

Gaming in China: overview

Yap Wai-Ming and Cindy Pan
Morgan Lewis Stamford LLC

global.practicallaw.com/5-635-9387

LEGISLATIVE FRAMEWORK OF GAMBLING REGULATION

Overview

1. What legislation applies to gambling?

Gambling in the People's Republic of China (PRC) is illegal, with the exception of Macau, Hong Kong and Taiwan. The key legislation regulating gambling is Article 303 of the Criminal Law of the PRC (Criminal Law) (as amended in 1997) and the Sixth Amendment to the Criminal Law, which provides that

"whoever, for the purpose of reaping profits, assembles a crowd to engage in gambling, or makes an occupation of gambling will be sentenced to a fixed term imprisonment of not more than three years, criminal detention or public surveillance, in addition to a fine.

Whoever runs a gambling house will be sentenced to a fixed-term imprisonment of not more than three years, criminal detention or public surveillance, in addition to a fine; and in severe circumstances, a fixed-term imprisonment of not less than three years but not more than ten years, in addition to a fine."

A judicial interpretation jointly issued by the Supreme People's Court and Supreme People's Procuratorate in May 2005 further clarified Article 303 of the Criminal Law (see below, Question 2).

The only forms of legitimate gambling in China are the two government authorised lotteries:

- **Welfare Lottery.** This is administered by the China Welfare Lottery Issuance Centre, which is regulated by the Ministry of Civil Affairs and has been authorised by the State Council to issue lottery tickets since 1987.
- **Sports Lottery.** This is administered by the China Sports Lottery Administration Centre, which is regulated by the General Administration of Sport and has been authorised by the State Council to issue lottery tickets since 1994.

Definitions of gambling

2. What is the legal definition of gambling in your jurisdiction and what falls within this definition?

General definition

Gambling is defined as an activity, for the purpose of making a profit, assembling persons to engage in gambling, opening or operating a gambling house or making gambling a profession (Article 303, Criminal Law). On 11 May 2005, the Supreme Court and the People's Procuratorate jointly issued the *Interpretation for Trial of Criminal Cases concerning Gambling* (the "2005 Interpretation"). A person breaches the 2005 Interpretation and constitutes "assembling a crowd to engage in gambling" provided in Article 303 in the following circumstances:

- Assembling more than three persons with intent to gamble, to engage in gambling and obtaining commission of a sum equal or more than RMB5,000.
- Assembling more than three persons to engage in gambling and the aggregate gambling stake exceeds RMB50,000.
- Assembling more than three persons to engage in gambling and the number of people involved in the gambling activities exceeding 20 persons.
- Organising more than ten Chinese citizens to engage in gambling activities overseas and obtaining a commission and/or introducer fee in return.

Some examples of activities that are prohibited under Article 303 and the 2005 Interpretation are as follows:

- A person who, for the purpose of making a profit:
 - establishes online gambling websites; or
 - acts as a conduit for online gambling websites, and accepts bets on behalf of online gambling websites.
- Any Chinese citizen who sets up casinos at the neighbouring areas outside of China and attracts Chinese citizens to engage in gambling.
- A person who knowingly provides direct supporting services such as capital, internet network, telecommunications facilities and payment settlement to gambling participants or organisers.

The 2005 Interpretation clarifies that recreational activities involving a small amount of assets at stake that are not conducted for the purpose of profits will not be considered as "gambling". Entertainment facilities and gaming rooms that receive service fees in the ordinary course of business also do not fall within the gambling prohibition.

Online gambling

While the general prohibition in Article 303 extends to online gambling, there is no specific legal definition of online gambling.

Land-based gambling

While the general prohibition in Article 303 extends to land gambling, there is no specific legal definition of land-based gambling.

Regulatory authorities

3. What are the regulatory or governmental bodies that are responsible for supervising gambling?

The only forms of legitimate gambling in China are the two lotteries which are authorised by the government (see Question 1). The State Council of the PRC can authorise the issuance of the two types of lottery, and is also the highest authority to grant the licence to issue lotteries. The Ministry of Finance is responsible for administering, regulating and supervising the national lottery industry.

The Welfare Lottery is administered by the China Welfare Lottery Issuance Centre, which is regulated by the Ministry of Civil Affairs and has been authorised by the State Council to issue lottery tickets since 1987. The Sports Lottery is administered by the China Sports Lottery Administration Centre, which is regulated by the General Administration of Sports and has been authorised by the State Council to issue lottery tickets since 1994.

See box, *The regulatory authorities*.

Gambling products

4. What gambling products have been specifically identified by legislation, and what different requirements have been established for each?

Activities that are conducted for amusement and not for profit (for example, playing chess/poker games in the park solely for entertainment) are not considered gambling.

Sports betting

Other than the Sports Lottery which is authorised by the government, any other form of sports betting is illegal.

Lottery

The only forms of legitimate gambling in China are the two lotteries which are authorised by the government, including the Welfare Lottery and the Sports Lottery (see *Question 1*). Accordingly, any other form of lottery is considered illegal in China.

LAND-BASED GAMBLING Regulation/licensing

5. What is the licensing regime (if any) for land-based gambling?

Available licences

The only land-based gambling that is permitted in China is the Welfare Lottery and the Sports Lottery. The issuance of the Welfare Lottery and the Sports Lottery is subject to the licence of the State Council. Additionally, no foreign lotteries are allowed to be issued or sold within the PRC. The China Welfare Lottery Issuance and Administration Centre and China Sports Lottery Administration Centre (collectively, the Lottery Issuance Agencies) are each responsible for the issuance and sales management of the Welfare Lottery and Sports Lottery. The sales agencies of Welfare Lottery and that of the Sports Lottery (collectively, the Lottery Sales Agencies) must each be approved by the local counterparty of the Administration of Civil Affairs and General Administration of Sport. The Lottery Issuance Agencies and the Lottery Sales Agencies can authorise some entities or individuals to distribute lotteries through entering into a lottery distribution agreement with such entities or individuals (the Authorised Lottery Distributors).

Eligibility

In general, an Authorised Lottery Distributor must satisfy the following requirements:

- Is an individual over 18 years and with full civil conduct capacity, or an independent entity with legal personality.
- Has sufficient capital to conduct lottery sales.
- Has possessed a location/venue that satisfies the needs for lottery sales.
- Has no criminal record or poor commercial credit records in the past five years.
- Any other requirements by the Lottery Issuance Agencies and Lottery Sales Agencies.

There may be some discrepancies between the PRC laws at the state level and those at the provincial or local level, and specific requirements may vary from region to region.

Application procedure

Under Article 24 of the Implementing Regulations of Regulations on Administration of Lotteries, the Lottery Issuance Agencies or the Lottery Sales Agencies must enter into a lottery distribution agreement with the Authorised Lottery Distributor. The distribution agreement will mainly include the following terms:

- The valid term of the agreement.
- The rights and obligations of the parties.
- The establishment, transfer, suspension of sales and removal of the location/venue where the lottery sales are to be conducted.
- Provision and management of the special equipment for lottery betting.
- Financial management and operating expenses of the Authorised Lottery Distributor.
- Provisions with respect to the prohibitions on selling lotteries to minors or cashing lotteries for minors.
- Supervision and default liabilities.

After entering into the distribution agreement, the relevant Lottery Issuance Agency or Lottery Sales Agency will grant the distribution permit to the Authorised Lottery Distributor. The relevant regulation does not specify a time limit for this distribution permit, which is the certificate of the distributor's qualification to distribute lotteries. There may be some discrepancies between the PRC laws at the state level and those at the provincial or local level, and specific requirements may vary from region to region. Specific local regulators must be consulted for detailed application procedure in different parts of China.

Duration of licence and cost

The duration of the distribution agreement and permit depends on discussions with the Lottery Issuance Agencies or the Lottery Sales Agencies. The total cost for obtaining a sales permit is not specified.

6. What are the limitations or requirements imposed on land-based gambling operators?

Prohibitions

At present, the only forms of gambling that are legitimate in China are the Welfare Lottery and the Sports Lottery. The sale of lottery tickets to minors below the age of 18 is prohibited (*Article 18, Regulations on Administration of Lotteries*). Cashing lottery winnings by minors below the age of 18 years is also prohibited (*Article 26, Regulations on Administration of Lotteries*).

Restrictions

Any person who distributes or sells lottery tickets without obtaining the permit from the relevant PRC authorities is in breach of Article 225 of the Criminal Law for conducting an illegal business.

Anti-money laundering legislation

Anti-money laundering refers to the adoption of relevant measures as prescribed under the provisions of the Anti-Money Laundering Law to prevent any money laundering which is designed to cover up or conceal the sources and nature of the criminal gains and proceeds derived from, among others:

- Drug-related crimes.
- Crimes committed by criminal gang organisations.

- Terrorist crimes.
- Crimes of smuggling.
- Graft and bribery.
- Crimes of disrupting the order of financial management. Crimes of financial fraud.

There is no direct connection between or specific requirement imposed by the anti-money laundering legislation of the PRC on gambling. However, gambling proceeds derived from and/or used in the crimes list above are regulated under the Anti-Money Laundering Law.

Any other gambling proceeds except for those derived from the winnings of the Welfare Lottery and the Sports Lottery are considered illegal gains. All property illegally obtained will be recovered or ordered restitution (*Article 64, Criminal Law*). The legitimate property of the victim(s) must be promptly returned. Contraband items and personal property used in the crime will be confiscated. Confiscated property and relevant fines will be handed over to the national treasury and must not be misappropriated or otherwise disposed of.

ONLINE GAMBLING Regulation/licensing

7. What is the licensing regime (if any) for online gambling?

Available licences

The Ministry of Finance is responsible for the supervision and administration of the online lottery sales (*Interim Measures for Administration of Online Lottery Sales*) (the Online Lottery Sales Interim Measures). The Lottery Issuance Agencies can co-operate with other entities or the Lottery Sales Agencies (collectively, the Co-operative Entities) by entering into a co-operative agreement to sell online lotteries, or authorising the Authorised Online Lottery Distributors to distribute online lotteries by entering into an online lottery distribution agreement. Under Announcement No. 18 of 2015 regarding issues concerning online lottery sales, only entities approved by the Ministry of Finance can engage in online lottery sales.

Eligibility

Under Article 7 of the Online Lottery Sales Interim Measures, a Co-operative Entity or an Authorised Online Lottery Distributor must satisfy the following requirements:

- Is an independent legal entity.
- Has a minimum registered capital of RMB50 million.
- Has maintained an adequate organisational structure, internal control and risk management systems.
- Has no criminal record or poor commercial credit records in the past five years.
- Has obtained an internet content provider licence.

There may be some discrepancies between the PRC laws at the state level and those at the provincial or local level, and specific requirements may vary from region to region.

Application procedure

The Lottery Issuance Agency must make an application to the Ministry of Finance to carry out the business of online lottery sales (*Article 9, Online Lottery Sales Interim Measures*). The application must include the following materials, among others:

- Application letter.
- Market analysis report and technical feasibility analysis report.

- Proof of certifications obtained by the Co-operative Entities or the Authorised Online Lottery Distributors.
- Various contracts including contracts with banks, equipment and technical service providers, the Co-operative Entities or the Authorised Online Lottery Distributors.
- Management materials, including:
 - management on the Co-operative Entities or the Authorised Online Lottery Distributors;
 - financial management, sales and risk management plans;
 - equipment and technical services provider management;
 - supervision and audit management; and
 - emergency response plans.
- Technical inspection reports issued by a third party inspection professional.

On approval from the Ministry of Finance, the Lottery Issuance Agency will issue a permit to the Co-operative Entity or the Authorised Online Lottery Distributor to carry out online lottery sales. There is no clear guideline available as to how long the procedure might take.

There may be some discrepancies between the PRC laws at the state level and those at the provincial or local level, and specific requirements may vary from region to region. As such, the authors are not able to cover each and every specific rule/regulation at the local level.

Duration of licence and cost

The duration of the sales agency agreement and permit depends on discussions with the Lottery Issuance Agencies and the Ministry of Finance. The total cost for obtaining a permit to conduct online lottery sales is not specified.

8. What are the limitations or requirements imposed on online gambling operators?

Prohibitions

It is prohibited to open betting accounts for minors or cash lottery winnings to minors (*Article 23, Online Lottery Sales Interim Measures*).

Restrictions

Under Article 4 of the Online Lottery Sales Interim Measures, no entity can carry out the business of online lottery sales without the approval of the Ministry of Finance. Any person who distributes or sells lottery without obtaining approval from the relevant authorities is in breach of Article 225 of the Criminal Law for conducting an illegal business.

Anti-money laundering legislation

See *Question 6, Anti-money laundering legislation*.

B2B and B2C

9. Is there a distinction between the law applicable between B2B operations and B2C operations in online gambling?

Other than the licensed online gambling sites for the Welfare Lottery or the Sports Lottery, any other gambling site is illegal in China. Within the legitimate online gambling regime, there is no clear legislative distinction between the law applicable to B2B operations and that applicable to B2C operations.

Technical measures

10. What technical measures are in place (if any) to protect consumers from unlicensed operators, such as ISP blocking and payment blocking?

The Ministry of Public Security of China operates the Great Firewall of China, which is essentially a censorship and surveillance project that blocks potentially unfavourable incoming data from foreign countries, including foreign gambling websites. The technical methods adopted for censoring include:

- IP blocking.
- URL filtering.
- DNS filtering and redirection.
- Connection reset.

In practice, most China Mainland-based financial institutions (financial institutions with a Chinese majority ownership) also block financial transactions between Chinese players located in China and overseas gambling websites.

MOBILE GAMBLING AND INTERACTIVE GAMBLING

11. What differences (if any) are there between the regulation of mobile gambling and interactive gambling on television?

The regulation for mobile gambling and that for interactive gambling on television differ as interactive gambling on television is strictly prohibited. Mobile gambling is regulated by the Measures for the Administration of Telephone Lottery Sales (Telephone Lottery Sales Measures). The only form of mobile gambling permitted is a telephone lottery. The Lottery Sales Agencies enter into agreements with entities which act as telephone distributors (Telephone Lottery Distributors with prior approval from the Lottery Issuance Agencies). Telephone lottery is then carried out through the TeleDraw system, which comprises an intermediary software interface between an approved provincial lottery centre's central system and the online retailer selling to the customers.

A Telephone Lottery Distributor must satisfy the following requirements under Article 9 of the Telephone Lottery Sales Measures:

- Have an independent legal person status.
- Have a registered capital of at least RMB10 million.
- Have had business premises and safety protection measures which meet the prescribed requirements.
- Have maintained a sound organisational structure, internal control system and risk management measures.
- The entity itself and its senior managers must have no criminal record or bad commercial credit record in the last five years. Have obtained the relevant telecommunications business licence.

The Lottery Issuance Agencies must organise regular lottery client security evaluation and risk assessment, and must set up a monitoring and warning system for the telephone lottery sales. Similar to the procedure for internet lottery sales agencies, telephone lottery sales agencies must submit an application to the Ministry of Finance and seek approval from the Ministry of Civil Affairs or the State Sports General Administration.

The application must include the following materials (*Article 10, Telephone Lottery Sales Measures*):

- Management solutions of the Telephone Lottery Distributors and the sales expense incurred, telemarketing lottery games, and management solutions of quota and time limit.
- Market study report and technical feasibility study report.
- Proof of certifications obtained by the authorised phone sales agency.
- Various contracts including the letter of intent with the authorised telephone sales agency.
- Management materials, including
 - management of the Telephone Lottery Distributors;
 - financial management, sales and risk management plans;
 - equipment and technical services provider management;
 - supervision and audit management; and
 - emergency response plans.
- Technical inspection reports issued by a third party inspection professional.

On approval from the Ministry of Finance, the Lottery Issuance Agency will issue a permit to the Telephone Distributor to carry out the telephone lottery sales.

SOCIAL GAMING

12. How is social gaming regulated in your jurisdiction?

Social gaming in the PRC is regulated by the Ministry of Culture through the following regulations:

- Interim Measures on the Administration of Online Games (Online Games Measures).
- Administrative Measures for the Content Self-Examination of Internet Culture Business Entities (Self-Examination of Internet Culture Business Entities Measures).

Any entity seeking to engage in a social gaming business must apply for an Internet Culture Business Permit to the local culture administrative authority at the provincial level. The entity must satisfy the following requirements:

- Have a name, domicile, organisational structure and articles of association.
- Have a fixed business scope of online games.
- Have maintained personnel who meet the relevant provisions of the state.
- Have a registered capital of not less than RMB10 million.
- Meet the other conditions prescribed by law, which are not expressly specified.

The permit is valid for three years.

Regardless of whether the game is free to play, or whether it provides a prize, any entity providing network operation of online games must obtain an Internet Culture Business Permit. This similarly applies for online games that involve virtual currency. Online games are regulated by the culture administrative department of the State Council and supervised by the culture administrative departments at the provincial level.

Online games must not contain content that (*Article 9, Online Games Measures*):

- Violates the basic principles determined in the Constitution.
- Compromises the unity, sovereignty or territorial integrity of the state.

- Divulges a national secret, jeopardising the national security or damaging the honour and interests of the state.
- Instigates hatred or discrimination among ethnic groups, undermining the solidarity among ethnic groups, or disrespecting ethnic customs and practices.
- Advocates cult or superstition.
- Spreads rumours to disrupt the public order and social stability.
- Advocates obscenity, pornography, gambling or violence, or abetting the commission of a crime.
- Insulting or defaming others and injuring the legitimate rights and interests of others.
- Breaching social morality.
- Otherwise prohibited by any law, administrative regulation or provision of the state.

Article 20 of the Online Games Measures provides further requirements for an online game business entity distributing virtual currency in the online games. The entity:

- Must not provide trading services for minors.
- Must not provide trading services for any online game which has not been examined or has not gone through the filing formalities.
- Must guarantee that a user makes registration with a valid ID certificate, and perform linkage to a bank account consistent with the registration information of the user.
- Must assist in verifying the legality of a transaction after receiving a notice from any party of interest, government department or judicial organ. If the transaction is illegal on verification, it must immediately take measures to terminate services for the transaction and keep the relevant records.
- Must keep the inter-user trading records, account records and other information for at least 180 days.

The virtual currency cannot be exchanged for other prizes. Article 19 of the Online Games Measures further provides the following requirements in relation to the virtual currency:

- The virtual currency of online games must only be used to exchange for online game products and services provided by the entity, and must not be used to pay for or purchase real objects or exchange for products and services provided by any other entity.
- The virtual currency of online games must not be distributed for the purpose of maliciously occupying the prepayment of users.
- The purchase record of an online game user must be kept for at least 180 days from the date of last service received by the user.
- The categories, price, total amount of the distributed virtual currency of an online game must be reported to the provincial culture administrative department at the registration place of the entity for filing purposes according to the relevant provisions.

A provider of online games is considered as an internet cultural entity following the Interim Provisions on the Administration of Internet Culture (Internet Culture Measures). Online games providers must also comply with the Guidelines for the Content Examination set out by the Department of Cultural Market Administration of the Ministry of Culture. Article 5 of the Self-Examination of Internet Culture Business Entities Measures provides that an internet culture business entity must:

- Establish sound content management rules.
- Establish a specialised content management department.

- Assign the personnel satisfying the requirements for the examination work to be responsible for the content management of the Internet cultural products and services.

This is to guarantee the legality of the contents of such products and services.

GAMBLING DEBTS

13. Are gambling debts enforceable in your jurisdiction?

All forms of gambling, other than the state-run Welfare Lottery and Sports Lottery, are illegal in China. Therefore, gambling debts are not legitimate debts and therefore cannot be collected through the legal or judicial systems of China.

TAX

14. What are the applicable tax regimes for land-based and online gambling?

A flat rate of 20% of income tax is applicable to the following income in China (*Article 3, Individual Income Tax Law*):

- Income from royalties, profits, dividends or bonuses.
- Income from lease or transfer of property.
- Accidental income.
- Other income.

Accidental income is defined as income generated from awards, prizes, lottery and other accidental income (*Article 8, Regulations for the Implementation of the Individual Income Tax Law*). Therefore, winnings from the Welfare Lottery and Sports Lottery are subject to 20% income tax.

Any other gambling proceeds except for those derived from the winnings of the Welfare Lottery and the Sports Lottery are considered illegal gains, and must be recovered, ordered restitution or and/or confiscated.

ADVERTISING

15. To what extent is the advertising of gambling permitted in your jurisdiction? To the extent that advertising is permitted, how is it regulated?

Land-based gambling

Advertisement of gambling activities is forbidden. This is explicitly provided in:

- Article 9 of the Advertising Law of the PRC.
- Article 25 of the Regulations on Publication Administration.
- Article 3 of the Regulations on the Administration of Audio and Video Products.
- Article 16 of the Provisions for the Administration of Internet News Information Services.

However, advertisement of the two lotteries is permitted provided it complies with Article 18 of the Regulations on Administration of Lotteries. The prohibitions placed on advertisements of lotteries are the following:

- Carrying out false or misleading publicity.
- Carrying out unfair competition through defaming business peers.
- Selling lottery tickets to minors.

- Selling lottery tickets on open account or credit.

Online gambling

See above, *Land-based gambling*.

DEVELOPMENTS AND REFORM

Legal development

16. Has the legal status of land-based and online gambling changed significantly in recent years, and if so how?

Land-based gambling

The only forms of legal land-based lottery are China Sports Lottery and China Welfare Lottery. In 2006, the Chinese Government announced that lottery sales stores close to schools are prohibited. On 21 February 2011, this particular legislation was invalidated.

Online gambling

On 3 April 2015, the Ministry of Finance, together with the Ministry of Public Security, the State Administration for Industry and Commerce, the Ministry of Industry and Information Technology, the Ministry of Civil Affairs, the People's Bank of China, and the General Administration of Sport of China and the China Banking Regulatory Commission jointly announced that unauthorised online lottery sales, either directly or through agencies, must immediately cease their services. The ban was ordered following a surprise audit of provincial lottery administration centres, which discovered widespread fraud from the failure to register all online sales.

Reform

17. What, if any, are the likely short-term and long-term developments/legislative amendments concerning gambling in your jurisdiction? Are there any proposals for reform?

Land-based gambling

There are currently no proposals for development or relaxation of gambling activities within China.

Online gambling

On 28 April 2016, the Chinese government issued the Circular on Properly Investigating and Punishing Unauthorised Online Lottery Sales. The government plans for online lottery sales to be centrally managed and monitored on a real-time basis by the lottery issuers. The Lottery Issuance Agencies are urged to comply with the procedures in giving approval for online gambling operators.

Many speculate that the ban on online lottery sales will be lifted in 2016. China Welfare Lottery Centre has published a public tender on 23 May 2016 for a telephone and online lottery market project. Baidu, Alibaba, Tencent, and 500.com, which have ceased its online lottery businesses, are likely to be the frontrunners in obtaining the new online operator licenses once the ban is lifted.

Social gaming

There is no development or proposed changes to the legislative framework affecting social gaming.

THE REGULATORY AUTHORITIES

State Council

Description. The State Council grants the authority and licence of the Welfare Lottery and the Sports Lottery to the China Welfare Lottery Issuance and Administration Centre and China Sports Lottery Administration Centre respectively.

Ministry of Finance (MOF)

Description. The MOF is responsible for regulating and supervising the entire lottery industry. The MOF is the body that gives approval for carrying out the online gambling service.

Ministry of Civil Affairs

Description. The Ministry of Civil Affairs is in charge of regulating the welfare lottery.

General Administration of Sport

Description. The General Administration of Sport is in charge of regulating the sports lottery.

China Welfare Lottery Issuance and Administration Centre

Description. This is responsible for administering the welfare lottery.

China Sports Lottery Administration Centre

Description. This is responsible for administering the sports lottery.

ONLINE RESOURCES

State Administration of Taxation

W www.chinatax.gov.cn/2013/n2925/n2956/c310065/content.html

Description. The official website providing information about taxation law in the PRC.

State Council

W <http://english.gov.cn/archive/>

Description. The official website of the State Council providing the published gazettes and announcements.

Supreme Court

W www.chinacourt.org/law/

Description. A website of the Supreme Court providing the published judgments and interpretations of statutes.

Ministry of Finance

W www.mof.gov.cn/index.htm

Description. The official website of the Ministry of Finance providing the legislations issued by the Ministry.

Practical Law Contributor profile



Yap Wai Ming, Director

Morgan Lewis Stamford LLC

T +65 6389 3009

F +65 6389 3099

E waiming.yap@morganlewis.com

W www.morganlewis.com

Professional qualifications. Advocate & Solicitor, Supreme Court of Republic of Singapore; Advocate & Solicitor, High Court Malaya, Malaysia

Areas of practice. Mergers and acquisitions; gaming and leisure.

Non-professional qualifications. LLB Honours, National University of Singapore

Languages. English, Bahasa, Mandarin

Professional associations/memberships

- Editor, Asia Gaming Lawyer.
- Editor, Gaming Law Review and Economics.
- Member, International Masters of Gaming Law.



Cindy Pan, Partner

Morgan, Lewis & Bockius

T +86 21 8022 8518

F +86 21 8022 8599

E cindy.pan@morganlewis.com

W www.morganlewis.com

Professional qualifications. New York; People's Republic of China (Qualified)

Areas of practice. Mergers and acquisitions; Private Equity; Investment Funds; gaming and leisure.

Non-professional qualifications. LLM, University of Alabama School of Law; LLB, Shanghai Jiao Tong University

Languages. English, Mandarin