

# Legal regulation and organisational framework of combating gambling addiction in Kazakhstan: Comparative analysis with western European models

Submitted: 10 June 2025

Reviewed: 30 September 2025

Revised: 29 October 2025

Accepted: 30 October 2025

Zhanna Khamzina\*

<https://orcid.org/0009-0001-4707-0853>

Yermek Buribayev\*\*

<https://orcid.org/0009-0000-7011-4239>

*Article submitted to peer blind review*

Licensed under a Creative Commons Attribution 4.0 International

DOI: <https://doi.org/10.26512/istr.v18i2.58562>

## Abstract

**[Purpose]** To identify the problematic aspects of the Kazakh model of combating gambling addiction and analysing its legal and institutional foundations to determine ways to improve regulatory effectiveness. The main goal was to assess how Kazakhstan's system of gambling regulation functions in comparison with Western European models and to identify organisational and legal challenges that impede its efficiency.

**[Methodology/approach/design]** The research was based on a systematic approach and the comparative legal method, integrating analysis of legal acts, regulatory documents, and statistical data. The authors examined Kazakhstan's legislative framework, institutional mechanisms of control, and organisational practices. Comparative analysis was conducted with regulatory systems of France, the UK, Denmark, and other EU states. The study also applied a structural-functional and modelling approach to propose recommendations for improving the national model of gambling regulation.

**[Findings]** The results revealed that Kazakhstan's model is characterised by strict state control and territorial concentration of gambling in specific areas such as the Burabai Resort Zone. The analysis demonstrated significant differences between Kazakhstan and Western European countries in terms of territorial organisation, allocation of powers, and penalty severity. The research identified major organisational problems, including a shortage of qualified personnel in supervisory bodies, lack of a unified data collection methodology, weak interagency coordination, and insufficiently developed prevention and rehabilitation programmes.

---

\*Full Doctor, Professor at the Department of Law, Abai Kazakh National Pedagogical University, 050010, Almaty, Republic of Kazakhstan. Email: [z.khamzina@outlook.com](mailto:z.khamzina@outlook.com).

\*\*Professor at the Department of Law, Zhetysu University named after Ilyas Zhansugurov, 040009, Taldykorgan, Republic of Kazakhstan. Email: [y.buribayev@outlook.com](mailto:y.buribayev@outlook.com).

**[Practical implications]** The findings contribute to the improvement of state policy in the field of combating gambling addiction. The study recommends introducing unified self-exclusion registers, expanding responsible gambling programmes, enhancing cross-sectoral cooperation, and developing public-private partnerships in addiction prevention. The implementation of these measures can strengthen social protection mechanisms, improve regulatory transparency, and reduce the socio-economic costs of gambling addiction in Kazakhstan.

**[Originality/value]** This study offers a comprehensive legal and organisational analysis of Kazakhstan's approach to gambling regulation, integrating comparative insights from Western Europe. It provides original recommendations for balancing strict state control with socially responsible practices and highlights the need for selective adaptation of international regulatory standards to national socio-economic and political conditions. The research holds particular value for policymakers, legal scholars, and public health specialists concerned with behavioural addictions and regulatory governance.

**Keywords:** Gambling business. Gambling addiction. Online platforms. Gambling. State control. Prevention programmes.

## INTRODUCTION

Known in the scientific and medical literature as pathological gambling addiction, ludomania occupies a significant place in modern research, as it combines medical, psychosocial and legal aspects. As defined by the WHO (2022), gambling addiction is classified in the International Classification of Diseases (ICD-11) as a disorder associated with behavioural dependence that leads to a progressive loss of control over gambling activity. In legal terms, this phenomenon is of particular importance, as the state is called upon to prevent the potential growth of socially dangerous consequences of gambling, including crime, fraud, loss of social stability and material resources.

The problem of gambling addiction has become particularly relevant in Kazakhstan due to the rapid development of digital technologies and online gambling. The digitalisation of society has created new challenges for the legal regulation of gambling, as traditional control mechanisms are not effective enough in the virtual environment (Hari et al., 2024; Sert et al., 2024). The issue of gambling addiction among young people and adolescents, who are one of the most vulnerable groups to the negative impact of online casinos and gambling, remains urgent. There has been a significant increase in the number of appeals to psychological and social services from minors with signs of gambling addiction. Given the scale of the problem and its possible socio-economic consequences, the study of the Kazakhstani model of combating gambling addiction is of strategic importance for the formation of effective state policy in this area (Menmuir, 2023).

The purpose of the study was to reveal the peculiarities of the Kazakhstani model of combating gambling addiction through the prism of legal regulation and organisational challenges in order to identify ways to improve it. The objectives of the study are:

1. To reveal the theoretical and legal foundations of counteracting gambling addiction in Kazakhstan, to determine the peculiarities of interaction between institutions in the system of prevention and treatment of gambling addiction.

2. To compare the Kazakh and Western European models of legal regulation of the gambling business to determine the possibilities of adapting successful international practices.

3. To substantiate the directions of improvement of the Kazakhstani model of combating gambling addiction based on the identified organisational challenges and develop practical recommendations for overcoming these challenges.

## LITERATURE REVIEW

The analysis of scientific literature shows a complex interest of researchers in various aspects of legal regulation of gambling and counteraction to gambling addiction. The study by A.Y. Zhatkanbaeva et al. (2021) analyses the legislation of the Republic of Kazakhstan on combating gambling addiction of children and adolescents. The researchers have developed comprehensive recommendations for improving state policy in this area, including the development of the concept of information security for children and youth, strengthening the responsibility of the state and family, and implementing a system of educational measures. The authors emphasise the need to recognise children and young people as equal participants in the formation of the information society and to protect young minds from negative influence.

B.D. Yerkenov (2024) conducted a thorough study of legal instruments to counteract the legalisation of proceeds of crime in the context of digital development. The researcher offered specific recommendations for improving Kazakhstan's legislation in the field of digital asset regulation based on the experience of European countries, including the introduction of mandatory identification of senders and recipients of cryptocurrency transactions, the use of artificial intelligence technologies for analysing financial data, and the development of an interdisciplinary approach to investigating crimes involving digital assets. In continuation of this topic, R.M. Zhamiyeva and M.G. Albekova (2023) analysed in detail the current state and dynamics of the development of the process of combating money laundering in the Republic of Kazakhstan. The researchers focused on the role of financial institutions and the challenges faced

in implementing countermeasures, especially with regard to new money laundering techniques using digital assets.

An important contribution to understanding the psychological characteristics of adolescent gambling addiction was made by K.O. Kaziev and G.Z. Nadenov (2023), who experimentally investigated the relationship between the family environment and the formation of addictive behaviour in adolescents. The researchers found that negative forms of addiction often occur in adolescents regardless of the social status of the youngsters' families, which requires special attention to preventive work. The authors developed recommendations for the psychological prevention of gambling addiction among adolescents. These recommendations included preliminary determination of clear time and financial limits for gambling activities; formation of adolescents' perception of gambling as entertainment rather than a source of income; creation of psychological support in educational institutions; and establishment of open communication in the family to foster positive emotional development.

Z. Khamzina et al. (2025), considering gambling addiction as a negative factor, note that gambling addiction negatively affects families and communities, leads to the breakdown of social ties and the exacerbation of social problems. Gambling is seen as an easy way to make money by taking risks, which makes this method especially attractive to minors. Minors are considered a high-risk group, as they are psychologically more susceptible to the illusion of winning without effort.

Special attention was paid to the legal regulation of information in Internet resources by D.A. Digay (2024), who substantiated the need to improve the legislative framework taking into account the specifics of the virtual environment. The author conducted a comprehensive study of the legal regulation of information in Kazakhstan's Internet resources, the systematisation and differentiation. Based on the analysis, the author offered specific recommendations for improving the existing legislation and law enforcement practice, including the introduction of a three-tier regulatory system with a balance of state control and self-regulation, establishment of clear criteria for content classification and delineation of responsibilities between platform owners and content authors, and creation of a specialised supervisory body involving Information Technology (IT) experts.

S.B. Anara et al. (2023) conducted a comprehensive study of criminological measures to combat corruption offences in the field of illegal gambling. The authors analysed the experience of countries such as the USA, the UK, Singapore, and the EU, focusing on the practice of countries with similar religious and cultural traditions. With regard to the possibilities of adapting this experience to the conditions of Kazakhstan, the researchers concluded that the

gradual implementation of anti-corruption programmes requires a systematic improvement of the legal framework. The authors consider the use of information and communication technologies, such as digital public services, transparency portals and blockchain technologies, to be particularly promising in combating corruption in the field of illegal online gambling. L.Y. Xiao et al. (2022) conducted a comparative analysis of international experience in regulating loot boxes as a form of video game gambling. The researchers examined different approaches to regulation – from a complete ban in Belgium to transparency requirements in China. Recommendations were offered for a balanced approach to regulating loot boxes, taking into account the interests of different groups of players and the commercial interests of game developers, including: setting spending limits, introducing a fairer reward structure, encouraging manufacturers to ethically design games through tax incentives, and constantly monitoring the effectiveness of both industry self-regulation and legal regulation to minimise potential negative consequences.

M. Hilbrecht et al. (2020) developed a conceptual framework for understanding the harmful effects of gambling that goes beyond a symptomatic approach. The researchers identified eight interrelated factors that represent the main themes in gambling, ranging from specific (gaming environment, exposure, types of gambling, and treatment resources) to general (cultural, social, psychological, and biological influences). The authors also considered emerging themes that reflect changes in the gambling landscape and leading discourses in the scientific community. L. Kraus et al. (2022) conducted a comprehensive analysis of the effectiveness of self-exclusion programmes as a tool for reducing gambling harms in different jurisdictions. The researchers studied national legal frameworks and self-exclusion programmes in Finland, Germany, Italy, and other countries. Based on the analysis, the authors concluded that the use of self-exclusion programmes needs to be significantly increased by reforming legal frameworks and exclusion conditions.

K. Kolandai-Matchett and M. Wenden Abbott (2022) conducted an in-depth study of the convergence of gaming and gambling. The authors identified multiple contexts of intersection (game elements in gambling, games with gambling elements, betting on games, free simulated online gambling, social media games, and gambling) driven by technological progress and commercial interests. The researchers justified the need for preventive regulation to prevent potential risks.

Overall, previous research demonstrates substantial progress in the study of gambling regulation. However, it remains largely fragmented and sectoral. Scholars have concentrated primarily on the legal and psychological aspects of gambling regulation or the technological challenges of the digital era. Yet, the

institutional and organisational dimensions of how legal mechanisms operate in practice, particularly in the Kazakh context, remain insufficiently examined. The effectiveness of preventive measures such as self-exclusion systems, age verification, educational campaigns, and rehabilitation programmes has not been systematically assessed, and little attention has been paid to the coordination among state, financial, and health institutions in combating gambling addiction.

While the majority of prior studies have explored the legal foundations of gambling regulation, they rarely address the interplay between law, institutional practice, and governance efficiency. This study fills that gap by analysing the Kazakhstani model of combating gambling addiction as an integrated system, combining legal, organisational, and comparative analysis. Unlike purely normative works, it investigates how regulatory mechanisms are implemented, coordinated, and adapted to national socio-economic conditions, thereby offering an original perspective that links legal regulation with institutional functionality and public policy effectiveness.

## MATERIALS AND METHODS

The research was based on a wide range of legal acts, analytical materials and statistical data. The legal framework was based on: the Law of the Republic of Kazakhstan No. 219 “On Gambling Business” (2007), which defined the basic principles of gambling business regulation; the Law of the Republic of Kazakhstan No. 116-VIII “On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Gambling Business” (2007), which introduced significant changes to the regulatory system; the Law of the Republic of Kazakhstan No. 235-V ZRK “On Administrative Offenses” (2014), which established liability for violations in the field of gambling business; the Comprehensive Plan for the Prevention of ludomania.

The research was based on a wide range of legal acts, analytical materials and statistical data. The legal framework was based on: the Law of the Republic of Kazakhstan No. 219 “On Gambling Business” (2007), which defined the basic principles of gambling business regulation; the Law of the Republic of Kazakhstan No. 116-VIII “On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Gambling Business” (2007), which introduced significant changes to the regulatory system; the Law of the Republic of Kazakhstan No. 235-V ZRK “On Administrative Offenses” (2014), which established liability for violations in the field of gambling business; the Comprehensive Plan for the Prevention of ludomania.

A critical source of information was departmental regulatory documents: orders and instructions of the Ministry of Culture and Sports (2020) and the

Ministry of Health and Social Development (2015), which detailed licensing and control mechanisms; resolutions and instructions of the Committee for the Regulation of Gambling Business (2025), which set technical requirements for operators and inspection procedures. For the comparative analysis, the regulatory documents of European regulators: materials of the French regulator National Gambling Authority (ANJ) (2025), the British Gambling Commission (2025), and the Danish regulator Spillemyndigheden (2025) were used, which allowed studying the best practices of gambling business regulation.

The international context of the study was provided by the World Health Organisation (WHO) (2025) documents on the classification of behavioural addictions, recommendations of the European Commission (2014) on the regulation of online gambling, and reports of the International Centre for Responsible Gaming (ICRG) (2024). The statistical base of the study was formed by the data of the Financial Monitoring Agency of Kazakhstan on the detection and blocking of illegal online platforms (LS, 2024), reports of the Ministry of Finance on tax revenues from the gambling business, analytical materials of industry associations. The source of economic data was the analytical report by EnergyProm (2023) on the dynamics of the gambling market of Kazakhstan, which contained statistical indicators of the volume of industry services and structural changes in the market for the period of 2019-2023, including data on the reduction in the number of gambling companies and the growth of the share of foreign operators. Additional sources were publications in specialised media and information portals (Kursiv Media, 2024; Kazakhstan Today, 2024; Liter, 2025), covering the practical implementation of state policy and public reaction to regulatory initiatives.

Analytical reports by international consulting companies on the state of the global gambling market (iGaming, 2024), The Lancet study on the spread of gambling addiction (El País, 2024), and materials of the European Gaming and Betting Association (2019) on responsible gambling programmes were crucial for the study.

The methodological basis of the study of the Kazakhstani model of combating gambling addiction was based on a systematic approach that allowed considering the regulation of gambling business as a complex system of interrelated legal, institutional, economic and social components. The theoretical basis was provided by the concepts of “smart regulation” and “regulatory state”, which ensured the assessment of the balance between public interests and economic efficiency. A key role was played by the comparative legal method used to compare the regulatory frameworks of Kazakhstan and Western European countries (France, Germany, the UK, and Scandinavian countries, in particular Sweden and Denmark), which helped to identify the specifics of Kazakhstan’s

approach to territorial zoning, licensing and control mechanisms. The analysis was complemented by a formal legal method to determine the legal status of the regulated entities and a historical and legal approach to trace the evolution of legislation. Additionally, institutional and structural-functional analysis methods were used to study the interaction of government agencies, identify coordination problems, and assess the effectiveness of the regulatory system. The modelling method was used to develop proposals for improving the model of combating gambling addiction, considering international experience and national specifics.

## RESULTS

### **Theoretical and legal foundations of combating gambling addiction**

Gaming regulation has traditionally relied on direct monitoring of casinos and gaming rooms through inspections and documentation. Online platforms have rapidly changed the regulatory environment because virtual casinos use servers in other jurisdictions and sophisticated digital methods to attract customers, complicating traditional government control mechanisms. Online gambling has developed rapidly due to globalisation, allowing operators to operate in multiple countries with no government control. Authorities need flexible legal procedures for local and cross-border issues. Market study shows that the global gaming sector in the US generated USD 160.4 billion in 2024 and would grow to USD 263.5 billion by 2029, making it an appealing field for private investment (iGaming, 2024). Research in *The Lancet* (El País, 2024) found that 80 million adults globally experience gambling addiction, with over 448 million at risk of developing it. State legal regulation systems aim to balance safeguarding citizens from gambling's negative effects with generating budget funds, such as by taxing gaming facilities.

Gambling addiction is lawful because of its medical nature and the state's social order interest (Asanbek kyzy & Sydykova, 2024). Two strategies are used to regulate gambling addiction. Prevention includes forbidding children from gambling, mandating strict personal identification when registering online, publishing hazard warnings, and developing hotlines or psychological treatment facilities. Large fines for licensing violations, strict financial transaction control, and fighting money laundering and other gambling-related economic crimes are punitive and regulating methods (Baturin & Moroz, 2024). International gambling advertising regulation and responsible gambling initiatives are formed. French, German, British, and Scandinavian countries like Sweden and Denmark prohibit advertising content and distribution. The French centralised regulator ANJ regulates advertising airtime. German law prohibits misleading advertising and provides federal states additional freedom. UK advertising infractions can cost

millions. Sweden and Denmark use self-exclusion to block games and advertising. Ads must be broadcast within a specific timeframe, cannot target vulnerable groups, and meet content criteria (ANJ, 2022). Government regulations mandated operators to build self-restriction systems, gambling habit monitoring, and betting limits in addition to advertising prohibitions (French Games (FDJ), 2024). The effectiveness of international responsible gaming standards and certifications is shown (ECA, 2024). State authorities and specialised supervisory agencies must apply gambling policy to fight addiction. Specialised regulatory agencies must oversee licence terms and ensure operators perform due diligence, according to international consensus. The European Commission recommends appointing accountable entities to monitor and enforce national gaming restrictions. Paragraph 51 of Commission Recommendation No. 2014/478/EU “On Principles for the Protection of Consumers and Players of Online Gambling Services and for the Prevention of Minors from Gambling Online” (2014) requires Member States to appoint specialised regulatory authorities to independently monitor player protection. The Commission suggests tracking player account openings and closings, self-excluded players, and gambling issue sufferers (paragraph 53). These recommendations protect consumers and limit the economic effect of compulsive gambling (European Commission, 2014). Institutional systems needed self-restriction and gambling issue databases. Research reveals that regulatory systems require regular oversight and a robust support infrastructure (Kraus et al., 2022).

An essential aspect of the theoretical basis for combating gambling addiction is the awareness of its multidisciplinary nature. Law enforcement practice cannot be limited to sanctions against operators or the prohibition of certain types of gambling. Close cooperation with medical institutions, public associations specialising in the treatment of addictions, and educational institutions is needed to foster critical thinking and a culture of responsible gambling among young people (Table 1). A number of countries in Western and Central Europe have comprehensive Responsible Gaming programmes that include legal mechanisms (licensing, control), preventive educational campaigns, and rehabilitation initiatives in hospitals and special centres. In particular, the UK has the GamStop system for self-exclusion of players, Sweden has Spelpaus for blocking access to gambling platforms, France’s ANJ regulator implements mandatory betting limits, and Denmark’s StopSpillet hotline provides support to addicts (Gambling Commission, 2025; Spillemyndigheden, 2025; ANJ, 2022). Legal guarantees of funding for such programmes are enshrined in the relevant legislative acts, as deductions for the treatment of gambling addiction are often

taken directly from taxes received from gambling operators (European Gaming and Betting Association, 2019).

Type of institution	Preventive mechanisms	Treatment and rehabilitation methods	Interdepartmental interaction
Medical institutions	Early diagnosis and screening Risk assessment Reporting signs of addiction	Cognitive behavioural therapy Group therapy sessions Pharmacological support	Cooperation with social security services Coordination with rehabilitation centres Joint clinical trials
Educational institutions	Educational programs about the risks of gambling addiction Financial literacy, cost control courses Support groups	Psychological support in training centres Counselling for families Integration with prevention programs	Joint activities with prevention centres Contacts with psychologists and social services
Research institutes	Development and improvement of risk assessment methodologies Research of behaviour patterns	Expert assessment of the effectiveness of rehabilitation methods Scientific monitoring of treatment results	Data exchange with medical institutions Providing recommendations to lawmakers Cooperation with international organisations
Community/supporting organisations	Social actions and information campaigns Hotlines and initial consultations Dissemination of materials about risks	Crisis intervention and emergency care Creating networks of mutual aid groups Psychosocial rehabilitation	Referrals for inpatient treatment Coordination with government programs Participation in community initiatives
Financial institutions	Transaction monitoring and payment behaviour analysis Automatic blocking of suspicious gambling expenses	Debt restructuring programs Financial rehabilitation and counselling Return to legal lending	Data exchange with regulatory authorities Joint projects with addiction treatment centres
Law enforcement agencies	Control over illegal gambling business Prevention of participation of minors Monitoring of compliance with licences	“Diversion” – programs (redirection instead of punishment) Support for people at risk Post-rehabilitation control	Coordination with regulators Data exchange with operators and medical institutions Joint preventive measures

**Table 1** – Institutional approaches to the prevention and treatment of gambling addiction

Source: compiled by the authors based on J. Wheaton et al. (2024), L. Blank et al. (2021) P. Johnstone and M. Regan (2020).

The analysis of institutional approaches presented in Table 1 indicates that for Kazakhstan, the most significant institutional components are those related to law enforcement, medical, and financial institutions, as they correspond to the country’s dominant regulatory logic of centralised state control and preventive

restrictions. Law enforcement agencies play a decisive role because Kazakhstan's legislative model emphasises administrative and criminal sanctions for illegal gambling and the prevention of minors' involvement, as reflected in the Law of the Republic of Kazakhstan No. 219 "On Gambling Business" (2007) and its later amendments. This aligns with the national focus on deterrence through punishment rather than voluntary participation in rehabilitation programmes. Equally important are medical institutions, whose role is gradually expanding under the Law of the Republic of Kazakhstan No. 432 "On approval of the Comprehensive Plan for Combating Illegal Gambling and Gambling Addiction in the Republic of Kazakhstan for 2024-2026" (2024). The inclusion of psychological counselling and state-funded rehabilitation demonstrates a shift towards recognising gambling addiction as a public health issue rather than merely a moral or legal one. These measures bring Kazakhstan closer to Western European practice, though the scale of implementation remains limited. Financial institutions, uniquely positioned to curb illegal monetary flows and enforce responsible-gambling policies, represent a third critical dimension.

The 2024 initiative prohibiting banks from transferring money to online casinos illustrates the growing significance of the financial sector in prevention. Combining financial monitoring with health and social protection agencies could be the first step towards a more complete inter-institutional system. In contrast, community and educational institutions, although included in the framework, currently play a minor role in Kazakhstan compared with Western European models. Strengthening their involvement through awareness campaigns, school-based prevention, and cooperation with NGOs would contribute to building a sustainable, socially orientated model consistent with international standards. By identifying these priorities, the table not only structures the institutional landscape but also points to the need to rebalance Kazakhstan's policy from punitive measures toward preventive and rehabilitative approaches, ensuring stronger alignment between institutional practice, the study's objectives, and the concluding recommendations.

Kazakhstan's gaming law is influenced by international standards but has its unique concepts. The Law of the Republic of Kazakhstan No. 219 "On Gambling Business" (2007) established explicit standards for gambling facilities (casinos and betting shops), specified casino regions, and established a licensing system. This law identifies gambling addiction as a social problem, but it focusses on business processes and taxation rather than addict rehabilitation. In recent years, bylaws and amendments, such as Law No. 116-VIII (2007) and the Comprehensive Plan for Combating Illegal Gambling and Gambling Addiction for 2024-2026 (2024), have tightened requirements for operators to prevent minors from entering gambling venues, imposed harsh penalties for advertising

violations, and increased state supervision of online platforms. In particular, the Law of the Republic of Kazakhstan No. 116-VIII (2007) enhanced gaming control by amending the Criminal Code and gaming Law. The most significant changes include criminal liability for organising an electronic casino or online casino with a fine of up to 2,000 minimum wages or imprisonment for up to 7 years; a unified betting system for bookmakers and sweepstakes; consultative supervision of pathological gamblers in mental health institutions, and a ban on public advertising of betting shops and sweepstakes (Lijagegnehu Biru et al., 2025). The analysis of these documents shows Kazakhstan's desire to meet international standards, but there are still issues with a unified state strategy for gambling addiction prevention and treatment and coordination between executive authorities.

Thus, the theoretical and legal framework for fighting gambling addiction views it as a complex social and legal issue requiring balanced state action. Globally, there is a growing consensus on the necessity for integrated addiction prevention, information, control, and recovery strategies. Western European countries show that sharing responsibility between the state regulator, gambling business operators, and NGOs is effective and that effective legal mechanisms to combat advertising, money laundering, and unfair competition in the gambling sector are necessary. Kazakhstan is considering foreign gambling addiction treatment models while facing internal constraints.

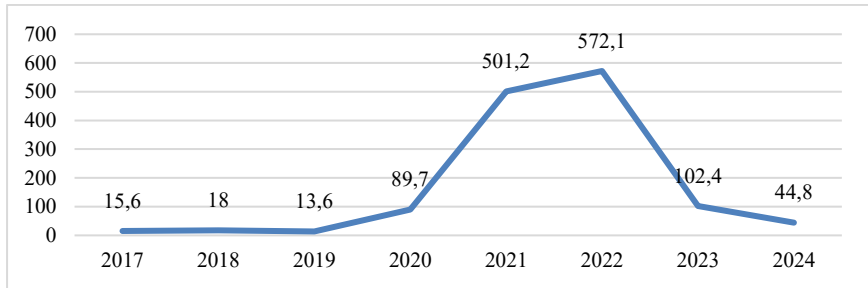
### **Legal regulation of gambling activities in Kazakhstan and comparison with Western European models**

The legal framework of the gambling business in Kazakhstan is based on a set of regulations that define mandatory conditions for the operation of casinos, betting shops, slot machine halls and other forms of gambling, as well as establishing preventive measures against gambling addiction. As already mentioned, the central document is the Law of the Republic of Kazakhstan No. 219 (2007), which regulates the procedure for obtaining licences, places of permitted activities and types of gambling that can be conducted legally. The Law requires that gambling activities be restricted to special areas (so-called gambling zones) and sets out rules governing the liability of venue owners for non-compliance with rules and prohibitions, including those related to serving minors or persons without IDs. In 2024, the structure of this legislative act was supplemented and clarified by the provisions of the Law of the Republic of Kazakhstan No. 116-VIII (2007). These amendments strengthened the mechanisms of state supervision over gambling activities, provided for stricter control measures in the online environment and enshrined the right of regulatory authorities to block access to illegal websites. In particular, the innovations include restrictions on participation in gambling for persons holding responsible government positions, military personnel, employees of special and law enforcement agencies, and heads of budget organisations. Violation of these

restrictions will result in dismissal from office. In addition, the list of persons prohibited from participating in gambling has been expanded to include persons listed in the Unified Register of Debtors.

Subordinate legislation developed by the authorised bodies plays a significant role in the legal regulation of the gambling sector and the fight against gambling addiction (Osanova et al., 2024). In particular, the Ministry of Culture and Sports of the Republic of Kazakhstan (2020) adopts detailed licensing rules, the procedure for reporting by operators and sets requirements for player identification. These documents focus on preventive measures: operators must check the age and identity of visitors, keep electronic logs of refusal to play, and conduct educational work on the consequences of gambling addiction. In turn, the Committee for Regulation of Gambling Business and Lotteries of the Republic of Kazakhstan (2025), which operates within the Government, has control functions and carries out scheduled and unscheduled inspections of gambling facilities, monitors the compliance of advertising with the established standards and imposes administrative penalties in case of violations. Such mechanisms are provided for, in particular, in Articles 444-450 of the Administrative Offences Code (2001), which define the amount of fines, suspension, or revocation of licences and the grounds for applying administrative enforcement measures. Additionally, in 2024, the Comprehensive Plan for Combating Illegal Gambling and Gambling Addiction in the Republic of Kazakhstan for 2024-2026 was approved (2024). The plan includes measures to organise the prevention of gambling addiction, identify gambling addiction among different population groups, treat and provide medical and social rehabilitation for people suffering from gambling addiction, and improve state regulation of the gambling business. The implementation of this plan is expected to reduce the number of people who regularly engage in gambling and betting, as well as increase the coverage of people suffering from pathological addiction with free treatment and rehabilitation at the expense of the state.

The practice of applying these norms demonstrates the state's desire to restrict gambling activities in a way that minimises the risks of attracting people with a tendency to gambling addiction. One of the central instruments has been the requirement of licensing authorities to locate gambling facilities only in officially designated areas, such as the Burabai Resort Zone (Akmola region), where government agencies can more easily monitor compliance with safety and social responsibility standards (Law of the Republic of Kazakhstan No. 219..., 2007). Figure 1 shows an analysis of the gambling market in Kazakhstan.



**Figure 1** – Economic dynamics of the gambling market in Kazakhstan (2017-2024), billion tenge

*Source: compiled by the authors based on EnergyProm (2023).*

Figure 1 shows that the gambling market in Kazakhstan has been changing dynamically, with the volume of services in this sector growing from 13.6 billion to 501.2 billion tenge between 2019 and 2021. In 2022, the figure reached 572.1 billion tenge, which reflects an increase of 14.1%. However, in the first quarter of 2023, the volume of services decreased to KZT 102.4 billion, which is a 26.6% decrease compared to the same period in 2022.

At the same time, the market is consolidating: the number of business entities in the gambling business has decreased from 93 to 35 over two years, with the largest reduction in the Almaty region. Structural changes in the industry are characterised by an increase in the share of the online segment, which accounted for 353.8 billion tenge (61.8% of the total market) in 2022, while land-based casinos generated only 26.4 billion tenge. An additional factor in the market transformation is the growing presence of foreign-owned organisations: the share increased from 12.7% in 2017 to 39.5% in 2022, and the amount of funds allocated to non-resident organisations was 225.9 billion tenge in 2022 (EnergyProm, 2023).

According to the Ministry of Tourism and Sports, 8,284 materials with signs of online casino activity were entered into the Cybernadzor information system, of which 4,459 sites were blocked (Kursiv Media, 2024). However, organisers quickly create mirror sites, continuing illegal activities. In 2024, the Financial Monitoring Agency reported the closure of access to 11.7 thousand online casino sites, which indicates a growing problem and the need for a comprehensive approach to solving it (Liter, 2025). The Vice Minister of Tourism and Sports Miras Tulebayev noted that there is no universal solution to this problem, and even in countries with strict censorship, online casinos continue to exist (Ulys Media, 2024). In addition to blocking websites, in 2024, more than 1,600 billboards advertising betting shops were dismantled, and restrictions were introduced on gambling advertising in inappropriate places (Auespekova, 2025). In addition, it is planned to prohibit banks from transferring money to online casinos, which should complicate financial transactions for illegal operators (Bes.media, 2024). Despite the measures taken, the problem remains relevant, requiring further efforts and the development of new strategies to effectively

combat illegal gambling. Legislation also requires operators to record the presence of civil or identity documents of players and to install age filter systems to prevent minors from participating in bets or games.

The issue of player verification deserves special attention, as it is a key aspect of gambling regulation and security. The legal requirements for user identification are based on international financial control standards that have proven to be effective in preventing fraud and protecting vulnerable groups (Vliamos, 2024; Permatasari et al., 2025). The mandatory identification mechanism (KYC) is borrowed from international financial monitoring practices, which involves a comprehensive verification of user data, in particular to combat money laundering. As defined by Dow Jones, KYC is a set of guidelines that financial institutions and businesses follow to verify the identity, compliance, and risk of a current or potential customer in order to detect suspicious behaviour, such as money laundering and financial terrorism, before it materialises (Dow Jones, 2024). The KYC process consists of three main stages. The first is the customer identification programme (CIP), which requires at least four elements of identification information: name, date of birth, address, and identification number. The second stage is customer due diligence (CDD), which classifies the information collected and assesses whether the customer's activities match the historical data. The third stage is enhanced due diligence (EDD), which is applied to high-risk customers, including politically exposed persons or persons with links to designated persons (Dow Jones, 2024).

Measures aimed at restricting access for vulnerable groups are of particular importance in the prevention of gambling addiction in Kazakhstan. In 2024, a digital service was introduced that allows citizens and residents of the country to voluntarily limit the participation in gambling and betting for a period of 6 to 12 months through the eGov mobile application. After submitting an application, a person is automatically included in the list of persons restricted from participating in gambling and betting without the right to withdraw the application. Only authorised officials and licensed gambling business organisers have access to the list upon individual requests, which ensures confidentiality of information (Ministry of Digital Development..., 2024). In addition, the state actively conducts outreach through state media and official web portals, emphasising the dangers of gambling addiction and the need to seek timely help from specialists. For example, in Aktobe region, screenings are conducted among different segments of the population to identify risk groups and increase financial literacy, which helps to prevent online fraud and prevent gambling addiction (Akimat of Aktobe Region, 2024). These initiatives demonstrate Kazakhstan's commitment to developing gambling harm reduction methods adapted to international approaches.

In Western European countries, gambling business regulation models are characterised by a variety of approaches that range from centralised control to decentralised management. France has a single regulator, the ANJ, established in 2010. This body operates as a "one-stop shop", providing licensing, control of advertising activities, anti-money laundering, and coordination with law enforcement agencies. The ANJ is also responsible for the implementation of

responsible gambling policies (ANJ, 2025). In Germany, the gambling business is regulated in accordance with the State Treaty on Gambling (2025), which entered into force on 1 July 2021. The treaty provides for the possibility of licensing online casinos across the country, but supervision of compliance with the rules is assigned to the federal states, which can set additional regional restrictions.

In the UK, gambling business is controlled by the Gambling Commission (2025), which is responsible for licensing, regulating operators and implementing self-restriction mechanisms for players. One of the key tools is fining unscrupulous operators that can receive sanctions in the amount of millions of pounds. In the Scandinavian countries (Sweden, Norway, Denmark), the model of state or semi-state operators prevails. For example, in Norway, Norsk Tipping is controlled by the state, and a significant part of its profits is directed to social programmes, in particular, to finance rehabilitation centres (Spillemyndigheden, 2025). Thus, Western European models are distinguished by a high level of protection of players' rights, focus on the prevention of gambling addiction, and widespread use of social responsibility mechanisms. At the same time, compared to the Kazakhstani model based on gambling zoning and strict control, Western European countries demonstrate a greater diversity of approaches and wider involvement of non-governmental structures.

However, although Kazakhstan has some similarities with European practice (licensing, mandatory identification, advertising restrictions, penalties), the differences are primarily in the level of state intervention and the specifics of territorial zoning. While in some EU countries (e.g. France or Germany), the model of strict state control over online gambling prevails, physical casinos and slot machine halls can operate without being tied to a single resort area. In Kazakhstan, there is an emphasis on the creation of separate regions designated for gambling activities, which, on the one hand, simplifies state control, and on the other hand, limits the development of this economic segment in different regions. The level of penalties is also not as high as in the UK, but, according to the Committee of the Ministry of Culture and Sports (2020), it still allows responding to violations related to the admission of minors or advertising that does not meet certain ethical standards. In terms of market liberalisation, the Kazakhstani model retains the principle of the state's leading role in licensing and supervision, while Western European countries often involve a wider range of non-governmental structures and public associations.

The adaptation of the Kazakh model to the European context and the integration of certain European approaches in Kazakhstan should be considered taking into account the historical, sociocultural and economic characteristics of both regions. The Kazakh model of territorial zoning of the gambling business, which provides for the creation of specialised regions, in particular in the Burabai resort area and near the Kapshagai reservoir, is of potential scientific and practical interest to European countries with developed tourist infrastructure in terms of optimising regulatory oversight and increasing the efficiency of control over the operation of gambling facilities. However, the growing competition in the entertainment sector in Europe may complicate the implementation of this

approach. Instead, the integration of full-scale self-restriction systems, such as the UK's GamStop or Sweden's Spelpaus (2025), seems to be appropriate, but also difficult to implement. The GamStop programme introduced in the UK is a centralised system that allows players to be excluded voluntarily from gambling. Players who register with GamStop are automatically blocked from all licensed gambling operators in the country, which helps to reduce the risk of gambling addiction (Anderson, 2025). Similarly, Sweden has a system called Spelpaus that provides voluntary exclusion of players from gambling. Spelpaus is integrated into the national database, which allows effectively blocking access to gambling platforms and gambling advertising for registered users. Implementation of such systems in Kazakhstan will require significant investments in technical infrastructure and legal detail to ensure that such registers are mandatory for all licensed operators.

Thus, Kazakhstan's experience in legal regulation of gambling activities includes the creation of specialised gambling zones, a strict licensing system, mandatory identification and a number of measures to prevent gambling addiction, in particular by restricting advertising and blocking illegal websites. Despite certain similarities with Western European models (licensing, institutional oversight, self-restraint mechanisms), there are significant differences in terms of territorial organisation, distribution of powers and the amount of fines. The role of the state in Kazakhstan remains more dominant, especially in terms of determining the regions of permitted activities. At the same time, the experience of European countries that are actively developing responsible gambling programmes and unified electronic registers of addicts can be valuable for further improvement of Kazakh legislation, especially in the online segment. These processes demonstrate the logic of the mutual influence of legal systems and suggest that elements of both the Kazakh and Western European models can complement each other, but full integration will remain selective due to the specific regulatory approaches and socio-economic conditions of each country.

### **Organisational challenges and prospects for improving the Kazakhstani model**

The implementation of Kazakhstan's approach to combating gambling addiction faces a number of challenges, especially in the area of monitoring and control over gambling facilities. According to the official data of the Financial Monitoring Agency, in 2023, more than 40 illegal online gambling platforms were eliminated, and more than 5.7 thousand websites and accounts were blocked (LS, 2024). Despite these measures, the annual amount of funds withdrawn from the country through illegal gambling exceeds 1 trillion tenge, according to the Agency's official reports (LS, 2024). According to the Vice Minister of Tourism and Sports Miras Tulebayev, even in countries with strict censorship, online casinos continue to exist, which indicates that there is no universal solution to the problem (Ulys Media, 2024). The lack of a unified information system makes it difficult to coordinate actions between different agencies. To address this

problem, the government of Kazakhstan adopted the Comprehensive Plan for Combating Illegal Gambling and Gambling Addiction for 2024-2026 (2024), which provides for the creation of a unified betting accounting system for bookmakers and sweepstakes.

Another significant barrier is the difficulty of proper monitoring and control of gambling facilities, especially in the online environment. According to the Financial Monitoring Agency, in 2023, more than 40 illegal online gambling platforms were shut down and more than 5,700 websites and accounts were blocked (LS, 2024). Due to the diversity of digital platforms and the ease of creating mirror sites, supervisory authorities have to act in a rapid response mode, blocking web resources after detecting violations. At the same time, illegal gambling operators are often registered outside the jurisdiction of Kazakhstan, taking advantage of weaknesses in international law on cybercrime, which leads to the annual withdrawal of more than 1 trillion tenge from the country (LS, 2024). This requires active cross-border cooperation both within regional initiatives and at the global level. In addition, the geographical factor plays a role in complicating control: gambling zones located in remote areas sometimes remain beyond the operational reach of authorised bodies, which opens up space for dishonest operators or grey schemes.

The imperfection of judicial practice is manifested in the unequal interpretation of the provision on liability for organising or promoting gambling, which leads to contradictory decisions in such cases and creates an atmosphere of legal uncertainty. This is confirmed by the decision of the Constitutional Court of the Republic of Kazakhstan, which, having considered an appeal on the legality of limiting judicial protection in case of non-payment of winnings in a betting shop, explicitly stated that “some provisions of Article 914 of the Civil Code of the Republic of Kazakhstan (1994) in its current version are not formulated clearly enough, do not allow for the uniform understanding and application, and allow for different interpretations” (Tengrinews, 2025). The Constitutional Court recognised that the exclusion of judicial protection of winnings in gambling organised by a state-licensed gambling business entity contradicts the basic principles of the civil legislation of the Republic of Kazakhstan.

Analysis of specific court decisions demonstrates significant discrepancies in law enforcement practice. An illustrative example of this inconsistency is the case of the Olimp bookmaker, when in 2019, the Specialised Interdistrict Administrative Court of Almaty suspended the licences of Only bet LLP and Alpha bet LLP with the Olimp bookmaker trademark for six months for conducting illegal activities through Internet resources (Kursiv Media, 2019). However, in a similar case in 2014, when the company was accused of tax evasion in the amount of 300 million tenge, the court imposed only a fine of about 2 million tenge on the head of the company, Petro Davydenko, without suspending the company’s activities (Kursiv Media, 2019). Another example of a different approach to the application of punishment is the case of 2023, when the Interdistrict Criminal Court of Astana (2023) sentenced three citizens to 4 years in prison for organising illegal poker games with illegal income of 44 million tenge, applying a much harsher punishment than in similar cases.

These discrepancies are not isolated cases, but rather a symptom of deeper systemic flaws in the enforcement of gambling legislation. Inconsistent court rulings, varying severity of penalties, and a lack of uniform standards of interpretation indicate insufficient legal certainty in the national regulatory framework. Such fragmentation undermines the predictability of law enforcement and reduces public confidence in the justice system. Thus, analysis of the Olimp case and similar court decisions highlights not only institutional shortcomings but also a structural problem: the gambling control regime in Kazakhstan remains vulnerable to inconsistent application of rules, selective prosecution, and insufficient coordination between judicial, law enforcement, and regulatory authorities. To address these shortcomings, a consistent policy of harmonizing judicial practice, clearer legislative wording, and the establishment of interpretive guidelines ensuring equality before the law are needed.

Given the complexity and scale of these challenges, government agencies are strengthening legislative responsibility in this area. In 2024, criminal liability for organising an illegal gambling business was introduced with a fine of up to 2000 minimum monthly wages or imprisonment of up to 7 years (Kazakhstan Today, 2024). According to the Parliament of Kazakhstan, to address these problems, the requirements for gambling businesses and the rules for the admission of citizens to gambling were further tightened, and administrative liability for violations of the legislation in this area was introduced (Administrative Offences Code, 2001). The Constitutional Court also recommended that the government consider bringing the legislation of the Republic of Kazakhstan in line with the regulatory resolution on the protection of the rights of players in licensed gambling (Tengrinews, 2025). A comprehensive analysis of the main challenges faced by the Kazakhstani model of gambling regulation and countering gambling addiction reveals a number of interrelated problems that require systemic solutions (Table 2).

<b>Challenge</b>	<b>Influence</b>
Lack of a unified statistical database	Inconsistent data, making it difficult to accurately assess preventive measures
Difficulties in monitoring online gambling platforms	Ineffective response to illegal platforms; continued operation of mirror sites
Geographical and logistical challenges	Remote gambling zones have escaped supervision, allowing the use of grey schemes
Corruption risks in the supervision process	Reduced control efficiency; illegal operations go unnoticed
Insufficiently developed prevention and rehabilitation programmes	Limited access of citizens to treatment and preventive measures
Limited cross-border cooperation	Inability to effectively combat international illegal operations
Insufficient social responsibility of operators	Lack of funding for rehabilitation and prevention initiatives

**Table 2** – Key organisational challenges in combating gambling addiction and the consequences

*Source: compiled by the authors based on P. Johnstone and M. Regan (2020), H. Lam and M. Harcourt (2024).*

The structured analysis presented in Table 2 demonstrates the systemic nature of the problems in Kazakhstan's model of gambling regulation and control. Particular attention is drawn to the interdependence of the identified challenges, where shortcomings in one area create a multiplier effect that reduces the effectiveness of the entire system of combating gambling addiction. It is important to note that overcoming these challenges requires not only targeted changes in certain areas, but also a comprehensive review of approaches to control and prevention, including improving mechanisms of interagency cooperation, strengthening human resources and introducing modern technological solutions. Understanding these interrelationships is fundamental to developing an effective strategy for modernising the existing model and introducing innovative regulatory mechanisms that meet the current challenges in the field of combating gambling addiction.

Prevention and rehabilitation programmes remain an important element in the fight against gambling addiction, which are implemented in Kazakhstan by both public and private initiatives (Akmatova, 2024). In the public sector, such activities are mainly coordinated by the Ministry of Health and local health departments, which conduct information campaigns on the risks of gambling, organise trainings for medical staff on the identification and treatment of gambling addiction, and supervise the work of specialised departments in psychoneurological dispensaries (Press Service of the Government..., 2023). In several large cities, there are private clinics offering coding and psychotherapeutic rehabilitation programmes with the involvement of psychologists, psychiatrists, and social workers. Nevertheless, the scale of prevention and treatment services is generally smaller than in Western European countries, where the system of insurance medicine and public funding provides access to rehabilitation services for the general population. For example, Denmark has a government hotline called StopSpillet to support people with gambling addiction, as well as the ROFUS register, which allows players to be excluded voluntarily from gambling. In addition, state medical institutions offer free therapy courses for addicted gamblers. In Poland, a special fund has been created to address gambling problems, financed by a portion of the revenues from the state monopoly on gambling; this fund supports research, prevention, and treatment of gambling addiction. In Italy, gambling addiction is officially recognised as a disease and its treatment is included in the national healthcare system, which ensures that therapy is accessible to the general population. Such measures contribute to the effective prevention and rehabilitation of addicts in these countries (Commission for the Regulation of Gambling..., 2023). In Kazakhstan, the public sector in this area is underdeveloped, which limits the possibility of providing free psychological assistance and long-term post-rehabilitation support.

In searching for ways to improve the Kazakhstani model, a comprehensive approach is advisable, which includes both changes in the legal framework and organisational initiatives. Firstly, it is necessary to clarify the provisions in the administrative and criminal legislation of Kazakhstan on the liability of officials of regulatory authorities for negligence or corruption that contribute to the spread

of illegal gambling. In addition, the regulation of gambling operators' obligations in terms of funding rehabilitation initiatives, public reporting on corporate social responsibility programmes and the introduction of self-restraint mechanisms should be strengthened. An additional effective measure could be the creation of a unified register of people with gambling addiction or those who voluntarily choose self-restraint: similar registers exist in the UK (Gambling Commission, 2025), Denmark (Spillemyndigheden, 2025) and other countries, allowing operators to block accounts of those on the list and identify problem gamblers in time. The implementation of this project requires technical support from IT specialists and the development of a clear procedure for the protection of personal data in order not to violate the rights to privacy of citizens.

An important step towards the modernisation of the Kazakhstani model could be the expansion of cooperation with international organisations, such as the WHO (2025) and the International Centre for Responsible Gambling (ICRG, 2024), which provide methodological and expert support in the field of behavioural addictions. Involvement of foreign experts will allow for the implementation of experience exchange programmes, training programmes for Kazakhstani psychotherapists, psychologists and social workers, and the development of joint information strategies. It is also important to develop public-private partnerships, in which large gambling operators, leading banks and insurance companies will jointly fund prevention and rehabilitation projects with the state, as has been successfully implemented in Massachusetts through a coalition of the Attorney General's office, the Gambling Commission and sports teams (Massachusetts Gaming Commission, 2025). Enshrining such obligations in licensing agreements or legislation will contribute to the long-term stability and transparency of financial flows used to combat gambling addiction. Additionally, it is important to introduce support through Gamblers Anonymous groups, which use the 12-step programme to help people overcome addiction (Gamblers Anonymous..., 2025).

The prospects for increasing the effectiveness of the integrated Kazakhstani model in the future depend on the ability of the authorities to carry out in-depth reforms and ensure the actual implementation of the decisions made. On the one hand, the centralised nature of Kazakhstan's political system facilitates the introduction of new legislative initiatives. On the other hand, any changes risk remaining declarative without adequate human resources, integrity control and balanced funding. Public demand for transparent, socially-oriented gambling practices can act as an important incentive: with open discussion of gambling addiction and sufficient media coverage of the negative consequences of endless bets, the public can become a driver of further changes. Thus, Kazakhstan has the opportunity to develop its own model of combating problem gambling, gradually integrating elements of successful Western European practices while taking into account the country's specific organisational, economic and cultural characteristics. If it succeeds in achieving proper interagency coordination, overcoming corruption risks, and developing unified standards for the treatment and prevention of gambling addiction, the Kazakhstani model will be able to more

effectively protect citizens from gambling addiction, contributing to social stability and responsible development of the gambling business in the long term.

## DISCUSSION

The study of the Kazakhstani model of combating gambling addiction reveals systemic shortcomings in the existing regulatory mechanisms and demonstrates the need for a comprehensive approach to solving the problem of gambling addiction. The results of the analysis are of particular importance for understanding the specifics of regulatory policy formation in the context of the transformation of the gambling market and the digitalisation of society. The study demonstrates that the effectiveness of the existing system is limited by a number of interrelated factors, the lack of a unified methodology for collecting and analysing data on the spread of gambling addiction, and difficulties in countering illegal online operators. The study findings are particularly relevant due to the asymmetry between the development of digital technologies and the adaptation of regulatory mechanisms, which creates significant risks for vulnerable groups. The analysis of statistical data shows that the annual amount of funds withdrawn from the country through illegal gambling exceeds 1 trillion tenge, which underscores the scale of the problem and the need to urgently improve existing control mechanisms. The trends identified in the study point to the need to rethink traditional approaches to gambling regulation and develop new strategies to combat gambling addiction, taking into account both international experience and local specifics of Kazakhstan.

The cultural and social context of gambling regulation identified in this study finds an important theoretical basis in the work of M. Brešan (2020), who proposed a typology of gambling cultures. In contrast to this classification, where transitional culture is characterised by gradual adaptation to new forms of gambling, the study of the Kazakhstani model reveals a more complex picture. Regulatory mechanisms in Kazakhstan are developing unevenly, with a special emphasis on territorial zoning and access restrictions, which differs from the evolutionary model described by M. Brešan. At the same time, the identified tendency to strengthen state control confirms M. Brešan's thesis about the significant influence of institutional structures on the formation of gambling culture. The problems of counteracting online gambling identified in the Kazakhstani model demonstrate significant parallels with the results of the study by M. Egerer and V. Marionneau (2023). These authors found limited effectiveness of blocking measures without proper implementation and constant updating of technical solutions. The researchers' conclusion about the need to combine different blocking methods and create informative landing pages is particularly important. The Kazakhstani practice of blocking illegal websites demonstrates similar problems with technical implementation, but is further complicated by the lack of a unified system of monitoring and coordination between different agencies.

J.V. Teo (2020), studying regulatory approaches in East and Southeast Asia, found a clear correlation between the religious factor and the tightness of gambling regulation. The results of the analysis of the Kazakhstani model partially confirm this conclusion, demonstrating the influence of cultural factors on the formation of regulatory policy. However, in contrast to the countries studied by J.V. Teo, this influence is less pronounced in Kazakhstan due to the secular nature of the state and the focus on economic factors in the formation of regulatory policy. In turn, A. Price (2022) made an important observation about the growing risks of online gambling during periods of social restrictions during the pandemic. This observation is confirmed by the data on a significant increase in the number of blocked illegal online casinos in Kazakhstan during 2024. However, in contrast to A. Price's conclusions about the temporary nature of such changes, the Kazakh situation shows a steady upward trend in online gambling even after the lifting of restrictive measures.

The conceptual approach of M. Chóliz (2023), which considers gambling addiction as a "virus" and suggests focusing on limiting the availability of gambling, only partially corresponds to the results of the study of the Kazakhstani model. The analysis demonstrates the greater effectiveness of an integrated approach that combines territorial zoning with preventive measures and rehabilitation programmes. It was found that limiting accessibility through the creation of special gambling zones alone does not solve the problem, especially in the context of digital technologies. The conclusions of M.A. Donati et al. (2022) regarding the importance of professional training of prevention specialists are fully consistent with the identified problem of staff shortages in the regulatory authorities of Kazakhstan. However, the researchers' assertion about the effectiveness of short-term training programmes is not confirmed in Kazakh practice, where there is a need for longer and more systematic training of specialists. The problem of training specialists in combating digital forms of gambling is particularly acute.

L.Y. Xiao's (2021) study on the legal regulation of loot boxes demonstrates the effectiveness of a combined approach through legislative regulation and industry self-regulation. This partially contradicts the trend towards increased state control identified in the Kazakhstani model, but may be useful for the development of co-regulatory mechanisms, especially in the digital market segment. L.Y. Xiao's approach to defining minimum consumer protection standards deserves attention when improving the Kazakh regulatory framework. P. Saunders and K. Doyle (2021), studying the problem of gambling addiction among indigenous populations, found increased risks for certain social groups. This observation finds parallels with data on the higher vulnerability of certain social groups in Kazakhstan. However, the researchers' recommendations for a community-led approach differ significantly from the Kazakhstani model, which focuses on centralised state regulation. The experience of implementing community-based initiatives in the field of ludomania prevention in Kazakhstan remains limited.

A systematic analysis of European gambling policy conducted by N. Aimo et al. (2023) reveals similar problems with policy formulation and implementation

to the Kazakh model. However, the European experience shows a much greater focus on data collection and analysis for regulatory decision-making. The insufficient attention to the policy formulation and implementation phases identified by the authors is also characteristic of the Kazakhstani model, which confirms the need for a systematic approach to the development of regulatory mechanisms. I. Melnikov (2016) proposed a model of interconnected components of the gaming industry based on system dynamics, which allows assessing the effectiveness of various regulatory measures. Based on the model, the author proposed policy solutions to prevent gambling addiction and minimise its negative consequences for society. L. Kraus et al. (2022) draw attention to the limited effectiveness of self-exclusion programmes without significant coverage of the target audience. This conclusion is fully supported by the results of the analysis of the Kazakhstani self-exclusion system, which demonstrates a low level of use due to insufficient public awareness and technical limitations. The implementation of self-exclusion mechanisms in the online environment is particularly problematic.

X. Wu (2024) proposes the use of knowledge graphs to analyse criminal networks in online gambling. In contrast to X. Wu's optimistic conclusions about the effectiveness of this tool, the study of the Kazakhstani model reveals significant limitations in the technological capabilities of regulatory authorities and the need to develop basic analytical tools. The implementation of complex technological solutions is complicated by staff shortages and limited funding. K. Seryapova et al. (2020), in the study of venture capital investment in Kazakhstan, found that the country's leading venture capital funds are refusing to invest in gambling-related projects, which limits the ability to finance innovative technologies in the field of responsible gambling. Y. Jia et al. (2022) complement this understanding by analysing jurisdictional conflicts in the field of cross-border gambling, which is particularly relevant for Kazakhstan given its geographical location and integration processes in the region. A.Y. Zhatkanbaeva et al. (2021) emphasise the need for special measures to protect young people from gambling addiction, which is fully supported by the data on the increase in cases of underage gambling in Kazakhstan. The researchers' recommendations for strengthening educational programmes and introducing technical controls are supported by the results of the study. However, the practical implementation of these recommendations requires a significant increase in interagency coordination and the development of technical infrastructure.

Thus, the study of the Kazakhstani model of combating gambling addiction reveals a complex interaction of regulatory, social and technological factors that affect the effectiveness of measures to combat gambling addiction. Comparative analysis with international studies demonstrates both common problems (the complexity of combating online gambling, the need for professional training, the importance of protecting vulnerable groups) and specific challenges inherent in the Kazakh context (peculiarities of territorial zoning, limited technological capabilities of regulatory authorities, and difficulties in interagency coordination). The identified problems and trends point to the need for a systemic modernisation of the existing regulatory model, taking into account international experience and

local specifics, development of the technological potential of regulatory authorities and strengthening of preventive mechanisms to protect the population from gambling addiction. Particular attention should be paid to the development of mechanisms for monitoring and evaluating the effectiveness of regulatory measures, improving the system of interagency coordination and developing comprehensive gambling addiction prevention programmes that consider the cultural characteristics and socio-economic realities of Kazakhstan.

## CONCLUSIONS

The Kazakhstani model of combating gambling addiction is based on strict state control and the territorial concentration of gambling within designated zones. Its legal framework has evolved from simple licensing to a multi-level system that includes mandatory player identification, financial monitoring, and the blocking of illegal online platforms. The model's key feature is centralised management and geographic restriction, differing from the liberal European approach. However, effectiveness remains limited by weak monitoring, lack of unified data collection on gambling addiction, and persistent illegal online activity, over 5,700 sites were blocked in 2023, yet illicit transactions exceeded 1 trillion tenge. While the industry's value rose from 13.6 to 572.1 billion tenge (2019-2022), online gambling now dominates over 60% of the market. Preventive and rehabilitation programmes are underdeveloped, with minimal psychological support and NGO participation. Unlike European systems such as the UK's GamStop or Sweden's Spelpaus, Kazakhstan focuses mainly on control rather than prevention. Adopting selected European practices, like self-exclusion registers and responsible gambling initiatives, could enhance regulation, provided adaptations align with Kazakhstan's political and socio-economic context.

Limitations of the study include the lack of complete statistical information on the extent of gambling addiction and the inability to access internal documentation of gambling business operators. Further research should be directed at developing a methodology for assessing the effectiveness of preventive measures and studying the impact of digitalisation on the mechanisms of state control in the gambling business. Another important area is the study of economic aspects of regulatory policy and the search for an optimal balance between the fiscal interests of the state and the tasks of social protection of the population.

## DECLARATION OF CONFLICTING INTERESTS

The authors declare that they have no existing or potential conflicting interests with respect to the research, authorship and publication of this paper.

## ACKNOWLEDGEMENTS

This research has been funded by the Science Committee of the Ministry of Science and Higher Education of the Republic of Kazakhstan (Grant No. BR24992927 “Integrative study of gambling addiction in Kazakhstan and multidisciplinary strategies for its minimisation”).

## REFERENCES

- Administrative Offences Code. (2001). <https://adilet.zan.kz/eng/docs/K010000155>
- Aimo, N., Bassoli, M., & Marionneau, V. (2023). A scoping review of gambling policy research in Europe. *International Journal of Social Welfare*, 33(3), 659–674. <https://doi.org/10.1111/ijsw.12632>
- Akimat of Aktobe Region. (2024). *To prevent gambling addiction and identify risk groups, screening will be conducted among various segments of the population in the Aktobe region.* <https://www.gov.kz/memleket/entities/aktobe/press/news/details/889072?lang=ru>
- Akmatova, A. (2024). Impact of new technologies on psychological problems of youth. *Bulletin of the Jusup Balasagyn Kyrgyz National University*, 2024(3), 377-380. [https://doi.org/10.58649/1694-8033-2024-3\(119\)-377-380](https://doi.org/10.58649/1694-8033-2024-3(119)-377-380)
- Anara, S. B., Kim, A. I., Seraliyeva, A. M., & Gassanov, A. A. (2023). Criminological measures to counteract corruption offences in the field of illegal gambling. *Journal of Financial Crime*, 30(4), 1566–1578. <https://doi.org/10.1108/JFC-11-2021-0246>
- Anderson, J. (2025). GAMSTOP reports record registrations as new five-year auto-renewal option launches. *The Sun*. <https://thesun.co.uk/betting/32675875/gamstop-record-registration-exclusion-auto-renewal>
- Asanbek kyzy, A., & Sydykova, G. (2024). Psychological foundations of adolescent dependence on computer games. *Bulletin of the Jusup Balasagyn Kyrgyz National University*, 16(2), 154–161. [https://doi.org/10.58649/1694-8033-2024-2\(118\)-154-161](https://doi.org/10.58649/1694-8033-2024-2(118)-154-161)
- Astana City Court. (2023). *The court convicted 3 Astana residents for organizing an illegal gambling business.* <https://astana.sud.kz/residents/sud-osudil-3-zhiteley-astany-za-organizaciyu-nezakonnogo-igornogo-biznesa>
- Auespekova, A. (2025). *War on illegal advertising: 1.6 thousand bookmaker billboards removed in Kazakhstan.* <https://press.kz/novosti/voyna-s-nelegalnoy-reklamoy-v-rk-ubrali-16-tisyachi-bilbordov-bukmekerv-9f7e76>

- Baturin, M., & Moroz, S. (2024). AIFC Court: Theory and Practice. *Revista Juridica Portucalense*, 35, 602–618. [https://doi.org/10.34625/issn.2183-2705\(35\)2024.ic-28](https://doi.org/10.34625/issn.2183-2705(35)2024.ic-28)
- Bes.media. (2024). *In Kazakhstan, banks will be prohibited from transferring money to online casinos.* <https://bes.media/news/v-kazahstane-zapretyat-bankam-perevodit-dengi-v-onlayn-kazino-bed6a0/>
- Blank, L., Baxter, S., Woods, H. B., & Goyder, E. (2021). Interventions to reduce the public health burden of gambling-related harms: A mapping review. *Lancet Public Health*, 6(1), e50–e63. [https://doi.org/10.1016/S2468-2667\(20\)30230-9](https://doi.org/10.1016/S2468-2667(20)30230-9)
- Brešan, M. (2021). Pro-Gambling culture. *Research in Social Change*, 12(2), 58–79. <https://doi.org/10.2478/rsc-2020-0009>
- Chóliz, M. (2023). Is gambling like a virus?: A conceptual framework and proposals based on empirical data for the prevention of gambling addiction. *BMC Public Health*, 23, 1686. <https://doi.org/10.1186/s12889-023-16610-x>
- Civil Code of the Republic of Kazakhstan. (1994). <https://adilet.zan.kz/eng/docs/K940001000>
- Commission for the Regulation of Gambling and Lotteries. (2023). *Gaming addiction.* <https://www.gc.gov.ua/files/Stratehiya/1.11.3.pdf>
- Commission Recommendation No. 2014/478/EU “On Principles for the Protection of Consumers and Players of Online Gambling Services and for the Prevention of Minors from Gambling Online”. (2014). <https://eur-lex.europa.eu/eli/reco/2014/478/oj/eng>
- Committee for the Regulation of Gambling and Lottery Business. (2025). <https://www.gov.kz/memleket/entities/olr>
- Digay, D. A. (2024). Legal regulation of information on internet resources in the Republic of Kazakhstan. *Journal of Actual Problems of Jurisprudence*, 111(3), 24–28. <https://doi.org/10.26577/JAPJ2024-111-i3-03>
- Donati, M. A., Boncompagni, J., Sareri, G. I., Ridolfi, S., Iozzi, A., Cocci, V., Arena, A., & Primi, C. (2022). Optimizing large-scale gambling prevention with adolescents through the development and evaluation of a training course for health professionals: The case of PRIZE. *PLOS ONE*, 17(5), e0266825. <https://doi.org/10.1371/journal.pone.0315431>
- Dow Jones. (2024). *Understanding the steps of a “Know Your Customer” process.* <https://www.dowjones.com/professional/risk/glossary/know-your-customer/>
- Egerer, M., & Marionneau, V. (2023). Blocking measures against offshore online gambling: A scoping review. *International Gambling Studies*, 24(1), 36–52. <https://doi.org/10.1080/14459795.2023.2190372>
- El País. (2024). *The risks of carrying a casino in your pocket: Why is gambling addiction common and how to tackle it?* <https://elpais.com/expres/2024-10-25/los-riesgos-de-llevar-un-casino-en-el-bolsillo-por-que-es-comun-la-adiccion-al-juego-y-como-atajarla.html>

- EnergyProm. (2023). *In Kazakhstan, the number of companies in the gambling business has decreased three times.* <https://energyprom.kz/articles-ru/industries-ru/tendenciya-rosta-ih-oborota-smenilas-padeniem>
- European Casino Association (ECA). (2024). *Position paper: Responsible gaming.* <https://www.europecasinoassociation.org/advocacy/positions/responsible-gaming/position-paper-responsible-gaming>
- European Gaming and Betting Association. (2019). *Monthly Newsletter – December 2019.* <https://www.egba.eu/news-media/newsletters/>
- French Games (La Française des Jeux, FDJ). (2024). *FDJ commitments for responsible gaming.* <https://groupefdj.com/en/responsible-gaming>
- Gamblers Anonymous International Service Office. (2025). <https://www.gamblersanonymous.org/>
- Gambling Commission. (2025). <https://gamblingcommission.gov.uk>
- Hari, S. S., Porkodi, S., Saranya, R., & Vijayakumar, N. (2024). Intelligent model to improve the efficacy of healthcare content marketing by auto-tagging and exploring the veracity of content using opinion mining. *International Journal of Electronic Marketing and Retailing*, 15(2), 240–260. <https://doi.org/10.1504/IJEMR.2024.136978>
- Hilbrecht, M., Baxter, D., Abbott, M., Binde, P., & Clark, L. (2020). The conceptual framework of harmful gambling: A revised framework for understanding gambling harm. *Journal of Behavioral Addictions*, 9(2), 190–205. <https://doi.org/10.1556/2006.2020.00024>
- iGaming. (2024). *iGaming in Numbers 2024-2029: Forecasts.* <https://igamingb2b.net/igaming-in-numbers-2024-2029-forecasts/>
- International Centre for Responsible Gaming (ICRG). (2024). *25th ICRG Conference on gambling and addiction.* San Manuel Band of Mission Indians: Las Vegas.
- Jia, Y., Liang, Y., Xiong, Y., & Zhang, Y. (2022). Exploring criminal jurisdictional conflicts in cross-border online gambling. In *Proceedings of the 2022 6th International Seminar on Education, Management and Social Sciences* (pp. 2980–2992). Dordrecht: Atlantis Press. [https://doi.org/10.2991/978-2-494069-31-2\\_351](https://doi.org/10.2991/978-2-494069-31-2_351)
- Johnstone, P., & Regan, M. (2020). Gambling harm is everybody's business: A public health approach and call to action. *Public Health*, 184, 63–66. <https://doi.org/10.1016/j.puhe.2020.06.010>
- Kazakhstan Today. (2024). *In Kazakhstan, criminal liability is introduced for the organisation of Internet casinos.* [https://kt.kz/rus/state/v\\_kazahstane\\_vvodyat\\_ugolovnyuyu\\_otvetstvennost\\_za\\_137796362.html](https://kt.kz/rus/state/v_kazahstane_vvodyat_ugolovnyuyu_otvetstvennost_za_137796362.html)
- Kaziev, K. O., & Nadenov, G. Z. (2023). Psychological features of teenagers' gambling addiction. *Bulletin of Korkyt Ata Kyzylorda University: Pedagogy and Psychology Series*, 4(4), 49–56. <https://doi.org/10.52081/PPS.2023.v04.i4.026>
- Khamzina, Z., Taubayev, B., Buribayeva, A., & Buribayeva, Y. (2025). Shielding the future: Enhancing legal protections for children in

- Kazakhstan. *International Journal of Innovative Research and Scientific Studies*, 8(1), 2842–2854. <https://doi.org/10.53894/ijirss.v8i1.5070>
- Kolandai-Matchett, K., & Wenden Abbott, M. (2022). Gaming-gambling convergence: Trends, emerging risks, and legislative responses. *International Journal of Mental Health and Addiction*, 20, 2024–2056. <https://doi.org/10.1007/s11469-021-00498-y>
- Kraus, L., Loy, J. K., Bickl, A. M., Schwarzkopf, L., Volberg, R. A., Rolando, S., Kankainen, V. E., Hellman, M., Rossow, I., Room, R., Norman, T., & Cisneros Örnberg, J. (2022). Self-exclusion from gambling: A toothless tiger? *Frontiers in Psychiatry*, 13, 992309. <https://doi.org/10.3389/fpsy.2022.992309>
- Kursiv Media. (2019). *An investigation into the activities of BC “Olympus” was launched in Kazakhstan*. <https://kz.kursiv.media/2019-12-06/v-kazahstane-nachali-rassledovanie-deyatelnosti-bk-olimp/>
- Kursiv Media. (2024). *Almost 4.5 thousand Sites with signs of online casinos were blocked in Kazakhstan in 2023*. <https://kz.kursiv.media/2024-01-31/dmnyv-onlajn-kazino-blok/>
- Lam, H., & Harcourt, M. (2024). Digital addiction in organizations: Challenges and Policy Implications. *Employee Responsibilities and Rights Journal*, 36(4), 519–533. <https://doi.org/10.1007/s10672-024-09493-6>
- Law of the Republic of Kazakhstan No. 116-VIII “On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Gambling Business, Lottery Activities, Health Protection, State Labour Inspection, State Control and Exclusion of Excessive Legislative Regulation”. (2007). [https://online.zakon.kz/Document/?doc\\_id=37261234](https://online.zakon.kz/Document/?doc_id=37261234)
- Law of the Republic of Kazakhstan No. 219 “On Gambling Business”. (2007). [https://adilet.zan.kz/rus/docs/Z070000219\\_/info](https://adilet.zan.kz/rus/docs/Z070000219_/info)
- Law of the Republic of Kazakhstan No. 235-V ZRK “On Administrative Offenses”. (2014). <https://adilet.zan.kz/rus/docs/K1400000235/info>
- Law of the Republic of Kazakhstan No. 432 “On approval of the Comprehensive Plan for Combating Illegal Gambling and Gambling Addiction in the Republic of Kazakhstan for 2024-2026”. (2024). <https://adilet.zan.kz/rus/docs/P2400000432/info>
- Lijagegnehu Biru, S., Gemechis, K., Girma, R., & Zikargie, Y. A. (2025). Regulating and mitigating the risks of youth sports betting in Ethiopia. *Law Journal of the National Academy of Internal Affairs*, 15(2), 98–107. <https://doi.org/10.63341/naia-chasopis/2.2025.98>
- Liter. (2025). *More than 11 thousand online casino sites closed in Kazakhstan*. <https://liter.kz/bolee-11-tysiach-saitov-onlajn-kazino-zakryty-v-kazahstane-1736333004/>
- LS. (2024). *Due to illegal gambling sites, 1 trillion tenge is withdrawn from Kazakhstan annually*. <https://lsm.kz/iz-za-nezakonnyh-igornyh-ploshadok-iz-kazahstana-vyvoditsya-1-trln-tenge-ezhogodno>

- Massachusetts Gaming Commission. (2025). *Annual Report 2023*. <https://massgaming.com/blog-post/massachusetts-gaming-commission-releases-2023-annual-report/>
- Melnikov, I. (2016). Gaming addiction through system dynamics. In: *Proceedings of the 14th International Scientific Conference Information Technologies and Management* (pp. 81–85). Riga: Information Systems Management University.
- Menmuir, T. (2023). Kazakh President wants “concrete plans” to curb gambling addiction. *SBC News*. <https://sbcnews.co.uk/retail/2023/09/06/kazakh-president-wants-concrete-plans-to-curb-gambling-addiction/>
- Ministry of Digital Development, Innovation and Aerospace Industry of the Republic of Kazakhstan. (2024). *A new digital service to combat gambling addiction has been launched in Kazakhstan through the eGov mobile application*. <https://www.gov.kz/memleket/entities/mdai/press/news/details/729481?lang=ru>
- National Gambling Authority (ANJ). (2025). <https://anj.fr/english>
- Order of the Minister of Culture and Sports of the Republic of Kazakhstan No. 195 “On approval of the rules for the provision of public services in the gambling business”. (2020). <https://adilet.zan.kz/rus/docs/V2000020947/info>
- Order of the Minister of Health and Social Development of the Republic of Kazakhstan No. 761 “On approval of the Rules for the provision of inpatient care”. (2015). <https://adilet.zan.kz/rus/docs/V1500012204>
- Ospanova, D., Moroz, S., & Niyazova, A. (2024). The problem of defining “juvenile justice” concept and its principles in legal science. *Journal of Infrastructure Policy and Development*, 8(13), 9250. <https://doi.org/10.24294/jipd9250>
- Permatasari, B. K., Widhiyanti, H. N., & Widyanti, Y. E. (2025). Validity of digital agreements and the legal relations of the parties in affiliate marketing. *Law Journal of the National Academy of Internal Affairs*, 15(1), 59–71. <https://doi.org/10.63341/naia-chasopis/1.2025.59>
- Press Service of the Government of the Republic of Kazakhstan. (2023). *Measures to combat gambling addiction and drug abuse discussed in the Government*. <https://primeminister.kz/ru/news/mery-po-borbe-s-zavisimostyu-ot-azartnyh-igr-i-narkomaney-obsudili-v-pravitelstve-24215>
- Price, A. (2020). Online gambling in the midst of COVID-19: A nexus of mental health concerns, substance use and financial stress. *International Journal of Mental Health and Addiction*, 20(1), 362–379. <https://doi.org/10.1007/s11469-020-00366-1>
- Saunders, P., & Doyle, K. (2021). Gambling interventions in indigenous communities, from theory to practice: A rapid qualitative review of the literature. *Journal of Gambling Studies*, 37(3), 947–982. <https://doi.org/10.1007/s10899-021-10019-0>

- Sert, M. F., Yildirim, E., & Çaliş, Ş. (2024). Could the Decisions of Quasi-Judicial Institutions be Predicted by Machine Learning Techniques? *Statute Law Review*, 45(3), hmae050. <https://doi.org/10.1093/slr/hmae050>
- Seryapova, K., Tsai, I., Nyrkova, V., Muzhitova, A., & Bekbasarova, T. (2020). Development of venture investments in Kazakhstan. *Polish Journal of Science*, 2(34), 22–25.
- Spelpaus. (2025). <https://www.spelpaus.se>
- Spillemyndigheden. (2025). <https://spillemyndigheden.dk>
- State Treaty on Gambling 2021. (2025). <https://mi.sachsen-anhalt.de/themen/gluecksspiel/gluecksspielstaatsvertrag-2021>
- Tengrinews. (2025). *Constitutional Court makes important ruling on bookmakers*. [https://tengrinews.kz/kazakhstan\\_news/konstitutsionnyiy-sud-vyines-vajnoe-reshenie-po-bukmekeram-562033/](https://tengrinews.kz/kazakhstan_news/konstitutsionnyiy-sud-vyines-vajnoe-reshenie-po-bukmekeram-562033/)
- Teo, J. W. (2020). *Foreign exemptions in tobacco, alcohol, and gambling regulation: A topographic study of East and Southeast Asia*. Philadelphia: University of Pennsylvania.
- Ulys Media. (2024). *No solution: Ministry of Sports on the problem of online casinos in Kazakhstan*. <https://ulymedia.kz/news/34633-resheniia-net-minsporta-o-probleme-onlain-kazino/>
- Vliamos, S. (2024). Political Economy and Impact Assessment. *Statute Law Review*, 45(1), hmae004. <https://doi.org/10.1093/slr/hmae004>
- Wheaton, J., Ford, B., Nairn, A., & Collard, S. (2024). Towards a conceptual framework for the prevention of gambling-related harms: Findings from a scoping review. *PLOS ONE*, 19(3), e0298005. <https://doi.org/10.1371/journal.pone.0298005>
- World Health Organisation (WHO). (2022). *WHO's new International Classification of Diseases (ICD-11) comes into effect*. <https://who.int/news/item/11-02-2022-who-s-new-international-classification-of-diseases-%28icd-11%29-comes-into-effect>
- World Health Organisation (WHO). (2025). *Gambling*. <https://www.who.int/news-room/fact-sheets/detail/gambling>
- Wu, X. (2024). Research on the empowerment of knowledge graphs in the governance of cross-border online gambling crimes. *Journal of Simulation*, 12(2), 5–12.
- Xiao, L. Y. (2021). Regulating loot boxes as gambling? Towards a combined legal and self-regulatory consumer protection approach. *Interactive Entertainment Law Review*, 4(1), 27–47. <https://doi.org/10.4337/ielr.2021.01.02>
- Xiao, L. Y., Henderson, L. L., Nielsen, R. K. L., & Newall, P. W. S. (2022). Regulating gambling-like video game loot boxes: A public health framework comparing industry self-regulation, existing national legal approaches, and other potential approaches. *Current Addiction Reports*, 9(8), 163–178. <https://doi.org/10.1007/s40429-022-00424-9>
- Yerkenov, B. D. (2024). Legal instruments of combating legalization (laundering) of proceeds of crime in conditions of digital evolution of the Republic of Kazakhstan. *Journal of Actual Problems of Jurisprudence*, 3(111), 1–8.

- Zhamiyeva, R. M., & Albekova, M. G. (2023). AML in Kazakhstan: Progress, challenges and future prospects. *Bulletin of the Karaganda University Law Series*, 110(2), 75–81. <https://doi.org/10.31489/2023L2/75-81>
- Zhatkanbaeva, A. Y., Atakhanova, S. K., Raiymbergenova, K. T., Nakisheva, M. K., & Aydarhanova, K. N. (2021). Analysis of the legislation of the Republic of Kazakhstan on the prevention of gambling addiction. *Journal of Actual Problems of Jurisprudence*, 4(100), 80–86. <https://doi.org/10.26577/JAPI.2021.v100.i4.10>

**The Law, State and Telecommunications Review / Revista de Direito, Estado e Telecomunicações**

**Contact:**

Universidade de Brasília - Faculdade de Direito - Núcleo de Direito Setorial e Regulatório  
Campus Universitário de Brasília  
Brasília, DF, CEP 70919-970  
Caixa Postal 04413

**Phone:** +55(61)3107-2683/2688

**E-mail:** [getel@unb.br](mailto:getel@unb.br)

Submissions are welcome at: <https://periodicos.unb.br/index.php/RDET>