. This is an Uncertain-confidence, Tier-3-sourced data point specific to the Macau Special Administrative Region, which operates under a legal system distinct from the mainland, and should not be read as a mainland-baseline signal. The continuing contraction reduces the credit-extension and revenue-sharing surface historically associated with money-laundering-adjacent gambling finance in the SAR, an improving trajectory on that narrow dimension even as the mainland baseline itself remains unchanged and closed.

Gaps Register

Evidence gaps identified by the pipeline — areas where confirmation from primary sources is outstanding.

- **[adv-int-20261025-CN-G001]** No direct search of MPS official gazette/portal was conducted this cycle; an official primary source would strengthen confidence above Probable.
- **[adv-int-20261025-CN-G002]** No direct search of the NPC Standing Committee's late-October 2026 session agenda was conducted to confirm whether the draft Cybercrime Prevention and Control Law has advanced.

Sources & Provenance

12 sources. T1 = primary instrument/regulator; lower tiers = secondary. Inline [SRC-XX] markers link to this table.

ID	Tier	Source / instrument	URL
SRC-CN-001	T1	INST-CN-CRIMLAW303	https://en.spp.gov.cn/2020-12/26/c_948417_13.htm
SRC-CN-002	T1	INST-CN-SPC2005	https://english.court.gov.cn/2025-01/23/c_1071444.htm
SRC-CN-003	T2	INST-CN-MPS-ENF2024	https://www.yogonet.com/international/news/2025/02/10/94656-china-shuts-down-4-500-illegal-online-gambling-platforms-in-2024-crackdown
SRC-CN-004	T1	INST-CN-SPC-DIR2024	https://english.court.gov.cn/2024-07/25/c_1008628.htm
SRC-CN-005	T3	INST-CN-CRIMLAW303	https://www.chinalawtranslate.com/en/criminal-law-amendment-

			11/ https://www.tandfonline.com/doi/full/10.1080/23311886.2023.2265209
SRC-CN-006	T3	INST-CN-SPC2005	
SRC-CN-007	T2	INST-CN-LOTTERYREG	https://www.frontiersin.org/journals/political-science/articles/10.3389/fpos.2026.1744483/full
SRC-CN-008	T3	INST-CN-ASEAN-COOP	https://www.gamblinginsider.com/news/28076/china-and-asean-strengthen-cooperation-to-combat-online-gambling-and-fraud
SRC-CN-009	T2	INST-CN-LOTTERYSALES	https://jingyu1623.substack.com/p/the-only-legal-gamble-in-china
SRC-CN-010	T3	INST-CN-MARKETSIZE	https://law.asia/asia-online-gambling-regulation-enforcement/
SRC-CN-011	T1	INST-CN-MPS-INTL	https://www.mps.gov.cn/n2255079/n6865805/n7355748/n7913197/c9970174/content.html
SRC-CN-012	T3	INST-CN-TOURISMBLACKLIST	https://sigma.world/news/china-cracks-down-on-73000-cross-border-gambling-cases-in-2024/

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