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The International Comparative Legal Guide to:

Gambling 2018

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A practical cross-border insight into gambling law

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Mexico

Begoña Cancino



Sofia Castañón



Creel, García-Cuéllar, Aiza y Enríquez, S.C.

1 Relevant Authorities and Legislation

1.1 Which entities regulate what type of gambling activity in your jurisdiction?

In Mexico, the General Bureau of Gaming and Raffles (the "Bureau") of the Ministry of Internal Affairs (the "Ministry") is the administrative body in charge of regulating, licensing, monitoring and the surveillance of gambling and gaming matters.

The only authorised gaming activities in Mexico are chess, dominoes, bowling, billiards, races (of persons, vehicles or animals), sports and raffles. All other games not mentioned are considered prohibited. Additionally, all betting games and raffles transactions must be prior authorised by the Ministry in terms of the applicable law and its regulations and shall be made in Mexican pesos. Games and raffles occasionally carried out within private homes for avocation purposes by family and friends are not governed by the Law.

1.2 Specify all legislation which impacts upon any gambling activity (including skill, prize competitions and draws, fantasy, egaming and social games), and specify in broad terms whether it permits or prohibits those activities.

In Mexico, gambling and gaming matters are governed by: (i) the Federal Gaming and Raffles Law (the "Law"); and (ii) Regulations of the Federal Gaming and Raffles Law (the "Regulations").

Pursuant to the Political Constitution of the United Mexican States, gambling and gaming activities are considered federal matters; thus, their legislation is reserved for the Mexican Congress. This means that the Law and its Regulations are applied across all Mexican territory.

In addition, other laws or regulations may apply to this matter, such as the Federal Consumer Protection Law, the Federal Law on Protection of Personal Data in Possession of Private Entities, the General Health Law, and federal and local Mexican Tax Laws.

As a general rule, gambling is a forbidden activity in Mexico. Any betting games and raffles transactions must be prior authorised by the Ministry; thus, the Bureau only has the authority to grant gambling and raffles permits: i) for opening and operating horse race betting, greyhound racetracks, frontons, and for setting remote betting centres; ii) for opening and operating fairs; iii) for opening and operating temporary off-site horse races and cockfighting betting; and iv) for holding and organising any of the regulated types of raffles. According to the Bureau's criteria, any other gambling activity not specifically provided by the Law would be unauthorised and rejected for lack of legal grounds.

2 Application for a Licence and Licence Restrictions

2.1 Who can apply for a licence to supply gambling facilities?

Exclusively Mexican entities – commercial companies duly constituted under Mexican Laws – can apply for a licence to install gambling facilities.

2.2 Who or what entity must apply for a licence or authorisations and which entities or persons, apart from an operator, need to hold a licence? Are personal and premises licences needed? Do key suppliers need authorisation?

Exclusively Mexican entities can apply for licences from the Bureau.

However, a Mexican entity with a physical establishment and a permit to install a gambling facility (the "Permit Holder") may partner with a non-licensed entity, even foreigners, for the use of its permit through a joint venture or any other association or type of agreement, prior authorisation from the Bureau, and only when such agreement/partnership does not allow the partner to (i) acquire corporate or administrative control, (ii) become a beneficiary of the Permit Holder, or (iii) assign the operation of the betting centre to third parties.

Premises authorisations are granted through municipal permits, and not by the Bureau.

Furthermore, the Bureau must authorise any advertisement and marketing over gaming activities, betting and raffles, shareholder structure modifications of the Permit Holder, changes in location of establishments, gaming operation system and the data infrastructure to be used in the facilities, among others.

2.3 What restrictions are placed upon any licensee?

In addition to the restrictions set forth in the Regulations, additional restrictions may be established on a particular permit.

To abstain from operating other gambling games and raffles rather than those explicitly authorised by law and/or permits, to abstain from assigning, transferring or selling the permit, to abstain from

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giving credit to players/gamblers, to abstain from installing casinos within 200 metres of an educational institution or religious centre, to abstain from allowing the admission of underage players or people under the influence of alcohol or drugs into the establishments, to forbid the shareholders of the Permit Holder to be individuals or legal entities resident in territories with tax advantages or jurisdictions with low tax rates, to forbid the acquisition of shares of the Permit Holder, directly or indirectly, through trusts, as well as particular advertisement restrictions, are some of the most common restrictions imposed on Permit Holders or licensees.

2.4 What is the process of applying for any gambling licence or regulatory approval?

Applications to request a gambling permit must be filed before the Bureau through the official process and include the following information and documentation:

a. name, nationality and address;
b. property and financial statements;
c. *curriculum vitae*;
d. professional or patrimonial links with other Permit Holders, shareholders, advisors, beneficiaries or staff members;
e. an affidavit stating they have no criminal record or history of bankruptcy; and
f. a credit report from a credit information company.

Legal entities must additionally file:

a. a copy of the incorporation deed, as well as all modifications;
b. balance sheets and statements of income;
c. a certified copy before a notary public of the act whereby the relevant corporate body of the legal entity has authorised the investment in the company requesting the permit;
d. a list of names, nationalities and addresses of the members of the board of directors and statutory auditor;
e. a list of shareholders; and
f. the identity of the final beneficiaries.

The Bureau may take up to three months to grant or reject the application, and may request additional information or documentation. Every granted permit will be published on the Bureau's webpage and will be publicly available.

2.5 Please give a summary of applicable time limits and potential for expiry, review revocation and nullification.

Permits for opening and operating horse race betting, greyhound racetracks, frontons, and for setting remote betting centres will be granted for a minimum validity of one year and a maximum of 25 years. These permits may be extended for subsequent 15-year periods, prior authorisation from the Bureau.

Permits for opening and operating fairs, as well as for opening and operating temporary off-site horse races and cockfighting betting will be granted for a maximum validity of 28 days, or the authorised period, as applicable.

Permits for holding and organising raffles will be granted for a maximum validity of one year.

Permits will lose validity: (i) at the end of the validity period; (ii) at the end of the event, as applicable; (iii) by revocation; (iv) in case of entities, insolvency, dissolution, liquidation or extinction of the permittee; and (v) in case of individuals, insolvency or death of the Permit Holder.

Any infringement of the provision of the Law, such as the transfer of the permit, the non-compliance with the object established in the permit, the non-compliance of stated operation deadlines, or the substantial modification of the terms and conditions of the authorised gambling and gaming activities, may cause the revocation of the permit and the permanent closure of the facility, if applicable. All causes of revocation shall be stated on the permit.

2.6 By product, what are the key limits on providing services to customers? Please include in this answer the material promotion and advertising restrictions.

- The admission of underage players or people under the influence of alcohol or drugs into the facilities shall not be allowed.
- Gaming equipment may only be leased or sold to authorised Permit Holders, operators and establishments.
- All bets must be made in the national currency (pesos).
- Establishments are not allowed to grant credit to participants.
- The permit may contain specific advertisement requirements for the gambling activities, such as the indication that only individuals older than 18 may participate in those gaming or betting activities, the obligation to abstain from explicitly promoting bets placed on gambling facilities, the obligation to abstain from using advertisements that may cause confusion to consumers, and the obligation to include the relevant permit number.

2.7 What are the tax and other compulsory levies?

The following taxes apply to gambling activities in Mexico:

i) General Bureau of Gaming and Raffles Fees. Within the permit, a licence fee has to be paid to the Ministry, in amounts that range from 1% to 2% of their income, depending on the origin of the bet and their permits.
ii) Income Taxes (*Impuesto Sobre la Renta* – "ISR"). Every individual or entity with a permanent establishment in Mexico must pay an Income Tax for all their income, at an approximate range of 30% for legal entities minus authorised deductions over expenses.
iii) Special Production and Services Tax (*Impuesto Especial Sobre Producción y Servicios* – "IEPS").
iv) Local and State Taxes (depending on the state and location). Some Mexican states impose additional taxes to casino users, such as value added tax (*Impuesto al Valor Agregado* – "IVA").

2.8 What are the broad social responsibility requirements?

The prevention of gambling addiction, money laundering and criminal acts committed through authorised establishments or through the black market.

Gambling services providers' social responsibilities are mainly towards the advertisement of gambling activities, through the non-allowance and non-promotion of underage individuals participation in such activities, and inviting individuals through advertisements to game and bet in a responsible and healthy way and always with the main purposes of entertainment, leisure and recreation.

All gambling personnel have to receive special training and, as stated in the answer to question 2.2, must comply with particular requirements set forth in the Law and Regulations to be able to

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provide professional services involving brokerage, betting crossing or fronton quartermaster.

In addition, the Bureau collaborates with the National Commission against Addictions (CONADIC) and the National Center for the Prevention and Control of Addictions of the Ministry of Health for the prevention and treatment of gambling addictions.

2.9 How do any AML, financial services regulations or payment restrictions restrict or impact on entities supplying gambling? Does your jurisdiction permit virtual currencies to be used for gambling and are they separately regulated?

Gambling activities are considered "Vulnerable Activities" pursuant to Mexican legislation; thus, gaming service providers and gambling Permit Holders and operators are required to comply with the regulations provided in the following laws, among others:

i) the Federal Law on the Prevention and Identification of Transactions with Funds from Illegal Sources (the "Anti-Laundering Law");

ii) the Regulations to the Federal Law on the Prevention and Identification of Transactions with Funds from Illegal Sources; and

iii) the General Rules referred to by the Federal Law on the Prevention and Identification of Transactions with Illegal Resources.

Pursuant to the Anti-Laundering Law, the execution of gambling and raffle activities, as well as the sale of tickets or tokens for such purpose, obliges the Permit Holders to identify every client and user involved and verify their identity, accept requests from the involved clients regarding information about the business owner, protect information about the Vulnerable Activity and avoid the loss of this information, allow verification visits to related authorities and give notice to the applicable authority when any of the aforementioned activities exceeds approximately $2,500.00 USD.

All betting games and raffles transactions must be made in Mexican pesos. Thus, virtual currencies are not permitted for gambling.

3 The Restrictions on Online Supply/ Technology Support/Machines

3.1 Does the law restrict, permit or prohibit certain online activity and, if so, how?

Pursuant to the Regulations, online betting over authorised gaming activities are permitted; however, online betting is only regulated with respect to online bets received by entities which already have an authorisation from the Bureau, which have a physical establishment in Mexico, and which carry out authorised betting and gaming activities.

For such purposes, these activities may be carried out at racetracks, dog tracks, frontons, fairs or remote betting centres (*centros de apuestas remotas*). Remote betting centres are establishments authorised by the Ministry to hold and operate betting data of sports competitions, events and games permitted by the Law, carried out in Mexico or abroad which may be broadcasted in time. Such remote betting centres are also allowed to place online bets with respect to sport events.

Yet, pursuant to the Regulations, a remote betting centre may receive and match bets, provided, however, that it does not receive and/or match bets from or contained at remote betting centres located abroad.

Furthermore, the Law and Regulations do not provide any specific prohibitions/provisions for gaming and betting via the Internet, when offered from an entity that is not related to an establishment authorised to install a remote betting centre, either foreign or Mexican.

3.2 What other restrictions have an impact on online supplies?

In Mexico, (i) there are no specific legal provisions applicable to gaming and bets via the Internet when offered from a foreign-based or local operator, (ii) the Law and its Regulations are silent as to a Mexican person placing online bets by any means, and (iii) Mexican law principles state that private parties are authorised to execute any kind of transaction when not specifically prohibited by Mexican law.

The legislative omission regarding independent online gaming which involves betting leaves unclear the permission or prohibition over such online supplying of gambling services. Thus, the loophole in the Law and its Regulations on this matter is covered by legislation applicable to other related matters.

3.3 What terminal/machine-based gaming is permitted and where?

Gambling machines and terminals are only permitted in physically established gambling facilities. Additionally, they shall be formally identified and in compliance with Mexican Official Standards ("NOMs").

Activities conducted with machines, whereby individuals bet by inserting coins, tokens or electronic devices, subject to chance and with the purpose of obtaining a prize, are also allowed.

4 Enforcement and Liability

4.1 Who is liable for breaches of the relevant gambling legislation?

The relevant Permit Holder and its operator, if applicable. Furthermore, in Mexico, legal entities are criminally liable for crimes committed on their behalf, in their name, for their exclusive benefit, by their legal representatives and/or administrators. On the other hand, directors or legal representatives of the Permit Holder may be liable for breaches made by the relevant entity.

4.2 What is the approach of authorities to unregulated supplies?

As stated in question 3.2, the lack of an updated gambling regulation is currently being covered by legislation applicable to other related matters, such as Criminal or Commercial Law. In this sense, any bad practice in the provision of gambling services in Mexico could be subject to sanctions imposed by other matters such as data and consumer protection, anti-bribery, commercial or criminal matters (i.e. electronic fraud, which would be managed and prosecuted by the Attorney General's Office).

4.3 Do other non-national laws impact upon liability and enforcement?

No, they do not.

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4.4 Are gambling debts enforceable in your jurisdiction?

No. The Regulations provide specifically that Permit Holders may not grant credit, directly or indirectly, to bettors in betting games or raffle participants, on the development of their permit-related activities.

5 Anticipated Reforms

5.1 What (if any) intended changes to the gambling legislation/regulations are being discussed currently?

Since 2014, there is a proposal to substantially amend the betting and gambling Law – *dated from 1947* – and, as a consequence, the complete gambling legal framework in Mexico. In general, such amendment proposes a new law aligned with technological advances, innovative business and communication models, and centred on the individuals and their freedom of leisure.

In particular, it proposes to incorporate the National Institute of Games and Raffles as a new gaming regulator and autonomous authority, introduce the obligation for all personnel to be certified by such Institute, and properly introduce online gaming.

Unfortunately, to date, such proposal remains unapproved and seems unlikely to be approved within 2018.

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