

Match Fixing and Money Laundering

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Introduction

This chapter, as with many others in this book, is premised on the following: a conspiracy to fix or otherwise manipulate the outcome of a sporting event for profitable purpose. That conspiracy is in turn predicated on the conspirators' capacity to: (a) ensure that the fix takes place as pre-determined; (b) manipulate the betting markets that surround the sporting event in question; and (c) collect their winnings undetected by either the betting industry's security systems or the attention of any national regulatory body or law enforcement agency.

Unlike many of the chapters in this collection, however, this contribution does not focus on the "fix" – part (a) of the above equation. It does not seek to explain how or why a participant or sports official might facilitate a betting scam through either on-field behaviour that manipulates the outcome of a game or by presenting others with privileged inside information in advance of a game. Neither does this contribution seek to give any real insight into the second part of the above equation: how such conspirators manipulate a sports betting market by playing or laying the handicap or in-play or other offered betting odds. In fact, this contribution is not really about the mechanics of sports betting or match fixing at all; rather it is about the sometimes under explained reason why match fixing has reportedly become increasingly attractive as of late to international crime syndicates. That reason relates to the fact that given the traditional liquidity of gambling markets, sports betting can, and has long been, an attractively accessible conduit for criminal syndicates to launder the proceeds of crime. Accordingly, the term "winnings", noted in part (c) of the above equation, takes on an altogether more nefarious meaning.

This chapter's attempt to review the possible links between match fixing in sport, gambling-related "winnings" and money laundering is presented in four parts.

First, some context will be given to what is meant by money laundering, how it is currently policed internationally and, most importantly, how the growth of online gambling presents a unique set of vulnerabilities and opportunities to launder the proceeds of crime. The globalisation of organised crime, sports betting and transnational financial services now means that money laundering opportunities have

moved well beyond a flutter on the horses at your local racetrack or at the roulette table of your nearest casino. The growth of online gambling platforms means that at a click it is possible for the proceeds of crime in one jurisdiction to be placed on a betting market in another jurisdiction with the winnings drawn down and laundered in a third jurisdiction and thus the internationalisation of gambling-related money laundering threatens the integrity of sport globally.

Second, and referring back to the infamous hearings of the US Senate Special Committee to Investigate Organised Crime in Interstate Commerce of the early 1950s, (“the Kefauver Committee”), this article will begin by illustrating the long standing interest of organised crime gangs – in this instance, various Mafia families in the United States – in money laundering via sports gambling-related means.

Third, and using the seminal 2009 report “Money Laundering through the Football Sector” by the Financial Action Task Force (FATF, an inter-governmental body established in 1989 to promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system), this chapter seeks to assess the vulnerabilities of international sport to match fixing, as motivated in part by the associated secondary criminality of tax evasion and transnational economic crime.

The fourth and concluding parts of the chapter spin from problems to possible solutions. The underlying premise here is that heretofore there has been an insularity to the way that sports organisations have both conceptualised and sought to address the match fixing threat e.g., if we (in sport) initiate player education programmes; establish integrity units; enforce codes of conduct and sanctions strictly; then our integrity or brand should be protected. This chapter argues that, although these initiatives are important, the source and process of match fixing is beyond sport’s current capacity, as are the possible solutions.

1. The Link between Money Laundering, Sports Betting and Match Fixing

Focusing first on money laundering; in 2012, a Senior Financial Sector Expert in the IMF’s Legal Department stated bluntly: “Money laundering is an essential component of any profit-making crime, because without laundering, crime really doesn’t ‘pay’” (Ashin, 2012, pp38-39). Money laundering is a process which transforms the proceeds of crime (typically that made from the trafficking of drugs) into assets that appear legitimate in nature e.g., property portfolios, luxury good such as artworks or accounts at reputable banks. While the social cost resulting from drug trafficking is evident, the associated societal cost resulting from the laundering of drug monies is also significant. The laundering of such “dirty” money perpetuates the power and influence of such criminal enterprises by resourcing the bribing and corruption of key political and law enforcement figures and thus it affords such enterprises further protection in carrying out their “trade”. The activity also denies a country’s Finance

Department significant tax revenue; destabilizes and deters legitimate enterprise and investment, and, in extreme cases, finances insurgency and even terrorist activities.

The link between the proceeds of crime and money laundering can be seen clearly in the most recent estimates on illicit financial flows globally. A 2011 United Nations Office on Drugs and Crime (UNODC) meta-analysis of existing estimates has suggested that criminal proceeds are, annually, now close to US\$2.1 trillion or 3.6% of global GDP. The best estimate for the amount available for laundering through the international financial system is the equivalent to 2.7% of global GDP or US\$1.6 trillion yearly (UNODC, 2011, p7). The starkest figures is however that the “interception rate” for anti-money-laundering efforts at the global level remains critically low: only 0.2% of the proceeds of crime laundered via the financial system are seized and frozen (UNODC, 2011, p7).

Gambling platforms of various kinds (from gaming machines to casino gambling to online sports betting exchanges) provide a unique conduit for laundering the proceeds of crime such that they emerge as legitimate business revenue. The characteristics that are most relevant include the following: liquidity is usually high; the cash flow is fluid and easily internationalised online; global sports betting law lacks harmony and enforcement is, in any event, uneven as aggravated by the fact that there is a bewildering array of regulated and unregulated bookmakers available to process bets; gambling winnings in some jurisdictions are tax free and/or can be easily diverted offshore; and the pay-out percentage, relative to investment returns available in other financial services industries, are high (Fielder 2013).

In a 2011 report, SportAccord (a representative body for both Olympic and non-Olympic international sports federations as well as organisers of international sporting events) took especial care to highlight the risks emanating for the last named point above: the high pay out rate. The report reiterated that for organised crime gangs money laundering is a “cost” of doing business, which they have historically struggled to keep to below 30%; consequently, it is unsurprising that given the high pay out rate available in sports betting internet sports betting becomes an extremely attractive means of laundering money.. The payout rate is the average amount won by players as a share of the cumulative amount staked – sometime called the “return to player” rate. Average pay out rates in the sports betting industry have risen from less than 80% 15 years ago to a situation where today online betting companies generally pay out over 92% of total amounts staked. The costs of laundering is thus reduced from 30% to as low as 8% and in turn “gives criminals an interest in both the betting industry and sports organisations” (SportAccord, 2013, p31). Using statistics similar to the UNODC figures given above, SportAccord estimates that sports betting could now be used to launder more than €11,000m worldwide and that the winnings of fixed matches could represent up to €6.8bn or six times more than the total global trade in illegal small arms (SportAccord, 2013, p37).

An interesting illustration of the above points was brought out in the annual report of the US Congressional Executive Commission on China (2013, p190), which assessed

aspects of the gambling industry in Macau, the former Portuguese colony and now a special administrative region of the People's Republic of China. The eight square kilometre peninsula is a powerhouse in the international gambling industry and in 2013 its 35 casinos brought in a record \$45bn (£27.4bn) in takings, up 19% from the previous year. The US Congressional report expressed serious concerns about the lack of law enforcement and regulatory reporting mechanisms to combat the laundering of large amount of money out of mainland China and through a web of gambling promoters and intermediaries known as "junkets". The US Congressional report cited research estimating that a staggering US\$202 billion in ill-gotten funds are channelled through Macau each year (US Congressional Executive Commission on China, 2013, p190, fn49).

To recap, money laundering is an essential component to the further profitization of transnational crime. In a scenario where, according to UN figures, 99.8% of laundered criminal proceeds go unintercepted by law enforcement agencies, it would be unsurprising if gambling was not used as a laundering mechanism and especially as the betting returns can be relatively high in yield. It follows that the temptation for criminal syndicates to enhance the laundering process, and their yields, by fixing the sporting events on which they are betting, must be significant. In turn, it becomes easy to understand why leading international law enforcements agencies such as Interpol constantly remind international sporting bodies that neither the source nor the gravity of the match fixing threat should be underestimated. If international criminal syndicates are so successful at both (a) trafficking drugs, weapons, commodities, wildlife, art and cultural property, human organs and people across borders and (b) laundering the resulting proceeds, then the integrity of sport can also and easily be trafficked and exploited for criminal gain. Indeed, the Secretary General of Interpol has been quoted as saying:

"In recent years, match fixing has become a global problem...It permits organized crime the opportunity to spread worldwide its illegal and violent activities which include murder, extortion and assault and which cause tax revenue and other losses of billions of dollars every year" (Noble, 2013, ppvi-vii).

It must be admitted here that match fixing in sport, although almost always motivated for illegal betting purposes, can and does take place in the absence of money laundering. But equally illegal betting and fixing of sports events can and does, for the reasons previously outlined, lend itself to the laundering of money originating from the proceeds of crime.

The next two sections of this chapter illustrate the following: first, what has been described is not a modern phenomenon because sports betting's facilitation of money laundering and/or the rigging of sporting events has a long and colourful history; and second, that sport's vulnerability as a channel for criminals to launder the proceeds of their illegal activities is not just confined to gambling-related match fixing but has an even wider corruptive base.

2. The Kefauver Committee

In the immediate post-WWII era, and prior to the Korean War's heralding of the Cold War, American public opinion turned/returned to internal matters of concern and particularly about emerging threat of so-called national crime syndicates and the resulting gang warfare in the country's larger cities. While in the pre-War era such gangs made their money from bootlegging or the smuggling of goods such as alcohol; in the post-War era, gambling provided a much more lucrative and safer means of not only committing crime but also laundering its illicit proceeds (Fox, 1989). In 1949, the American Municipal Association an advocacy group representing thousands of municipal authorities across the United States (and known today as the National League of Cities), petitioned the US government to investigate the perceived threat from organised crime and particularly that associated with the Italian immigrant community (US Senate Historical Office 2013, p1). In April 1950, when the body of an assassinated Kansas City gambling kingpin was found in a Democratic Party clubhouse, slumped beneath a large portrait of President Truman, political pressure intensified on the US Congress.

On 3 May 1950, the US Senate established a five-member Special Committee to Investigate Organized Crime in Interstate Commerce. US Senate Resolution 202 of 2 May 1950 facilitated the establishment of a five person committee "authorized and directed to make a full and complete study and investigation of whether organized crime utilizes the facilities of interstate commerce...in furtherance of any transaction which are in violation of the law of the United States...and, if so, the manner and extent which and the identity of the persons firms or corporations by which such utilization is being made, what facilities are being used, and whether or not organized crime utilizes such interstate facilities." The Committee, chaired by Senator Estes Kefauver, then began a 15-month investigation across 14 major US cities in which it interviewed hundreds of witnesses in open session (Wilson, 2011).

Kefauver was of no doubt that the key to the Committee's deliberations, and thus its principal investigative focus, would have to be on what he called "the lifeblood of organised crime": interstate gambling (US Senate Historical Office 2013, p2). Through this "key", Kefauver thought he would unlock a nationwide conspiracy between Mafia families, corrupt politicians and crooked police officers (Moore, 1974). The hearings began in Florida on 28 May 1950 and soon revealed a political and policing culture, and particularly in Miami, that not only tolerated extensive illegal gambling dens in nightclubs, at restaurants and on sidewalk vending stalls (US Senate Special Committee to Investigate Organised Crime in Interstate Commerce, 1950, Hearings, Part 1 and Part 1a), but also crystallized into direct links between illegal bookmaking syndicates and the then governor of the state, Fuller Warren (US Senate Special Committee to Investigate Organised Crime in Interstate Commerce, 1951, Final Report, pp73-76).

The New York hearings were particularly dramatic and focused on the so-called “Prime Minister of the Underworld”, Frank Costello, also known to law enforcement authorities across the United States as the key figure in the nation’s biggest illegal gambling syndicate (US Senate Special Committee to Investigate Organised Crime in Interstate Commerce, 1950, Hearings, Part 18). The evasive raspy-voiced replies from Costello (which later influenced Marlon Brandon’s delivery in *The Godfather*) eventually put Costello in jail for contempt (Wilson, 2011, pp733-734) but more importantly revealed the sophisticated, interlinked nature of organized crime families interests in gambling racketeering and secondary criminality including tax evasion and money laundering (US Senate Special Committee to Investigate Organised Crime in Interstate Commerce, 1951, Final Report, pp.2-73).

Of other interest is that in the early stages of his career in the 1920s and coinciding with the Prohibition era, Costello was closely associated with Arnold Rothstein, the criminal financier widely reputed to have been involved in the 1919 Baseball World Series fix (Katcher, 1994, pp138-149) and also with William “Big” Dwyer who in the 1920s was involved variously as an owner and/or rigger of National Hockey League clubs and matches (Bruno, 2013, pp74-83). Indeed subsequently the experience gained by Kefauver during these hearings was put into good effect a decade later when the Senator led a series of hearings into the then state of professional boxing in the US and the egregious fixing and rigging of championships in that sport under the guise of the Mob-run International Boxing Council (Mitchell, 2009, pp184-191).

Despite the massive public interest generated by the Kefauver Committee’s hearings (the live New York hearings attracted a TV audience of near 30 million viewers) the Committee’s legacy was somewhat disappointing; for instance its principal recommendation, the creation of a federal crime commission was, in effect, vetoed by J Edgar Hoover at the FBI (Moore, 1974, 215). Nevertheless, the Kefauver Committee’s recommendations did present a blueprint as to how cross-border illegal gambling rackets might be confronted. In a specific sense, Kefauver correctly identified that the illegal “bookie” empire, as he called it, had “two vulnerable points within reach of [US] Congress’ power over interstate commerce: the essential flow of specialized gambling information to the bookmaker [over interstate] wire services, and this dependence on interstate [communication] facilities in placing lay-off and come-back bets” (US Senate Special Committee to Investigate Organised Crime in Interstate Commerce, 1951, Final Report, p88). The Committee drafted legislative bills to strike at these points and, although never introduced, they remain instructive because today international criminals make similar use of the opportunities offered by the global, online financial system as powered by sophisticated computerised data processing and utilising offshore tax havens and legitimate investment fund accounts.

Almost a decade later, the Kennedy Administration in the US in 1960 did to some extent pick up on the recommendation of the Kefauver Committee by way of the Federal Wire Act of 1961 (18 U.S.C. ch. 50 §1081 et seq.). That Administration recognised that that interstate gambling by electronic means was effectively

underwriting large scale criminal activity in the US (Schwartz, 2010). The Act sought to target such activity in the following manner:

“Whoever being engaged in the business of betting or wagering knowingly uses a wire communication facility for the transmission in interstate or foreign commerce of bets or wagers or information assisting in the placing of bets or wagers on any sporting event or contest, or for the transmission of a wire communication which entitles the recipient to receive money or credit as a result of bets or wagers, or for information assisting in the placing of bets or wagers, shall be fined under this title or imprisoned not more than two years, or both.”

Nevertheless, as the Kefauver Committee had also realised, criminal prohibitions such as the above were a rather blunt and ineffective means of combating interstate economic conspiracy such as that involving illegal gambling. A package of legal remedies was necessary including civil law actions and licensing regimes. Arguably therefore the long term legacy of the Kefauver Committee can be seen in the Organized Crime Control Act of 1970 (better known as Racketeer Influenced and Corrupt Organizations or RICO Act of 1970, 18 U.S.C. ch. 96 § 1961 et seq) a celebrated United States federal law that provides for extended criminal penalties and a civil cause of action for acts performed as part of an ongoing criminal organization and aims to eradicate organized crime by attacking the sources of its revenue, such as illicit gains and laundering of monies through gambling or bookmakers. Moreover, section 224 of the Act was one of the first statutory provisions worldwide specifically to target sports bribery:

“Whoever carries into effect, attempts to carry into effect, or conspires with any other person to carry into effect any scheme in commerce to influence, in any way, by bribery any sporting contest, with knowledge that the purpose of such scheme is to influence by bribery that contest, shall be fined under this title, or imprisoned not more than 5 years, or both....As used in this section – The term “sporting contest” means any contest in any sport, between individual contestants or teams of contestants (without regard to the amateur or professional status of the contestants therein), the occurrence of which is publicly announced before its occurrence...”

In sum, the most enduring element of the collective Kefauver hearings was twofold. First, it gave the US public “its first glimpse into the shadow economy of the underworld” and the figures were staggering: the Kefauver committee estimated conservatively that the annual illegal gambling take in the US in the early 1950s was between \$15-20 billion which was about 10% more than the total federal budget on military spending at the time (Russo, 2001, 270). Second, the Kefauver hearings also revealed an ingrained ethos of corruption in sport nationally. In the 1960s, when, as previously mentioned, Kefauver returned to sport in a series of Congressional hearings on the state of professional boxing, he revealed a sport that was an administrative and structural mess (US Senate Committee on the Judiciary, 1960).

Corruption and outright criminality was rife, as indexed against poor governance and accountability in key self-regulatory aspects of the sport as aggravated by political and even law enforcement authorities nationwide. Again, the lifeblood of this sports-related crime syndicate in boxing, manifesting itself in the widespread rigging of championship bouts, was gambling.

3. Money Laundering through the Football Sector by the FAFT

In July 2009, the Financial Action Task Force published a major study on money laundering through the professional football industry (FAFT 2009). The study claimed that money laundering through the football sector was “deeper and more complex than previously understood” (FAFT, 2009, p4) and highlighted weaknesses in football’s governance structures which made it attractive to criminal syndicates and including: private equity investment in or sponsorship of football clubs; third party ownership of the players’ economic rights; unregulated agents manipulating the transfer market; and tax evasion by way of the exploitation of players’ image.

The FAFT Report also highlighted sports betting as an area susceptible to money laundering (FAFT, 2009, pp24-25). In this, the FAFT Report made four points of interest.

First, it noted a matter that is sometimes underplayed in the debate on illegal betting and match fixing: sport has always had an “ambiguous” and even interdependent relationship with betting. The FAFT Report pointed out that betting has historically been an important revenue source for sport in many countries (through, for instance, state imposed betting tax levies redirected to sport’s benefit). Indeed for some sports e.g., horse racing, betting is the sport’s *raison d’être*. In a more modern sense, as traditional sources of sponsorship for sport (such as tobacco and drinks companies) have been prohibited from being commercially associated with sport on public health grounds, sports betting companies have filled the gap left on a club’s jersey. The potential conflict of interest here is a matter that needs further debate. In the same year as the FAFT was published the Court of Justice of the European Union observed as follows Case C-42/07 *Liga Portuguesa de Futebol* [2009] ECR I-7633 at para [71]:

“Moreover the possibility cannot be ruled out that an operator which sponsors some of the sporting competitions on which it accepts bets [the stated case involved Bwin, a well-known European based on-line gaming undertaking and significant sponsor of football, basketball and motor sport clubs and competitions], and some of the teams taking part in those competitions may be in a position to influence their outcome directly or indirectly and thus increase its profits.”

The second point of interest is that the FAFT Report admitted the while problems linked to betting on sport “are not new”, the increasingly transnational nature of the betting industry and the “use of the Internet for online betting further increase the risk of money laundering” (FAFT, 2009, p24). In this, the FAFT reiterated a point made

earlier in this chapter: the attractiveness of the gambling markets to criminals as a means of money laundering (and concomitantly the difficulties in combatting it) must be seen in context and namely that the global gambling market is largely a non-transparent and heterogeneous market with a mix of private and state companies acting both nationally and internationally and with varying degrees of regulation ranging from the liberal to the prohibitionist and frequently operating online and offshore or both. The hotchpot nature of the global gambling industry means that proposals for a World Anti-Corruption Agency along the lines of the World Anti-Doping Agency's remit (that of harmonising anti-doping policies in global sport) is distractingly ambitious.

The third point of interest is that the FAFT focused on the involvement of Asian criminals and the region's gambling markets as a source of illegal football betting. In this regard, the FAFT report highlighted the successful actions of Interpol in combating illegal gambling activities of criminal syndicates in Asia – collectively called “Operation Soga”. According to Interpol's “Integrity in Sport” website, as of 2013, the four Soga operations since 2007 have resulted in 2,360 successful raids and the closure of illegal gambling dens which handled illegal bets worth more than USD 2 billion; and the seizure of more than US\$27 million in cash from illegal gambling operators.

The final point of interest from the FAFT report is the view that “illegal football gambling does not necessarily only involve Asian criminals. On the contrary, most of the Asian bookmakers are professional and well organised companies with a lot of expertise in the field” (FAFT, 2009, p25). Problems arise because such bookmakers rarely deal directly with large, criminally exposed punters, but only by means of a network of intermediaries. This network can stretch from criminal syndicates based in Asia to gangs based in Eastern Europe who in turn target players and clubs for fixing purposes. This is an important point. Some commentators are dismissive of any hope of confronting the match fixing threat to sport because they say it emanates from the unregulated Asian gambling markets and yet it must be remembered that Asian bookmakers, although not as tightly supervised as those in European jurisdictions, are not operating in a totally “hidden market”. Many, in jurisdictions such as Singapore, operate openly and professionally. It is the criminal, shadowy web of intermediaries wherein lies the problem (Hill, 2008, 2013).

Conclusion: If Sport goes it alone, it will fail

Transnational organised crime gangs operate within the abovementioned web of gambling intermediaries, and these gangs have identified sports organisations as providing excellent cover for their activities (SportAccord, 2013, p34 and Australian Crime Commission, 2011 and 2013): sports organisations and players generally have a good public image and therefore investment in a club presents both money and/or “image” laundering opportunities for criminals; sports bodies sometimes suffer from intrinsic structural and governance fragilities and are either weak in international organisation (e.g., professional boxing) or, with unnecessary fierceness, protect their

domestic regulatory independence and hence seek to operate outside the norms of domestic public law (e.g., football) despite receiving millions in public monies to facilitate large scale international sport events. In sum, this means that sometimes there is less transparency and fewer controls in the close-knit regulatory landscape of international sport (Transparency International, 2009).

Moreover, and at both a national and international level, sports governing bodies are only now beginning to operate in a collective, consensual manner to address this integrity threat to sport and thus at present there are markedly differing levels of integrity oversight in professional sport. In addition, transnational organised crime syndicates, experienced in the trafficking of narcotics, are aware that individual, aspiring professional athletes, many of whom lack significant formal education, may be susceptible to exploitation. Many young athletes are not well represented, if at all, by their (un)regulated agents. Meaningful, representative player unions do not exist in some sports and thus some athletes are vulnerable to being “groomed” as “gambling mules” for future criminally-related betting scams.

With specific regard to money laundering and match fixing but also to the match fixing in sport debate more generally, sport should look to external expertise and should do so in three ways.

Recommendations

Recommendation 1: corruption and poor governance reflected in opaque accountability and transparency standards in administrative bodies is not the sole preserve of sport; neither are transnational criminal offences involving large scale, criminal syndicates. Corruption in the public sector and corruption relating to transnational economic crime has been widely analysed and in this the applicability of anti-money laundering measures in, for instance, international legal instruments such as United Nations Convention against Transnational Organized Crime and the United Nations Conventions against Corruption should be given greater consideration (UNODC & IOC, 2013).

Recommendation 2: money laundering through gambling outlets results in financial and credibility detriment to gambling companies and the industry’s regulators. Consequently both have advanced means of tracking and mitigating the money laundering threat, which could be usefully adapted to sport’s needs e.g., see the anti-money laundering guidelines of the Remote Gambling Association (a London & Brussels-based trade association whose membership are all licensed for gambling purposes in Europe and includes most of the world’s largest and most respected Internet gambling companies) and the guidance provided by the UK Gambling Commission on anti-money laundering initiatives. Both are examples of best practice (RGA, 2010 and UK Gambling Commission, 2013).

Recommendation 3: this brief chapter argues that match fixing in sport should be placed firmly within the international discourse on transnational financial services

fraud. This would not, as some might have it, unnecessarily conflate or exaggerate the seriousness of match fixing in sport; rather the recognition of the true global extent of match fixing in sport would be the first necessary step in the fight back by sport against the fixers. It would allow sport access (a) the anti-corruption research (funded by entities such as the EU Commission (2011, para 4.5)), the resources (that can be brought to bear by organisations such as the aforementioned UNODC); and (b) the expertise available at inter-governmental level (epitomised by that carried out by FAFT and Interpol) that already exists in this area. Crucially, by properly describing match fixing in sport as being characteristic of the opportunism of transnational organised crime syndicates, this might also help explain at governmental level how the integrity threat to sport is not just something that narrowly concerns the insularity or specificity of sport but is also one that necessitates wider societal concern and deeper investigative resourcing.

Finally, on 12 May 2016, the then UK Prime Minister David Cameron hosted a landmark international anti-corruption summit in London, which sought to “galvanise” a global response to tackle corruption across a range of areas and including corporate secrecy, government transparency, the enforcement of international anti-corruption laws, and the strengthening of international institutions (Anti-Corruption Summit: London 2016). One of the areas included was sport and in the Conference’s subsequent Communiqué, paragraphs 23-24 stated the following, which encapsulated much of what this piece has attempted to address. The outworkings of this communicate and its commitments, notably an International Sport Integrity Partnership, are awaited with interest.

“[23] There is no place for corruption in Sport. High-level corruption in sports administration, match fixing, procurement, endorsement deals, site selection, illegal betting and doping, and the involvement of organised crime, have damaged the credibility of sporting bodies. They must be decisively addressed through a coordinated response. We welcome the work of the international sports organisations to strengthen openness and improve governance so that they meet global best practice. We urge them to achieve the highest global standards and regain public trust through a culture of good governance. We recognise the autonomy of international sports organisations conferred under national laws. We believe this must be exercised responsibly and be earned by continually demonstrating good governance in a spirit of openness.

[24] We welcome the discussions, bringing together international sports organisations, governments and relevant international organisations with other stakeholders leading up to the summit, to help tackle corruption in sport. We also welcome the intention to launch an International Sport Integrity Partnership (in the margins of a meeting of the International Forum for Sport Integrity in Lausanne in early 2017). We will work with international sports organisations and other key stakeholders to support and strengthen efforts to implement high standards of transparency and good governance, and to

underpin the wider fight to eliminate corruption from sport. We will encourage good governance within national sports organisations (including through educational and capacity building initiatives) and improve information sharing between international sports organisations and law enforcement agencies. We will take legislative or other measures to combat practices such as match-fixing, illegal betting and doping, and will put in place measures to protect 'whistleblowers' from discriminatory and retaliatory actions. We will consider extending the definition of Politically Exposed Persons to include senior members of international sporting federations. International organisations will assist by taking action, such as developing codes of best practice and accountability frameworks for individual institutions, and by supporting the development of international legal frameworks.

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