

COMPARATIVE STUDY: LEGAL PROBLEMS OF THE INTERNET BLOCKING APPLIED FOR ONLINE GAMBLING IN LITHUANIA AND DENMARK

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Abstract

The aim of the article is to analyze internet blocking measures provided/not provided by the laws of online gambling in Lithuania and Denmark using comparative method. The author purposefully chose countries because of their very different legal regulation of the researched matter and in order to analyze a wider range of possible legal regulation models. Separate countries and cultures struggled against the harm of gambling by using many well-known measures for gambling control, but online gambling generates additional old, but much more intense and totally new threats; therefore, the old methods and control measures are insufficient. The article presents blocking measures for the internet content that are designed for a partial gambling control, although, even internet content blocking/filtering may cause negative legal consequences (the limitation of human rights, including but not limited to, self-expression and access to information, as well as dissemination of freedom, the right to have a private and family life, and other restrictions). There is a corresponding connection, which is reflected in the case of Denmark, that the blocking of the internet content is legalized at the same time as the legalization of online gambling. In the case of Lithuania, online gambling, as well as the blocking of the internet content, is not permitted.

Keywords: Online gambling, internet filtering/blocking, DNS blocking

Introduction

Purpose of the study: to reveal the differences, similarities, and trends of the internet blocking applied for the online gambling regulation in two EU countries by using comparative method, in order to find an opportunity to unify the regulation or support a necessity of the regulation differences between the national jurisdictions.

Hypothesis: Since the EU does not have unified requirements for the legal regulation of online gambling, its control measures, such as internet blocking, are fundamentally different and extremely opposite in the individual member states.

Methods

Theoretical methods: *Comparative, Analysis, Synthesis, Generalization and Induction.* **Empirical methods:** *Case study, Document analysis.*

Problem to be investigated. The studies of changes in the online gambling laws during the last few years in the European Union countries show that there are more and more countries that address online gambling problems in their new versions of the laws or legislative amendments, and also provide appropriate measures for the control of online gambling, such as blocking the online content⁷ by using technical measures. The aim of this article is to reveal different attitude of the EU national jurisdictions towards the internet blocking applied for the online gambling regulation. It analyzes two different countries and jurisdictions that regulate internet filtering/blocking issues differently, as well as online gambling – some of them permit gambling, other completely prohibit.

Problems of online gambling

Overall, by using various means that enable gambling not in a particular room, gambling was used far more earlier than the internet, but it requires to use a broader term, i.e., e.g.: UK laws use a term “remote gambling”, which includes more support measures that allow gambling not in a particular room:

“Remote gambling is defined by the Gambling Act 2005 as gambling in which persons participate by the use of remote communication including:

- *the internet*
- *telephone*
- *television*
- *radio*
- *any other kind of electronic or other technology for facilitating communication.”*⁸

The purpose of this article is only “online gambling”, i.e., gambling that takes place through the internet, and accordingly, it is possible to discuss about the measures of internet blocking.

Online gambling is a relatively new phenomenon, since the internet is also a relatively new phenomenon, and development of internet potential (increase of the internet speed and internet access penetration, simpler

⁷ For example: Gambling Laws of Estonia, Belgium, Italy and etc.

⁸ Gambling Commission of UK

http://www.gamblingcommission.gov.uk/gambling_sectors/remote_eg_online_gambling/about_the_remote_gambling_indu/about_remote_gambling.aspx

management of the content in the websites, etc.) took place only in the last decades, and in particular, current changes occurred very rapidly; therefore, legal regulation, undoubtedly, was left behind emerging online social relations. Very useful and excellent opportunities, as well as services (online media with the latest news, distance learning, and many others) were the result of the internet development, but rapidly evolving internet also determined different relations and services, where the proportion between the benefit and harm to an individual and society is a quite complex issue. One of them is online gambling. Historically, many countries restricted gambling, in order to reduce potential negative effect in the physical space, and it was more or less successful, but due to the disregard and accessibility of the national borders, the internet creates online gambling qualitatively and quantitatively as a different activity, i.e., it is easy to attract more and more people into this activity, and also expand the potential negative impact on society. A technology of the mobile internet enable an individual to have “own gambling house” anywhere and at any time, which is a very dangerous combination, especially combining it with other addictions, for example: alcohol or drugs. Is the gravity of online gambling to society differs from the Land based gambling? It is quite easy to gather a few reasons of the gravity increase, when traditional gambling transforms into online gambling. On-line gambling has new or heavily highlighted old risk, such as:

1. Easier way to access gambling, i.e., a special place (casino) is unnecessary, it is enough to have a computer with the internet or even easier, to have the internet connection on a smart phone, so an individual can connect and gamble at any time.
2. Accordingly, less chance for an individual and other person to control behavior of a gambler, i.e., passionate individual can gamble for a long time without even stopping and no one will notice, which differs from gambling in casinos, where a person, who gamble for a long time, is easy to notice. Also, due to different jurisdictions and regulation, the internet has less restricted access to gambling for compulsive *gamblers*.
3. It is easier to spend virtual money without understanding their value.
4. Due to less restrictive regulation on the internet, it is not always clear, who is an organizer of the gambling; therefore, there is a greater probability of fraud compared with a casino. Also, there is a greater probability of fraud, when using the data of a credit card.
5. Since on the internet the state of an individual is not controlled and often invisible, the individual can play under a strong influence of alcohol or drugs and toxic substances, causing a higher risk to make harmful decisions, etc.

Lithuania

Civil Code of the Republic of Lithuania (18 July 2000, No. VIII-1864) gambling has a separate Chapter XXI “Gambling and wagering”, in fact, it consists of two Articles (No 6.243 and 6.244)⁹.

Civil Code of the Republic of Lithuania provides: No obligations shall arise on the ground of gambling and wagering, except in cases established by laws. Claims connected with gambling and wagering shall not be protected within judiciary proceedings, except in cases established by laws. (paragraph 1 of Article 6.243.” Effects of gambling and wagering”) and In the events where games or wagers are prohibited by laws, no action can be brought by the benefited party (winner) claiming the agreed sum to be paid, likewise no recovery of the paid sum may be instituted by the losing party (loser) (paragraph 2 of Article 6.243.” Effects of gambling and wagering”) and 1. Lottery or any other games based on risk and chance can constitute a basis for obligations if organized and carried out within the procedure established by laws. Otherwise, Articles 6.237 (Obligation to return property not due) and 6.242 (Unjust enrichment) of this Code shall apply to the claims arising from lotteries and games (paragraph 1 of Article 6.244.” Lottery and other games based on risk and chance”).

Since the 17th of May 2001, Lithuania adopted the law on gambling regulation; official translation to English: Gaming Law (*Lith. Lietuvos Respublikos Azartinių Lošimų įstatymas*¹⁰) No. IX-325. This law is still valid with 15 larger or smaller legislative amendments. This law provides a possibility to provide gambling only in the real space (Article No. 5 of Gaming Law: „1. Licenses may be issued for the organization of the following games: 1) gaming in gaming machines halls; 2) bingo; 3) table games: roulette, card games and (or) games of dice; 4) totalisator; 5) bookmaking“), more precisely, it does not say anything about online gambling; therefore, such relations are impossible based on systemic explanation (taking into consideration the Civil Code of the Republic of Lithuania). The law provides Main Functions of Control Commission (Article 28) and Rights of the Control Commission (Article 29) but does not contain any specific duties and/or rights of the Control Commission related to online gambling regulation or the right to give mandatory orders to the Internet Service Providers (ISP). Provisions of this law includes only general norms for the Control Commission (Article 28 (5)) to oversee, how the

⁹ Civil Code of the Republic of Lithuania, 2000, No VIII-1864; *Orig.* Lietuvos Respublikos civilinis kodeksas, 2000, Nr. VIII-1864. Official translation: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_1?p_id=403201

¹⁰ Gaming Law of Republic of Lithuania. *Orig.* Lietuvos Respublikos Azartinių Lošimų įstatymas 2001, No. IX-325, official translation of initial version: http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_1?p_id=136584

requirements of the laws and other legal acts regulating the operation of gaming are adhered to by gaming operators; and (Article 29 (11)) to apply the means of persuasion, established by this Law and other legal acts, to the companies operating games.).

It can be stated that online gambling in the Republic of Lithuania is prohibited, there is no provided possibility of the internet blocking related to online gambling. However, it would not be a detailed statement, because the overall effect to the illegal internet content in Lithuania is permitted, except the content beyond the ISP network, but including the content, which is in the servers controlled by the service provider. In this case, other applicable laws of the Republic of Lithuania can also be mentioned, for example: Law on the Provision of Information to the Public (2 July 1996 – No I-1418)¹¹, which ensures appropriate human rights and freedoms and holds censorship restrictions, *i.e.* Article 10. “Prohibition to Impose Unlawful Restrictions on Freedom of Information” provides that “*Censorship of public information shall be prohibited in the Republic of Lithuania. Any actions whereby an attempt is made to control the content of information to be published in the media before its publication, with the exception of cases provided for by laws, shall be prohibited.*”, and “Article 11. “Right to Protect Freedom of Information” states that “1. *Every person shall have the right to appeal in court against the decisions and actions of state and municipal institutions and agencies as well as officials should they violate or unlawfully restrict a person’s right to obtain, collect or disseminate information.* 2. *It shall be prohibited to persecute a producer or disseminator of public information, their participant or a journalist for the information published if there has been no violation of law in the course of production and dissemination thereof.*”¹²

However, this law also provides restrictions for certain content distribution: „*It shall be prohibited to publish in the media information which: 5) promotes and/or advertises addictions and narcotic or psychotropic substances.*”¹³

By implementing the discussed laws, the Republic of Lithuania has provided appropriate procedures that remove certain information from the servers controlled by the service providers.

The restriction to advertise is also provided by the Gaming Law (9 paragraph of Article 10: “*The advertising of gaming shall be prohibited in the territory of the Republic of Lithuania, except where it contains only the*

¹¹ Law on the Provision of Information to the Public. *Orig.*Lietuvos Respublikos visuomenės informavimo įstatymas. 1996. Nr. I-1418; Official translation: (2 July 1996 – No I-1418), http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_1?p_id=417769

¹² *Ibid.*

¹³ *Ibid.*

name of a gaming company, gaming establishment (casino), bingo or machine hall, totalisator or betting station, the addresses of places in which gaming is operated, types of gaming and the number of gaming devices in a gaming establishment (casino), bingo or machine hall.)”

It is also should be mentioned that for several years the Parliament of the Republic of Lithuania (*Lith. Seimas*) considers a few new versions of the law regulating gambling. All these draft provided a possible blocking of the internet content. Currently (the summer of 2013), there is one draft, which provides the blocking of the internet content and appropriate rights of a controlling authority (subparagraph 1 of paragraph 2 of Article 76: *„to give binding instructions to the service providers of the electronic communication network to take urgent measures in order to remove information enabling illegal gambling from the electronic communication network or remove the possibility for the users to access it;“*, emphasizing (paragraph 3 of Article 76), that such instructions to the ISP are mandatory.

This draft of the law offers to establish that:

„1. Persons who provides communication service are required to ensure the installation and operation of technical blocking measures that would block illegal information encouraging to gamble. (paragraph 4 of Article 76),

2. The list of technical measures that would restrict illegal organization of gambling and participation in gambling in the Republic of Lithuania by using means of communication is provided by the Government or the authorized institution. (paragraph 5 of Article 76),

3. Expenses of the persons who provides communication services and other legal entities incurred in relation to the instructions provided by the Regulatory Service shall be reimbursed from the state budget in accordance with the procedure determined by the Government. (paragraph 7 of Article 76).¹⁴

It seems that Lithuania, in the context of the internet blocking, is not interesting, because it prohibits online gambling and online gambling blocking, but interesting enough, when it comes to proceedings of the legal practice. In this case, there are two important cases that are quite different, one of them is civil, the other is administrative“.

Lithuanian administrative case¹⁵

Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania (hereinafter – the Authority) on the 21st of December

¹⁴ Draft of Lithuanian Gambling Law. *Orig.* Lietuvos Respublikos Azartinių Lošimų įstatymo pakeitimo įstatymo projektas. 2013, Nr. XIP-4393.

¹⁵ Administrative case No. N⁵⁷⁵-641/2012, *Gaming Control Authority under the Ministry of Finance of the Republic of Lithuania v natural person V.B.* (personal data hidden) [2012], Lithuania.

2010 compiled an administrative protocol about V. B. that he, as a responsible employee of the largest Lithuanian ISP, failed to fulfill his duties properly, and the appropriate ISP, who is a supplier of the network service, had technical measures to block internet websites that are not in his network and also had direct channel of the international connection with the foreign operators, provided the access through the ISP, which belongs to the Republic of Lithuania, from the technical equipment in the Republic of Lithuania to the foreign websites of foreign operators www.triobet.lt and www.unibet.com, where were gambling advertisements that are prohibited by the Gaming Law of the Republic of Lithuania. The protocol states that V. B. actions violated certain norms determined by Administrative Code of Lithuania (hereinafter – AC).

On the 25th of February 2011, Vilnius city 1st district court has decided to ignore the bill regarding administrative violation case of V. B. in the context of C article 173¹⁸ part 1, because the court has failed to determine an event and composition of this violation in this person's actions. The court pointed out that based on the information of the administrative case, the websites www.triobet.lt and www.unibet.com operate not in the servers of appropriate ISP, and the ISP is not required to block them. However, the Authority provided an appeal and pleaded to withdraw the earlier court decision and refer the case back for reconsideration.

On the 5th of December 2012, the Supreme Administrative Court of Lithuania finally approved that V. B. administrative liability is impossible. The arguments of the court also stated that in such case, determined by the Gaming Law, regarding the restriction of gambling advertisements, it is important to determine which subject's will directly has determined the publication of an advertisement. Gambling advertisement is possible when there is active action, and there was no information regarding how advertising has to be related to order, production, mediation, or dissemination, which as not applicable to V. B. The Communications Regulatory Authority of the Republic of Lithuania (CRA) conclusions regarding possibilities of blocking were also cited. According to CRA, operators who operates in the Republic of Lithuania has to ensure possibilities to block sensitive information which is exclusively in their servers, but the legal acts do not provide that the operators are required to terminate the access to the websites that operate in other operators' networks. The authority also pointed out that there are several technical methods how the operators can block the websites that are not in their networks, but these methods are ineffective and cannot guarantee a full restriction of accessing information on the website. Technically, only the operator, whose network contains the information of the websites, can fully control the access. CRA noted that Lithuanian operators do not control the internet resources that are

in the other electronic networks (for example: foreign websites) directly; therefore, they cannot technically terminate the access of such resource to the internet. Essentially, similar conclusions were provided by the Ministry of Transport and Communication of the Republic of Lithuania.

Lithuanian civil case

On the 2nd of July 2010, Vilnius Regional Court decreed in the Civil case No.2-6458-578/2010¹⁶, where the plaintiff's Lithuanian legal entities: association "Lažybų organizatorių aljansas", UAB "TopSport" and UAB "Orakulas" sued the defendants foreign legal entities: "bwin International Ltd", "Unibet International Ltd.", "Nordic Gaming Group Ltd.", "Spread Your Wings Ltd." and "bet365 Ltd." Regarding defense of infringed rights, termination of unlawful actions, and damage compensation. The third persons in the case were the Gaming Control Authority, ten of more than one hundred ISPs. The plaintiff was asked to apply temporary protection measures and one of them is: 3. Deny all possible accesses through the public use computer network operating in the Republic of Lithuania to the following networks: bwin. com, unibet. com, triobet. com, sportingbet. com, bet365. com.

This temporary measure would be considered as the internet blocking.

Due to procedural reasons, including undefined list of the executors of this temporary measure, unclear execution method, and other reasons, none of the ISP's bothered to fulfill this court decision. ISP's pleaded to clarify the decision by specifying particular way of blocking and where it should be applied, but on the 10th of March 2011, the Vilnius Regional Court in the civil case No. 2-2961-823/2011 has denied this appeal¹⁷. These temporary protection measures were also contested by the ISP and the defendants. There were litigations at Vilnius Regional Court and the Court of Appeal of Lithuania regarding the issue of removing these measures for a few times, and in 2011 these temporary protection measures were removed. Some of the main arguments stated that such blocking measures were not provided by the law, etc.

To sum up the situation in Lithuania, it can be argued that neither the laws nor the courts recognize filtering of the internet content as a measure for online gambling control.

Denmark

In the field of gambling, Denmark is an interesting country, because the state monopoly has been existing in the field of gambling for a long time, and since 2010, the Bill for a Regulation of Gaming Act liberalized

¹⁶ Civil case No.2-6458-578/2010, Vilnius Regional Court, 2010, Lithuania.

¹⁷ Civil case No. 2-2961-823/2011 Vilnius Regional Court, 2011, Lithuania

gambling, including online gambling, and provided certain control measures, such as internet blocking.

Internet blocking and prohibition to helped to the unlicensed online gambling companies, stated in the Bill for a Regulation of Gaming Act of Denmark Part 12 "Penalty provisions" section 59, subsection 2:"59 (2). *Anyone who intentionally or by gross negligence promotes participation in games without a license, cf. subsection (1) above, shall be liable to a fine. Promotion of participation in games shall i.e. be deemed to cover transmission of payments of stakes and winnings to and from an illegal game provider as well as transmission of information via a communications network to an illegal game system*".¹⁸

Explanatory notes to the individual provisions of the Bill for a Regulation of Gaming Act of Denmark clarifies the concept of illegal internet service: „4.7. *Protection of the legal gaming market*
2. *By making it a criminal offence for Internet service providers (meaning Internet service providers which make a DNS server available to its own Internet users or other providers' Internet users, for instance TDC, Telenor and Telia) to promote Internet access to illegal game systems. The penalty for promoting Internet access can be avoided by the Internet provider establishing a DNS blocking for a specific Internet domain (Internet blocking) when the Internet provider has been notified by the Danish Gaming Board that access is provided to a game provider's illegal game system contrary to the provisions of the Act.*"¹⁹

And such measures would be applies to such individuals: "... *some game providers who will still attempt to market themselves in Denmark without applying for a Danish license and paying the Danish duties. Protection of the rest of the gaming market from these game providers will be necessary.*"²⁰

Since the application of the most new gambling laws (Denmark, Belgium, etc.) caused discussions with the European Commission, therefore, the relation between the national law and EC law is defined as follows: "*In its case law the European Court of Justice has established that gaming for money (gambling) is covered by Article 49 and Article 56 of the Treaty on the Functioning of the European Union. Furthermore, the European Court of Justice has established that national measures aimed at restricting these liberties or make the provision of such services less attractive must be justified by a pressing social need, be suited for ensuring the realization of*

¹⁸ Bill for a Regulation of Gaming Act of Denmark. Lov 202.
<http://www.skat.dk/SKAT.aspx?old=1905227>

¹⁹ Explanatory notes to the Bill for a Regulation of Gaming Act of Denmark. Lov 202, Clause 4.7, Item 2; 2010 http://www.skat.dk/SKAT.aspx?old=1905229#_Toc263873951

²⁰ *Ibid.*

the object pursued and must not go beyond what is necessary to attain the object.”²¹

Legally interesting structure used in Danish law is that the internet service provider becomes responsible for the fact that he allows the users to connect to a potential offender through the DNS server: *“In so far as subsection (2) is concerned, it is proposed that the penalty provisions for promoting access to game providers without a license be extended so that it becomes a punishable offence to transmit payments of stakes and winnings in games and to transmit information via a communications network to an illegal game system/game provider.*

This way an Internet service provider that makes a DNS server available to its own end-users or other providers' end-users (hereinafter referred to as "Internet service providers") can be punished for transmitting information (provide Internet access) to a specific Internet domain with an illegal game system.”²²

The mentioned explanation of the Bill provides which sources should be followed by the ISP in order to make a decision to block or not to block a certain content: *“Under the proposed scheme the Danish Gaming Board will be able to inform the Internet service providers or the payment institutions about the Internet domains which the Danish Gaming Board believes to contain illegal game systems or to and from what accounts payments of stakes and winnings may not be made. Such information will be in the form of a recommendation.”²³*

An explanation of the Bill particularly explains the importance of recommendations provided by the Danish Gaming Board for the ISP, when making a decision to block the content of the internet:

“The background to the Danish Gaming Board's recommendation to the Internet service providers and the payment institutions is that they do normally not have knowledge about what game providers are illegal and they are not under any obligation to make current checks of whether or not they are providing Internet access or transmitting payments of stakes and winnings to and from a game provider which is violating Danish law.

The sole purpose of the recommendation is to give the Internet service providers and the payment institutions information about the Internet domains which, in the opinion of the Danish Gaming Board, are providing illegal game systems or to and from what accounts the Danish Gaming

²¹ *Ibid.*

²² Explanatory notes to the individual provisions of the Bill for a Regulation of Gaming Act of Denmark Lov 202: Explanatory notes to Part 12 "Penalty provisions" To section 59. 2010.

²³ *Ibid.*

Board believes that payments of stakes and winnings should not be transferred.

In cases where an Internet service provider or a payment institution has received a recommendation of that nature from the Danish Gaming Board, the Internet service provider or the payment institution may, under the proposed section 59(2), avoid prosecution by establishing a DNS blocking (Internet blocking) of the Internet domain in question or by blocking payments to the accounts in question.

It is not a condition for commencing criminal prosecution against the Internet service provider or payment institution concerned that the enterprise in question has received a recommendation from the Danish Gaming Board. If an Internet service provider e.g. knows that it is providing Internet access to an illegal game system, criminal prosecution may be commenced even though the Danish Gaming Board has not issued a recommendation to the Internet service provider to the effect that the Danish Gaming Board believes that it is providing Internet access to an illegal game system, i.e. on the condition that the requisite means is present.

Whether or not access has in fact been provided to an illegal game system contrary to section 59(1), cf. subsection (2), is in each individual case a matter for the courts of law to decide.”²⁴

Undoubtedly, there is a separate relation of the ISP participation in online gambling, when the ISP purposefully participates in such activities: *“Telecommunication providers who are co-arrangers of an illegal lottery will be punishable according to the rules of illegal provision (or contribution thereto) or for illegal promotion.”²⁵*

Such perception of ISP activities is hardly consistent with the principles of the internet operation, because ISP does not guarantee any connections from a point (e.g. user) to a point (e.g. potential violators of the gambling laws), and only provides a possibility to access the internet. Furthermore, such statements distort the meaning of DNS servers, which is purely technological in order to avoid inconveniently long IP addresses, convert them into convenient domain names, and would help us. Neither of the users is obligated to use DNS server's services from the internet service providers, any user can freely access all existing and accessible, sometimes free of charge, servers. An example of such servers can be a free Google Public DNS, which present itself: „Google Public DNS is a free, global Domain Name System (DNS) resolution service, that you can use as an

²⁴ Explanatory notes to the individual provisions of the Bill for a Regulation of Gaming Act of Denmark Lov 202: Explanatory notes to Part 12 "Penalty provisions" To section 59. 2010.

²⁵ *Ibid.*

alternative to your current DNS provider.”²⁶ Therefore, it causes an ambiguous situation, when the internet service provider becomes liable for denying the access to its client, who does not use DNS server of this service provider, although, in particular, this DNS server becomes a blocking measure, which cannot be use anymore. In this case, who is responsible, the internet service provider or the administrator (who is not an actual internet service provider) of DNS server (often located in other jurisdictions)? Based on provided explanation of the legal norm, the main responsibility would fall upon the administrator of DNS server, so in this presented case, upon Google.

Summary: Denmark clearly transfers the duty of internet filtering to ISP and determines clear responsibility for failure to fulfill this duty, but at the same time it is severely limited to the liability of Danish Gaming Board for illegal online gambling on the internet, because they provide the black list which is only as a recommendation.

Conclusion

1. In the European Union, where the gambling issues are not harmonized (where is no secondary EC Law, and is valid only Green Paper) separate member states regulates the online gambling issues very differently in their national jurisdictions.
2. There were defined and compared two very different countries and legal regulations of online gambling and blocking of the content:
 - a. One of them is Denmark, where online gambling is permitted if the provider of such services complies with the requirements of the national laws, and in other cases, it is automatically determined by the ISP duty to block it in accordance with the recommendatory black lists issued by the regulator and on their own initiative,
 - b. The other one is Lithuania, where the online gambling is prohibited by laws and the laws do not provide an option of the internet blocking, and the legal practice is also not favorable to the application of the internet blocking.
3. Considering that Danish Bill for a Regulation of Gaming Act is relatively new (2010), and the Lithuania Gaming Law is relatively old (2001) and the Parliament of Lithuania for long time period discuss drafts of the law that provides the internet blocking, and also considering the experience of a few EU countries²⁷ in applying such blocking, it can be argued that the majority of EU countries can choose the internet blocking for online gambling, but it will depend not only on spontaneous processes in individual countries, but also

²⁶Google website <https://developers.google.com/speed/public-dns/>

²⁷Laws of Estonia, Belgium, Italy and etc.

on potential emergence of regulatory EU level. Such internet blocking determined a number of legal problems, therefore, scientific studies would help to solve many legal issues related to the internet blocking.

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