



INTERNATIONAL LAW  
JOURNAL

---

**WHITE BLACK  
LEGAL LAW  
JOURNAL**  
**ISSN: 2581-  
8503**

**Peer - Reviewed & Refereed Journal**

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

[WWW.WHITEBLACKLEGAL.CO.IN](http://WWW.WHITEBLACKLEGAL.CO.IN)

### **DISCLAIMER**

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Editor-in-chief of White Black Legal – The Law Journal. The Editorial Team of White Black Legal holds the copyright to all articles contributed to this publication. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of White Black Legal. Though all efforts are made to ensure the accuracy and correctness of the information published, White Black Legal shall not be responsible for any errors caused due to oversight or otherwise.

WHITE BLACK  
LEGAL

## **EDITORIAL** **TEAM**

### **Raju Narayana Swamy (IAS ) Indian Administrative Service** **officer**



Dr. Raju Narayana Swamy popularly known as Kerala's Anti Corruption Crusader is the All India Topper of the 1991 batch of the IAS and is currently posted as Principal Secretary to the Government of Kerala . He has earned many accolades as he hit against the political-bureaucrat corruption nexus in India. Dr Swamy holds a B.Tech in Computer Science and Engineering from the IIT Madras and a Ph. D. in Cyber Law from Gujarat National Law University . He also has an LLM (Pro) ( with specialization in IPR) as well as three PG Diplomas from the National Law University, Delhi- one in Urban Environmental Management and Law, another in Environmental Law and Policy and a third one in Tourism and Environmental Law. He also holds a post-graduate diploma in IPR from the National Law School, Bengaluru

and a professional diploma in Public Procurement from the World Bank.

### **Dr. R. K. Upadhyay**

Dr. R. K. Upadhyay is Registrar, University of Kota (Raj.), Dr Upadhyay obtained LLB , LLM degrees from Banaras Hindu University & Phd from university of Kota.He has succesfully completed UGC sponsored M.R.P for the work in the ares of the various prisoners reforms in the state of the Rajasthan.





## **Senior Editor**

### **Dr. Neha Mishra**



Dr. Neha Mishra is Associate Professor & Associate Dean (Scholarships) in Jindal Global Law School, OP Jindal Global University. She was awarded both her PhD degree and Associate Professor & Associate Dean M.A.; LL.B. (University of Delhi); LL.M.; Ph.D. (NLSIU, Bangalore) LLM from National Law School of India University, Bengaluru; she did her LL.B. from Faculty of Law, Delhi University as well as M.A. and B.A. from Hindu College and DCAC from DU respectively. Neha has been a Visiting Fellow, School of Social Work, Michigan State University, 2016 and invited speaker Panelist at Global Conference, Whitney R. Harris World Law Institute, Washington University in St.Louis, 2015.

### **Ms. Sumiti Ahuja**

Ms. Sumiti Ahuja, Assistant Professor, Faculty of Law, University of Delhi,

Ms. Sumiti Ahuja completed her LL.M. from the Indian Law Institute with specialization in Criminal Law and Corporate Law, and has over nine years of teaching experience. She has done her LL.B. from the Faculty of Law, University of Delhi. She is currently pursuing Ph.D. in the area of Forensics and Law. Prior to joining the teaching profession, she has worked as Research Assistant for projects funded by different agencies of Govt. of India. She has developed various audio-video teaching modules under UGC e-PG Pathshala programme in the area of Criminology, under the aegis of an MHRD Project. Her areas of interest are Criminal Law, Law of Evidence, Interpretation of Statutes, and Clinical Legal Education.



### **Dr. Navtika Singh Nautiyal**

Dr. Navtika Singh Nautiyal presently working as an Assistant Professor in School of law, Forensic Justice and Policy studies at National Forensic Sciences University, Gandhinagar, Gujarat. She has 9 years of Teaching and Research Experience. She has completed her Philosophy of Doctorate in 'Intercountry adoption laws from Uttranchal University, Dehradun' and LLM from Indian Law Institute, New Delhi.



### **Dr. Rinu Saraswat**

Associate Professor at School of Law, Apex University, Jaipur, M.A, LL.M, Ph.D,

Dr. Rinu have 5 yrs of teaching experience in renowned institutions like Jagannath University and Apex University. Participated in more than 20 national and international seminars and conferences and 5 workshops and training programmes.

### **Dr. Nitesh Saraswat**

E.MBA, LL.M, Ph.D, PGDSAPM

Currently working as Assistant Professor at Law Centre II, Faculty of Law, University of Delhi. Dr. Nitesh have 14 years of Teaching, Administrative and research experience in Renowned Institutions like Amity University, Tata Institute of Social Sciences, Jai Narain Vyas University Jodhpur, Jagannath University and Nirma University.

More than 25 Publications in renowned National and International Journals and has authored a Text book on Cr.P.C and Juvenile Delinquency law.



### **Subhrajit Chanda**

BBA. LL.B. (Hons.) (Amity University, Rajasthan); LL. M. (UPES, Dehradun) (Nottingham Trent University, UK); Ph.D. Candidate (G.D. Goenka University)

Subhrajit did his LL.M. in Sports Law, from Nottingham Trent University of United Kingdoms, with international scholarship provided by university; he has also completed another LL.M. in Energy Law from University of Petroleum and Energy Studies, India. He did his B.B.A.LL.B. (Hons.) focussing on International Trade Law.

## ***ABOUT US***

WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal providededicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

# **THE LEGAL LANDSCAPE OF SPORTS CONTRACTS AND BETTING IN INDIA: EVOLUTION AND CHALLENGES**

AUTHORED BY - SRI HARI CHARAN

School of Law CHRIST (deemed to be university)

## **ABSTRACT**

This article explores the issue of sports contracts, betting, and games of chance in India. It examines the legal and relevant regulatory framework which governed sports contracts from their emergence as informal contracts to the present complex multi-million-dollar transactions. It describes the historical background of gambling in India-from cultural practices to colonial prohibitions-and analyses the current legal status of sports betting, creating an intricate relationship between central and state legislations. In addition, it considers the impact of major professional sports leagues on the betting landscape. It remains that the issue of online gambling web sites as well as fantasy sports continues to provoke debate against the hurdles faced by technocrats' innovators along with issues brought about for regulators to regulate. In so far as this is concerned, issues cut across social and economic implications in case legalisation becomes an issue, including other addictions, crimes, and benefits towards welfare through gambling. This paper has considerably explored interrelated themes and brought together an exhaustive range of findings on the issues and prospects facing the sports system in India, more specifically on the topic of contracts, betting, and gambling.<sup>1</sup>

## **KEYWORDS**

Sports contracts, Gambling legislation, online sports betting, fantasy sports, match-fixing, regulatory challenges, economic implications, sports integrity, sports law, sports commercialization.

---

<sup>1</sup> Author, Sri Hari Charan, 2250330, 5 BA LLB C.



## 1. INTRODUCTION

Notwithstanding, with a population of 1.4 billion, India has an intrinsic interest in athletics that runs through and throughout its intricate culture. The country may face shutting of regular activities while a rising interest in football, kabaddi, and other sports has made the sporting scenario of India a dynamic and complex scenario. This paper is meant to explore the complex world of sports contracts, betting, and gaming in India, where the forces of law, economy, culture, and ethics converge at a critical juncture.

It's high time that such a drastic change in the Indian sports landscape, witnessed over the last few decades with the progressive economic development of the country and increasingly professionalized nature of athletic organizations, moves on from informal agreements to multi-million-dollar contract litigation involving policy changes and shifting social norms. Sports betting and gambling, controversies have persisted in a culture neither entirely legalized nor socially acceptable. Strongly ingrained in many cultural practices, but highly regulated by law in most parts of the country, sports-betting-related gambling has deep-seated issues. The increased availability of internet tools and global liberalization once again bring to question the future of sports betting in India.

This paper aims to give a detailed examination of the relevant issues involved in sports contracts, betting, and gaming in India, such as legal framework, economic repercussions, social ramifications, and future trends. Those aspects contained in an incisive analysis explain the challenges and prospects present in the Indian sporting landscape.

## 2. THE LEGAL LANDSCAPE OF SPORTS CONTRACTS IN INDIA

### *2.1 Historical Context*

In many ways, the development of sports contracts in India reflects the journey that the nation underwent from being mainly an amateur sporting culture to the very vibrant and proliferating professional setting. Sports were essentially seen as a pastime, especially in the early years after Indian independence. There was no contractual structure for sports, even as late as the early years of its independence. The concept of professional sports contracts really started to take off during the 1970s and 1980s, especially in cricket, given that this game had been gaining popularity and potential for monetary feasibility. Only with the 1990s, following India's liberalization of economic policy and global sporting influence, did sports contracts begin to



take their contemporary, modern form. It marked a major legal challenge since the existing law mechanisms were drafted without much thought for the particularly unique features of sports contracts and, therefore needed progressive interpretations of the law and precedents.

## ***2.2 Key Legal Principles***

The main legislation dealing with sports contracts in India is the Indian Contract Act of 1872. The said statute defines some elementary precepts which indicate the law of contract, among other issues covered by such legislation. Such include offer and acceptance, consideration, and contractual capacity. Some characteristic features of sports contracts may include:<sup>2</sup>

1. The contract entered into by minors is of much more relevance to this problem as most of the athletes start careers at a young age. Indian legal framework declares that any contract entered by a child is voidable and may create complications in a sports-related contract that has a time frame.
2. Restraint of Trade: Provisions that restrain an athlete to practice his profession would be void under section 27 of the Indian Contract Act, since it prevents somebody from exercising his trade by virtue of the agreement.<sup>3</sup>
3. Specific Performance: Such uniqueness of sportsmen makes specific performance in many cases an efficacious remedy than damages arising from breach of contracts.

## ***2.3 Types of Sports Contracts***

1. Player Contracts: These, therefore are contracts between an athlete and a club or franchise as a form of employment, which outlines terms of employment, remuneration, and expectations of performance.
2. Endorsement Deals: As athletes gain popularity, these endorsements by brands directly translate to much incomes. The contracts for the endorsement usually are extremely long and contain a lot of clauses on image rights and public appearances.
3. Broadcasting Rights: In conjunction with increased popularity in television sport programs, broadcasting rights have become so price sensitive and complicated.
4. Coaching and Management Contracts: These are contracts which relate to the relationships involving teams and their coaching and management staffs<sup>4</sup>.

---

<sup>2</sup> The Indian Contract Act, No. 9 of 1872.

<sup>3</sup> The Indian Contract Act, No. 9 of 1872, § 27.

<sup>4</sup> Tushar Katheria, *Importance of Moral Clause in Sports Contracts*, 3 Issue 3 Int'l J.L. Mgmt. & Human. 2025 (2020).

## ***2.4 Regulatory Bodies and Their Role***

While there is no overarching sports law in India, various regulatory bodies play crucial roles in shaping the contractual landscape:

1. Board of Control for Cricket in India (BCCI) is the governing body of cricket having considerable influence on the contracts and trade arrangements of the game. Sports Authority of India (SAI) is primarily concerned with training and infrastructure, but it has an influence also on the contract standards of Olympic sports.<sup>5</sup>
2. All India Football Federation (AIFF) as well as other sport-specific organizations, periodically draft rules for contracts applicable to their respective sport.

## ***2.5 Recent Developments and Challenges***

The past couple of years have witnessed significant development in sports contracts in India, which further brings out the fast-paced sports industry. Not only in cricket, the cause toward standardized contracts that players sign has picked up, but at the same time, football and similar sport-specific organizations have come out with the necessary level terms and minimum guarantees for sports persons. In fact, franchise-based leagues in many sports have introduced new contractual arrangements that combine elements of employment and commercial partnerships. Much more emphasis is then placed on dispute resolution procedures, and increasingly, there is recognition of the need for specialized sport arbitration entities to deal with the distinct characteristics of sports-related disputes. Another prime issue is gender equity in sport contracts, with attempts to redress past imbalances regarding compensation and access opportunities for female players. Broad stipulations with respect to intellectual property rights and social media usage have become necessary for athlete contracts because of the digital revolution, just as a growing commercial environment for sports dictates broader stipulations. As the Indian sports ecosystem evolves, these contractual frameworks will be further developed, keeping in harmony the interests of athletes, teams, leagues, and commercial partners.

# **3. THE EVOLUTION OF SPORTS BETTING AND GAMBLING IN INDIA**

---

## ***3.1 Historical Perspective***

The institution of gambling and betting goes way back in India to the most ancient times. An

---

<sup>5</sup> Board of Control for Cricket in India v. Cricket Association of Bihar & Ors, (2014) 7 SCC 383, See also: Board of Control of Cricket in India v. Cricket Association of Bihar (2015) 3 SCC 251

important figure by name Gamble can be traced back in ancient epics of India, including Mahabharata wherein games of chance are an integral feature of the story.

### ***3.2 Colonial Influence and the Public Gambling Act of 1867***

The British colonial government enacted the Public Gaming Act of 1867, which remains to be the foundation of the Indian gaming legislation. According to this act, a public gaming house is understood to be carrying on or conducting, in an open or public place, one of the games specified in Schedule I. Games of skill are kept outside controls applicable to games of chance, which continues to remain as an exempting factor from the present legal viewpoints.<sup>6</sup>

### ***3.3 Post-Independence Developments***

In the immediate decades after India achieved independence in 1947, the policy with respect to gambling and betting was generally founded on a prohibitionist approach-this was suited not only to the inheritance of colonial law but also to the prevailing view of sociocultural attitudes of the time. There were, however, slowly emerging exemptions, at least in horse racing and state-owned lotteries. Decisions by several courts declared horse racing to be a game of skill and, therefore, betting on races could continue to be permitted in most countries. The institution of state-conducted lotteries in some regions was the first government-sanctioned gambling structure after independence for India. Despite these exceptions, the overwhelming bulk of gaming activities, like sports betting, continued to be outlawed under a range of state laws formed according to the 1867 Act. Different states adopted varying approaches to gambling legislation:

1. Goa, Daman and Diu: In the 1970s, these territories legalized certain forms of casino gambling, making them unique in the Indian context.<sup>7</sup>
2. Sikkim and Nagaland: These states have taken steps to regulate and license online gambling operations.<sup>8</sup>
3. Most other states: Gambling largely remains prohibited, with exceptions for lottery and horse racing in some cases.

### ***3.4 The Rise of Cricket and Informal Betting***

Cricket was gaining popularity in India, especially after the advent of one-day internationals in

---

<sup>6</sup> The Public Gambling Act, No. 3 of 1867.

<sup>7</sup> The Goa, Daman and Diu Public Gambling Act, No. 14 of 1976.

<sup>8</sup> The Sikkim Online Gaming (Regulation) Act, 2008.



the 1970s and 1980s, that increased informal betting operations. Though illegal, cricket betting mushroomed and operated through clandestine networks and informal channels. This was the time that intricate betting syndicates were starting to emerge. Many believed them to be connected to organized crime. This unregulated cricket match betting became an exponential scale mushrooming, and a subversive market was therefore established, operating beyond the legal boundaries. The event strongly depicted the chasm between the prohibition in statutes and social existence that led to debates on regulation of sports-betting for the next couple of decades.<sup>9</sup>

### ***3.5 Match-Fixing Scandals and Their Impact***

The dark underbelly of illegal betting was marked by a series of match-fixing scandals overhauling Indian cricket as the millennium lurked to turn. Worst of them was that in 2000 involving erstwhile Indian captain Mohammad Azharuddin and others, for which life ban was imposed on the latter that was later revoked and went on to leave a deep credibility crisis for Indian cricket. These scandals highlighted the risks of the unregulated betting markets. That said, these scandals heated up arguments for legitimizing and further regulating sports gambling. These scandals resulted in the increased anti-corruption measures initiated by sport authorities and brought about a greater scrutiny at the interface between gambling and sports integrity.

### ***3.6 Technological Disruption and Online Betting***

The dawn of the internet and mobile technology within the 21st century dramatically changed Indian sports betting. Although the legal restrictions are very stringent, Indian gamblers accessed most of the international betting websites which belonged to nations that allow online gambling. Technological advancement, once again created a fresh set of problems for the law enforcement agencies whose capacity to implement the laws on gaming was altogether crippled by the borderless nature of the internet. This has even worsened the case as the cryptocurrencies provide anonymous transactions which obviate the traditional laws of finance. Fantasy sports platform like Dream11 has given another dimension to the whole betting environment by standing toe to toe with legal grayness by labeling it as games of skill rather than games of chance.<sup>10</sup>

---

<sup>9</sup> Ilakkiya K., *Sports Law - A Developing and Crucial Law Given Less Attention*, 2 Indian J.L. & Legal Rsch. 1 (2021).

<sup>10</sup> Alaukik Shrivastava, *Resolving Legal Complexities and Paving the Way Forward for the Fantasy Sports*

### **3.7 Legal Battles and Interpretations**

Several key legal cases have shaped the understanding of sports betting and gambling laws in India:

1. Dr. K.R. Lakshmanan vs State of Tamil Nadu (1996), Supreme Court case ruling horse racing as a game of skill and not chance, thus binding the judgment for other sporting activities as well.<sup>11</sup>
2. The Legality of Fantasy Sports: Various High Courts have ruled that fantasy sports are games of skill, allowing their operation despite gambling prohibitions.

### **3.8 Recent Debates and Proposed Changes**

In recent years, there have been increasing calls for the legalization and regulation of sports betting in India:

1. Law Commission Report (2018): The commission recommended that gambling and betting on sports be legalized and regulated.<sup>12</sup>
2. State-Level Initiatives: Some states have considered or implemented partial legalization of online gambling and betting.
3. Niti Aayog Guidelines (2020): The government think tank proposed guidelines for fantasy sports platforms, indicating a shift towards formal recognition of these activities.<sup>13</sup>

The evolution of sports betting and gambling in India reflects the country's complex relationship with games of chance and skill. It has changed from ancient cultural practice to colonial prohibition to becoming an underground network and then to digital platforms. While India continues to grapple with the promising economic avenue and also the social perils of gambling, the battle to define its future course in law is alive and contentious.

## **4. CURRENT STATUS OF SPORTS BETTING AND GAMBLING**

### **4.1 Legal Framework**

The current legal status of sports betting and gambling in India is complex and varies across states:

---

*Industry in India*, 26 Gaming Law Review 502 (2022).

<sup>11</sup> Dr. K. R. Lakshmanan v. State of Tamil Nadu & Anr., AIR 1996 SC 1153

<sup>12</sup> Law Comm'n of India, Legal Framework: Gambling and Sports Betting Including in Cricket in India, Report No. 276 (July 2018).

<sup>13</sup> NITI Aayog, Guiding Principles for the Uniform National-Level Regulation of Online Fantasy Sports Platforms in India (Dec. 2020).

1. Central Legislation: The Public Gambling Act of 1867 remains the primary central law, prohibiting public gambling houses.<sup>14</sup>
2. State Laws: Gambling is a state subject under the Constitution, allowing states to enact their own laws. Most states prohibit gambling, with exceptions for lotteries and horse racing.
3. Information Technology Act, 2000: This act has been used to tackle online gambling, although it doesn't explicitly address the issue.<sup>15</sup>
4. Foreign Exchange Management Act (FEMA): This act is relevant for transactions with offshore betting websites.<sup>16</sup>

#### ***4.2 Exceptions and Grey Areas***

Although gambling is largely prohibited in India, there are considerable loopholes and ambiguous gray areas that cloud the issue. The Supreme Court has ruled horse racing a game of skill, but it is legal in many jurisdictions and licensed wagering goes on at race tracks. State lotteries operated by the states are another example, conducting their activities legally in many states as a vitally important source of revenue for governments. Extremely liberal laws of gambling are present in the states of Goa, Daman, and Sikkim, so it is possible to find there casinos, which operate under some rules. Online betting is really a grey area - extremely complicated. Indian law forbids the location of gambling web sites on the territory of India, but prohibits neither the placement of bets on web sites located abroad. Therefore, a loophole - some Indian gamblers make use of it. Fantasy sports platforms operate within a legal gray area by claiming they offer games of skill and hence are not barred from gambling legislation. The claim has been upheld by various High Courts, though there are legal disputes.

#### ***4.3 Online Betting Landscape***

An Indian Internet gambling ecosystem is therefore complex and always evolving, operating within the gray areas of law that open opportunities and barriers. Despite complete prohibition on betting, millions of Indians now place bets at different websites. The online casinos coming from jurisdictions where the internet form of betting is legal have gained much popularity with the Indian gamblers. Local languages, rupees, and other bets on national and international

---

<sup>14</sup> The Public Gambling Act, No. 3 of 1867.

<sup>15</sup> Information Technology Act, No. 21 of 2000.

<sup>16</sup> Foreign Exchange Management Act, No. 42 of 1999



sports events form part of the expansive gamut of support for the platforms.<sup>17</sup> The fact that these sites can be accessed through cellphones and broadband internet has greatly expanded their market, especially among the younger, more tech-savvy crowd. Fantasy sports platforms become a particularly polemic sphere in this context. A platform like Dream11 has significantly done well by claiming its services are games of skill rather than games of chance, thus avoiding gambling laws. Supporting this argument is the finding of decisions by many High Courts, and this popularity alone sends fantasy sports skyrocketing. The legality of such sites is a much-debated issue with litigation against them. The online betting scenario has been throwing even more compounding factors with regards to cryptocurrencies and VPNs which will allow users to browse away from the usual conditions on banking and location. This competition between competitors, platforms, and regulators in the digital age reflects the challenges of effective implementation of gambling legislation. The Indian internet betting scene is dynamic and largely unregulated, generating significant concerns with regard to consumer protection, addiction, and sports integrity.<sup>18</sup>

#### **4.4 Major Sports and Betting**

In India, the landscape of sports betting is dominated by cricket, which commands an overwhelming share of the betting market, both legal and illegal. This passion in cricket translates into massive volumes of betting, mainly during high-profile events like Indian Premier League (IPL), international tournaments, and bilateral series. Cricket betting is deep-rooted in Indian society, although illegal at the hands of law, the volume of money that circulates among people during major events is easily counted in billions of dollars. The betting ecosystem around cricket is sophisticated, from local bookies operating through personal networks to rather elaborate platforms that offer live and in-play betting options. Conversely, interest in football betting, though not as strong as it is for cricket, has grown considerably in interest, mostly for the international leagues and tournaments. The betting ecosystem around cricket is sophisticated, ranging from local bookies operating through personal networks to elaborate online platforms offering live, in-play betting options. Football, while not as dominant as cricket, has seen a significant rise in betting interest, particularly on international leagues and tournaments. The English Premier League, UEFA Champions League, and FIFA World Cup attract substantial betting activity from Indian punters, often through offshore

---

<sup>17</sup> Varun Srikanth & Arun Binoy Mattamana, *Regulating Online Gambling: The Indian Perspective*, 27 Computer Law & Security Review 180 (2011).

<sup>18</sup> Chanvi, *Online Betting in Sports: A Comparative Analysis*, 3 Indian J. Integrated Rsch. L. 1 (2023).

online platforms. The growth of the Indian Super League (ISL) has also spurred increased domestic football betting. Horse racing occupies a unique position as one of the few forms of legal sports betting in India. Many states allow betting on horse races as it tends to be more a game of skills rather than pure luck. This, therefore, has led to an organized infrastructure of betting pertaining to horse racing that involves on-course and off-course betting facilities. Other sports such as tennis, basketball, and kabaddi are becoming popular through the betting platform, with online forums that provide varying options for betting. For example, Pro Kabaddi League attracted such a huge amount of betting interest, which, in essence, was more or less in step with the rise in popularity of this sport as a spectacle. However, the volumes are still much lower than for cricket and football. The difference in betting volumes of various sports indicates the popularity levels, awareness that gamblers have about each sport, the range of betting available, and also information thereof.

#### ***4.5 Recent Legal and Policy Developments***

1. Supreme Court Observations: In recent years, the Supreme Court has made observations suggesting the need to regulate betting to curb illegal activities.<sup>19</sup>
2. Law Commission Recommendations: The 276th report of the Law Commission recommended legalizing and regulating gambling and betting.<sup>20</sup>
3. State-Level Initiatives: Some states like Maharashtra and Karnataka have considered introducing laws to regulate online gambling.

#### ***4.6 Enforcement and Regulatory Challenges***

The application of betting and gaming legislation in India poses significant challenges, largely with the help of digital technology. The internet betting context is changing fast, and the law enforcement institutions cannot find it easy to adjust in this regard. They also lack technical know-how and skills to regulate as well as police activities in this field effectively. The international nature of the internet instills jurisdictional problems because it makes an attempt to deal with offshore betting sites a very difficult affair. The enforcement challenge is made worse by the use of cryptocurrency and advance encryption methods by some betting companies. The legal framework for internet betting is somewhat ambiguous, leading to

---

<sup>19</sup> Director, Inspector General of Police v. Mahalakshmi Cultural Association, (2012) 3 Mad LJ 561, See also Dr. K. R. Lakshmanan v. State of Tamil Nadu & Anr., AIR 1996 SC 1153

<sup>20</sup> Law Comm'n of India, Legal Framework: Gambling and Sports Betting Including in Cricket in India, Report No. 276 (July 2018).

varying enforcement from state to state. The scale of betting operations-such as when large cricket tournaments are held-better than what the law enforcement agencies are capable of regulating or overseeing. The social incorporation of gambling as entertainment has made regulation difficult because the authorities often concentrate on the larger operators, allowing the bettor at the individual level to largely elude notice.

## **5. MAJOR SPORTS LEAGUES AND GAMBLING**

---

### ***5.1 Indian Premier League (IPL) and Cricket***

The IPL has revolutionized cricket since its debut in 2008 not only in the format of the game but also in its relationship with betting. Betting on cricket has grown to annually galloping volumes that would have been previously thought impossible-even in billions of dollars-as reported, mainly on account of the league's success. This monolith of a betting market, however-criminalised as it remains-is a double-edged sword for the sport.

The spot-fixing scandal in 2013 woke up the league, touching players, team officials, and even team owners on that. That exposed the dark side of illegal betting and the potential to compromise the sport at large. In response, the IPL and the BCCI have put in very strict anti-corruption measures, including player education programs and partnerships with anti-corruption units.<sup>21</sup>

Technically, BCCI says it detests betting. Unfortunately, most teams in the league have often found themselves between the truth and lies due to their sponsorships. A number of them have been put under fire for associating with companies that do not even host betting activities in India nor promote a location where one can place bets in India but enjoy betting elsewhere. This raises the fascinating question of a tightrope walking between the maximization of revenues and the observance of ethical standards in a league that officially bans but practices to a large extent.<sup>22</sup>

### ***5.2 Indian Super League (ISL) and Football***

Football betting in India is a different case; it's international more than local influence. Most Indian football fans do not gamble much on the domestic league, focusing instead on European

---

<sup>21</sup> Board of Control for Cricket in India v. Cricket Association of Bihar & Ors, (2014) 7 SCC 383.

<sup>22</sup> Board of Cricket Control in India v. Cricket Association of Bihar & Ors., (2016) 8 SCC 535.



leagues like the English Premier League, La Liga, and even the UEFA Champions League. This, to an extent, has fuelled interest in the home league, albeit the ISL.

Although just a year old, the ISL has been more conducive to alliance with fantasy sports platforms than cricket. This could be a different strategy toward the betting-adjacent industry for the sport of football considering how much less relevant the game is in India and the need to create more revenue streams for the sport.

However, with its boom also comes certain issues. Indian football in its lower division bore reports of match-fixing. Now though these are isolated cases, they have only made the All India Football Federation (AIFF) dig more vigilantly and mingle with international organizations to keep the sport clean.

### ***5.3 Pro Kabaddi League (PKL)***

The Pro Kabaddi League came out as an unsuspecting new player in the sports betting industry as recently as 2014. The interest it has garnered in kabaddi-an old sport in India-motivated more interest and impulses to place a bet, especially from rural areas.

Kabaddi is very fast-paced with short points and rapid turnarounds, which are particular appeals for real-time live betting. However, the regulatory framework of kabaddi betting appears less developed as compared to cricket or football. The gap in regulation thus poses both opportunities and risks for the sport as it continues growing.

### ***5.4 Other Emerging Leagues***

Not only cricket, football, or kabaddi, other sports too are gaining momentum with interest in betting. In fact, Premier Badminton League (PBL) has attracted betting activity during the games involving foreign stars. The more dramatic a badminton match can turn out in an instant, the more exciting an event it is for bettors.

Once India's most successful Olympic sport, hockey is staging a revival through the Hockey India League. Although there has yet to be a surge in hockey betting, upward trends in sports and previous Indian triumphs on the international scene make this an area of great promise for potential future expansion in betting.

### ***5.5 League Policies and Anti-Corruption Measures***

The Indian sports leagues have finally realized the importance of developing good anti-corruption mechanisms. Among them, IPL has been at the forefront by putting together a dedicated integrity unit that works with the ICC's Anti-Corruption Unit as well as local law enforcement agencies to monitor suspicious betting patterns and various integrity breaches. Now, player education is also an important component of anti-corruption programs. Leagues hold mandatory workshops for players, their support staff and officials that educate them on the dangers of getting involved with bookmakers and particularly on the severe implications if one was found to be involved in match-fixing or spot-fixing.

Other leagues have contracted with the specialized firms that employ sophisticated data analytics to track global betting markets. Such systems will be able to spot anomalous betting patterns in real time, and a league will be in a position to take swift action if suspicious activity is identified.

## **6. ONLINE BETTING AND ITS IMPACT**

---

### ***6.1 The Rise of Online Betting Platforms***

This is where increasing smartphone usage and affordable high-speed internet has propelled the growth of betting online in India. Technological advancement has transformed what was once a niche activity-betting-into entertainment that can be easily accessed by people. Betting apps and websites now have features such as one-click betting, live streaming of events, and instant cash-outs, making them more attractive even to relatively inexperienced bettors.<sup>23</sup> There are many options, which have long gone beyond traditional sporting events. E-sports betting has undergone tremendous growth, especially in the younger population, with competitive video game events. Virtual sports comprise computer-generated events on which the outcome is determined by algorithms; they offer 24-hour opportunity to place bets. Moreover, cryptocurrency has brought about a change in the face of online betting for the reason that it allows anonymity, and it could transcend the kind of financial banking restrictions that have always been present.

### ***6.2 Legal Status of Online Betting***

The Indian legal system for online betting is very confusing and, at many times, ambiguous.

---

<sup>23</sup> Srikanth, supra note 17 at 10

So, while it is actually unlawful to bet in games of chance under the Public Gambling Act of 1867, there's no clear-cut position on whether or not Internet betting, especially on sites that are based outside India, is banned or allowed. This vagueness has succeeded in paving the way for most of the international betting websites operating inside Indian borders legally.

Different states have taken varied approaches to this issue. Sikkim<sup>24</sup> and Nagaland<sup>25</sup>, for instance, have moved towards regulating online gambling, while states like Telangana have explicitly banned online betting. This patchwork of regulations creates challenges for both operators and users.

The role of payment gateways and banks within this ecosystem is therefore highly complex. Most Indian banks and the payment services providers are caught between the devil and the deep sea, mainly because there's a huge demand from users for these services while still wanting to comply with often vaguely worded regulations. Some have decided to block transactions towards known betting sites, whereas others process them under broader merchant categories.

### ***6.3 Popular Online Betting Formats***

Currently, the in-play, or live, betting format is most popular among formats of online betting. With this format, punters place bets while an event is held and can watch odds change in real-time based on action. The dynamic nature of live betting has thus made it quite interesting for punters and profitable for operators.

Fantasy games are another small niche in Indian online betting. Players such as Dream11 have managed to achieve mainstream success by classifying themselves as 'games of skill', always looked at a lot more favorably under Indian law than games of chance. The platforms allow users to create virtual teams of real players that compete on the statistical performance of these players in actual games.

Now that has changed with more developed players turning towards exchange betting that lets the user bet among themselves and not against the bookie. This peer-to-peer model often brings

---

<sup>24</sup> The Sikkim Online Gaming (Regulation) Act, 2008.

<sup>25</sup> The Nagaland Prohibition of Gambling and Promotion and Regulation of Online Games of Skill Act, 2015.



more optimal odds and lets a user both back and lay an outcome.<sup>26</sup>

#### **6.4 Economic Impact**

Though largely unregulated, online betting in India has an enormous economic impact. Industry estimates value the market in billions of dollars every year and has been experiencing highly increasing growth year after another. This new phenomenon has created plenty of job opportunities not only in technological and product development but also in service areas such as customer care support, marketing, and data analysis.

The potential real tax revenue remains a recurring theme in policy circles when talking about a regulated betting market. The advocates of its legalization argue that inclusion of this industry in the formal economy would spell significant contributions in taxes that could be channeled toward sports development, public health initiatives, or whatever other causes social.<sup>27</sup>

#### **6.5 Cybersecurity Challenges**

Online gambling is very vulnerable to cybersecurity attacks. The involvement of large money in transactions coupled with personal data creates an attractive lure for cyber-crime perpetrators.

It motivated much investment in security infrastructure, which also included advanced encryption technologies, multi-factor authentication systems, and real-time fraud detection algorithms.<sup>28</sup>

Newly found insights in cybersecurity surveillance point to detection of unusual patterns in betting that can be associated with match-fixing. Platforms continue to develop increasingly sophisticated algorithms that will analyze huge amounts of betting data in real-time to identify suspicious activities that could indicate the involvement of match-fixing or insider betting.

---

<sup>26</sup> Chanvi, supra note 18 at 10

<sup>27</sup> Anshu Kumar, *What Is India Losing by Not Legalizing Gambling? A Legal Framework for Gambling.* / Artha Vijnana / EBSCOhost, 61 (2019), <https://openurl.ebsco.com/contentitem/gcd:141329761?sid=ebsco:plink:crawler&id=ebsco:gcd:141329761> (last visited Aug 13, 2024).

<sup>28</sup> US — Countervailing Duty Investigation on DRAMs, Report of the Panel, 21 Feb 2005, <https://jusmundi.com/en/document/decision/en-united-states-countervailing-duty-investigation-on-dynamic-random-access-memory-semiconductors-drams-from-korea-report-of-the-panel-monday-21st-february-2005> (last visited Aug 16, 2024).

The protection of data concerning the identity of users and all financial information remains a challenging task. The integration of digital payment systems and cryptocurrencies continues, forcing online betting sites to adapt at a fast rate their security measures in order not to be beaten by new attacks.

## **7. SOCIAL AND ECONOMIC IMPLICATIONS**

---

### ***7.1 Economic Potential***

The potentially legalizing and regulating sports betting in India is a major economics opportunity. As the country would receive huge governmental tax income from legalized betting, it may become one of the innovative sources of funds for public initiatives. A regulated betting market would gain billions of rupees annually for the national economy, estimations indicate. In addition to tax revenues, a controlled betting industry would generate various employment opportunities in the fields of technology, customer service, marketing, and compliance.<sup>29</sup> The employability could be in various capacities, from junior positions to highly specialized employability related to data analytics and risk management. Legalisation of betting would also attract foreign betting companies to invest in the Indian market that could bring more advanced technologies, best practices, and capital investment to the country. Such foreign direct investment would induce innovation in this industry and contribute substantially to India's digital economy.

### ***7.2 Social Costs***

The economic advantages of the legalization of betting are undoubtedly very great, but at the same time, there are social costs associated with it. The first and most prevalent criticism of the legalization of betting is that it increases the tendency of individual addictions to gamble. When betting platforms are made more accessible, especially over the internet, the chances of an increase in the problem rate of gambling are high, leading to the tragic consequences of addiction for the family units involved as well. Serious issues associated with compulsive gambling include financial stress, resulting in debt and bankruptcy and associated mental health complications. In addition, everyone is concerned that gambling will boost crime, fraud or money laundering associated with betting. Finally, the final issue is about sports integrity, with the fear that the massive betting may intensify match-fixing and other corruptions in sports.<sup>30</sup>

---

<sup>29</sup> Kumar, supra note 27 at 17

<sup>30</sup> Sanju George, Richard Velleman & Benedict Weobong, *Should Gambling Be Legalized in India?*, 43 Indian Journal of Psychological Medicine 163 (2021).

### ***7.3 Impact on Sports Integrity***

Perhaps the complexity of the relationship between sports betting and the integrity of sports is that, on one side, it could better regulate a market offering oversight and tools in detecting unusual patterns of betting that might indicate match fixing. The regulatory bodies and sports leagues can then collaborate to maintain game integrity. Increasing financial stakes associated with widespread legal betting push for more leverage on corruption. There is also a likelihood of increased temptation by athletes, coaches, and officials to affect the game's outcomes for purposes of sports betting. In general, players may suffer additional stress that may affect their performance and behavior both during and outside games. The more extensive betting in sports may fundamentally alter the way fans interact with and view the sport itself, and may cause the focus to shift from game enjoyment to financial returns.

### ***7.4 Cultural Considerations***

The cultural implications of legalized sports betting in India are significant, multi-fold, and would massively change. Traditionally Indians abhorred gambling in their cultures; it was seen with vice and moral degradation. Religious texts and traditional values up and down India cautioned people against the dangers of gambling. However, attitudes change very fast, mostly among the younger generations, who tend to be more liberal about betting and gambling. They can see it as entertainment or an income-generating activity.<sup>31</sup> Since the attitude and approach of different parts of India toward betting would be relatively varied, such a law in states that allow legal gambling, like Goa and Sikkim, could readily welcome sports betting, while others may resist it. Such cultural differences may make it tricky to enforce a single national sports betting policy.

### ***7.5 Public Health Concerns***

It has stimulated a number of public health concerns regarding its potential legalization. There is little doubt that problem gambling, which is increasingly identified as a serious mental health disorder with a recognized treatment need, will increase and put further pressure on mental health services if betting activity proliferates. The normalization of betting is especially linked to concerns about development in relation to young people. Increased exposure to betting advertisements and easy access to the internet might mould attitudes towards gambling very early on in life. The public health system might demand additional expenditure on a rise in

---

<sup>31</sup> Kumar, *supra* note 27 at 17

health disorders caused by gambling, such as addiction treatment, coupled with other effects like depression, anxiety, and substance abuse. This would strip funds away from other crucial health programs.<sup>32</sup>

## **8. REGULATORY CHALLENGES AND POTENTIAL SOLUTIONS**

### ***8.1 Current Regulatory Framework***

The modern Indian regulatory framework of sports betting and gambling is a patchwork of regulation made largely in accordance with colonial-era legislation ill-adapted to the situation in modern times. This includes the Public Gambling Act of 1867<sup>33</sup> remains the primary central law, prohibiting public gambling houses, while the Information Technology Act of 2000<sup>34</sup> Although the law did not specifically prohibit online gambling, it had been sufficiently exploited to ban the menace. Fragmented added by the state subject to gambling under Constitution has diluted enforcement across regions with huge grey areas existing within the ambit of online betting. It remains one of those regulations that lack an integrated national policy, and offshore betting websites take advantage of this legal limbo to fleece their consumers.

### ***8.2 Proposed Regulatory Models***

There have been ideas of various regulatory models for India in response to the latest challenges. It runs the gamut from a centralized national-level body that will regulate all forms of betting and gambling, to control systems at the state level operating within broad national guidelines.<sup>35</sup> There is also the hybrid model, which has gained considerable popularity by merging central regulation with implementation and customization at the state level. Each would have its advantages and disadvantages: the central model would ensure homogeneity but could be expected to provoke resistance from the states; on the other hand, the model implemented at the state level would more easily adjust to the local conditions, but this risked a discontinuous national pattern. It is a hybrid model that would address equally the concerns and is likely to be the door to wholesale regulation, which honors the federal fabric of India yet provides a coherent national framework.

---

<sup>32</sup> Vivek Benegal, *Gambling Experiences, Problems and Policy in India: A Historical Analysis*, 108 *Addiction* 2062 (2013).

<sup>33</sup> The Public Gambling Act, No. 3 of 1867.

<sup>34</sup> Information Technology Act, No. 21 of 2000.

<sup>35</sup> NITI Aayog, *Guiding Principles for the Uniform National-Level Regulation of Online Fantasy Sports Platforms in India* (Dec. 2020).



## 9. INTERNATIONAL COMPARISONS

---

### ***9.1 United Kingdom Model***

This UK model of regulating sports betting, which India so desperately needs, is a lesson for India. Compared to that model, what India follows is an even partial and incomplete regulatory framework which tries to balance protection to consumers against growth of the industry. While this model focuses on protection against certain measures of advertising, it has always allowed strict rules against vulnerable groups. Other UK initiatives in problem gambling include a national self-exclusion scheme and makes betting companies contribute compulsorily to fund addiction treatment. Although the UK model has sometimes received mixed results, it has shown promise on most occasions, featuring challenges: mostly concerns about the prevalence of gambling adverts in sports as well as the increasing demand for more stringent affordability checks by the bettors.<sup>36</sup>

### ***9.2 United States Approach***

The United States, by contrast, can be taken as the other model because regulation of sports betting is carried out mostly at the state level in response to the Supreme Court's determination back in 2018 to void the federal ban. Such an approach has given a very fragmented regulatory landscape because some states have gone on to open their borders to legal sports betting while others have maintained prohibition. Professional sports leagues have had a lot to do with this: most have partnered with betting companies and sought "integrity fees" – a portion of the bets that would be paid into funds for monitoring. This model has led to a sports betting system in the US that has grown exponentially, even if it also raises the conundrum of how to enforce across state lines and state-to-state differences in consumer protection.

### ***9.3 Australian System***

The Australian regulatory approach under the Interactive Gambling Act has offered a nationwide framework for online gambling, but sport-specific approaches are allowed. One would note from this model that it is tightening the restrictions of advertising during live sports broadcasts over recent times in a response to public opinion on normalization of gambling. It is a case where experience through this form of regulation can indicate the importance of adaptable regulation that can react to emerging social issues. At the same time, the country's

---

<sup>36</sup> Rhea Agnihotri, *Navigating the Legal Landscape: Frameworks and Regulations for Sports Betting and Gambling*, 4 Jus Corpus L.J. 562 (2023).

approach on the encouragement of responsible gaming through compulsory pre-commitment systems for certain types of gambling may well serve as a model to India on properly balancing commercial interests with social responsibility.<sup>37</sup>

## 10. CONCLUSION

In India, the sports contract, betting, and gaming industries are at a crossroads. India poses significant challenges and opportunities for controlling such activities in the digital age. The current situation, which includes prohibition but also a vibrant underground, contrasts sharply with international trends and technological realities.

The evolution of sports contracts in India reflects the rise of the country's sports business, necessitating the implementation of more complicated legal structures. Since athletes have evolved as worldwide brands and sports events have become key economic drivers, the contracts that govern these collaborations must develop to maintain justice, safeguard rights, and promote advancement.

The debate over sports betting and gambling is multifaceted, having legal, economic, social, and cultural dimensions. Thus, while establishing such operations, the potential economic benefits of legalization—for example, tax revenue and job creation—must be carefully balanced against the societal costs, particularly the risks of addiction and financial hardship. The more these internet betting firms proliferate and function ambiguously in legal circumstances, the more comprehensive regulation becomes unavoidable. Because of these, betting has become more accessible than ever before, presenting a whole new set of issues for regulators and law enforcement organizations.

India may draw on global experience to develop a unique regulatory structure tailored to its specific situation. It could include a phased approach to legalization, stringent consumer protection protocols, and the use of technology to ensure transparency and integrity. Finally, the direction India adopts in this sector will have far-reaching consequences that will be felt not only in the sports and gambling businesses, but also throughout the fabric of society. As the country navigates these complicated concerns, it is critical that all parties--government,

---

<sup>37</sup> Deokinandan Sharma, *A Comparative Analysis of the Gambling Laws in India & Great Britain*, 1 Glob. Sports Pol'y Rev. 119 (2020).

sports organizations, athletes, spectators, and public health officials--engage in an ongoing conversation to develop a cohesive and effective policy response.

The future of sports contracts, betting, and gambling in India is uncertain, but it is clear that the current situation cannot be maintained. India's stance toward these interwoven and multifaceted issues will alter dramatically over the next few years, whether through reform or protracted ban.

## BIBLIOGRAPHY

### 1. ARTICLES

1. Deokinandan Sharma, <i>A Comparative Analysis of the Gambling Laws in India &amp; Great Britain</i> , 1 Glob. Sports Pol'y Rev. 119 (2020).
2. Angshuman Hazarika & Komal Ray, <i>Current Updates on the Regulation of Online Sports Betting in India</i> , 27 Gaming Law Review 117 (2023).
3. Vivek Benegal, <i>Gambling Experiences, Problems and Policy in India: A Historical Analysis</i> , 108 Addiction 2062 (2013).
4. Tushar Katheria, <i>Importance of Moral Clause in Sports Contracts</i> , 3 Issue 3 Int'l J.L. Mgmt. & Human. 2025 (2020).
5. Tanisha Khanna & Ranjana Adhikari, <i>Law Commission Bats for Regulation of Betting in India</i> , 22 Gaming Law Review 497 (2018).
6. Shaun Star & Divyangana Dhankar, <i>Major Differences in Minors' Contracts: A Comparative Analysis into the Validity of Contracts with Minors in the Sport and Entertainment Industry</i> , 43 Liverpool Law Rev 203 (2022).
7. Agniva Mandal, <i>Legalization of Betting in Sports in India</i> , 5 Issue 3 Int'l J.L. Mgmt. & Human. 366 (2022).
8. Matthew A. King, <i>Murphy v. NCAA and Legalization of Sports Betting in States and Indian Country</i> , 59 Judges J. 16 (2020).

9. Rhea Agnihotri, *Navigating the Legal Landscape: Frameworks and Regulations for Sports Betting and Gambling*, 4 Jus Corpus L.J. 562 (2023).
10. Chanvi, *Online Betting in Sports: A Comparative Analysis*, 3 Indian J. Integrated Rsch. L. 1 (2023).
11. Varun Srikanth & Arun Binoy Mattamana, *Regulating Online Gambling: The Indian Perspective*, 27 Computer Law & Security Review 180 (2011).
12. Alaukik Shrivastava, *Resolving Legal Complexities and Paving the Way Forward for the Fantasy Sports Industry in India*, 26 Gaming Law Review 502 (2022).
13. Sanju George, Richard Velleman & Benedict Weobong, *Should Gambling Be Legalized in India?*, 43 Indian Journal of Psychological Medicine 163 (2021).
14. Kathryn R L Rand & Steven Andrew Light, *Sports Betting and Indian Gaming: Should Tribal Casinos Get in the Game?*
15. Vidushpat Singhanian, *Sports Betting: Is It Really Illegal in India?*, in *Sports Betting: Law and Policy* 443 (Paul M. Anderson et al. eds., 2012), [https://doi.org/10.1007/978-90-6704-799-9\\_25](https://doi.org/10.1007/978-90-6704-799-9_25) (last visited Aug 13, 2024).
16. Ilakkiya K., *Sports Law - A Developing and Crucial Law Given Less Attention*, 2 Indian J.L. & Legal Rsch. 1 (2021).
17. Mani Yadav & Abhinav Singh Chandel, *Sports Law in India - An Evolving Discourse Or a Need for Paradigm Shift*, 12 NUALS L.J. 21 (2018).
18. Gary Sokolow, *The Future of Gambling in Indian Country*, 15 Am. Indian L. Rev. 151 (1990).
19. US — Countervailing Duty Investigation on DRAMs, Report of the Panel, 21 Feb 2005, <https://jusmundi.com/en/document/decision/en-united-states-countervailing-duty-investigation-on-dynamic-random-access-memory-semiconductors-drams-from-korea-report-of-the-panel-monday-21st-february-2005> (last visited Aug 16, 2024).



20. Anshu Kumar, *What Is India Losing by Not Legalizing Gambling? A Legal Framework for Gambling.* / *Artha Vijnana* / *EBSCOhost*, 61 (2019), <https://openurl.ebsco.com/contentitem/gcd:141329761?sid=ebsco:plink:crawler&id=ebsco:gcd:141329761> (last visited Aug 13, 2024).

## 2. CASES

1. Bimalendu De v. Union of India, AIR 2001 Cal 30
2. Board of Control for Cricket in India v. Cricket Association of Bihar & Ors, (2014) 7 SCC 383
3. Board of Control of Cricket in India v. Cricket Association Of Bihar (2015) 3 SCC 251
4. Board of Cricket Control in India v. Cricket Association of Bihar & Ors., (2016) 8 SCC 535, pp.4, 96
5. Bobby Art International, etc. v. Om Pal Singh Hoon & Ors., AIR 1996 SC 1846
6. Carlill v. Carbolic Smoke Ball Co., (1892) 2 Q.B. 484
7. Carmen Media Group Ltd v. Land Schleswig-Holstein and Innenminster des Landes Schleswig-Holstein, Opinion of Advocate General, Mengozzi, delivered on 3 March 2010 in Case C-46/08, Para 103.
8. CBI v. Ashok Kumar Aggarwal (2013) 15 SCC 222
9. Central Inland Water Transport Corporation Limited & Anr. v. Brojo Nath Ganguly & Anr, AIR 1986 SC 1571
10. D. Krishna Kumar v. State of Andhra Pradesh, 2003 Cr LJ 143
11. Director, Inspector General of Police v. Mahalakshmi Cultural Association, (2012) 3 Mad LJ 561,
12. Dr. K. R. Lakshmanan v. State of Tamil Nadu & Anr., AIR 1996 SC 1153
13. Egerton v. Earl of Brownlow (1853)4 HLC 484
14. Erlenbaugh v. United States, 409 U.S. 239, 246 (1972)
15. Firm of Pratapchand Nopaji v. Firm of Kotrike Venkata Setty & Sons, AIR 1975 SC 1223
16. Gherulal Parakh v. Mahadeodas Maiya & Ors., AIR 1959 SC 781
17. Guru Prasad Biswas & Anr. v. State of West Bengal & Ors, (1998) 2 Cal LT 215
18. H. Anraj v. State of Maharashtra, AIR 1984 SC 781
19. Internet and Mobile Association of India v. Reserve Bank of India, W.P.(C) No.528/2018
20. Khoday Distilleries Ltd. v. State of Karnataka, (1995) 1 SCC 574

### 3. STATUTES

---

1. The Public Gambling Act, No. 3 of 1867 (India).
2. The Indian Contract Act, No. 9 of 1872, § 30 (India).
3. The Prize Competitions Act, No. 42 of 1955 (India).
4. The Goa, Daman and Diu Public Gambling Act, No. 14 of 1976 (India).
5. The Sikkim Online Gaming (Regulation) Act, 2008 (Sikkim).
6. The Nagaland Prohibition of Gambling and Promotion and Regulation of Online Games of Skill Act, 2015 (Nagaland).
7. The Tamil Nadu Gaming Act, No. 3 of 1930 (Tamil Nadu).
8. The Telangana Gaming (Amendment) Act, 2017 (Telangana).
9. The Maharashtra Prevention of Gambling Act, 1887 (Maharashtra).
10. The Delhi Public Gambling Act, 1955 (Delhi).
11. The Sports Broadcasting Signals (Mandatory Sharing with Prasar Bharati) Act, No. 11 of 2007 (India).
12. The National Sports Development Code of India, 2011 (India).
13. The Sports Authority of India Act, 1984 (India).
14. The Manipur Olympic Association (Registration) Act, 1988 (Manipur).
15. The Rajasthan Sports (Registration, Recognition and Regulation of Associations) Act, 2005 (Rajasthan).
16. The Gujarat Sports Act, 2011 (Gujarat).
17. The Jammu and Kashmir State Sports Act, 2018 (Jammu and Kashmir).
18. The Uttarakhand State Sports Act, 2011 (Uttarakhand).
19. Information Technology Act, No. 21 of 2000 (India).
20. Foreign Exchange Management Act, No. 42 of 1999 (India)

### 4. Reports and Guidelines

---

1. Law Comm'n of India, Legal Framework: Gambling and Sports Betting Including in Cricket in India, Report No. 276 (July 2018).
2. NITI Aayog, Guiding Principles for the Uniform National-Level Regulation of Online Fantasy Sports Platforms in India (Dec. 2020).