

- RESEARCH ARTICLE -

EVALUATION OF ILLEGAL SPORTS BETTING BEHAVIOR ACCORDING TO CYBERCRIME EXPERTS FROM A COMMUNICATIVE VIEWPOINT¹

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Abstract

All kinds of criminal betting activities that are played over sports competitions by using digital technologies without the permission of the authorized institutions are considered as illegal betting. In the formation of illegal bets, legal violations due to illegal structuring and activities, and economic violations in terms of providing untaxed unfair profits draw attention. The perspectives of those working in the field gain importance in the evaluation of the criminal, economic, psychosocial and communication dimensions of illegal bets. The aim of this qualitative study is to reveal a determination about illegal sports betting in line with the opinions of the expert police officers working in the Istanbul Police Department Anti-Cybercrime Branch. The results of the operations carried out for illegal sports betting between 2017-2020 are also used as the supporting data of the research. In the study, illegal sports bets were evaluated with the semi-structured in-depth interview technique based on the descriptive method, with the data obtained from the expert police. With the literature review and expert police interviews, important data were obtained about the methodology and communicative paradigms of the impact of illegal sports betting crimes on individuals and society. In this context this original research, evaluated from the perspective of cybercrime experts, makes a contribution to the literature.

Keywords: *Illegal Sports Betting, Sports Industry, Cybercrime, Social Media Platforms, Betting Addiction.*

JEL Codes: *A12, K24, K42, Z28.*

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YASADIŐI BAHİS DAVRANIŐININ SİBER SUÇ UZMANLARINA GÖRE İLETİŐİMSEL BAKIŐLA DEĐERLENDİRİLMESİ³

Öz

Yetkili kurumlardan izin alınmaksızın, biliŐim teknolojileri aracı kılınarak spor müsabakaları üzerinden oynatılan ve konusu suç teŐkil eden her türden bahis eylemi, yasadıŐı bahis kapsamında deđerlendirilmektedir. Usulsüz yapılanma ve faaliyetleri nedeniyle hukuksal, vergilendirilememiŐ haksız kazanç sađlanması yönüyle de ekonomik ihlaller, yasadıŐı bahislerin oluŐumunda dikkat çekmektedir. YasadıŐı bahislerin kriminal, iktisadi, psikososyal ve iletiŐim boyutlarının deđerlendirilmesinde, sahada görev alanların perspektifleri önem kazanmaktadır. Bu nitel çalıŐmanın amacı İstanbul Emniyet Müdürlüğü Siber Suçlarla Mücadele Őube Müdürlüğünde görevli uzman polislerin görüşleri dođrultusunda, yasadıŐı spor bahisleri hakkında bir tespitin ortaya konulmasıdır. 2017-2020 tarihleri arasında yasadıŐı spor bahislerine yönelik gerçekteŐirilen operasyon sonuçları da araŐtırmanın destekleyici verileri olarak kullanılmaktadır. AraŐtırmada yasadıŐı spor bahisleri; betimsel yöntemle dayalı yarı yapılandırılmıŐ derinlemesine mülakat tekniđiyle, uzman polislerden elde edilen verilerle deđerlendirilmiŐtir. Literatür taraması ve uzman polis görüşmeleriyle, yasadıŐı bahis suçlarının birey ve toplum üzerindeki etkisi, metodolojisi ve iletiŐimsel paradigmaları hakkında önemli verilere ulaŐılmıŐtır. Bu bağlamda siber suç uzmanları perspektifiyle deđerlendirilen bu özgün araŐtırma alanyazına bir katkı sunmaktadır.

Anahtar Kelimeler: YasadıŐı Spor Bahisi, Spor Endüstrisi, Siber Suçlar, Sosyal Medya Platformları, Bahis Bađımlılıđı.

JEL Kodları: A12, K24, K42, Z28.

“Bu çalıŐma AraŐtırma ve Yayın Etiđine uygun olarak hazırlanmıŐtır.”

1. INTRODUCTION

All types of betting actions played on sports events by using digital technologies without the permission of the relevant institutions are considered as illegal betting. Violation of two basic elements puts bets outside the general standards. Non-taxed earnings are in violation of economic criteria, while illegal structures and activism are in violation of legal norms. Digital environments, which have a high share in the realization of these violations, are included in this study as the third important factor. Organizations that use digital media to place and promote illegal bets, and players who spend their savings on their survival are also important actors of the research.

In this qualitative study, communication processes and effects of sports betting

³ GeniŐletilmiŐ Türkçe Özet, İngilizce makalenin aŐađısında yer almaktadır.

phenomenon are evaluated with the opinions of 8 expert police in Istanbul Police Department Anti-Cyber Crimes Branch by taking into account the operation data for illegal sports betting crimes between 2017-2020. Interview findings on illegal sports betting crimes are analyzed and interpreted. In the first stage, the deficiencies in legal regulations about illegal sports betting, which cause great economic losses, are analyzed. Without obtaining a license to play sports betting in Turkey it is not legal and judicial proceedings are carried out on the persons concerned. (Eralp, 2017). Betting, mediating, advertising, encouraging betting and betting on sports competitions other than those legally permitted are defined as a crime in Article 5 of the “Law on Betting and Chance Games in Football and Other Sports Competitions” (Babayigit, 2018:302). Various prison sentences are given for violations of the articles, except for illegal sports betting. Administrative fines are stipulated only for those who play illegal sports betting.

The annual cost of illegal sports betting to the world is estimated at about 1.69 trillion euros in the European Police Organization (Europol) 2020 Report. This economic loss makes it necessary to consider the illegal betting industry as a major problem threatening global economies in all countries (Devecioğlu, 2020). Statistics on illegal sports betting in Turkey also point to the imminent danger. The data of the Financial Crimes Investigation Board (FCIB) for 2017 reveal that 5 million people make illegal sports bets of approximately 50 billion TL per year (Şahin, 2019). Unfair earnings from those who play illegal sports bets reach the top points of organizations and serious damage to the economy of the countries.

The study emphasizes that International Organizations coordinate the measures to be taken against illegal sports betting crimes, support the strategic interventions of the states and the decisions of the virtual environment measures. It is anticipated that the combat success of the states will increase by determining the reasons for the illegal sports betting organizations to attract players and the establishment of new legal regulations. The main concern should be to prevent and punish illegal sports betting crimes in international cooperation (Alas, 2018). This challenging process brings to the agenda that illegal sports betting organizations should be questioned with legal, economic, sociological and psychological parameters and necessary measures should be taken so that they do not consider digital environments as an area of freedom to commit crimes. This new field of struggle, requires states and institutions to act in coordination against illegal sports betting crimes and to develop strategies in order to prevent illegal sports betting.

A limited number of research on illegal sports betting in Turkey has focused on the economic and legal functions of betting. Ötkan & Çolakoğlu (2020) in their study titled “Participants Opinions Related Sports Betting Games in Turkey”, state that the sanctions imposed to prevent illegal sports betting are far from deterrence and seriously harm the economies. Özlü, Yıldız & Yılmaz (2019) emphasize that the sports economy, whose financial value is increasing and growing, attracts the attention of

betting games with their research on “Investigation of the Attitudes of Individuals Who Play Sports Betting According to Various Variables”. Sağır & Çabuk (2010) evaluate the economic and legal effects of illegal sports betting on individuals and society in their research named “Impact On Society’s Expectations Of The Game Of Chance: The Case Of Sakarya”. Baba (2012), in his analysis, which he explained with legal presumptions called “The Crime of Match-Fixing and Incentive Payments”; points out that match-fixing and incentive actions help illegal betting organizations to gain a large amount of unfair profits.

In this study; A linear relationship is determined between the economic and legal dimensions of illegal sports betting and the contribution of virtual media sharing to the occurrence of the crime and those affected by this crime. Expert police state that in recent years, the crime of illegal sports betting has been committed in two different ways, namely Online Illegal Sports Betting System and Closed Circuit Illegal Sports Betting System. In order not to be subject to legal proceedings, organizations apply these methods that provide cash flow of internet banking and cash, detailed in the study content. People can play according to the amount of money they have deposited and want to receive the sums they have earned from the organization members they have contacted at the beginning. However, they are not paid under various excuses, they are encouraged to continue to play on what they earn, and people lose all of what they earn in a short time by playing.

On the other hand, in illegal sports betting order, the heroes of the communicative cycle are digital media and illegal sports betting organizations. Social media platforms are also seen as the building blocks that encourage the support of these heroes. The fact that social network providers do not take into account the warnings and demands of the states points to a deficiency in this contradiction. Organizations perpetuate their psychological and sociological exploits with attractive promises of winning. Arguments such as passion, entertainment, and excitement, which are used as mativation tools to increase the number of players, find their response (Akça, 2019:1462; Huggins, 2018:127). However, players who are unable to collect their illegal earnings avoid complaining to the authorized units due to the fact that they are partners of the crime and the illegal nature of the system. Grievances leads to illegal search for rights and a growing spiral of crime, such as snowballs.

In the research, the individual and mass effects of the victimization caused by illegal sports betting are also evaluated. Illegal sports betting organizations increase their wealth day by day, while individuals lose their savings in hopes of gaining and increasing addiction level Dietl & Weingartner, 2014:132). Losses affecting family and work life also affect socialization processes. Increasing addiction in daily life becomes palpable in all layers of society. Legal processes and capture activities include institutional efforts. But in the fight against illegal sports betting, psychological and sociological platforms also stand out. The research proposes to establish a board with the participation of representatives of the institutions to evaluate illegal sports betting in all its aspects.

1.1. Conceptual Framework

The concept of betting includes predicting the outcome of an event or process in line with the available information and obtaining pre-determined benefits according to the result. The parties reach a mutual agreement by calculating the probability of winning and the risks of losing with the causality fiction (Humphreys, Paul & Weinbach 2014:522). In this respect, betting games, which include football and other sports competitions, require the experience and knowledge of the players rather than just luck. Although there is a close relationship between betting games and gambling, the most important thing they differ from is that gambling is entirely a game of chance and is played without any prior preparation.

In some international literature, illegal sports betting definitions cover all bets placed without permission. The definition of illegal sports betting in Turkey refers to the competitions played in all professional leagues. (Caruso, 2009:358). However, the legal processes of illegal sports betting crimes are followed under the Law on the Regulation of Betting and Chance Games in Football and Other Sports Competitions (Some, 2013). Legal bet is played by organizations that are institutionalized with the permission of the states and are subject to financial and legal control. Illegal sports betting does not have a common definition as it is shaped according to the governance and legal practices of the countries. It is generally seen as games that are played with illegal entities without obtaining the necessary permissions, earning unfair and untaxed profits. Organizations that make those who play a part of the crime create grievances and resort to many methods to not give their earnings.

There are various opinions and definitions about illegal sports betting in the literature. They agree that illegal sports betting crimes involve organizational activities, cause individual and public grievances, and provide unfair income. Ignatin (1984) in the study titled "Sports Betting" points out that illegal sport betting is generally seen as a channel in which organized crime organizations generate a source of income. It is noted that unfair incomes are mostly used for various organizational activities, mainly for the financing and distribution of drugs. Albanese (2018) in the research "Illegal Gambling Businesses and Organized Crime: An analysis of Federal Convictions", states that illegal sports betting organizations do not pay their customers through various frauds and use their earnings to support organized crime activities.

In their research titled "Review of Illegal Betting As Financial Crime in Web Forensics" by Sönmez & Varol (2018), it is emphasized that illegal sports betting takes place between different countries, causing damage to the economies and creating a social problem as it leads individuals to bet. With a similar interpretation Kargün, Ağaoğlu & Kaya (2020), in their study titled "Review of Illegal Betting As Financial Crime in Web", describe illegal sports betting sites as virtual environment traps that are not taxable incomes, harm economies and affect individuals socio-psychologically. Costa (2018), defines illegal sports betting as a systematic acting on the organizational plane, directly threatening the integrity of the sport, in the research named "The Globalized

Network of A Dirty Game: Match-Fixing, Illegal Betting and Transnational Organized Crime in Italian Football”.

In approaches to illegal sports betting, it is emphasized that criminal organizations perceive sports, especially football, as a field of abuse. Currently, football receives the largest economic share of illegal betting in sports, and a significant amount of money is offered to the world betting market (Kızar, Dalkılıç & Bayrak, 2015:214). Information technologies have a very important role in the spread of illegal sports betting, which is determined as a crime by the legislator (Şen, 2019). Structures created for the purpose of illegal sports betting take advantage of digital media vulnerabilities in order not to be subjected to prosecution by authorized institutions and organizations. These structures, which have turned into illegal sports betting organizations ontologically, continue their activities without worrying about getting caught in virtual environments. Illegal sports betting organizations create an informal economy that causes countries to lose taxes and obtain significant benefits. Illegal sports betting organizations, which have become a new struggle figure in multiple virtual environments, also increase the number of players and the rate of unfair winnings with the organizational mechanisms and extensions they create in the real world.

Illegal sports betting organizations, with their complex and independent from the borders of the country, generate illegal income directly or indirectly and change their crime techniques day by day. Illegal sports betting in the community and social media platforms are encouraged to play with various tricks by the members of the organization. Exaggerated presentation of the possibility of earning high amounts of money is perceived as a highly attractive offer by individuals who want to realize hopes (Yaşar, 2010:139). Large amounts of criminal proceeds from abused players are distributed among members of the organization to the extent of their involvement in the crime.

Individuals fall into illegal sports betting traps with the ambition of winning. In addition, illegal sports betting sites open their doors to a global ecosystem that enables unregistered fund transfer and money laundering (Özyurt, 2015). The taxation systems of the states with irregular transactions and the basic dynamics of the social structure with uncontrolled expansion are seen as the losers of illegal sports betting. Illegal sports betting organizations continue to exist in the international arena as the only winner of this vortex. Nowadays, illegal sports betting has grown into a huge industry that poses a global problem. It is seen that there is a need for responsive regulations to be prepared with the joint efforts of the states.

1.1.1. Illegal Sports Betting in the World and Turkey

There are many sports betting sites established as a result of application and examination in the world. Sports branches attract the attention of the betting economy as well as the individuals. Close monitoring of sports activities and finding a place in traditional and digital media accelerate the commercialization of sports (Özsoy et al.,

2014:121). The fact that betting companies sign sponsorship agreements for sports, especially with football clubs, describes their existence (Forrest, 2011:15). With this awareness, those involved in the betting cycle increase the motivation to bet in the community. There is no consensus on license acquisition methods, authority limits and application contents of betting websites.

According to the legislation of one country, the crime is defined as acts performed within the jurisdiction of the national sports betting license according to the other. In other words, sports betting sites established by authorization and paying taxes are only legal in their country of residence. It is illegal compared to other countries. While sports betting sites are not available for use and should not allow access, they are made available to place bets in countries where they are unauthorized by various methods (Angelini & Angelis, 2019:714). For those who take advantage of this paradoxical situation, betting has evolved illegally and turned into a crime scene that is difficult to deal with.

The fact that digital environments provide unlimited opportunities for data transfer and the size of the unregistered budget increase the appetite of organized crime organizations. Illegal sports betting takes place in the legal systems of the states in various ways, as it causes highly dangerous individual and social consequences. In Article 3 of the Council of Europe Convention on the Manipulation of Sports Competitions dated 2014, illegal sports betting is defined as “all sports betting activities that are not allowed in the form or operator according to the laws in force in the jurisdiction of the customers”. In its 11th article, it states the necessity of “researching the most appropriate possibilities in combating illegal sports betting operators and taking measures within the framework of the laws in force” (EPAS, 2014). States Parties are expected to prohibit and monitor advertising to illegal sports betting operators, monitor and block improper financial flow.

There are differences in the perspectives and legal regulations of states regarding illegal sports betting. Among the reasons why states allow betting games, generating income and providing control over illegal ones are considered as important parameters (McGowan, 2014:673). Betting activities are concentrated in the leading states with high economic power and the use of information technologies, as well as in countries with relatively narrow incomes and relatively non-rigid legal structures. In the Europol Sports Corruption 2020 Report, the economic value of illegal sports betting, which is more than 60% of which is football in the world, is estimated at approximately 1.69 trillion euros per year. China, South Korea, Italy, United Kingdom and Cyprus are seen as the countries that occupy an important place in the sports betting market with a share of 37% (Devecioğlu, 2020:173; Sporarena, 2017). It is estimated that more than \$ 150 billion is wagered annually at sporting events in the United States. Of this high amount, about \$ 4.5 billion constitutes only legal bets (Porter, 2019:267). The proportional anomaly of illegal sports betting also reveals a tragedy in choices that needs to be investigated.

This privileged lawless sector is mostly spread all over the world from countries where illegal sports betting organizations do not feel much control pressure. According to 2013 French Institute of International and Strategic Affairs data, 14 gambling and betting licenses were issued in Gibraltar, 59 in Alderney, 46 in the Isle of Man, 5 in Antigua and Barbuda, 17 in Curacao, 86 in Malta and 68 in Cagayan (Yılmaz, 2019:2; Vidal, 2014:12). In Costa Rica, nearly 500 operators provide service without any license. Most of the operators place bets with the license they have obtained from these countries, which are known as betting havens, without permission from the authorized units of the countries. In this regard, 80% of the bets in the global sports betting market are illegal today (Vidal, 2014:13). The low tax rate and lack of supervision give illegal sports betting organizations freedom of action.

Sports betting in Turkey is regulated by the “Regulation on the Practice of Fixed Probability and Joint Betting Games Based on Sports Competitions”. This regulation determines the Spor Toto Organization as the sole authorized institution for playing sports bets. Spor Toto Organization undertakes the task of determining sanctions against those who organize sports-based betting games without permission (Fixed, 2009; Regulation, 2019). The necessary legal actions against unauthorized bettors are also included in the provisions of the regulation. Betting actions without obtaining a license from the public authority are illegal (Aslan, 2018). By the Spor Toto Organization, bets are played in a virtual environment by electronic dealers named “iddia, birebir, bilyoner nesine, misli, oley ve tuttur”. “Law on the Regulation of Betting and Games of Chance in Football and Other Sports Competitions” except those legally permitted; Placing, mediating and transferring betting money in sports competitions and advertising betting sites and encouraging betting are defined as crimes with sanctions. The players are sentenced to administrative fines, and those who violate other articles of the law are sentenced to imprisonment between 1 and 6 years. (Law, 2013; TCK, 2004).

According to FCIB’s 2017 data; about 50 billion TL of illegal sports bets are played by 5 million people annually. The income from legal sports betting is 12 billion TL, which is about one quarter of the unfair profit from illegal sports betting (Şahin, 2017; Spor Toto, 2018). According to 2018 FCIB data, 33,852 transactions with a total amount of approximately 420 million TL were identified and the accounts of 12,240 people were seized with banks (FCIB, 2018:102). The illegal sports betting market, which has reached worrying crime revenues, points to a process that must be confronted with the cooperation and operational capabilities of the institutions.

1.1.2. Illegal Sports Betting and Cyber Policing Practices

In Turkey, under the coordination of the Ministry of Justice and the Ministry of Interior; the fight against illegal sports betting is carried out by Spor Toto Organization, General Directorate of Security, FKIB, Banking Regulation and Supervision Agency (BDDK), Information Technologies and Communications Authority (BTK). Corporate powers are used to detect illegal sports betting sites, block access to websites, control finances, confiscate accounts, and file criminal charges. The General Directorate of Security

carries out operational studies for illegal sports betting crimes with the organizations of the Department of Combating Cyber Crimes in the headquarters and provinces. Anti-Cyber Crimes Branch operating in the provinces coordinate with the general law enforcement units and other specialized branches of the police in data acquisition and capture operations.

Illegal sports betting organizations target the security of information systems and the vulnerabilities of those who play. While social life is supported by urban structuring and organizational activities, digital environment structuring plays a dominant role in the categorization of this crime. Since illegal sports betting crimes cannot be committed without the use of information systems, they are also at the center of cyber policing practices. With their unrecorded earnings, organizations damage the financial structure of countries and commit crimes. This informal economy, which is formed as a result of illegality, is actually a crime economy as its functions are banned. (Altınışık, 2017:243; Beckert & Wehinger, 2013:16). Illegal sports betting organizations develop their crime methods and strategies with their skills in information technologies and try to reduce the effectiveness of the system in order not to be caught. The Anti-Cyber Crime Branches also obtain information through field studies, investigate all aspects of illegal sports betting crimes in the digital environment with cyber patrol activities and catch their perpetrators.

The literature includes the approaches, powers, and research methods of the police to illegal sports betting crimes. Shixi (2011) emphasizes in the book, “Sport Betting and Its Regulation in China” that the police are in charge of investigating illegal sports betting, match-fixing and corruption. Carpenter (2012) points out in the study titled, “Match-Fixing-The Biggest Threat to Sport in the 21st Century” that the police are an important actor in the justice mechanism and that illegal sports betting crimes can be prevented by coordination. Smith, (2011), in the research named “Sports Betting in Canada”, reveals that expert police officers should work without shortage of resources in preventing the illegal sports betting market. Chappelet (2015), within the scope of “The Olympic Fight Against Match-fixing”, determines the strengthening of cooperation between the judiciary and the police as a precondition for the fight against illegal sports betting crimes.

With proactive and reactive policing applications; the structuring of illegal sports betting organizations, criminal procedures and recruitment methods are deciphered (Wang & Antonopoulos, 2016:263). The operations carried out by the Cyber Crimes Branch of the Istanbul Police Department against organizations that engage in illegal sports betting show that such crimes are gaining momentum, as is the case all over the world. It is seen in Table 1 that the number of seizures has increased over the years. The incident numbers represent every illegal sports betting organization uncovered in the operations. While the number of arrested due to illegal sports betting crimes was 110 in 2017, it reached 264 in 2018 and 447 in 2019. There is an increase of about 140% in 2018 and about 300% in 2019 in the number of seizures compared to 2017.

Table 1: Police Operations Against Illegal Sports Betting Organizations Between 2017-2020

Year	2017	2018	2019	2020
Incident	91	38	392	118
Captured	110	264	447	199
Arrested	44	120	113	80
Judicial Control	16	75	114	117

Source: Istanbul Police Department Anti-Cyber Crimes Branch

There is a similar increase in the number of those arrested. 44 people were arrested for illegal sports betting crimes in 2017, 120 in 2018 and 113 in 2019. In other words, the number of people arrested for illegal sports betting crimes compared to 2017; It increased by about 170% in 2018 and about 155% in 2019 (Table 1). Due to the Covid-19 pandemic, all results for illegal sports betting organizations are limited to 15 June 2020.

Considering the values in the first six months of 2020, in case the epidemic process normalizes; it is evaluated that illegal sports betting crimes, operations, seizures and arrests will increase proportionally. It is the primary effort of the police to arrest perpetrators, intermediaries, promoters and stop internet access without wasting time in illegal sports betting crimes. In addition, evaluating the cyber threats created by illegal sports betting organizations on the internet, making the necessary analysis and determining the policing approach against these threats are among the main duties of the police.

2. METHODOLOGY

2.1. Purpose and Method of the Research

The aim of this study is to determine the situation of illegal sports betting in line with the opinions of expert police officers, taking into account the operations carried out by the Istanbul Police Department Anti-Cyber Crime Branch between 2017-2020. In this context, answers are sought to 6 aim questions of the research:

1. How would you describe illegal sports betting and why illegal sports betting is preferred by those who play?
2. How to detect illegal sports betting crime and how do you get information?
3. What is done after it is found that illegal sports betting is being played?
4. What are the legal powers and limitations of the police on the crime of illegal sports betting?
5. What can be done to prevent the crime of illegal sports betting?

6. Who gets income from illegal sports betting and who is the winner and loser of illegal sports betting?

Considering the purpose questions, in-depth interview technique based on descriptive method was used within the scope of this qualitative study. The study includes semi-structured interviews with expert police officers working in the Istanbul Police Department Anti-Cybercrime Branch regarding illegal sports betting crimes. Since the data of operations carried out between 2017-2020 contains the most up-to-date information on illegal sports betting crimes, they are included in the study as the determining elements of the interviews. The interviews conducted with 8 expert police officers on 12 November 2020 were recorded by taking notes and the interview lasted approximately 7 hours.

2.2. Model of the Research

In-depth interviews with expert police officers within the framework of the descriptive method were analyzed by categorical analysis modeling. The expressions of the experts were written with their professional experiences and knowledge. In line with the information obtained from the interviews, two different forms were created regarding the methods of committing illegal sports betting crimes. It was used as supportive data in the argumentation of the method, detection and differential features of illegal sports betting crimes, which the research collected under 6 headings.

2.3. Process of the Research

In this study, written permission was obtained from the Istanbul Police Department by following official procedures to consult the opinions of expert police about illegal sports betting crimes. The data obtained from the interview were grouped with confidentiality and need-to-know principles, analyzed and interpreted. However, with the literature review on illegal betting and expert police interviews, important data were obtained about the impact, methodology and communicative paradigms of illegal betting crimes on individuals and society.

3. RESULTS

In the first part of the first aim question of the study, expert police describe illegal sports betting. Experts describe illegal sports betting as an important type of crime that creates an informal economy, plays in digital environments with passwords provided to players, and feeds on strong organizational connections in real life. They state that illegal sports betting organizations have changed their methods of crime, updated their internet access for players, and improved their betting systems in order to avoid legal proceedings.

It is primarily untaxed unfair gain... It is played with information sent to players on the internet. Organizational connections are strong... Until recently it was only seen in digital media. ... However, in illegal

sports betting crimes, organizations now use the real world and the internet together... Illegal sports betting organizations constantly change tactics to avoid getting caught. They are sending bet site changes to players... Our catches for illegal sports betting crime have increased. That's why organizations turn to other ways to place bets.

In the second part of the first question of the research, experts share their opinions on the reasons for preference of illegal sports betting. They find that illegal sports betting brings more profit than legal sports betting as an important reason for preference. Experts believe that illegal sports betting offers more options and gives the opportunity to play live in competitions, making illegal sports betting attractive. They agree that the encouragement of illegal sports betting in public areas and the fake wealth sharing, which is frequently seen in virtual environments, increase the number of players.

More income from legal betting sites... The odds promised to the players are much higher... The possibility of alternative bets increases their use... They even play live bets on a match played in countries whose name has not been heard... The lie that they earn a lot of money is spread in the neighborhoods... Social media often cite imaginary winners... Luxury vehicles, loaded Shares such as the amount of money and entertainment life spreads illegal sports betting.

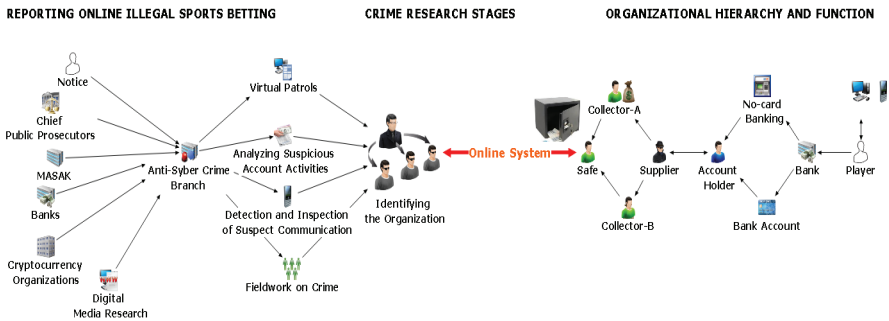
The second objective question of the research covers the ways of being aware of illegal sports betting. Victims, Bank Compliance Centers and other public and private institutions in charge of supervision and prosecution of illegal sports betting, are notified to the Anti-Cyber Crimes Branch. Victims, Bank Compliance Centers and other public and private institutions in charge of supervision and prosecution of illegal sports betting, are notified to the Department of Combating Cyber Crimes. In addition, determinations are made through field studies and cyber patrol activities.

Those who see the internet, those who hear... the witnesses report... Those who play and deceive, those who cannot get their money, report... Apart from those who come directly to us, we receive news from Prosecutors Offices, Electronic Payment Systems, FCIB, and Bank Compliance Centers... Virtual environment investigations and field studies have a big role in the determinations... The investigations we carry out are generally based abroad. websites...

With the third purpose question of the research, the action taken by the police against illegal sports betting crimes is revealed. As a result of the investigation, when an illegal sports betting crime is detected, the preliminary and investigation process is initiated. The work on the organizational structure is completed and operation instructions are received from the Chief Public Prosecutors. Crimes committed with the Online Illegal Sports Betting System detailed in Figure 1 are committed by being a member of betting websites. For money transfers, mobile phones, credit cards and

electronic money methods are used. However, criminal organizations have started to use cardless transactions such as Cep Bank and QR Code in order not to be caught and exposed to blocked transactions. Members of the organization, which experts call Supplier, provide bank accounts from citizens in exchange for a commission in order to collect illegal bets. Those who make use of their accounts are called Account Holders. Organizations use accounts opened on behalf of these persons in transfers. In the hierarchical plane, Account Holders deliver the money received to them to Collectors, and Collectors to the Safes.

Figure:1 Online Illegal Sports Betting System



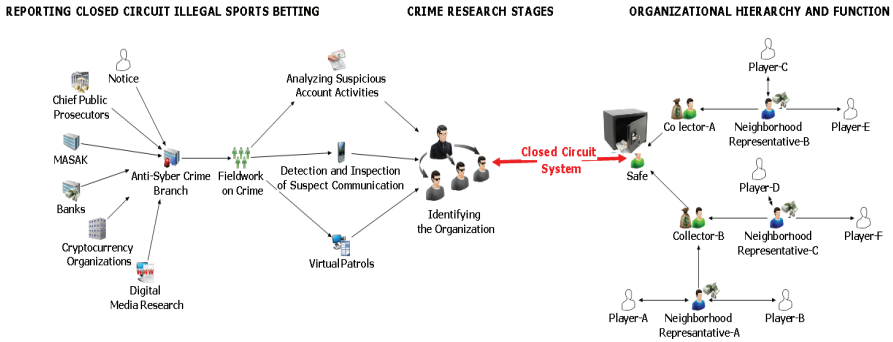
Source: Shaped by the author based on interviews with expert police officers.

Incoming notices are investigated with the need-to-know principle and the principle of confidentiality. Organizational structure is determined... Data is provided from FCIB, banks and internet service providers... With the instructions of the Public Prosecutors, the roles of the suspects in the illegal sports betting crime, their organizational contacts and their information on the internet are also determined... The operation is initiated. There is a hierarchical system in illegal sports betting organizations and they care about confidentiality... Online illegal Sports Betting System requires membership... Money transfer made with options such as, credit card, electronic money... Organizations have Suppliers... They find Account Holders for the organization by paying commissions... Accounts opened on behalf of these persons are used for money transfers... Account Holders send the money to Collectors. Collectors are also transmitted to the Safes. Recently, they use cardless transactions such as Mobile Bank and QR Code to prevent their identities from being deciphered.

The Closed Circuit Illegal Sports Betting System is depicted in Figure 2. In this method, without an intermediary, illegal sports betting earnings are collected directly from the player in cash. At the lowest layer of the system, which has a strict hierarchy, there are Neighborhood Representatives who provide players, receive money to place

bets on the Internet, and give the players their usernames and passwords in return. There are organizational structures called Collectors and Safes on the Neighborhood Representatives. Experts believe that the Safes are smuggling money illegally from the country.

Figure:2 Closed Circuit Illegal Sports Betting System



Source: Shaped by the author based on interviews with expert police officers.

In operations after 2019, we saw that they started to place illegal sports bets without using their bank accounts and internet banking... We called it a Closed Circuit Illegal Sports Betting System... The players only know the Neighborhood Representative and they get a usernames and password by giving money to him... Neighborhood representatives are at the lowest level. They hand over the money to the members of the organization that we coded as Collectors... They also physically deliver the cash to the upper level Safes... We assume that the Safes illegally smuggled money out of our country.

In the fourth question of the study, the experts evaluate the powers and limitations of the police. Experts point out that there is only the Law on the Regulation of Betting and Games of Chance in Football and Other Sports Competitions that provides penalties for bets. The deterrence of the penalties contained in the law is considered insufficient. In this regard, illegal sports betting crimes are often committed, encouraging advertisements are made in virtual environments and the recruitment of organizations becomes easier. The investigation process is strictly carried out with the relevant prosecutors instructions and the decision of the judge. It is stated that activities such as conducting field work, conducting monitoring activities with technical means, detecting, auditing, recording and transcribing the communication are carried out.

Law on the Regulation of Betting and Games of Chance in Football and Other Sports Competitions is the only one that authorizes the police in illegal sports betting and determines the penalties for

those who violate... We carry out all our actions in accordance with Article 5 of the Law... Also, investigations are carried out according to the Criminal Procedure Law... TPC 140 covers "information gathering, field studies and follow-up with technical means" about illegal sports betting organizations, "Identification, recording, inspection and transcription of communication" is included in TPC 135... Investigations are necessarily carried out on the orders of the prosecutor and judge. However, the punishments are not enough... That's why organizations do not stop committing crimes... Crime is committed frequently... It is advertised on the internet... Organizations do not have difficulty in recruiting.

Experts answer the fifth purpose question of the research, which includes what can be done to prevent illegal sports betting, by giving priority to the phenomenon of social awareness. It is mentioned that there are even those who do not know that illegal sports betting activities constitute a crime. Experts emphasize that illegal sports betting is played by all layers of society. Experts recommend broadcasting public service announcements, conducting scientific studies and holding conferences to protect the public. Social media praising the shares should prevent illegal sports betting Representative of Turkey, and they must be reported to the government.

It is very important to raise the awareness of the society... Because we come across statements by those who bet on these sites that they do not know that it is a crime... We can say that it is played in all segments of the society, young-old, male-female, primary school-university education, rich-poor... Public service ads will be effective... Conferences, academic research should be done... People are affected by the colorful and attractive contents of social media... They play to win easy money... Encouraging sharing in social media platforms should be followed by Turkey Representatives... They should cooperate with authorities for issuing the necessary penalties.

The last aim question of the research includes the opinions of experts in the distinction of winner and loser in illegal sports betting. Experts point out that police officers should primarily examine those who gain unfair gain. All illegal sports betting organizations in the hierarchical plane, which provides players, increases the number and ensures that lawlessness continues, generate unfair income and commit crimes. Those who propagate illegal sports betting in society and in the virtual environment are fed from the illegal sports betting spiral. Addiction level is increased with the perception of colorful world, abundant earnings and entertainment.

First of all, those who are in the illegal sports betting organizational structure gain unfair profit in the extent of their positions and effects... These start from the neighborhood representative or even the victims who use their account... Hierarchically, money changes hands and

goes to the leaders of the organization. Those who create the software of the sites and advertise on social media also receive income from this system... They have huge income and can easily find organization members. They take advantage of all legal loopholes... They create addictions by betting with the mask of fun and increase their earnings.

According to experts, the economic and psycho-social dynamics of the country are among the obvious losers of illegal sports betting. Organizations transfer their unregistered and tax-free income abroad by various methods, creating economic losses and damaging the image and reputation of the country. The increase in the number of players and financial losses causes personal, family and social destructions and related crimes. Individuals are deceived and turned into members of the organization and a constant state of anxiety is observed in daily life due to negative examples. The illegal sports betting, which the organization wins on a permanent basis, incites those hoping to earn income from work to play and takes all their savings.

Illegal sports betting has economic, individual and social damages... Unfair gains are obtained from illegal sports betting... The organizations send the money abroad in various ways... Serious damage is being done economy of the country... Many people are deceived and turned into members of the organization... Country image and reputation is damaged... The well-known phrase “the house always win” also applies to illegal sports betting... It has turned into a social disease... Illegal sports betting is addicting like drugs... People lose all their savings with the hope of effortless money and a better life.

4. DISCUSSION

Illegal sports betting is followed and played in digital environments instantly with portable devices and without compromising the comfort of life. Illegal sports betting organizations resort to different methods in order to prevent being tracked on the one hand and to increase the number of players on the other hand (Rompuy, 2016:236; Ferentzy & Turner, 2009:113). The most common illegal sports betting crimes are committed by a subscription method, which expert police call the Online Illegal Sports Betting System. Police operations, joint efforts of institutions, especially FCIB investigations and Bank Compliance Centers try to prevent betting actions by following the accounts. Illegal sports betting organizations started to use cardless transactions such as Mobile Bank and QR Code in order to carry out their activities. As of 2019, organisations have resorted to what experts describe as a Closed Circuit Illegal Sports Betting System that allows hand-to-hand money exchange to reduce the traceability of criminal profits.

Tax-free earnings from players through hierarchical and cellular structures pave the way for unfair enrichment of organizations through cash and electronic payment

systems. FCIB's 2017 report notes that illegal sports betting has turned into a betting market of about 50 billion TL, played by 5 million people, and the quantitative rise of police operations in Istanbul between 2017-2020 reveals the need for regulation in legal sanctions. It is obvious that the penal sanctions in Article 5 of the Law on the Regulation of Betting and Games of Chance in Football and Other Sports Competitions are not sufficient to prevent such crimes. The maximum penalty for committing illegal sports betting offenses is six years in prison (İnce, 2020). Even these defendants obtain the right to release on conditional release after they have spent half of the sentence in Penal Institutions, according to the "Law on the Amendment of the Law on the Execution of Penalties and Security Measures and Some Laws".

As the same scale of penalty reduction is provided for illegal sports betting defendants who receive less prison sentences, there is a perception of impunity for illegal sports betting crimes. Such crimes are underestimated, and organizations do not have difficulty in recruiting. It is thought that special regulations regarding penalty increase and organizational structure will contribute to the fight against illegal sports betting crimes. It is considered that giving relatively more and gradually increasing penalties against the actions of illegal betting organizations will be effective in reducing these crimes.

When the opinions of the expert police officers and the police operations based in Istanbul are examined with the method of induction, it is understood that these crimes are multilateral. Data on processing procedures and harms reveal the necessity for illegal sports betting to be considered within the scope of cross-border crimes (Hill, 2009:424). The world's annual loss of about 1.69 trillion euros, as stated in the Europol report for 2020, reveals the international danger caused by illegal sports betting (Europol, 2020). By creating a database, intercontinental money traffic is directed, strong organizational connections are established, and organizational personnel professionalized in cyber technologies are provided.

Illegal sports betting organizations take advantage of legal dissimilarities and emerge with different structures in almost every state of the world. They carry out sports corruption with the licenses they easily get from countries known as betting paradise (Costes et al., 2016:85). Therefore, the illegal sports betting industry should be seen as a criminal economy formed by criminal purposes and functions. The lone struggle of the countries against illegal sports betting organizations does not show the expected effect. Under the coordination of International Organizations; master plans based on law and economy should be implemented with strong cooperation, effective supervision and coordination.

Digital media applications play an important role in playing and spreading illegal sports betting (Lopez & Griffiths, 2018:6). Illegal sports betting crimes continue to be committed in the digital world, which allows for hiding. Criminal organizations make good use of information technologies and develop different methods to overcome the cyber precautions taken. Encouraging sharing of well-known people shows the

magnitude of unfair profits in illegal betting (Uludağ, 2017). Illegal sports betting components, whose activities on the Internet are shown as innocent, should actually be considered as criminal organizations that can reach huge revenues, recruit personnel and take advantage of all legal loopholes.

Illegal sports betting organizations advertise on digital media from anonymous accounts and keep illegal betting interest dynamic. Thus, these websites and digital contents are promoted as reliable (Eraslan, 2020; Regulator, 2020). The freedom fiction of virtual environments, the different legal and administrative approaches of the states, the slow and reluctance of social media organizations in the controls strengthen the belief that illegal sports betting cannot be prevented.

CONCLUSION

The main criticism is the multiple virtual environments that host illegal sports betting, gaining a supranational status and preventing countries from establishing governance mechanisms. In order to strengthen cooperation with public authorities, social network providers have recently been obliged to have representatives in Turkey. However, the most well-known social media platforms such as Facebook, Instagram, Twitter, YouTube, Periscope and Tiktok are reluctant to appoint representatives, even though the penalty is gradually increasing (Law, 2020; Ünal, 2020). At this stage, states must protect their citizens not only from illegal sports betting, but also from the indifference of social media bosses. The perceptual inadequacy of digital media measures depicts that these crimes could not be prevented in the near future.

Other illegal sports betting actor that is critically described in the study is the players. Players make the sport betting industry sustainable. Those who bet on illegal sports often lose, but the number of players is increasing. Despite this paradoxical situation, it is seen that the fine imposed by the law for the players is not sufficient. Prevention of crime, protection of society and the treatment of the criminal should be the main purpose of sanctions (Çolak & Altun, 2006:163). Imposing short-term imprisonment on players in the final stage of repeated illegal sports betting offences will be effective in reducing such offences. Players do not hesitate to bet on the website of a company with no guarantees or even an unknown whereabouts in hopes of winning. Since there is no mechanism for players to complain, the money they send may evaporate or the money they have earned for various reasons is not given (Bedük, 2019; Atamer, 2020). Public service announcements, social media events and training programs should be organized in order to raise awareness about the size of the danger. Decisions to block access should be implemented without waiting and measures should be taken to prevent these websites from being established under different names but for the same purposes.

Another important aspect of the study is that the psychological and sociological impact and severity of illegal sports betting crimes have gained momentum. Due to the adrenaline and aggression generated by the desire to win, players do not realize

that they are losing too much money. Playing more voluminous and frequently with the ambition to buy back, individuals turn into betting addicts. Despite the negative consequences, the self-control of individuals who continue to engage in illegal sports betting behavior is weakened (Çakmak & Tamam, 2018:79). This process affecting the social life of individuals causes familial and social breakdowns. In this regard, an automatic punishment system should be established by identifying those who transfer money directly or indirectly to the accounts of illegal sports betting websites. It is observed that there is a need for a formation that can take action against illegal sports betting crimes that cause hard to compensate individual and social wounds. In this context; The establishment of the Illegal Sports Betting Prevention and Fight Board, which includes public and private enterprises, FCIB, BRSA universities, social media companies, educators, information technology experts and cybercrime officials, is considered as author's recommendation.

The study draws attention to the communicative processes of social media content, which have an important share in the commitment of illegal sports betting crimes. Nowadays, the inadequacy of singular efforts of the states to protect from social media damages is explained through the illegal sports betting phenomenon. There is a close correlation between supporters of organizations fed by individual and social destructions of illegal sports betting and cyber forces that do not take state regulations seriously. This communicative methodology of the digital world, which is maintained without developing an international coordination mechanism and without real cooperation and effort, will be the subject of research that addresses various crimes, lawlessness and interaction failures.

Studies in the literature generally deal with illegal sports betting in its economic and legal dimensions. No study has yet been found that examining the structures of illegal sports betting organizations, their activities on social media platforms and the trauma they cause in the society with the views of the practitioners. The value of this original study, which is evaluated from the perspective of cybercrime experts, emerges here and makes a contribution to the literature. The research is open to studies in the field of Mass Communication Law; It underlines that legal studies should be carried out urgently in this field. Apart from the content of this study; it is observed that there is a need for in-depth and comprehensive research in psychological, sociological and economic contexts for individuals who play illegal sports betting.

YASADIŐI BAHİS DAVRANIŐININ SİBER SUÇ UZMANLARINA GÖRE İLETİŐİMSSEL BAKIŐLA DEĐERLENDİRİLMESİ

1.GİRİŐ

Gerekli izinler alınmadan usulsüz yapılanmalar ve dijital mecra örgütlenmeleriyle spor müsabakaları üzerinden gerçekleştirilen tüm bahis organizasyonları yasadışı olarak nitelendirilmektedir. Hukuksal boşlukların suistimal edilmesiyle sağlanan vergilendirilmemiş haksız kazanç oldukça önemli boyutlara ulaşmıştır. Bu hali ile ekonomik, sosyolojik ve psikolojik sorunlar oluşturan yasadışı spor bahisleri, devletlerin mücadele yöntemleri geliőtirmek zorunda oldukları bir konuma doğru evrimlenmektedir (Tak vd., 2018:38). Bu tehlikeli girdabın içerisinde, dijital ortamları tüm olanaklarını yasadışı spor bahisi oynatmak ve teşvik etmek için kullanan örgütlerle, birikimlerini onların varlığını sürdürmeleri için harcayan oyuncular, yasadışı spor bahisi suçunun önemli aktörleri arasında yer almaktadır.

Avrupa Polis TeŐkilatı (EUROPOL), Spor Yolsuzluđu 2020 Raporunda, dünyada %60'ından fazlasını futbolun oluşturduđu yasadışı bahisin ekonomik deđerini, yılda yaklaşık 1.69 trilyon Euro olarak tahmin edilmektedir. Mali Suçları Araőtırma Kurulu (MASAK)'ın 2017 yılı verilerine yılda 5 milyon kişinin, yaklaşık 50 milyar TL'lik yasadışı spor bahisi oynadığını ortaya koymaktadır (Őahin, 2019). İstanbul'da polisin yasadışı spor bahisi operasyonlarındaki yakalama sayısında 2017 yılına göre, 2018'de yaklaşık %140 ve 2019'da yaklaşık %300 oranında bir artış gözlenmektedir.

Araőtırma, suç kapsamındaki çözümlenmelerin yanında, yasadışı spor bahislerinin oluşturduđu mağduriyetlerin bireysel ve kitlesel etkileri de deđerlendirilmektedir. Yasadışı bahis örgütleri her geçen gün servetlerini artırmakta, bireyler ise, artan bağımlılık düzeyi ve kazanma umuduyla birikimlerini kaybetmektedir. Kişiler olumsuz etkilenmekte ve içinden çıkamadıkları sorunlar ile karşılaşmaktadırlar (Navas, 2015:1549). Aile ve iş yaşantısını etkileyen kayıplar, toplumsallaŐma süreçlerine de tesir etmektedir. Gündelik yaşamda artan bağımlılık, toplumun tüm katmanlarında hissedilir hale gelmektedir.

2.YÖNTEM

Yasadışı spor bahislerinin; kriminal, iktisadi, psikososyal ve iletişim boyutlarının deđerlendirilmesinde sahada görev alanların perspektifleri önem kazanmaktadır. Bu nitel araőtırma yasadışı spor bahisleri, İstanbul Emniyet Müdürlüđu Siber Suçlarla Mücadele Őube Müdürlüğünde görevli 8 uzman polisle gerçekleştirilen yarı yapılandırılmış mülakatlardan elde edilen veriler ile deđerlendirilmektedir.

Bu alıŐmanın amacı; 2017-2020 tarihleri arasında yasadıŐı spor bahisi sularına ynelik gerekleŐtirilen operasyonlar dikkate alınarak, sz konusu birimde grevli uzman polislerin grŐleri dođrultusunda, yasadıŐı spor bahisleri hakkında bir durum tespitinin ortaya konulmasıdır. AraŐtırma ama sorularıyla yasadıŐı spor bahislerinin; tercih nedenleri, tespit yntemleri, soruŐtırma sreleri, nleme alıŐmaları, kazanan ve kaybedenlerine iliŐkin yanıtlar aranmıŐtır.

Betimsel ynteme dayalı, derinlemesine mlakat tekniđi kullanılan bu nitel araŐtırmada, uzman polislerin yasadıŐı spor bahisi sularına iliŐkin yarı yapılandırılmıŐ mlakatlarına yer verilmiŐtir. Uzmanların, mesleki deneyimleri ve bilgi birikimleriyle anlatımları metinleŐtirilmiŐtir. YasadıŐı spor bahis sularının yntem, tespit ve ayırıcı zelliklerinin argmantasyonunda, destekleyici veriler olarak kullanılmıŐtır.

3.BULGULAR

Siber Sularla Mcadele Őube Mdrlđnde grevli uzman polisler yasadıŐı spor bahisi kayıt dıŐı ekonomi oluŐturan, oyunculara sađlanan Őifrelerle dijital ortamlarda oynatılan ve gerek yaŐamda gl rgt bađlantılarından beslenen, nemli bir su tr olarak grmektedir. YasadıŐı bahis rgtlerinin yasal takibata uđramamak iin su iŐleme yntemlerini deđiŐtirdiklerini vurgulamaktadırlar. YasadıŐı spor bahislerinin, yasal bahislere oranla daha fazla kazan getirmesi, nemli tercih nedenleri arasında sayılmaktadır. Ayrıca yasal bahislere kıyasla, yasadıŐı bahislerin fazla seenek sunması ve msabakalarda canlı oynama imkanı vermesi, yasadıŐı bahisleri cazip kıldıđı dŐnlmektedir.

Uzman polisler, yasadıŐı bahislerin tespitinde ve bilgi edinilmesinde, saha alıŐmalarının ve ihbar mekanizmasının nemine iŐaret etmektedir. YasadıŐı spor bahisleri, temelde tespit edilen iki ayrı formatta gerekleŐtirilmektedir. Tm kanunsuz edimlerin dijital ortamda gerekleŐtiđi evrimii YasadıŐı Bahis Sistemi ile iŐlenen yasadıŐı bahis sularında, bahis sitesine yelik Őarttır ve transferlerde cebe havale, kredi kartı, elektronik para yntemleri kullanılmaktadır. Ancak rgtler yakalanmamak ve bloke iŐlemlerine maruz kalmamak iin, son dnemde Cep Bank ve QR Kod gibi kartsız iŐlemleri kullanmaya baŐlamıŐlardır. Kapalı Devre YasadıŐı Bahis Sistemi olarak isimlendirilen diđer yntemde; kurum, banka, elektronik deme gibi herhangi bir aracı olmaksızın, yasadıŐı bahis tahsilatı dođrudan oyuncudan nakit olarak tahsil edilmektedir. Katı bir hiyerarŐi ieren sistemin en alt tabakasında oyuncu temin eden, internet zeninden bahis oynatmak iin para alan ve karŐılıđında oyunculara kullanıcı adı ve Őifrelerini veren rgt yeleri bulunmaktadır. Oyunculara verdikleri para lsnde, bakiye tanımlaması yapılmaktadır. Nakit ya da dijital ortamdan elde edilen her iki formatın haksız kazanları, eŐitli yasadıŐı metotlarla rgtlerin st ynetimlerine ulaŐtırılmaktadır.

YasadıŐı spor bahis konusunda polisi yetkilendiren ve ihlali halinde ceza ngren, Futbol ve Diđer Spor Msabakalarında Bahis ve Őans Oyunları Dzenlenmesi Hakkında Kanunun. 5.maddesinde yer alan cezaların, caydırıcılıđı yetersiz

görülmektedir. Cezasızlık algısıyla yasadışı spor bahisi suçunun, sıklıkla işlendiğine işaret edilmektedir. Ayrıca demografik yapı, öğrenim düzeyi, yaş grupları, cinsiyet gibi ölçütler gözetilmeksizin, toplumun her katmanı tarafından yasadışı bahislerin oynandığı, özendirici reklam ve paylaşımlarla da örgütlerin eleman temininde güçlük çekmediği vurgulanmaktadır.

4.TARTIŞMA

Yasal benzeşimlerden yararlanan ve dünyanın hemen her devletinde farklı yapılanmaları bulunan spor bahisi örgütleri, bahis cenneti olarak bilinen ülkelerden kolaylıkla alınan oynatma ruhsatlarıyla spor yolsuzluğunu gerçekleştirmektedir. Bu yasadışı spor endüstrisi, kriminal nedenlerle ve aktivitelerle gelişen ağırlaştırılmış bir suç ekonomisini oluşturmaktadır (Broadhurst, 2012:164). Bu bakımdan ülkelerin yasadışı bahis örgütlerine karşı tekil mücadelesi, beklenen etkiyi göstermemektedir. Uluslararası Örgütlerin koordinesinde; güçlü işbirliğine, etkin bir denetim ve eşgüdümle uygulanan, hukuk ve ekonomi tabanlı master planlara ihtiyaç olduğu görülmektedir.

SONUÇ

Yasadışı spor bahislerine imkan sağlayan dijital ortam kontrolsüz ve denetimsiz bir mecra olarak görülmektedir. Kazanma arzusunun ortaya çıkardığı öfke ve saldırganlık nedeniyle, kaybedilen paranın farkına varılmaması ya da geri alabilme hırsıyla daha hacimli ve sıklıkla oynanması, bireyleri yasadışı spor bahis örgütlerinin istediği ve beklediği şekilde bahis bağımlılarına dönüştürmektedir. Olumsuz sonuçlarına rağmen yasadışı bahis oynama davranışını sürdüren bireylerin, öz denetimleri zayıflamaktadır (Çakmak ve Tamam, 2018:79). Bireylerin sosyal yaşamını etkileyen bu süreç ailesel yıkımlara ve toplumsal çöküntülere neden olmaktadır. Bu bakımdan yasadışı sitelerin hesaplarına doğrudan veya dolaylı olarak para transferi yapanlar belirlenerek, otomatik cezalandırma sistemi oluşturulmalıdır.

Tehlikelinin büyüklüğü konusunda farkındalık oluşturmak amacıyla kamu spotları, sosyal medya etkinlikleri ve eğitim programları düzenlenmelidir. Erişimin engellenmesi kararları beklemeksizin uygulanmalı ve bu sitelerin, değişik isimlerle ancak aynı amaçlarla kurulmalarını engelleyecek tedbirler alınmalıdır. Bu kapsamda; adli ve idari kurumlar, kamu ve özel teşebbüsler, MASAK, BDDK üniversiteler, sosyal medya şirketleri, eğitimciler, bilişim teknolojileri uzmanları ve siber suç yetkililerinden oluşan, hızlı karar verebilen yetkin bir Yasadışı Bahis Engelleme ve Mücadele Kurulu oluşturulması, yazar tavsiyesi olarak değerlendirilmektedir.

Bu bağlamda araştırma, Kitle İletişim Hukuku alanındaki çalışmalara açık olup; bu alanda ivedilikle hukuksal çalışmalar gerçekleştirilmesi gerektiğinin altını çizmektedir. Bu çalışmanın içeriği dışında; yasadışı bahis oynayan bireylere yönelik psikolojik, sosyolojik ve ekonomik bağlamda derinlemesine ve geniş kapsamlı araştırmaların yapılmasına ihtiyaç olduğu gözlenmektedir

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KATKI ORANI / CONTRIBUTION RATE	AÇIKLAMA / EXPLANATION	KATKIDA BULUNANLAR / CONTRIBUTORS
Fikir veya Kavram / <i>Idea or Notion</i>	Araştırma hipotezini veya fikrini oluşturmak / <i>Form the research hypothesis or idea</i>	Atalay BAHAR
Tasarım / <i>Design</i>	Yöntemi, ölçeği ve deseni tasarlamak / <i>Designing method, scale and pattern</i>	Atalay BAHAR
Veri Toplama ve İşleme / <i>Data Collecting and Processing</i>	Verileri toplamak, düzenlenmek ve raporlamak / <i>Collecting, organizing and reporting data</i>	Atalay BAHAR
Tartışma ve Yorum / <i>Discussion and Interpretation</i>	Bulguların değerlendirilmesinde ve sonuçlandırılmasında sorumluluk almak / <i>Taking responsibility in evaluating and finalizing the findings</i>	Atalay BAHAR
Literatür Taraması / <i>Literature Review</i>	Çalışma için gerekli literatürü taramak / <i>Review the literature required for the study</i>	Atalay BAHAR